Presentation Overview

• What does the NPDES Early Warning SNC Dashboard do?
• Accessing the Dashboard
• Dashboard Orientation
• Dashboard walkthroughs and related R2 activities:
  1) Identifying facilities that are at risk of SNC (initial or continued)
  2) Identifying the specific violations causing a facility to be in SNC (violation drilldown)
  3) Identifying old “legacy” violations (up to 20+ years)
What does the NPDES Early Warning SNC Dashboard do?

Identifies violation statuses for individually permitted facilities for the current official quarter, current unofficial quarter and in **realtime**…

…and identifies **all** violations causing SNC for a selected facility
What does the NPDES Early Warning SNC Dashboard do?

- **Early Warning:**
  - Identifies facilities at risk of SNC *before* they first show up as SNC on either an unofficial or official RNC run – i.e., before it is too late to prevent them from being in SNC *(Walkthrough 1)*
  - Lists effluent exceedances for facilities that are a single exceedance away from SNC at a time when SNC may still be preventable

- **Violation Drilldown:**
  - Identifies all individual violations that must be resolved to prevent SNC at a given “at risk” facility, or return an SNC facility to compliance *(Walkthrough 2)*
  - Displays the date range of SNC-causing violations for each facility, in order to facilitate focus on both the newest violations and on very old violations that may require data clean-up *(Walkthrough 3)*
Accessing the Dashboard

- Available to EPA and States at echo.epa.gov using your ECHO Gov Login
- Analyze Trends ➔ Data Visualization Gallery ➔ NPDES Early Warning SNC Dashboard
What does this app display?

- A summary of facility statuses for the last official, the last unofficial, and the current ("realtime") quarters.
- A listing of facility statuses (e.g., status violations, SNC, or permit violations) by month, and per permit.
- Analysis of SNC rates by type, region, major/minor, and POTW/non-POTW.
- A listing of effluent exceedances for facilities that are not responsible for SNC to assist with early detection.
- A listing of unresolved SNC, DMR non-receipt, or violations by month, and permit.
- Analysis of SNC rates by type, region, major/minor, and POTW/non-POTW.

What is covered by the app?

- Facility Universe – Individual NFDES permits that are effective, expired, or administratively continued.
- Violation Universe – unresolved violations that will cause SNC, resolved violations that caused SNC within the past two years, and RNC violations that are unresolved but will result in No SNC.
- Violation Types – Compliance Schedule, DMR Non-Receipt, Effluent (including Single Event Violations [SEVs]), Permits Schedule violations.

What is "realtime" status?

- RNC statuses are not computed until after the end of a quarter (unofficially) and do not become official until 2.5 months later.
- The realtime status indicates what the status would be for the current quarter if it ended today. By focusing on the realtime status, SNC can thus be prevented by addressing the underlying violations before the end of the current quarter.
- Realtime status is defined as follows:
  - Local Schedule Event violations (RNC Category 1) are currently unresolved.
  - Effluent (SEV) violations with a detection code classified as SNC are currently unresolved.
  - Effluent (EA) violations of enforcement action limits are currently unresolved.
  - Effluent (EI) – RNC or chronic violations have been, or will be, detected in this quarter.
  - T - Schedule report violations (SNC Category 1) are currently unresolved.
  - DMR NR – Non-receipt violations are unresolved for an entire DMR outfall.
  - Warning – a single additional effluent exceedance before quarter’s end could trigger SNC.
- No SNC = current violations will not result in a status of SNC (S, E, X, or T) or D0.
- Computations assume that TRC/chronic violations will be resolved after 3 months without a new violation. This may not actually occur if no reporting is required during the quarter (e.g., seasonal reporting).

This app is powered by ECHO, which references iOSS-NFDES each weekend. For more information, go to the ECHO Data Dictionary.
Walkthrough 1

Identifying facilities at risk of SNC (initial or continued)

*Goal of this review is to determine what action should be taken before the end of the quarter to prevent facilities from being in SNC*
### Violation Filters

- **Violation Lead Agency**
- **Violation Type**
- **SNC Flag**
- **Export Facility Status Table**
- **Export Violations Table**

### Facility Filters
- **Region**
- **State**
- **POTW Flag**
- **Permitting Agency**
- **Current Quarter SNC Flag**
- **Major/Minor**

### 154 Facilities - Realtime Breakdown

- **T - Sch. Report**
- **Effluent (EA)**
- **DMR NR**

### 5,488 Unresolved Violations for 154 Selected Facilities + 3,889 SNC-Causing Violations Resolved in Past 2 Years + 39 Future RNC Violations in "E..."
5,488 Unresolved Violations for 154 Selected Facilities + 3,888 SNC-Causing Violations Resolved in Past 2 Years + 38 Future RNC Violations in “E...
### Summary

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<td>Mikey Mart II</td>
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<td>N - DMR NR</td>
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### Violation Filters
- **Violation Lead Agency**
- **Violation Type**
- **SNC Flag**
- **Unresolved SNC**

### Facility Filters
- **Region**
- **State**
- **POTW Flag**
- **Permitting Agency**
- **Current Quarter SNC Status**
- **Major/Minor**

### Unresolved but not SNC
If data downloads are not working properly, use more filters.

4,125 Unresolved Violations for 98 Selected Facilities + 6 SNC-Causing Violations Resolved in Past 2 Years + 28 Future Random Noncompliance Violations.
### Violation Filters

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<thead>
<tr>
<th>Facility Name</th>
<th>Official Status</th>
<th>Unofficial Status</th>
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<td>N-Reportable Noncompliant</td>
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<td>Taberg 8d WWTF (NY0257381 - Minor)</td>
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<td>N-Reportable Noncompliant</td>
<td>DMR NR</td>
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<td>12/29/19</td>
<td>2019-10</td>
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<td>Cbs Corporation (NY0081403 - Major)</td>
<td>V-Other Violation</td>
<td>D-DMR Not Received</td>
<td>DMN NR</td>
<td>10</td>
<td>11/18/20</td>
<td>2019-09</td>
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<td>Knowldeez Cenovia (NY0262855 - Minor)</td>
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<td>N-Reportable Noncompliant</td>
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<td>11/28/19</td>
<td>2019-09</td>
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<td>Mikey Mart II (NY0268175 - Minor)</td>
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<td>DMR NR</td>
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<td>11/18/20</td>
<td>2019-09</td>
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<td>V-Other Violation</td>
<td>D-DMR Not Received</td>
<td>DMR NR</td>
<td>6</td>
<td>10/29/19</td>
<td>2019-09</td>
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<td>Mom Siliccone LLC (NY0004888 - Major)</td>
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### Facility Filters

- **Region**
- **State**
- **POTW Flag**
- **Permitting Agency**
- **Current Quarter SNC Flag**

### Violation Type

- **DMR**
- **Effluent**
- **Permif**

If data download are not working properly, use more filters.

### Realtime Breakdown

- **Event**
- **Facility**
- **Monit./Period/Event**
- **Outfall**
- **Parameter/Sched Event (gray-ERA)**
- **Limit Type/Comment**
- **Vio Code**
- **RNC**
- **Limit Value**
- **Report Value**
- **Exceedance**

3,672 Unresolved Violations for 33 Selected Facilities + 8 SNC-Causing Violations Resolved in Past 2 Years + 9 Future RNC Violations in Early Detection...
### Summary

<table>
<thead>
<tr>
<th>Facility Name &amp; Permit</th>
<th>Official Status Sep-19</th>
<th>Unoff Status Dec-19</th>
<th>Realtime Status Mar-20</th>
<th>Current Unres. Vois</th>
<th>1st Vo. Det. Date</th>
<th>Last Vo. Det. Date</th>
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### Violation Filters

- Violation Lead Agency
- Violation Type
  - Data Indicator - 8
  - Data Indicator - E
  - Data Indicator - G
  - Data Indicator - X
  - Data Indicator - 1
  - Data Indicator - 2
  - Data Indicator - 3
  - Data Indicator - 4

### Facility Filters

- Region
- State
- POTW Flag
- Permitting Agency
- Current Quarter SNC Flag
- Major/Minor

If data downloads are not working properly, use more filters.

### Facilities - Realtime Breakdown

- **11 Facilities**
  - **332 Unresolved Violations for 11 Selected Facilities**
  - **0 SNC-Causing Violations Resolved in Past 2 Years**
  - **9 Facilities**

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<td>Norlite LLC</td>
<td>Nov-2019</td>
<td>86C-M</td>
<td>000811 - 1: Temperature, water deg, fahrenheit</td>
<td>Concentration Average</td>
<td>INVALID NODD</td>
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<td>No Data Indicator - 8</td>
<td>12</td>
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Related Activities:

- Using the tool’s filtering capabilities to group facilities with similar issues that can potentially be addressed systemically, refer all SNC-causing issues to appropriate personnel for action:
  - DMR non-receipt violations → DMR reporting coordinator
  - Pretreatment violations → pretreatment program coordinator
  - Single event violations → compliance officer who identified the violation
  - Compliance schedule violations → compliance officer for the enforcement action

- Contacting facilities with missing reports and assisting them as needed with submittal

- Working with permittee to terminate permit if that is reason for non-submittal
Walkthrough 2

Identifying unresolved violations causing SNC for a specific facility
### 8,481 Unresolved Violations for 851 Selected Facilities + 11,866 SNC-Causing Violations Resolved in Past 2 Years + 56 Future RNC Violations in "...

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<th>Official Status</th>
<th>Unoff Status</th>
<th>Realtime Status</th>
<th>Curre... Unr... Vo...</th>
<th>1st Viol. Del. Date</th>
<th>Last Viol Del. Date</th>
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<td>1/13/20</td>
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<td>11/18/19</td>
<td>1909-09</td>
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<td>CA Corporation (NY0004183 - Major)</td>
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<td>11/18/19</td>
<td>1909-09</td>
<td>88</td>
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<td>Champlain Truck Stop (NY0236786 - Minor)</td>
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<td>6</td>
<td>10/19/19</td>
<td>1909-08</td>
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<td>7/21/19</td>
<td>66300 - 1 - Relative total</td>
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### Violation Filters

- Violation Lead Agency
- Violation Type
- SNC Flag

### Facility Filters

- Region
- State
- POTW Flag

### Permitting Agency

- Current Quarter SNC Flag

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**1,503 Facilities - Realtime Breakdown**

- **DMR NR Warning**
  - 89.8%
  - No SNC

---
15 Unresolved Violations for Middletown (C) STP + 3 SNC-Causing Violations Resolved in Past 2 Years + 8 Future RNC Violations in "Early Detection"
### 4.6 Unresolved Violations for Middletown (C) STP: 3 SNC-Causing Violations Resolved in Past 2 Years + 8 Future RNC Violations in "Early Detection"

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<td>8-Schedule Violations</td>
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<td>18/20/19</td>
<td>74855 - 1- Coliform, fecal general</td>
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6 Unresolved Violations for Middletown (C) STP + 8 SNC-Causing Violations Resolved in Past 2 Years + 8 Future RNC Violations in
### Facility Statuses with Violation Drilldown

#### 6 Unresolved Violations for Middletown (C) STP + 8 SNC-Causing Violations Resolved in Past 2 Years + 8 Future RNC Violations In "Early Detection"

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<th>Monit. Period/Event</th>
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<th>Limit Value</th>
<th>Repor Value</th>
<th>Exceedance %</th>
<th>Date Rece</th>
<th>RNC Status</th>
<th>RNC Resol Date</th>
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Walkthrough 3

Identifying old “legacy” violations that may require data clean-up
8,905 Unresolved Violations for 211 Selected Facilities + 8 SNC-Causing Violations Resolved in Past 2 Years + 22 Future RNC Violations in "Early Detection/Unresolved SNC" Category.
8,985 Unresolved Violations for 211 Selected Facilities + 8 SNC-Causing Violations Resolved in Past 2 Years + 22 Future RNC Violations in "Early ...

--- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | ---
Readington-Lebanon Sta (NJ86493729) | Jan 2020 | - | - | PR631 - Preheating Performance | Late Schedule Event | Early Detection | - | - | - | - | -
Stage II Treatment Plant (NJ86020965) | Jan 2020 | - | - | PR631 - Preheating Performance | Late Schedule Event | Early Detection | - | - | - | - | -
Tuxedo Park VSTP (NJ86013126) | Dec 2019 | - | - | 82209 - Sewer System Evaluation Report | Updated SSEES | CAR - Schedule Event | 1NC - Unresolved RNC | - | - | - | - | -
NYCDEP - Oakwood Beach (NJ86013126) | Dec 2019 | - | - | CBS15 - Commerce | Late Schedule Event | Early Detection | - | - | - | - | -
### 7 Unresolved Violations for Meadowbrook-Limestone WWTP + 6 SNC-Causing Violations Resolved in Past 2 Years + 6 Future RNC Violations in °Ea…

#### Facility Filters
- **Region**
- **State**
- **POTW Flag**
- **Permitting Agency**
- **Current Quarter SNC Flag**
- **Major/Minor**

#### Facility Filters
- **Region**
- **State**
- **POTW Flag**
- **Permitting Agency**
- **Current Quarter SNC Flag**
- **Major/Minor**

If data downloads are not working properly, use more filters.
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Questions?

For more information contact Daniel Teitelbaum (EPA R2) at Teitelbaum.Daniel@epa.gov,
Rusty Wasem (EPA HQ) at Wasem.Russell@epa.gov or
Katherine Green (EPA R2) at Green.Katherine@epa.gov.
Additional Data Reviews Performed by R2 Data Management Team Leader Using the Tool:

• Review the full list of facilities with an unofficial status of SNC as of the second month following the end of the quarter, and consult appropriate personnel again as needed
  • Goal at this point is to see if any data should be corrected to resolve or eliminate violations before the official RNC run

• Re-review the unofficial list in the two weeks between the last RNC run and publication of official statuses, to identify any additional facilities now coming up as SNC
  • Goal at this stage is to re-run or manually override facility-level statuses that are incorrect as of the last RNC run
Resulting Data Clean-Up Activities:

- Correcting ICIS-NPDES data that caused violations to be detected erroneously, including:
  - Errors in permit limit data entry that cause false effluent/non-receipt violations
  - Errors in schedule event dates
- Manually resolving old violations (up to 20+ years) that do not resolve on their own
- Entering missing SEV resolution or schedule event completion dates
- Linking violations to order that addresses them, in order to change status from unresolved to resolved pending
- Manually setting violations to “resolved pending” when they are being addressed by an open order that ICIS will not allow us to link them to
- Manually resolving nonreceipt violations caused by invalid NoDI codes after determining that there was a valid reason data was not submitted
- Manually resolving violations caused by glitches in data transfer from state database
  - E.g., NJ’s data system does not distinguish between a DMR that was missing and an on-time DMR where a single value was later revised, or between pretreatment report violations that are or are not SNC
- Rerunning RNC status when corrected data is entered in ICIS after final RNC run (2 months after end of quarter)
- Manually overriding RNC statuses when ICIS error causes erroneous SNC designation
  - E.g., if an SNC violation is RP at the end of a quarter and becomes resolved by back in compliance before the RNC run, the RNC run for the quarter erroneously treats it as unresolved as of the end of the quarter