Message

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Sent: 4/26/2019 9:56:16 PM
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Subject: QNCR and SNC Review
Attachments: SNC_Fact_Sheet_2019.pdf; data_transfer_process_2019.pdf; qncr_process_updated_2019.pdf; R9 - CA QNCR Summary 3-19-18.pdf; Details on SNC and formal enf.docx

Hello.

I am the project lead for EPA's nationwide priority of reducing the rate of significant noncompliance (SNC) for NPDES facilities. The scope of the SNC reduction project includes all major and minor individual facilities. For those of you unfamiliar with SNC or the project, I've attached a Fact Sheet that gives an overview of the project, including its goals and deadlines.

For the last several months, I have been working with DWQ, OIMA, and EPA Region 9 to identify and resolve data and systemic issues in and between CIWQS and EPA's NPDES database, the Integrated Compliance Information System (ICIS). Dischargers enter data in CIWQS using the DMR tab. It is then transferred from CIWQS to ICIS (see attached data transfer process flow diagram). I plan to continue this work so each quarter, we have a reliable SNC list.

Using data in ICIS, EPA headquarters creates a quarterly non-compliance report (QNCR) each quarter. DWQ staff reviews this report for discrepancies (see attached a process flow diagram for the QNCR review process).

In the next two months, I would like to meet with each region and discuss the facilities in SNC. I would like to find and resolve any additional system or data issues; determine the appropriate enforcement for facilities exceeding their effluent limits or not adhering to their compliance schedules; and identify resources that can help you and /or the facilities. I've attached the final 1Q2019 QNCR Summary Report for you to look at. The summary report shows SNC violations in red. Note, EPA's 1st quarter is our 4th quarter. To help you understand that report, I've also attached a more detailed explanation of what violations trigger SNC status and how they get resolved.

Please contact me with any questions you have and let me know when you will be available to meet.

Sincerely,
Erin

Erin Mustain, PE
Senior Water Resource Control Engineer
State Water Board

Office of Enforcement
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