



# **SNC Rate Reduction Strategies**

**Florida Department of  
Environmental Protection  
January 2020**



# Florida SNC Trends

**In 2013, efforts began to correct or resolve noncompliance at Quarterly Noncompliance Report (QNCR) identified facilities**

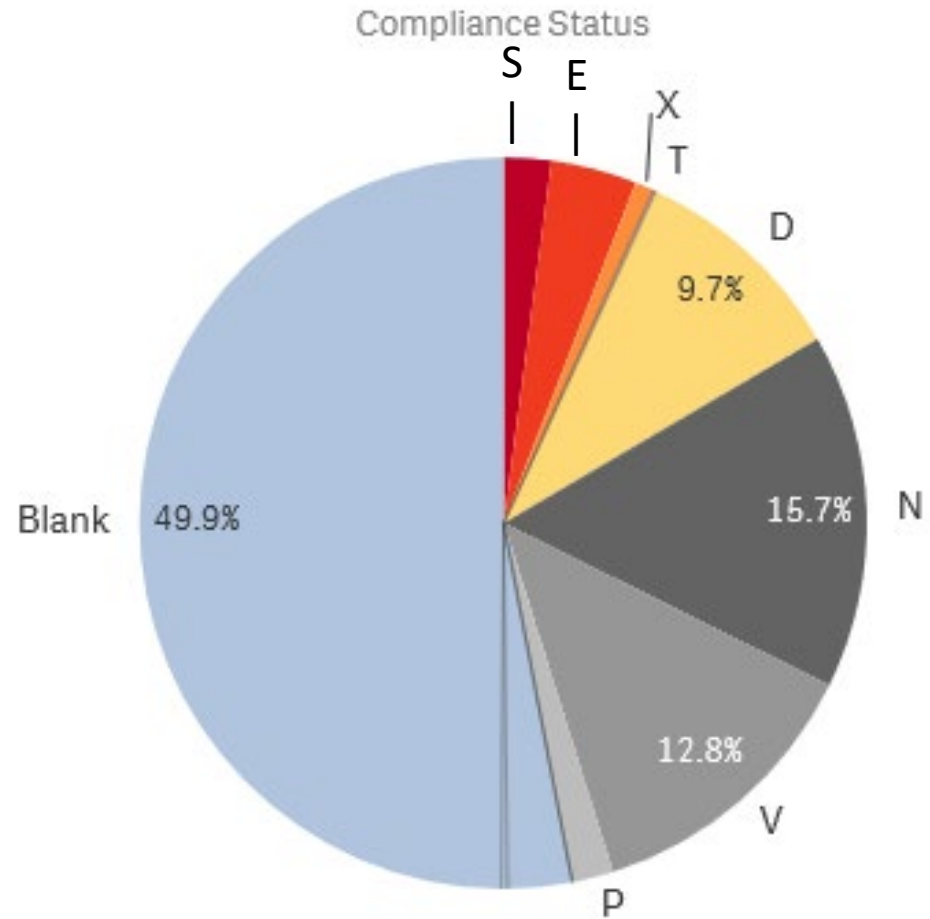
**Facilities in Category 1  
Non-Compliance (All, Individual)**





# Nationwide SNC/ Category 1

- **FY2019Q3**
- **9.7% for Discharge Monitoring Report (DMR) non-receipt (labeled D) out of an overall 16.6% SNC rate**

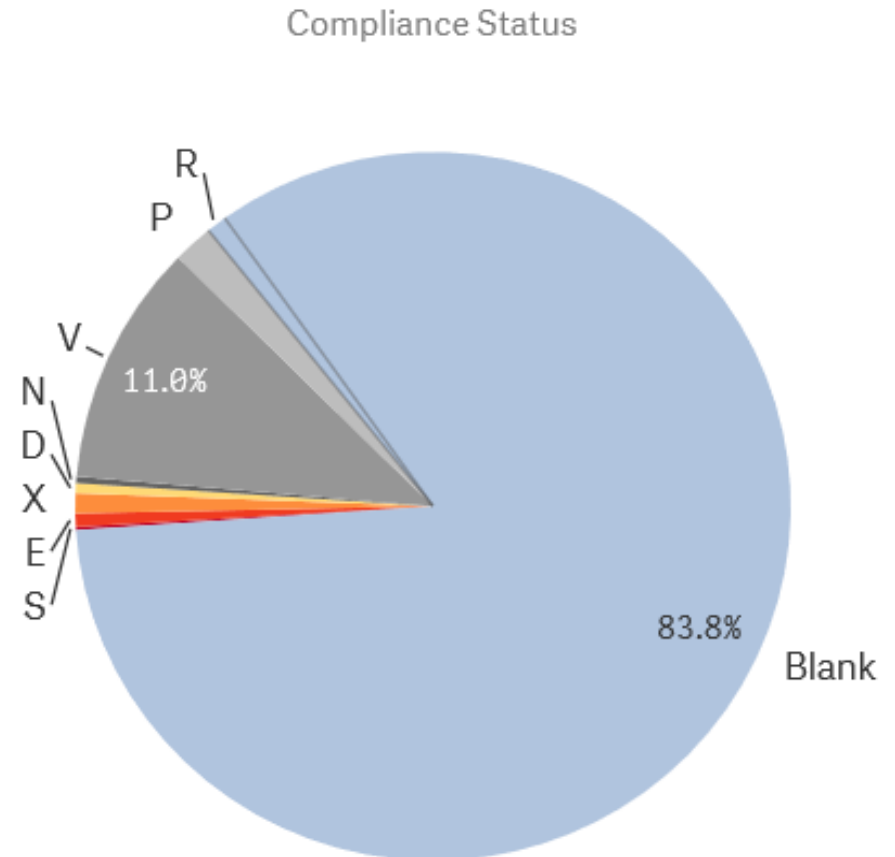






# Florida SNC/ Category 1 Rate

- **FY2019Q3**
- **2.1% SNC/Cat. 1 rate (14 facilities out of 661)**
- **Florida's biggest contributor to the SNC rate is effluent violations of the non-monthly average, followed by monthly average effluent violations**





# Leadership Focus

- **DEP leadership noted the improvements that were possible in its Air Program's SRF evaluations, and created similar expectations for its Water Program**

## Areas of Strong Performance

- **FDEP CAA met or exceeded expectations in all elements of the SRF.**



- **Interest grew in maintaining accuracy of publicly-facing ECHO data, and the annual data verification was given priority**



# SRF Round 3 Results

## CWA Element 4 — Enforcement

### Finding 4-2

### Area for State Improvement

### Summary

The State's Enforcement Responses were not always timely or appropriate.

- **Creation of timely and appropriate guidance for resolving QNCR violations**
  - **Made clear expectations for when enforcement should be executed**
  - **Resolves SNC through enforcement**

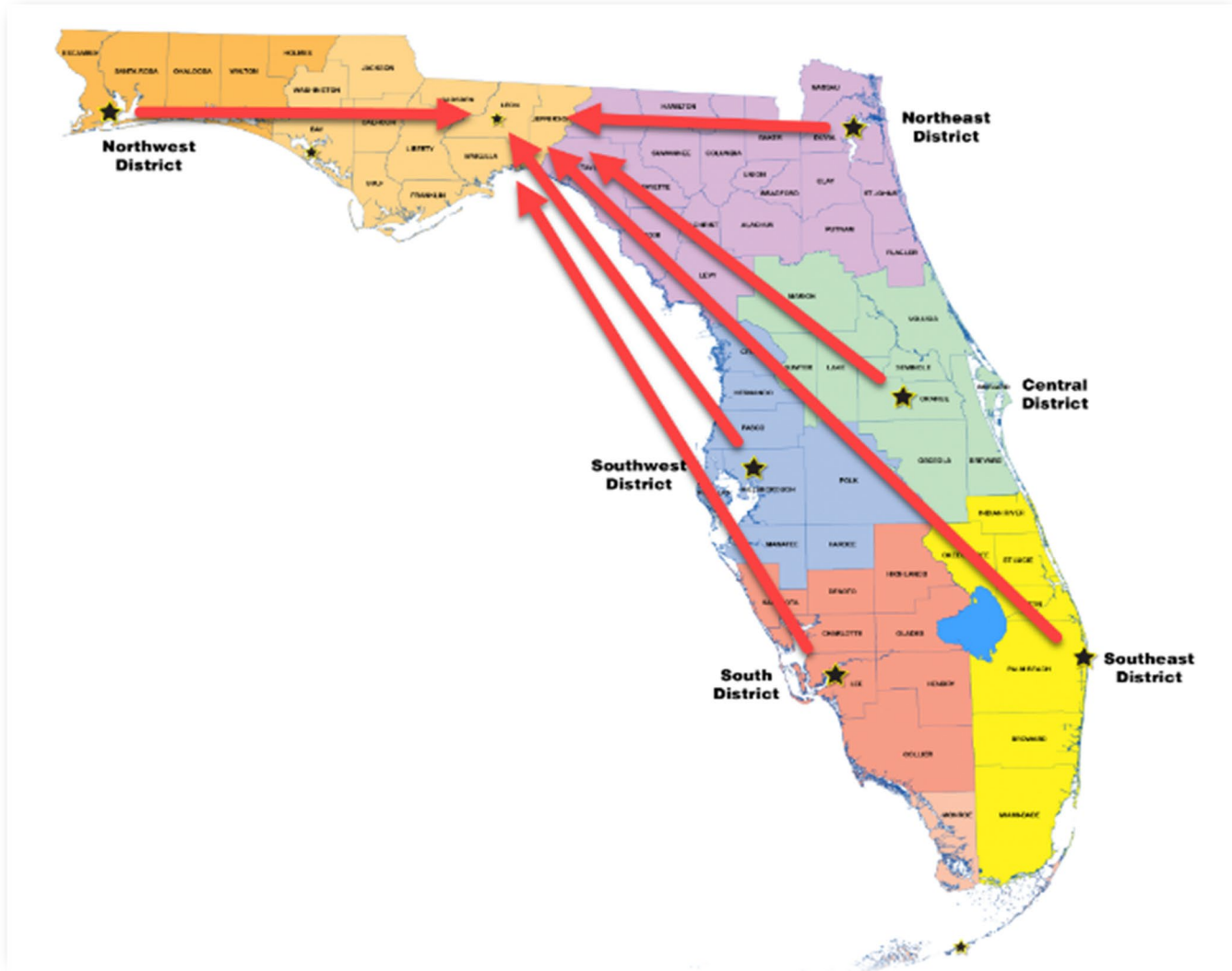


# Database Resources

- **Compliance and Enforcement Tracking (COMET) is Florida's internal database which catalogues and organizes all compliance and enforcement activities at NPDES and non-NPDES facilities**
- **Dedicated database staff create reports for new retrieval needs – IT staff member as well as internal Compliance and Enforcement staff member**



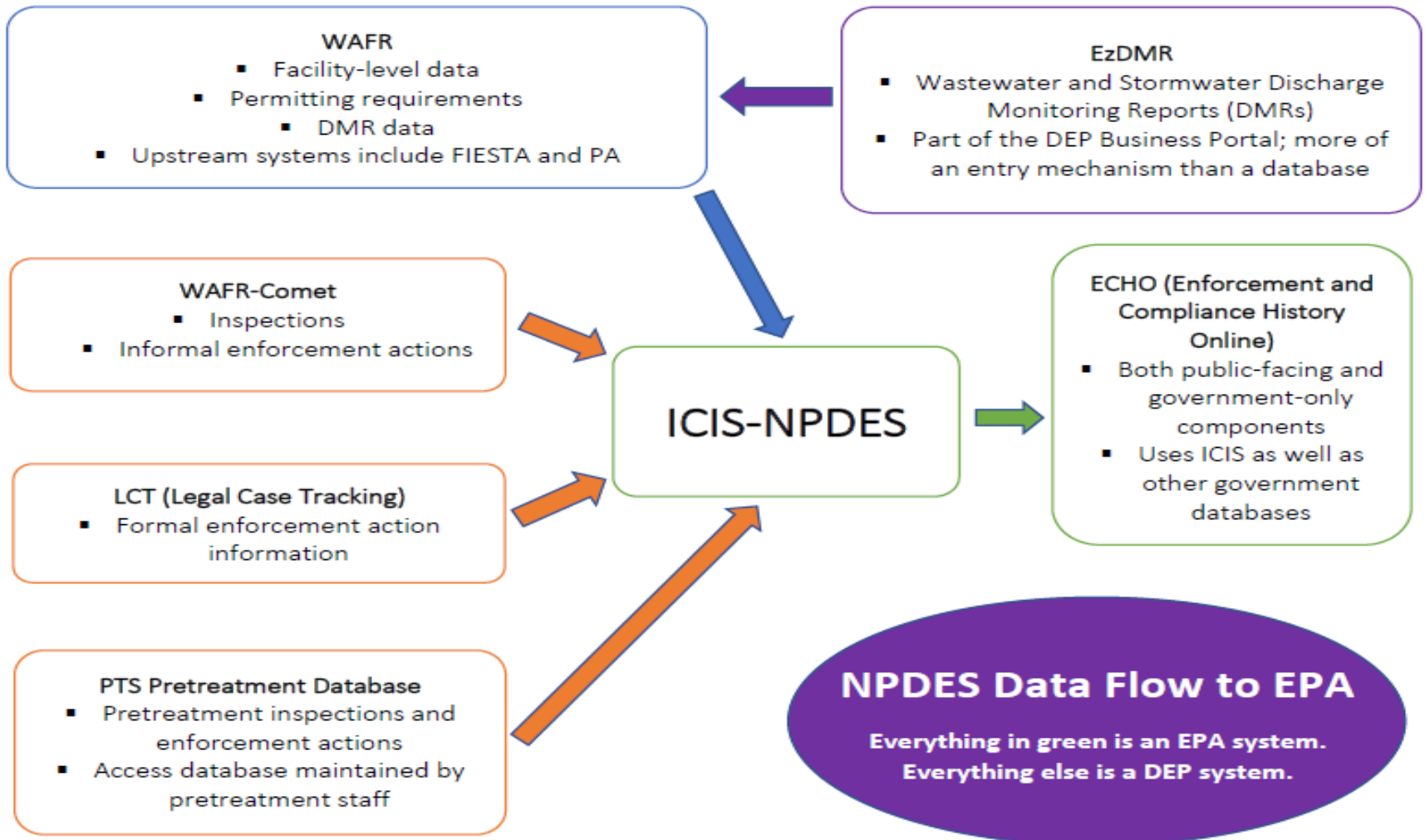
# Centralized QNCR Handling







# Reporting Violations





# Missing DMRs

- **Proactive measures**
- **Missing Outfalls Report**
  - **Rolling window of missing DMRs**
  - **Call facility to ensure DMR submittal**

C	D	E	F	G	H
Curr. Major Minor Status	NPDES ID	Facility Name	WAFR Monitoring Group	DMR Report Frequency	Monitoring Period
Minor	FL0023426	IDEAL MOBILE HOME PARK WWTF	D-001	Quarterly	09/30/2019
Minor	FL0042617	PORT BUENA VISTA WWTF	D-001	Monthly	10/31/2019
Minor	FL0043176	PARADISE POINT WWTF	D-001	Monthly	10/31/2019



# Effluent Violations

- **QNCR Exceedance Identifier Report**
  - Internal report that calculates TRC and chronic effluent violations before the appearance on the QNCR

**Florida Department of Environmental Protection**  
**QNCR Exceedance Identifier Report**  
 Report Generated from DOPPLER - FLDEP 12/9/2019

Search Criteria:  
 Begin Date = 01/01/2019  
 End Date = 12/09/2019

**Violation Flag Definitions:**

- TRC1** - Exceedances 1.4 times the limit occurred during two or more months for the same Group I pollutant within a six-month period.
- TRC2** - Exceedances 1.2 times the limit occurred during two or more months for the same Group II pollutant within a six-month period.
- CHR** - Exceedances occurred for the same parameter during four or more months within a six-month period that do not meet the Technical Review Criteria (TRC).
- EFF** - Effluent violations that do not meet the TRC but appear with TRC violations for the same parameter within the same six-month period.

FacilityID	Facility Name	Facility Status	Facility Type	Rank	County	Office										
Monitor Group	Monitor End Date	Report Freq	Monitor Location	Param Code	Param Description	PCS Code	Prefix	Result	Limit	Unit	Stat Base	Violation Group	TRC Limit	Violation Flag		
<b>FL0020109</b>	Winter Garden WWTF	A	DW	MA	ORANGE	CD										
D-001	5/31/2019	MO	EFF-1	p 00665	Phosphorus, Total (as P)	1		1.10	0.75	mg/L	WA - Wkly Avg	Group I	1.05	TRC1		
D-001	8/31/2019	MO	EFF-1	p 00665	Phosphorus, Total (as P)	1		1.9	0.75	mg/L	WA - Wkly Avg	Group I	1.05	TRC1		
<b>FL0020125</b>	City of Wewahitchka "Ricky McMillan" WWTP	A	DW	MI	GULF	NWDP										
D-001	1/31/2019	MO	EFF-01	p 00600	Nitrogen, Total	1		11.6	10.0	mg/L	MB - Maximum	Group I	14	CHR		
D-001	3/31/2019	MO	EFF-01	p 00600	Nitrogen, Total	1		10.7	10.0	mg/L	MB - Maximum	Group I	14	CHR		
D-001	6/30/2019	MO	EFF-01	p 00600	Nitrogen, Total	1		11.6	10.0	mg/L	MB - Maximum	Group I	14	CHR		
D-001	7/31/2019	MO	EFF-01	p 00600	Nitrogen, Total	1		11.4	10.0	mg/L	MB - Maximum	Group I	14	CHR		



# Compliance Schedules

- **ICIS Compliance Schedule Date Report**
  - **Monthly report of upcoming Consent Order milestones**

Schedule Forecast Report: Date report was run: 12/2/19

District	Facility Type	NPDES ID	Facility Name	Schedule Event	Schedule Date	Days Between Schedule Date and Current Date
C	DW	FL0020141	SANFORD, CITY OF - NORTH WWTF	Achieve Final Compliance With Emission or Discharge Limits	12/31/2019	29
C	DW	FL0036251	WEKIVA HUNT CLUB WWTP	Achieve Final Compliance With All Obligations Under This order	12/31/2019	29
NE	DW	FL0020907	BUNNELL, CITY OF WWTF	Achieve Final Compliance With All Obligations Under This order	10/31/2019	-32
NE	DW	FL0023493	MANDARIN WATER RECLAMATION FACILITY	Achieve Final Compliance With All Obligations Under This order	01/28/2020	57
NE	DW	FL0023604	MONTEREY WRF	Achieve Final Compliance With All Obligations Under This order	01/28/2020	57
NE	DW	FL0026000	BUCKMAN RMF	Achieve Final Compliance With All Obligations Under This order	01/28/2020	57



# Ongoing Issues

- **Timely execution of enforcement**
- **Timely and appropriate resolutions guidance**
  - **Changed from 120 to 180 days**
  - **Difficult to meet deadline**
- **Meeting compliance schedule milestones**
- **Overwhelming workload**
- **Lack of prioritization**





# Facilities Contributing to Florida's SNC FY2019Q3

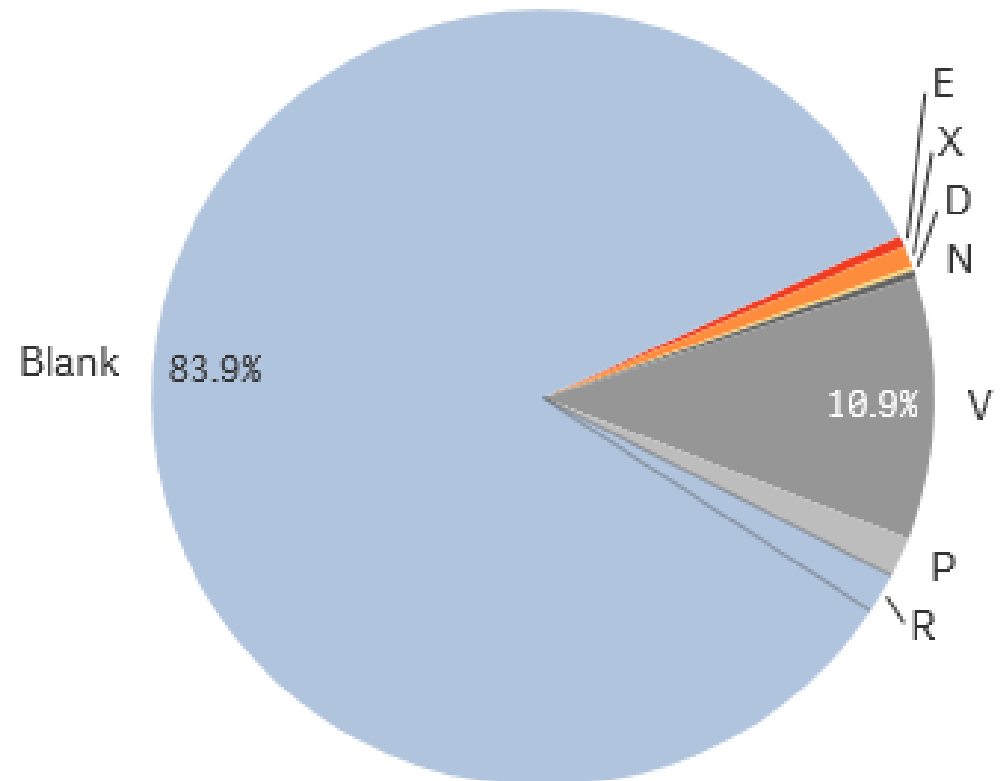
- **Currently, there are three facilities that have extended enforcement execution dates.**
  - **Resolution if enforcement was performed according to the timely and appropriate guidance.**
- **Missing DMRs account for three of the facilities contributing to SNC.**
  - **Resolution with the proactive measures DEP is performing for missing DMRs.**



# Outlook for Florida FY2019Q4

- **1.5% SNC Rate**
- **Very low DMR non-receipt**

Compliance Status





# Compliance & Enforcement Contacts

## Florida Department of Environmental Protection Division Water Resource Management

Contact	Phone Number	Email
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