



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

What are we doing about SNC?

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Compliance and Enforcement



Sources of Significant Non-Compliance (SNC)

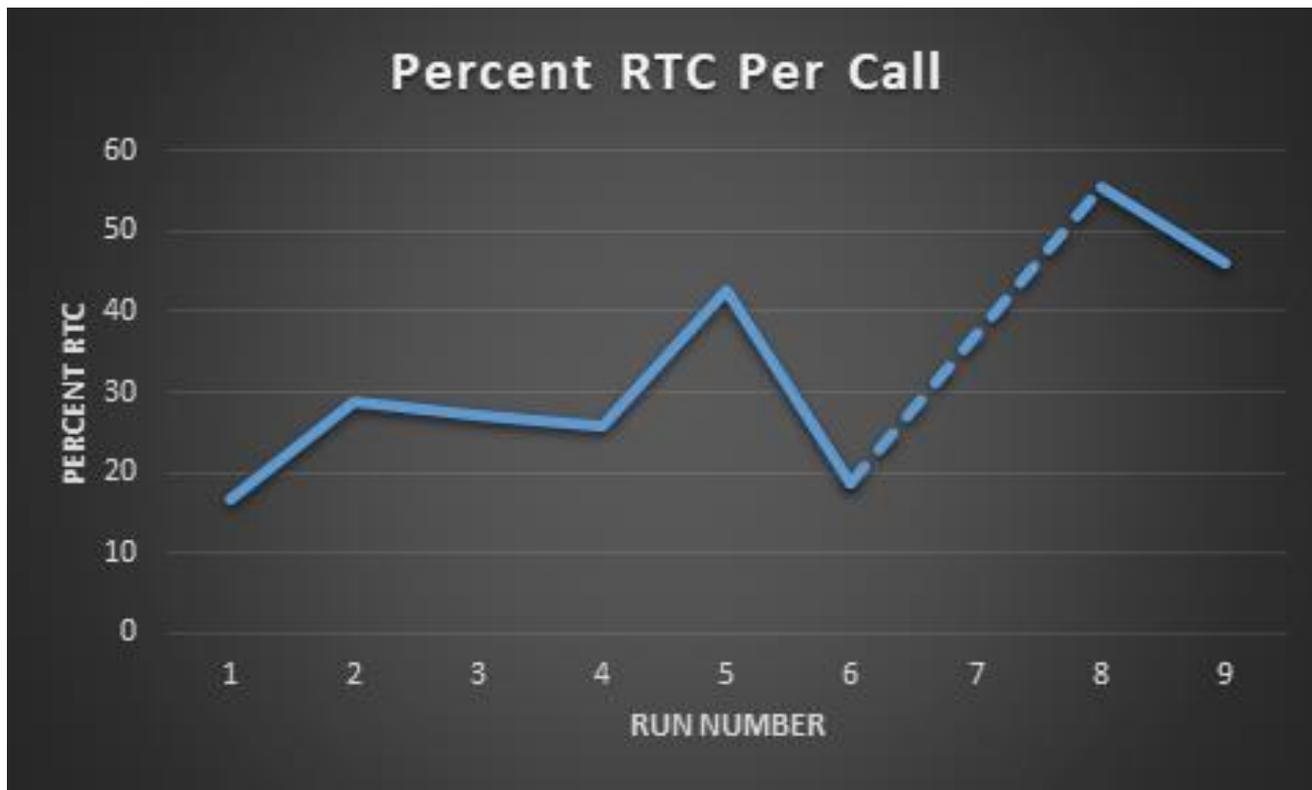
- 💧 Data errors in ICIS, false violations
- 💧 Missing or late discharge monitoring Reports
- 💧 Effluent limitation violations
- 💧 Scheduled Events not completed

Data Errors

- 💧 Data correction perpetually ongoing
 - 💧 All majors up to date, now scheduled to be checked for 2nd quarter 2020
 - 💧 Approx. 400 minors (218 MOR60A)
- 💧 Issues
 - 💧 Modified and expired permits that don't match ICIS
 - 💧 Permits and reports must use allowable parameters and units

Missing DMRs

💧 Since October 2019 we have placed 3,456 calls to 2,178 Facilities



Missing DMR Example

- 💧 Facility was non-compliant with subdivision rule and after much work, the only remaining violation was missing DMRs
- 💧 We struggled to get this corrected. After several months of reminders they are now compliant.



Effluent Limitation Violations

- 💧 Not a quick fix
- 💧 Targeted inspections
 - 💧 Technical Assistance
 - 💧 Guidance for planning improvements





Scheduled Events

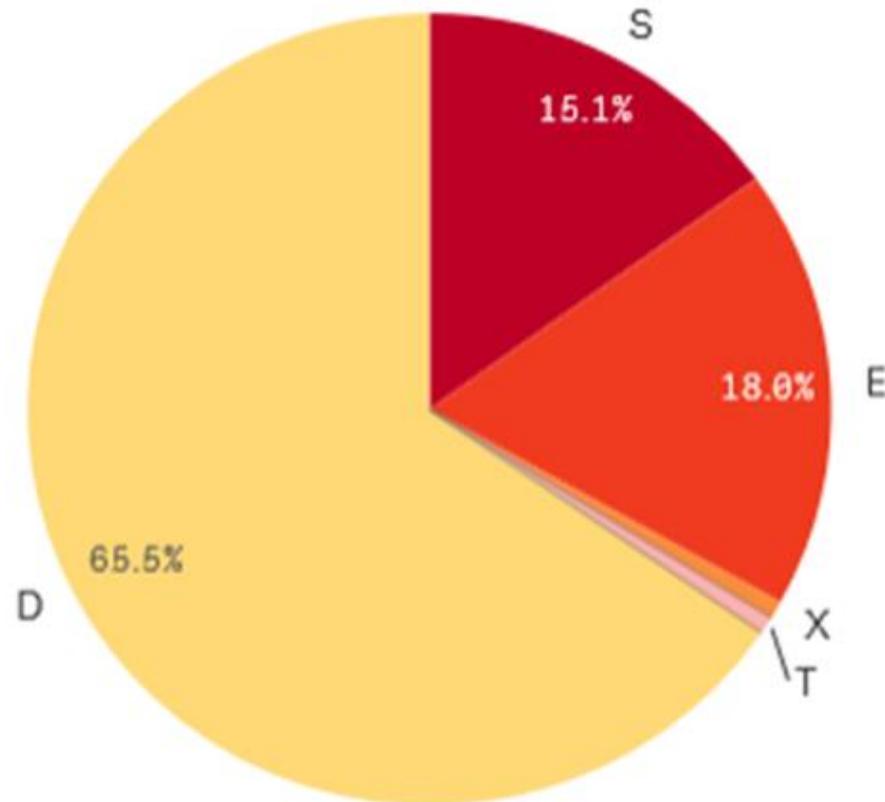
- 💧 Enforcement Milestones
- 💧 Permit Scheduled Events
- 💧 Narrative Conditions



FFY2020Q2 aka January to March 2020

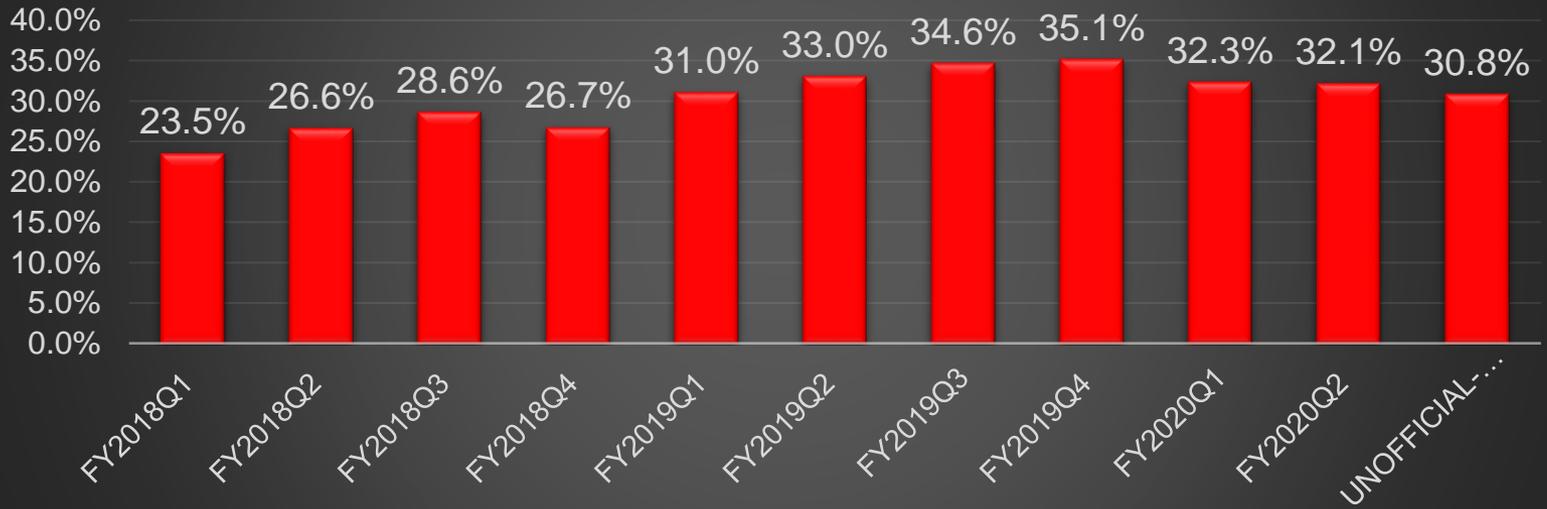
Compliance Status

- Missing Reports-D
- Missing Scheduled Events-S
- Effluent Violations-E





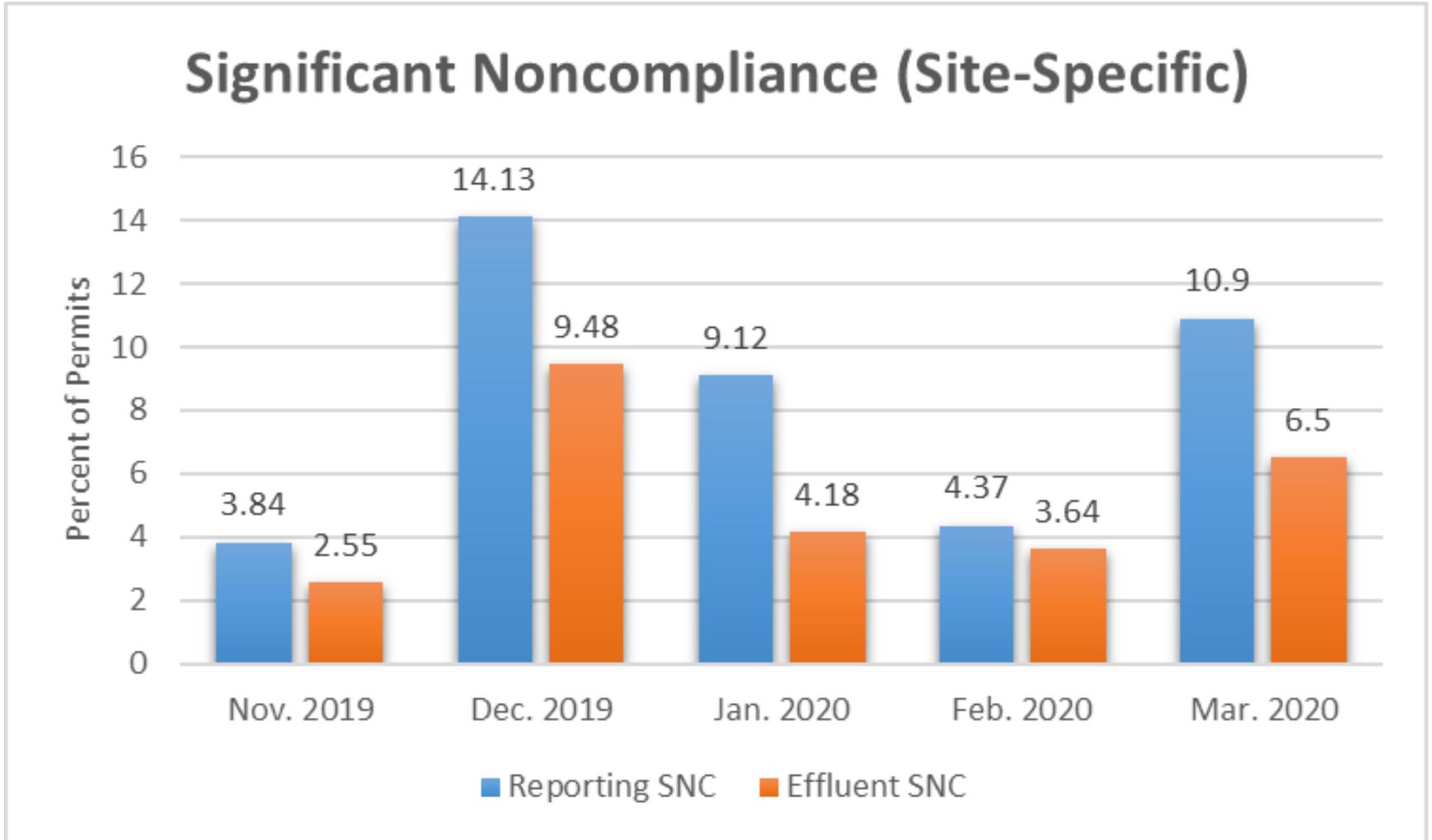
Missouri's Quarterly SNC Rates



Quarter	Facilities with SNC	Total Facilities	Percentage
UNOFFICIAL- FY2020Q3 (April-June 2020)	806	2620	30.8%
FY2020Q2 (January-March 2020)	840	2619	32.1%
FY2020Q1 (October-December 2019)	837	2589	32.3%
FY2019Q4 (July-September 2019)	905	2582	35.1%
FY2019Q3 (April-June 2019)	899	2597	34.6%
FY2019Q2 (January-March 2019)	845	2559	33.0%
FY2019Q1 (October-December 2018)	792	2551	31.0%
FY2018Q4 (July-September 2018)	682	2556	26.7%
FY2018Q3 (April-June 2018)	738	2576	28.6%
FY2018Q2 (January-March 2018)	684	2568	26.6%
FY2018Q1 (October-December 2017)	595	2535	23.5%



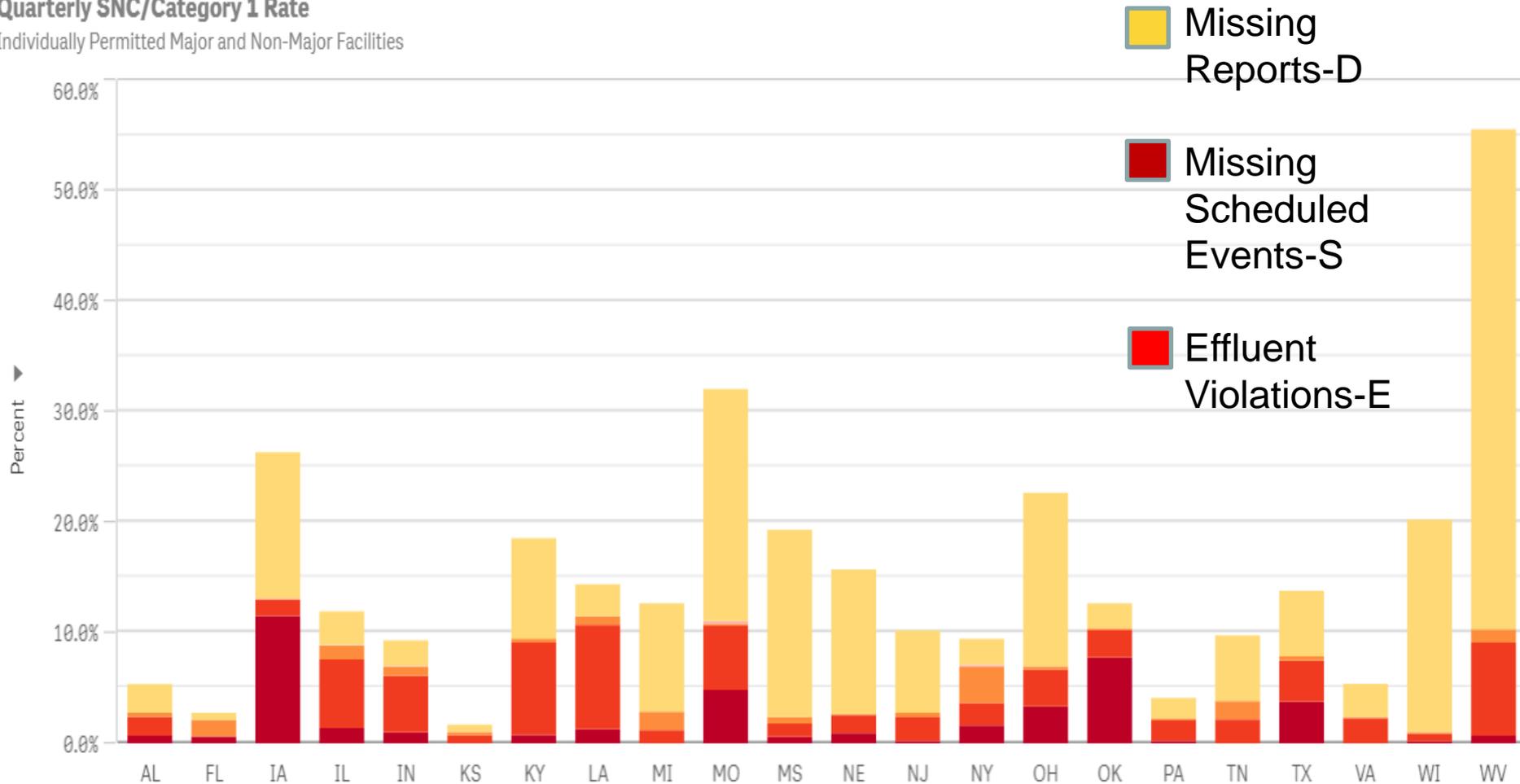
SNC Metrics: July 2020



Comparison to other States

Quarterly SNC/Category 1 Rate

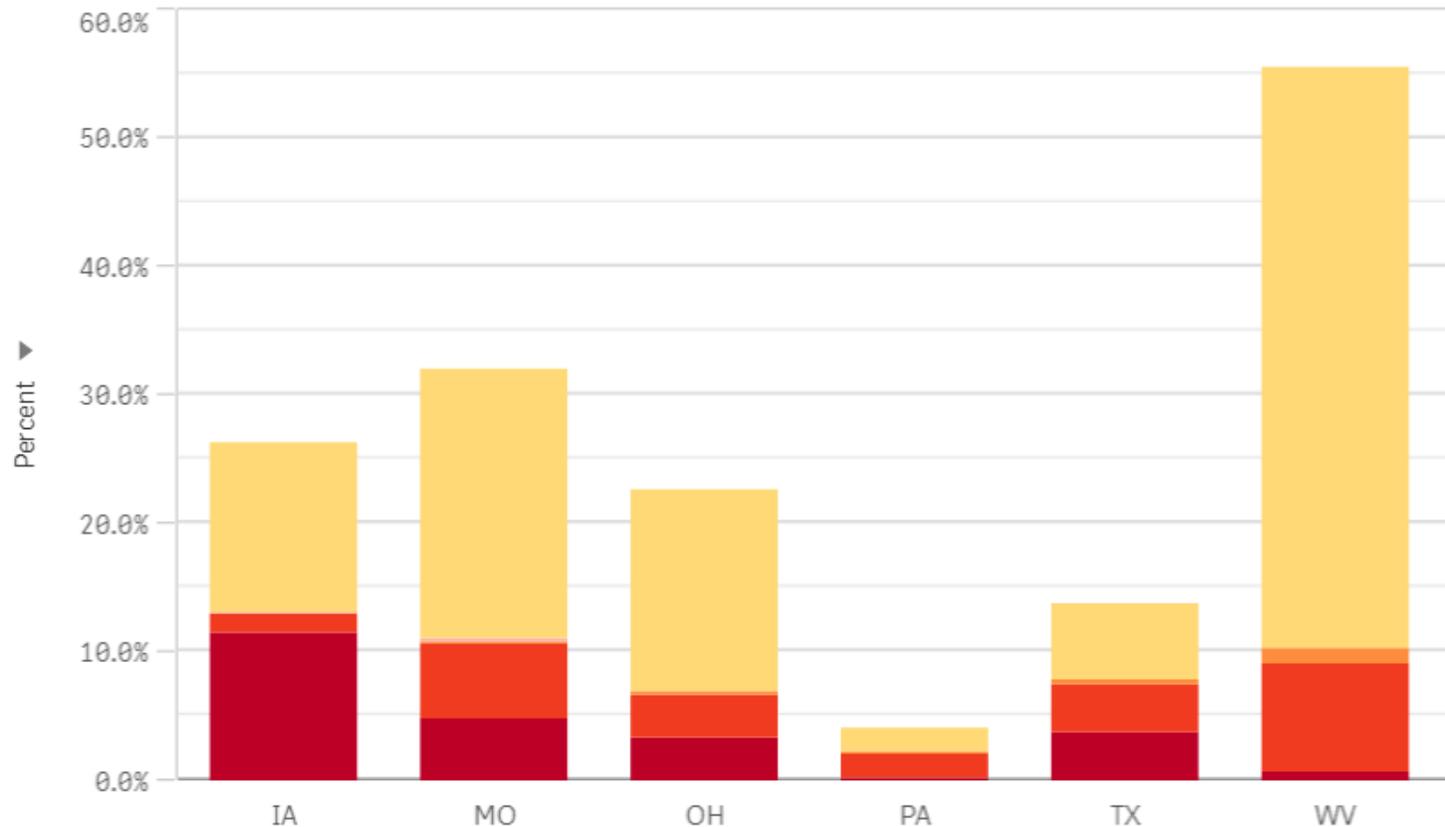
Individually Permitted Major and Non-Major Facilities



Comparable States

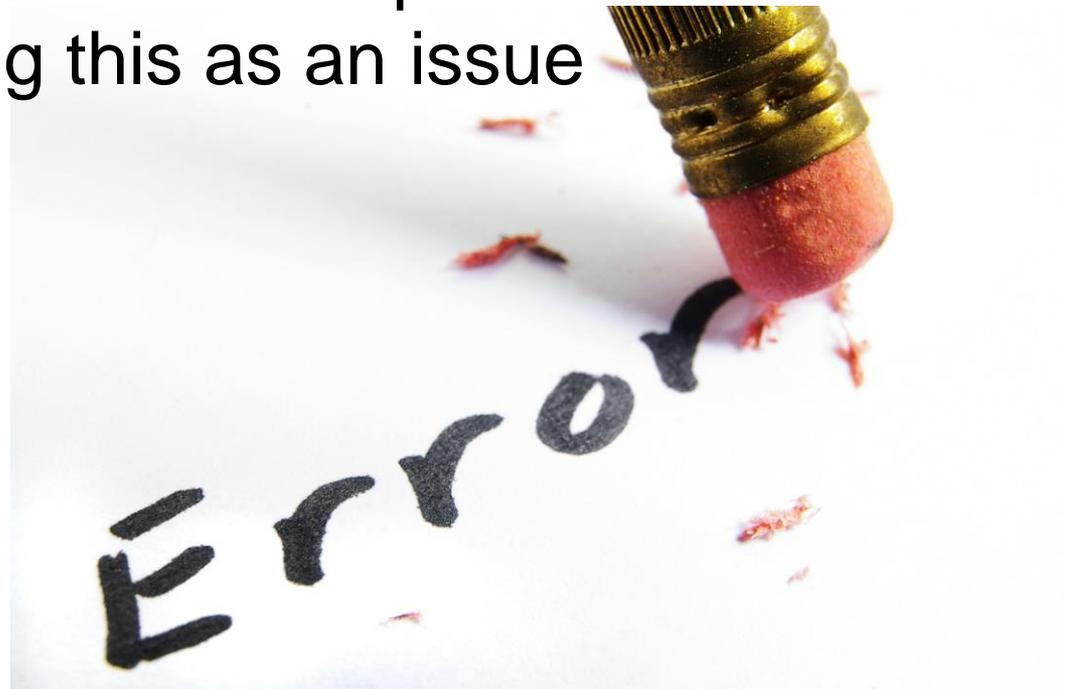
Quarterly SNC/Category 1 Rate
Individually Permitted Major and Non-Major Facilities

-  Missing Reports-D
-  Missing Scheduled Events-S
-  Effluent Violations-E



What are the other states doing?

- 💧 We looked at 21 states for common problems and tools effective in reducing SNC.
- 💧 Data correction was a common problem with 11 out of 21 states citing this as an issue



Other States Continued

- 💧 Tools for SNC reduction
 - 💧 PA emails inspectors when a facility exceeds permitted effluent limitations
 - 💧 NY uses an expedited penalty which reduced their SNC by 50%
 - 💧 Kentucky's DMR automation has led its SNC rate fall 60% between FFY2011 and FFY2019
 - 💧 LA uses a calendar of team SNC tasks which lowered their SNC rate by 4% in just one quarter.

Best Approach to SNC Reduction?

- 💧 Data Clean-up
- 💧 Environmental Monitoring and Enforcement
- 💧 Compliance Assistance
- 💧 Dr. Jay Shimshack, Frank Batten School of Leadership and Public Policy, University of Virginia



Questions?

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