



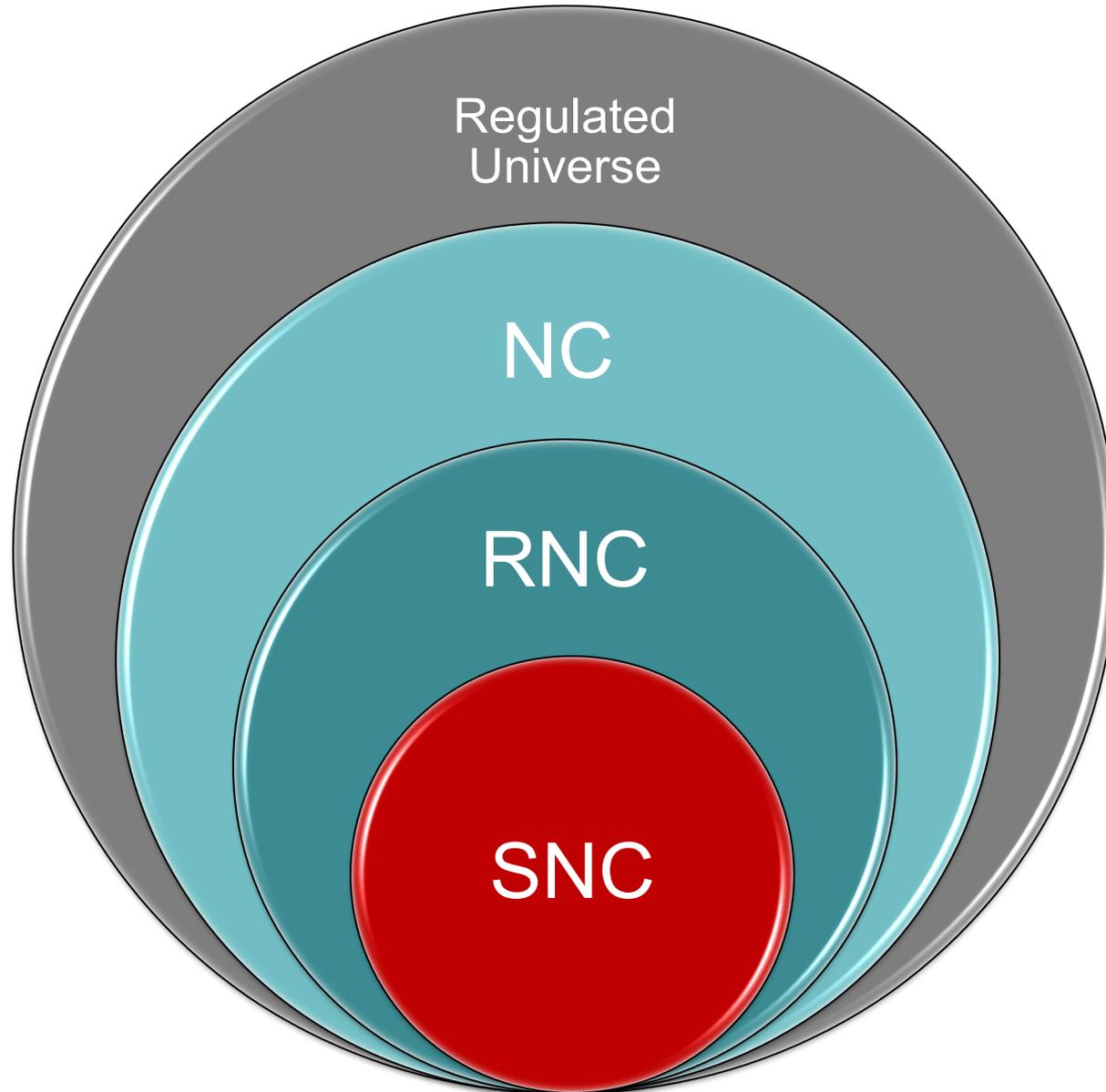
MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Significant Non-Compliance SNC

Kristi Savage-Clarke

Missouri Department of Natural Resources
Compliance and Enforcement





Why is SNC Important?

Allows targeting of limited enforcement resources to those violations posing the greatest risk to health and the environment

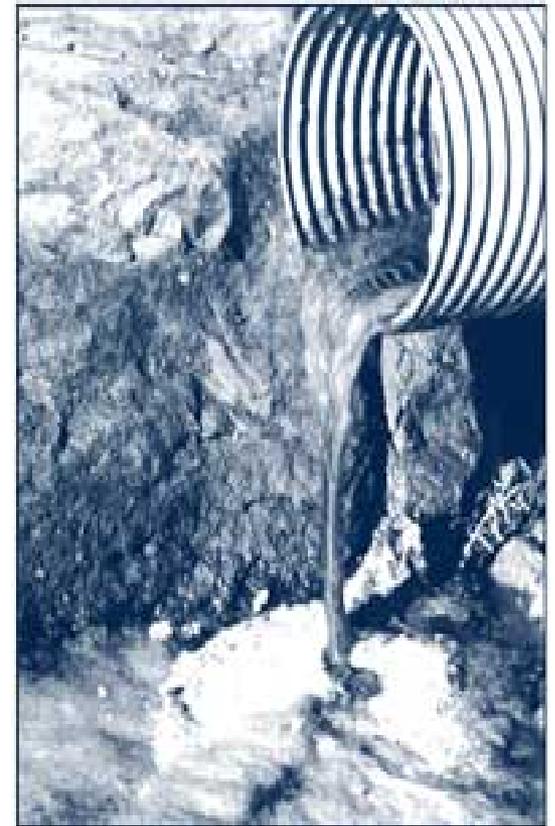




What is SNC?

💧 It's all about the violations!

- 💧 Reporting
- 💧 Effluent limitations
- 💧 Schedules
- 💧 Bypass
- 💧 Pass through
- 💧 Unpermitted discharge



Majority of DNR's SNC Violations?

- 💧 60% of Missouri's SNC Violations are related to reporting
 - 💧 Non-receipt. late and incomplete reports

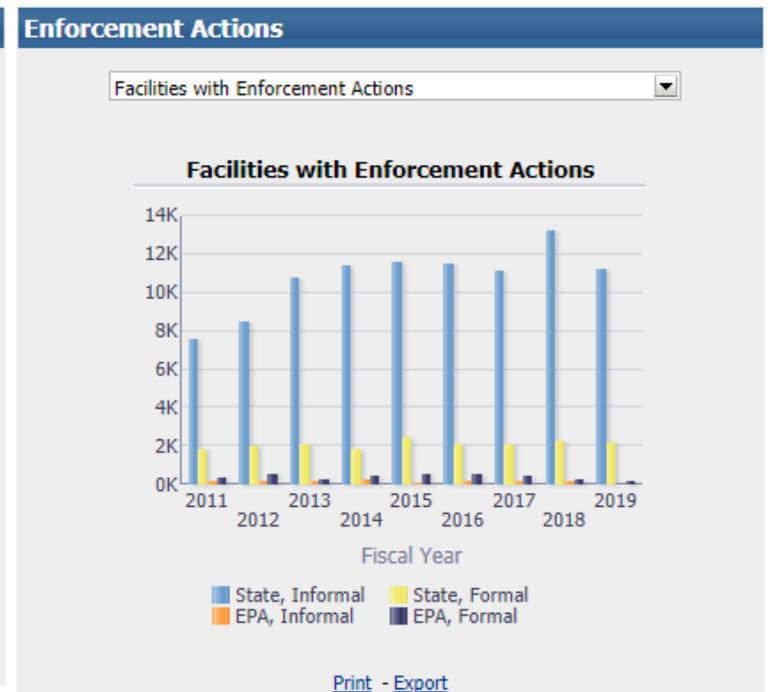
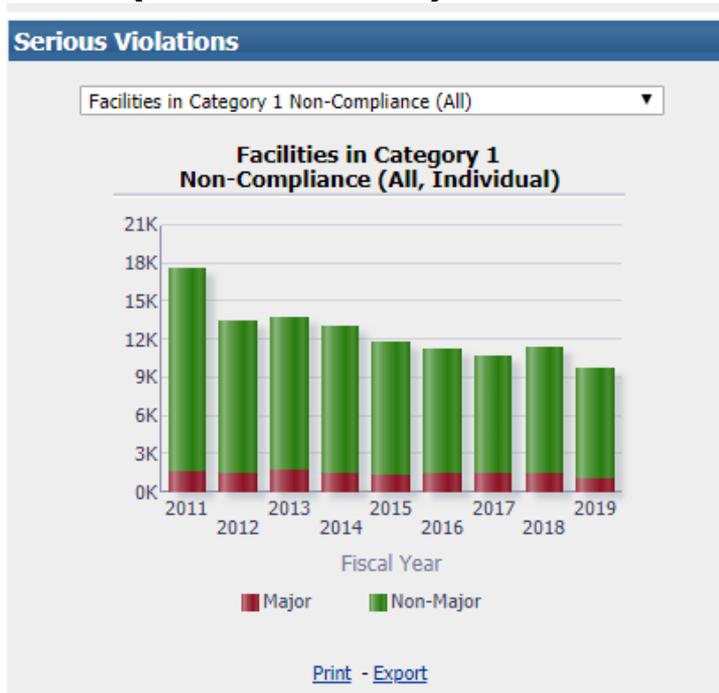


How does EPA Determine SNC?

- 💧 Identifies violations based on data, compared to permit requirements in ICIS
- 💧 Evaluates whether required data was received on time
- 💧 Recognizes formal enforcement actions

EPA SNC Data

💧 Enforcement and Compliance History Online (ECHO)



ECHO

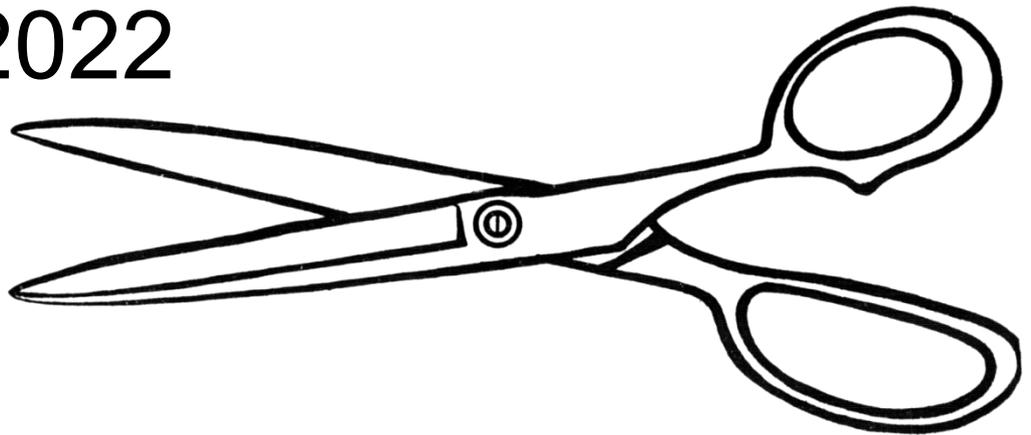
- 💧 Data available in ECHO 2.5 months after the end of the quarter
- 💧 Each state is responsible for quality assurance on its data
- 💧 Critical for batch submission states like Missouri

ECHO Challenges

- 💧 If we have data errors, and late submissions they must be entered by hand in order to be counted accurately
- 💧 Data errors corrected by batch take too long to re-run in ECHO, unlikely to be corrected before report is posted

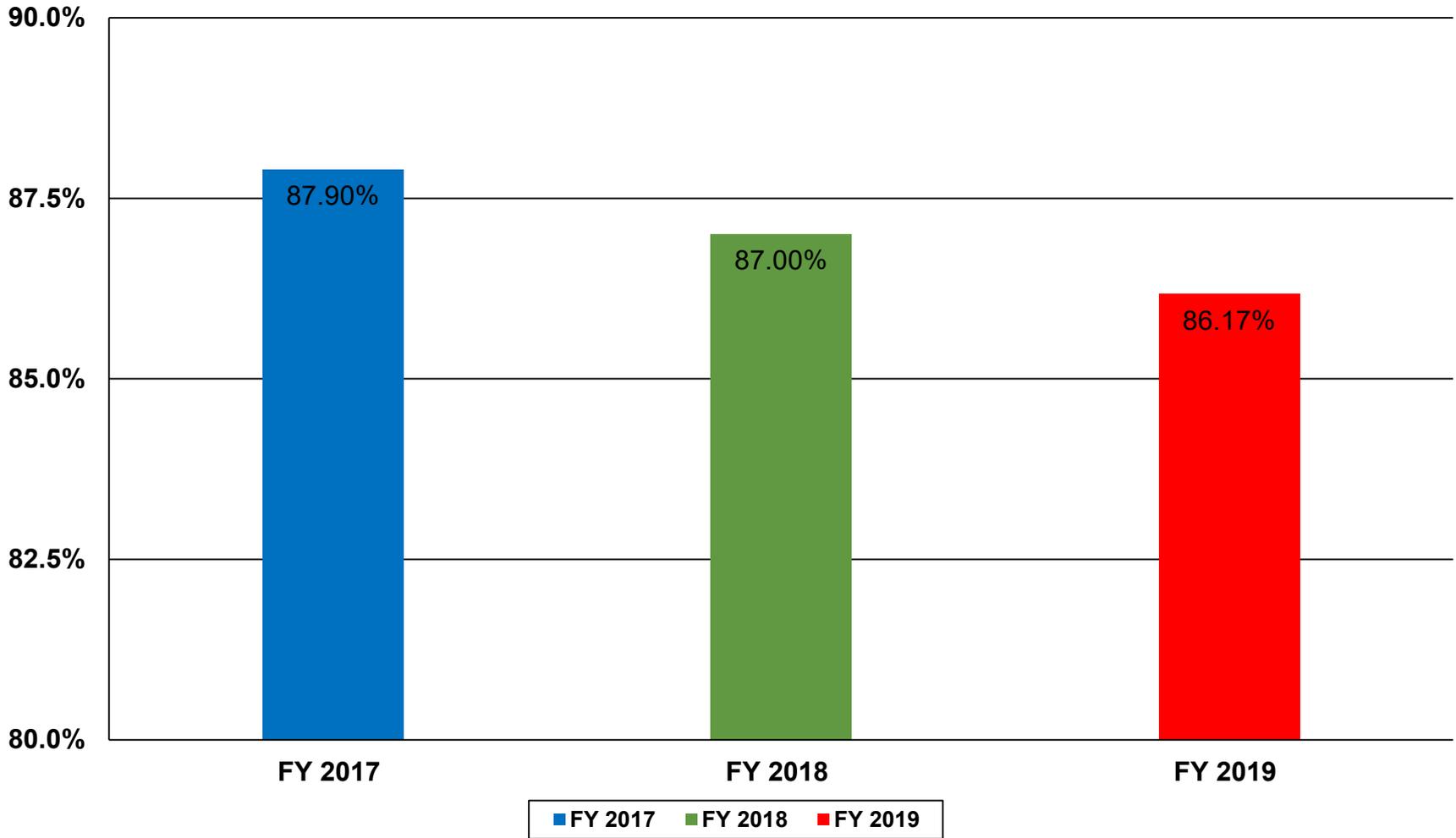
EPA National Compliance Initiative (NCI)

- 💧 June 7, 2019 CWA NPDES SNC NCI
- 💧 50% reduction NPDES SNC rate
- 💧 Reduce rate from 29.4% to 14.7% by end of FFY 2022



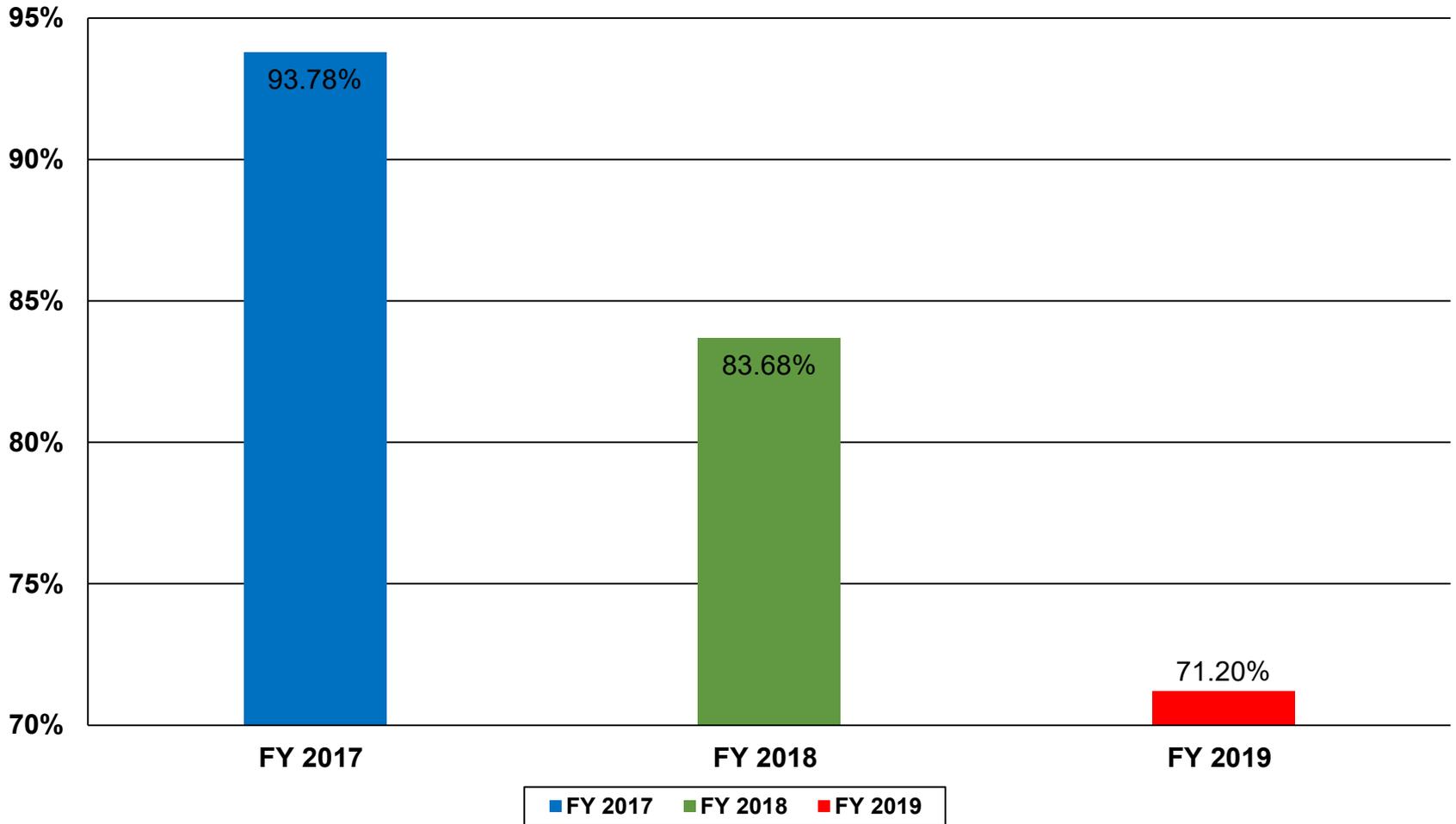


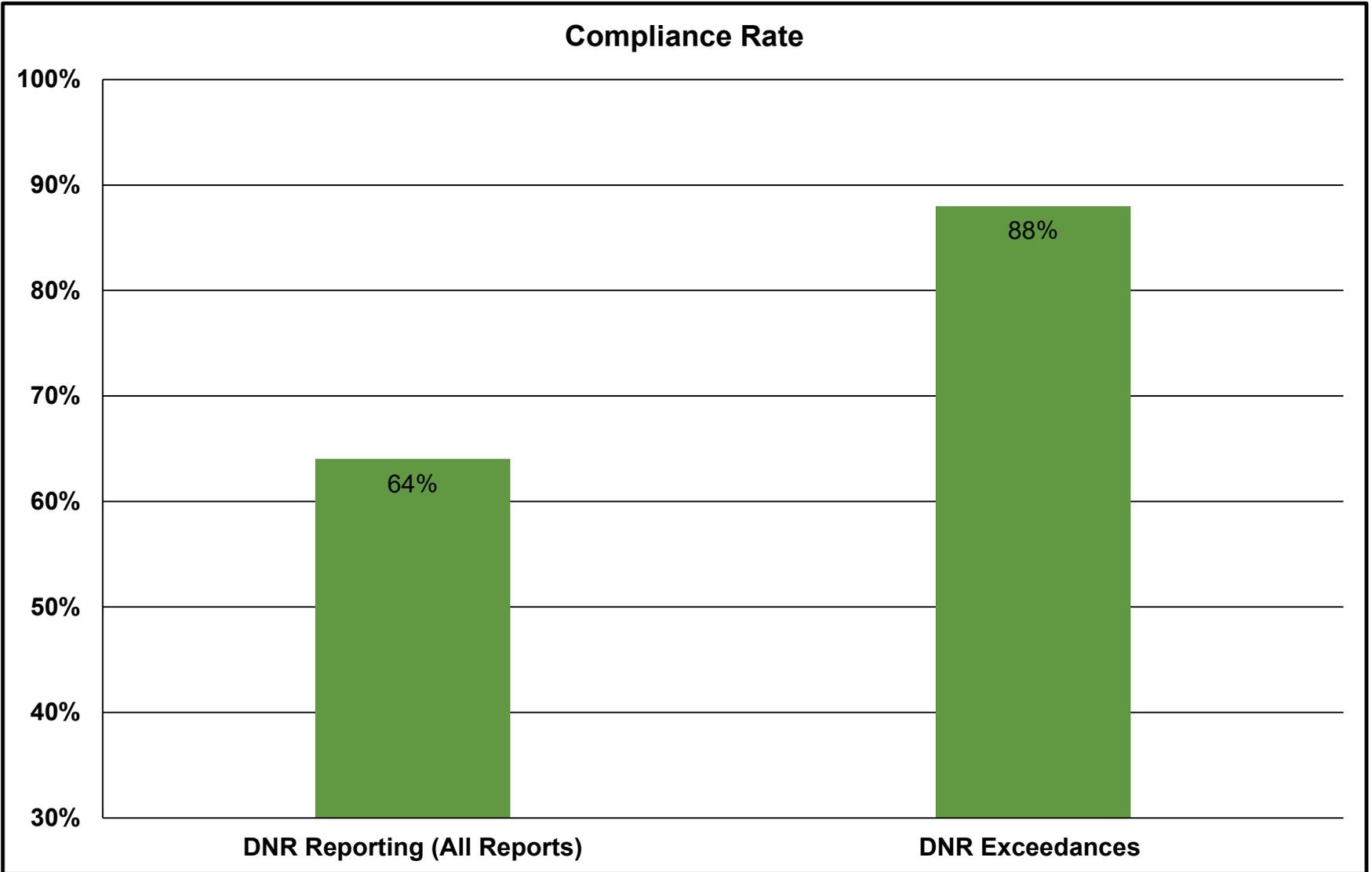
Wastewater Systems in Compliance with Effluent Limitations





Wastewater Systems in Compliance with Reporting Requirements

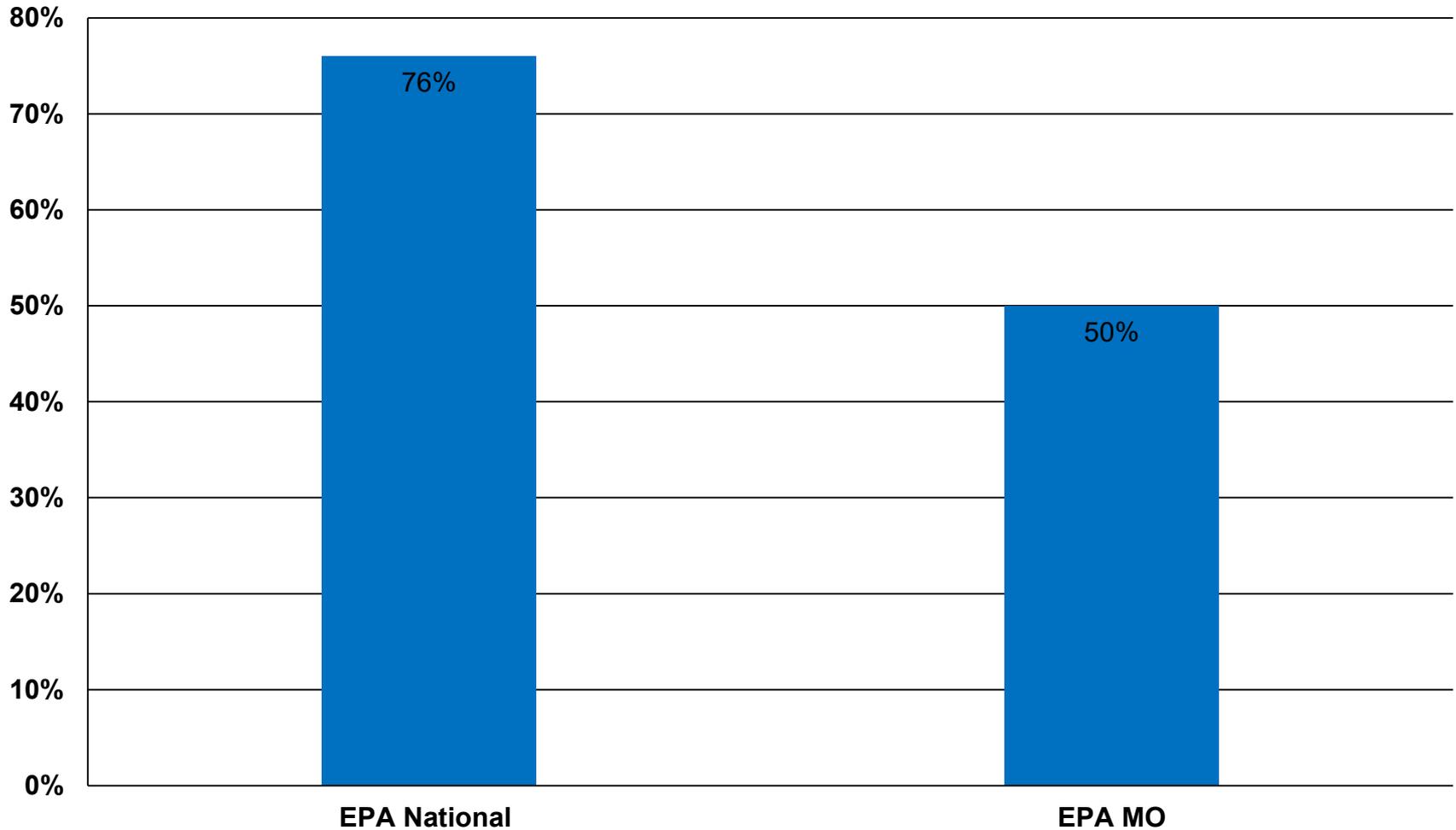




DNR Oct. 1, 2018 – Oct. 1, 2019, ECHO FFYQ4



**Compliance Rate
(Rolling Four Quarters)**



DNR Oct. 1, 2018 – Oct. 1, 2019, ECHO FFYQ4

How can DNR Help Facilities Get and Stay out of SNC?

- 💧 Avoid SNC
- 💧 Prompt return to compliance
- 💧 Timely formal enforcement





What is DNR Doing?

- 💧 Data
- 💧 Targeting RNC
- 💧 Monitor progress monthly



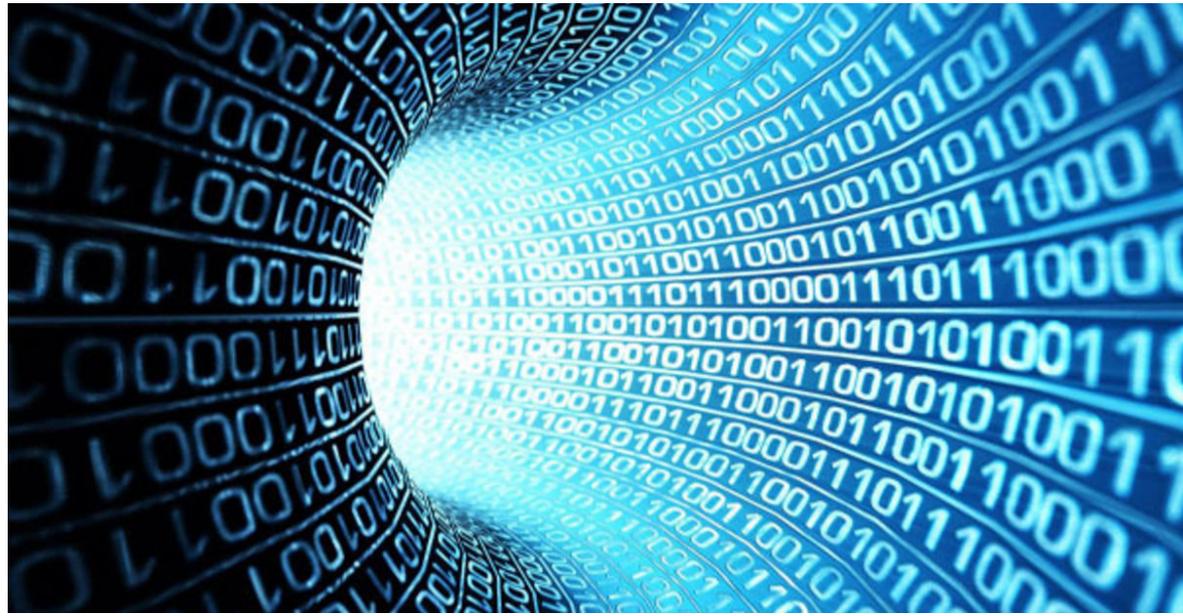
Tools

- 💧 Compliance Assistance
 - 💧 Region staff
 - 💧 Record Review letters
 - 💧 Reminders
- 💧 Formal enforcement
 - 💧 Abatement Orders etc.
 - 💧 Litigation through AGO



Tools continued

- 💧 Data Changes
 - 💧 Corrections
 - 💧 Additional Coding





Missing DMR Data October to January 2020

- 💧 1591 missing or late DMRs
- 💧 1643 auto-dialer calls
- 💧 999 calls answered
- 💧 419 DMRs submitted
- 💧 Missing or late DMRs reduced by 26%





MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Questions?