



AGENDA for EPA-State SNC National Compliance Initiative SYMPOSIUM 2

EPA Region 6, Dallas, TX
Renaissance Tower, 1201 Elm St., 5th floor
Jan 22-24, 2020
[Final Agenda (3), 1/16/2020]



[**Note:** this agenda may be adjusted prior to the Symposium. The primary topics for the Symposium will remain.]

Purpose of Symposium: To share information and best practices related to improving the rate of SNC across authorized states and EPA direct implementation areas - with particular focuses on the challenges associated with reducing SNC at small POTWs and other small systems, approaches for improving data quality and addressing completeness issues, and the roles of compliance assistance and enforcement in this initiative.

- **Meals on your own – restaurants for dining in groups will be identified.**
- **EPA and ACWA will provide coffee and snacks.**
- **Hotel information is provided at the bottom of this agenda.**

Day 1 (Wednesday, Jan 22)

Session #	Time	Agenda Item	Moderator(s)
	7:45-8:30am	<ul style="list-style-type: none">• Symposium Registration - Coffee and pastries• EPA Greeters: Chad Harsh (EPA Region 3), Jessica Duggan (EPA Region 8)	
1	8:30 - 9:30am	<ul style="list-style-type: none">• Critical Logistics (Rachel Matthews, EPA Region 6)• Welcome and Introductions<ol style="list-style-type: none">1. EPA Region 6 – Welcome to Dallas<ul style="list-style-type: none">○ Deputy Regional Administrator, David Gray○ Enforcement and Compliance Assurance Director, Cheryl Seager2. TCEQ Executive Director, Toby Baker3. EPA-OECA Office of Compliance Director, David Hindin4. ACWA President, Melanie Davenport5. Attendee “standing” introductions – by EPA Region and states in the Region (<i>if time permits</i>)	Chad Harsh, EPA Region 3 Rachel Matthews, EPA Region 6 Daniel Palmer, EPA OECA/OC

2	9:30 - 10:00am	Symposium Preliminaries - Dan Palmer, Joe Theis, and Beth Ragnauth, EPA OECA/OC <ul style="list-style-type: none"> ○ Session Objectives: Describe the current status of our effort to reduce the rate of SNC; and, discuss what we want to achieve through this symposium that will move us toward our goal. <ol style="list-style-type: none"> 1. SNC Rate (10 minutes) <ul style="list-style-type: none"> • Current SNC rate, progress in FY 2019 • Analysis of SNC rate 2. Quick review of the Symposium agenda (5 min) 3. Symposium Objectives and Products (5 min) <ul style="list-style-type: none"> • What do we want to accomplish at this Symposium? • What are the products that we want to generate at this meeting? <ol style="list-style-type: none"> a. List of new ideas that are generated or described for SNC workgroup exploration b. List of SNC and/or EPA action items – items for action and problems to solve now c. List of items for the parking lot (can't do now or not SNC NCI - but for referral or future consideration 4. SNC NCI activities for focus in FY 2020+ (10 min) 	Daniel Palmer, EPA OECA/OC
	10:00 - 10:20am	Break	
3	10:20- 11:50pm	Evidence-Based Best Practices for Improving Compliance <ul style="list-style-type: none"> • Session Objective: To examine what are the characteristics of a compliance and enforcement program that produces a low SNC rate <ol style="list-style-type: none"> 1. David Hindin, Director, EPA Office of Compliance (35 min) <ul style="list-style-type: none"> • Evidence-based government: how do we know if what we are doing works? • OECA wants to work with states that want to try something different • Pilot opportunities 2. Jay Shimshack, University of Virginia (55 min) <ul style="list-style-type: none"> • What do we know from research about what works to improve compliance? 	Daniel Palmer, EPA OECA/OC
	11:50- 1:00pm	LUNCH	
3 (continued)	1:00- 2:00pm	Evidence-Based Best Practices for Improving Compliance (<i>continued</i>) <ol style="list-style-type: none"> 3. Elements of a state NPDES enforcement program that produce a low noncompliance rate <ul style="list-style-type: none"> • Melanie Davenport, Virginia DEQ, Director, Water Permitting Division (20 min) • Leandro Garcia and Adrienne Pennington, Florida DEP (20 min) 4. Discussion: what are the key challenges states face in working to reduce their SNC rate (20 min) 	Daniel Palmer, EPA OECA/OC

4	2:00-2:40pm	Expanding Use of Notifications for Deterring and Preventing Effluent SNC <ul style="list-style-type: none"> Session Objective: Explore ongoing efforts to: 1) quickly respond to effluent SNC as it occurs and 2) predict and intervene early to prevent SNC. <ol style="list-style-type: none"> EPA Region 2's approach to using notifications in NY and NJ - Justine Modigliani, EPA Region 2 (20 min) Introduction to predictive capabilities of the NPDES Early Warning SNC Dashboard - Katherine Green, EPA Region 2 (20 min) <i>(Demo of dashboard coming Friday!)</i> 	Daniel Palmer, EPA OECA/OC
	2:40-3:00pm	Break	
4 (continued)	3:00-3:45pm	Expanding Use of Notifications for Deterring and Preventing Effluent SNC (continued) <ol style="list-style-type: none"> EPA-Stanford University collaboration on project to test prevention of SNC using notifications - Dan Ho, Director, Regulation, Evaluation, and Governance Lab, Stanford University (45 min) 	
5	3:45-5:30pm	Importance of Enforcement Actions to Achieve the NCI Goals <ul style="list-style-type: none"> Session Objective: To discuss different approaches for using enforcement actions to resolve and/or deter SNC/Category 1 violations. <ol style="list-style-type: none"> Introduction to enforcement session (10 min, Joe Theis, OECA/OCE) Panel Discussion: Use of Enforcement Actions to Resolve SNC/Category I Violations (65 min) <ol style="list-style-type: none"> Richard Paull, NJ DEP: Overview of NJ's approach and SNC case example (15 min) Meredith Streeter, NY DEC: Overview of NY's approach and SNC case example (15 min) Denny Dart, EPA Region 1: Region 1 Efforts to Reduce SNC (10 min) Mike Boeglin, EPA Region 8: Overview of NPDES Wastewater ESA and applicability to SNC (10 min) Group Discussion (15 min) <ul style="list-style-type: none"> <i>Other examples of the successful use of enforcement actions to resolve SNC/Category I violations, and challenges/hurdles encountered.</i> <i>What is your current approach for resolving SNC-level violations at NPDES minor permittees?</i> EPA HQ Approach for Prioritizing SNC Follow-up Actions (30 min total) <ol style="list-style-type: none"> <u>Goal:</u> Identify companies with multi-state or corporate-level serious NPDES noncompliance <u>ECHO Violation Tracker Tool and ICIS Data – overview of steps</u> (15 min, Rusty Wasem, OC/ETDD): <ul style="list-style-type: none"> ECHO search, results summary, and Corporate Compliance Screener <u>Next Steps</u> (15 min, Ben Bahk, OCE/WED) <p>After identification of potential candidate(s) from b. above:</p> <ul style="list-style-type: none"> Issue an Information Request (per CWA 308) Coordinate with affected EPA Regions and authorized states on any site inspections and follow-up enforcement response 	Joseph Theis, EPA OECA/OCE

Day 2 (Thursday, Jan 23)

Session #	Time	Agenda Item	Moderator(s)
6	8:30 – 9:20am	Recent EPA SNC NCI Related Guidance <ul style="list-style-type: none"> Session Objective: Familiarize the audience with recent EPA guidance relevant to the SNC NCI and the content of the new SNC NCI Implementation Strategy <ul style="list-style-type: none"> FY2020- FY2023 National Compliance Initiatives memorandum – Dan Palmer, OECA/OC (5 min) <ol style="list-style-type: none"> Selection of SNC as one of EPA’s 6 NCIs for the FY 2020-2023 NCI cycle – Dan Palmer Memo for Enhancing Effective Partnerships Between the EPA and the States in Civil Enforcement and Compliance Assurance Work – Joe Theis, OECA/OCE (10 min) https://www.epa.gov/compliance/memo-enhancing-effective-partnerships-between-epa-and-states-civil-enforcement-and EPA memorandum: Regional Role in Reducing the NPDES Rate of Significant Noncompliance – Joe Theis, OECA/OCE (10 min) https://www.epa.gov/enforcement/memo-regional-role-reducing-npdes-rate-significant-noncompliance <ol style="list-style-type: none"> What the Role of the Regions memo requires of the EPA Regions What are the implications of the Role of the Regions memo for the authorized states? Feedback from regions and states on how the quarterly meetings are going SNC NCI Implementation Strategy – Dan Palmer, OECA/OC (30 min) <ol style="list-style-type: none"> What is the SNC NCI Strategy? Goals Key Measures and Deliverables Reporting on progress When will we consider the SNC NCI done? 	Daniel Palmer, EPA OECA/OC Joseph Theis, EPA OECA/OCE
	9:20-9:40am	Break	
7	9:40-10:35am	Improving Compliance at Small POTWs (including directed compliance and financial assistance) <ul style="list-style-type: none"> Session Objective: Share methods, networks and resources to help states bring small POTWs back into compliance. <ol style="list-style-type: none"> Seth Heminway - Effluent Violation Sub-group Project Updates EPA (~5 minutes) Approaches: <ol style="list-style-type: none"> Jon van Dommelen, Ohio EPA - Applying Compliance Assurance Tools Based on Data Analysis - Binning process applied to small POTW non-compliance problem (20 minutes) Kristen Fenati, TCEQ Small Business & Local Government Assistance Program - State technical/compliance assistance for systems under a compliance order (20 minutes) Cathy Siders, IL EPA - Low Cost Load Optimization as an Interim Step to Full Compliance (10 minutes) 	Seth Heminway EPA OECA/OC Jenny Beese, EPA Region 5

	10:30-10:50am	BREAK	
7 (continued)	10:50-11:30am	Improving Compliance at Small POTWs (continued) d. Denny Dart , EPA Region 1 – Project to Identify Root Causes (pollutants), identify compliant and non-compliant POTWs, and then to pair compliant and noncompliant POTWs of similar flow and permit limits and encourage mentoring – all using draft Qlik Dashboard. (20 minutes) 3. Tara Johnson , EPA Office of Wastewater Management Water Infrastructure and Resilience Finance Center (WIFRC) – Financial Resources and Beyond: Overview of Environmental Finance Centers, State Revolving Funds, WIFIA, USDA Rural Development...Water Finance Clearinghouse and WaterOperator.org demos. (20 minutes)	Seth Heminway EPA OECA/OC Jenny Beese, EPA Region 5
	11:30am-12:40pm	Lunch	
7 (continued)	12:40-2:10pm	Improving Compliance at Small POTWs (continued) 4. Technical Assistance and Training Organizations a. Kevin Kundert , Rural Community Assistance Partnership (RCAP) - National overview on training and technical assistance (10 minutes) b. Harold Hunter , Texas State Director- Environmental Services Communities Unlimited (Rural Community Assistance Partnership (RCAP) affiliate) TX - Case studies (10 minutes) c. Karen Conrad , Communities Unlimited Oklahoma (RCAP affiliate) – System Regionalization (10 minutes) d. Bill O’Connell , National Rural Water Association (NRWA) (15 minutes) 5. Discussion on how to meet challenges (remaining time ~35 minutes) <ul style="list-style-type: none"> What take-aways are you seeing? What else can the SNC NCI do to help states, assistance providers and operators come back into compliance? Achievable Action Items? 	Seth Heminway EPA OECA/OC Jenny Beese, EPA Region 5
8	2:10 – 3:25pm	Importance of Addressing Data Completeness and Data Quality Issues to Achieve the NCI goals <ul style="list-style-type: none"> Session Objective: Provide context to importance of addressing data issues for reducing the SNC rate and examples of success in data management. <ol style="list-style-type: none"> Current state-of-affairs and how much we need to do (Beth Ragnauth, OECA/OC, 15 min) Where we should focus the data completeness and quality effort to get biggest impact most efficiently (Beth Ragnauth, OECA/OC, 15 min) Case Study: Region 8 and Wyoming’s journey working together to resolve data issues (Josie Lopez, EPA R8, 25 min) Kansas’s data quality management (Debbie Mendenhall, KDHE, 15 min) 	Beth Ragnauth, EPA OECA/OC
	3:25-3:45pm	Break	

9	3:45 – 4:45pm	EPA Data-Related Projects <ul style="list-style-type: none"> Session Objective: Provide information on EPA NPDES data system, data transfer, eRule, and NNCR work that relates to the SNC NCI effort <ol style="list-style-type: none"> David Hindin, EPA OECA Office of Compliance (15 min) <ol style="list-style-type: none"> Phase 2 eRule update NNCR Rob Cannon and Jason Swift, EPA OECA Office of Compliance (35 min) <ol style="list-style-type: none"> ICIS-NPDES work being done ICIS replacement Support offered to states with DQ and data transfer problems Examples of successes in solving state DQ and transfer problems Questions (10 min) 	Beth Ragnauth, EPA OECA/OC
10	4:45- 5:30pm	Reducing Federal Facility SNC – Presentation and Discussion <ul style="list-style-type: none"> Session Objective: Learn about ongoing strategies to reduce the rate of SNC at federal facilities and discuss potential broader application of these strategies. (45 min) <ol style="list-style-type: none"> Background <ul style="list-style-type: none"> Provide current statistics on FFs in SNC Strategies/follow-up that have been employed Suggestions for new strategies? Discussion on most useful way to share information with regions/states Lessons learned and broader application possibilities 	Nicki Freyre, EPA OECA/FFEO

Day 3 (Friday, Jan 24)

Session #	Time	Agenda Item	Moderator(s)
11	8:30 – 9:40am	SNC Electronic Tool Intensives – Training on How to Use the Basic Functions of Two Key SNC Electronic Tools <ul style="list-style-type: none"> Session Objective: Learn to use the ECHO SNC Tracker and the NPDES Early Warning SNC Dashboard by walking through several use cases. <ol style="list-style-type: none"> New SNC Early Warning Dashboard (<i>the EPA Region 2 SNC Tool demoed at the Atlanta symposium</i>) – Katherine Green and Daniel Teitelbaum, EPA Region 2 (25 min) <ol style="list-style-type: none"> Training (<i>more than a demo</i>) Focused on use of the R2 tool to “truth” SNCs and to identify SNCs to address before they are official SNCs ECHO SNC Tracker – Rusty Wasem, EPA OECA/OC (25 min) <ol style="list-style-type: none"> Training (<i>more than a demo</i>) 	Justine Modigliani, EPA Region 2

		<ol style="list-style-type: none"> 1) Creating prioritized list 2) Binning <ol style="list-style-type: none"> a. Minor POTWs by Flow b. Industrial Minors c. Public Water Systems 	
	9:45-10:05am	Break	
12	10:05 - 11:15am	Reducing the Rate of True DMR Non-Submittal and Faulty DMR Submission <ul style="list-style-type: none"> • Session Objective: Presentation of successful practices to reduce DMR non-submittal and errors, and a discussion of root causes and how these and other practices can be applied successfully by others. <ol style="list-style-type: none"> 1. Speakers: <ul style="list-style-type: none"> • Marty Haroldson, ND (10 min) • Christy Monk, AL (10 min) • Esteban Herrera, Region 6 (10 min) 2. Discussion: (40 min) <ol style="list-style-type: none"> a. What are the underlying causes of DMR non-submittal and faulty submission in your state/region? b. What approaches have worked/haven't worked to get DMRs in correctly? c. How can the SNC NCI Workgroup assist states in applying these solutions? 	Colleen Rathbone, EPA Region 8
13	11:15-11:45am	Role of EPA and State inspections/inspectors in SNC NCI <ul style="list-style-type: none"> • Session Objective: Explore how inspections can be used to enhance deterrence - Daniel Palmer (30 m) <ol style="list-style-type: none"> 1. Field presence itself creates deterrence 2. How to more <u>actively</u> deter violations through inspections 	Daniel Palmer, OC Seth Heminway, OC
14	11:45am - 12:15pm	Symposium Conclusion <ol style="list-style-type: none"> 1. Review of Symposium – Dan Palmer and Melanie Davenport, ACWA (5 min) 2. To do items – David Piantanida (5 min) 3. Look ahead/what's next? - Chad Harsh (5 min) 4. What were the biggest take-aways from the symposium (<i>volunteers</i>) (15 min) 	Daniel Palmer, EPA OECA/OC David Piantanida, EPA Region 8 Chad Harsh, EPA Region 3
15	12:15 - 12:45pm	Symposium Farewell <ol style="list-style-type: none"> 1. Director, Program Support & Environmental Assistance Division, TCEQ Office of Compliance & Enforcement, Kristi Mills-Jurach (10 min) 2. EPA Region 6, Director, Enforcement and Compliance Assurance Division, Cheryl Seager (10 min) 3. SNC NCI Chairs (10 min) 	Daniel Palmer, EPA OECA/OC Rachel Matthews, EPA Region 6

SNC NCI Symposium - Logistical Information

Meeting Location

- EPA Region 6, Renaissance Tower, 1201 Elm St., 5th floor, Dallas, TX 75270
- <https://www.epa.gov/aboutepa/visiting-epas-region-6-office-dallas#access>

Remote Access to the Symposium via GoToWebinar

- See attachment below.

How to get to the 5th floor to check in – “Stacked” Elevators

- The Renaissance building has stacked elevators. Our security check-in is on the 5th floor (along with the conference rooms). If you are going to an odd numbered floor you need to use the elevators at the lower level. If you use the ground level ones, it may take longer to get to the 5th floor and you will feel like you are stuck in them and sometimes the button to an odd floor doesn't even work. Be patient if that happens. Best choice is to go downstairs and get on the elevator from the lower level.
- The entrance on the Pacific Ave side has stairs into the building (Starbucks is on that side). If you need the handicap accessible areas, you can enter the building from the Elm Street side, without stairs. The Elevator to the lower level is to the right of the escalators when you come in.

Symposium Registration

- On Jan 22, 23 and 24th, EPA will have a table set-up by 7:45 AM on the 5th floor at the conference facility and will be handing out name tags as meeting participants sign-in. EPA will also be on hand to answer questions you have regarding the agenda, bathrooms, meeting space, WiFi, remote participation, and anything else related to the Symposium.
- Registration for this meeting is required for state attendees. It is free but limited. Preference will be given to the first person from each state to register but we expect more than one state will wish to send multiple representatives. To ensure you have a seat, please register ASAP. To register, please fill out the PDF form at the link provided below and send it to Rachel Matthews at Matthews.Rachel@epa.gov.
 - Registration pdf form: <https://www.acwa-us.org/documents/2020-national-snc-nci-symposium-registration-form/>

Hotel 1 [All reserved rooms taken!]

- Hilton Garden Inn, Downtown Dallas
- 1600 Pacific Avenue, Dallas, Texas 75201, Tel: +1-214-299-8982
- Cut-off Date: All reservations must be made by December 16th, 2019, in order to receive the discounted group rate of \$161.00 per night.
- Unique group code is EPA6
- Make your reservation using this link: https://hiltongardeninn.hilton.com/en/gi/groups/personalized/D/DALPAGI-EPA6-20200121/index.jhtml?WT.mc_id=POG

Hotel 2

- SpringHill Suites, Dallas Downtown/West End
- 1907 N. Lamar Street, Dallas, TX 75202, 1-800-331-3131
- Cut-off Date: All reservations must be made by January 13th, 2019, in order to receive the discounted group rate of \$150.00 per night.
- Indicate that your reservation is part of a “specialty group rate”; the group is the “EPA group.”
- Make your reservation using this link: [Book your group rate for Environmental Protection Agency](#)

Texas Hotel Tax Exempt Form for Feds

<https://comptroller.texas.gov/taxes/hotel/forms/>

Transportation and Maps

- [Train from DFW to Downtown Dallas](#)
- [Train Lines in Downtown Dallas](#)
- [Map Showing Hotels, EPA Offices, and Train](#)
- [Map Showing Places to Eat and Things to Do](#)