# Overview of Enforcement under the Safe Drinking Water Act (SDWA)

#### HILLARY HECHT ENFORCEMENT OFFICER US EPA, REGION 9 ENFORCEMENT DIVISION UIC/PWSS/FIFRA SECTION MARCH 2015

1

#### **Region 9 Enforcement Division Programs**

 Inspections, enforcement, and oversight of all federal statutes and primacy programs (few exceptions)

- Environmental Justice Coordination
- National Environmental Review Act Program

## **Drinking Water Enforcement**

• Role(s) of the drinking water enforcement section

• Enforcement Division coordination with Region 9 Water Division

• In FY14, Enforcement Division conducted drinking water inspections in Indian Country and joint inspections with States

• PWS Inspectors have observed violations ranging from failure to post public notifications to mcl Exceedances

• Enforcement Tracking Tool (ETT)







# Enforcement Response Policy (ERP) Signed on Dec. 8, 2009



http://www.epa.gov/compliance/resources/policies/civil/sdwa/drinking\_water\_erp\_2009.pdf

#### **Enforcement Response Policy**

• System-based approach that prioritizes public water systems by assigning a point score based on the threat to public health.

× Sum (S1+S2+S3 +...) + n

# **The Formula**

- Sum of: (S1 + S2 + S3...) + n
- **S** = Severity of the violation
  - $\circ$  10 points
    - For each acute health based violation
  - 5 points
    - For other health-based violation and Total Coliform Rule (TCR) <u>repeat</u> monitoring violation,
    - For each nitrate monitoring and reporting violation
  - 1 point
    - For each other monitoring and reporting or any other violation
- **n** = number of years that the system's oldest violations have been unaddressed (0-5)

# **Examples of Priority PWSs per the ERP**

PWS	Violations - # and Severity (S)	Years (n)	Score (∑S) + n				
ABC Town	2 acute turbidity exceedances.	0 (both in current year)	(10+10)+0	20			
DEF MHP	2 non-acute TCR MCL violations.	1 (1 in previous year)	(5+5) +1	11			

#### How does a PWS get on EPA's Radar?

- A national enforcement priority is defined as a system scoring **11** points **or higher** using the S+n formula.
- Targeting systems that are significant non-compliers with health based violations.

Image: Description of the second of the s	INIT   DOME   XERT   PAGE LAYOUT   FORMULAS   DATA   REEW   VEW   Market View   Market Vie															
	INIT   DOME   XERT   PAGE LAYOUT   FORMULAS   DATA   REEW   VEW   Market View   Market Vie					ſ	$ \rightarrow $									
	INIT   DOME   XERT   PAGE LAYOUT   FORMULAS   DATA   REEW   VEW   Market View   Market Vie							)								
	INIT   DOME   XERT   PAGE LAYOUT   FORMULAS   DATA   REEW   VEW   Market View   Market Vie						Ľ									
India   Next   PARAL Hally   Mail   Repart Hally   Mail     India   Status   India   Center   X     India   Center   India   X   X     India   Center   Enforcement Response Policy Targeting Tool - PVVS Ranking using Sum (G11 + 22 + 33 +) + Promula:   India   X   X   M   O   P   Q   India     India   Center   India	Induit   Note:   Note: <t< td=""><td>🚺 🔒 🔊 ở °</td><td><mark>⊘</mark> ∓</td><td></td><td>ERP_Tool_Ja</td><td>n_2015_09  </td><td>[Read-On</td><td>ly] - Excel</td><td></td><td></td><td></td><td></td><td></td><td></td><td>? 🖅 -</td><td>- 8 ×</td></t<>	🚺 🔒 🔊 ở °	<mark>⊘</mark> ∓		ERP_Tool_Ja	n_2015_09	[Read-On	ly] - Excel							? 🖅 -	- 8 ×
Lat   C   D   E   F   G   H   J   K   L   N   O   P   C     1   -   PWS Ranking using Sum (15) + S2 + S3 +) + F Ormula .   -	Cita   I   X   I   X   L   N   O   P   Q   I     1   A   8   C   D   E   F   G   H   J   K   L   M   O   P   Q   I     1   The Enforcement Response Policy Targeting Tool - PWS Ranking using Sum of (3t + 52 + 53 +) + n Formula - I   I   Database: Jane 2015 WDSFED Freeze   I <t< td=""><td>FILE HOME IN</td><td>NSERT PAGE LAYOUT FORMULAS DATA F</td><td>REVIEW</td><td>VIEW</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>Hecht, Hi</td><td>illary - 🔍</td></t<>	FILE HOME IN	NSERT PAGE LAYOUT FORMULAS DATA F	REVIEW	VIEW										Hecht, Hi	illary - 🔍
Image: Construction	A   B   C   D   E   F   G   H   J   K   L   M   N   O   P   C     1   The Enforcement Response Policy Targeting Tool - PWS Ranking using Sum of (31 + s2 + 33) + n Formula -   Image: Community -   Image:	I SECURITY WARNING	G Macros have been disabled. Enable Content													×
The Enforcement Response Policy Targeting Tool • PVS Ranking using Sum of (st + S2 + S3 +) + no Formula .     a state provide the provide th	The Enforcement Response Policy Targeting Tool PWS Ranking using Sum Of (\$1 + \$2 + \$3 +) + n Formula .     Database:	Q14 • :	$\times \checkmark f_x$													^
The Enforcement Response Policy Targeting Tool • PVS Ranking using Sum of (st + S2 + S3 +) + no Formula .     a state provide the provide th	The Enforcement Response Policy Targeting Tool PWS Ranking using Sum Of (\$1 + \$2 + \$3 +) + n Formula .     Database:															
Image: constraint of the set of set	Image: Im	A B C							J	К	L	м	Ν	0	Р	Q ^
Image:	Image: Constraint of the second sec	1														
PA   state   PV/SID   PV/SIAme   ETT   Spe hav   PV/SI   PV/SID	PA   Provide   PWST and Tert   Syste Name   PWST Syste Name   PWST Syste Name   PWST Syste Name   Repeat Name   Stace Date   OnePath   School or Risce Date   School or Nince Date			11		(						)14)				
Region   Region   Note Date   Note Date   Note Date   Note Date   Chidcare     5   19   09   0900005101   Tores Maturez Clinic.   99   N   NT/CWS   221   Nation Path   100   117   22   Nation Path   100   117   22   Nation Path   100   117   22   Nation Path   100	Field   Fierd   Since Date   Vio   Its   Childcare     5   90   09   090000394   Mishangoon (Upper Signulovi/Upper Mishangnov)   104   N   C/VS   426   122   22   Not on Path      6   09   09   090000394   Mishangoon (Upper Signulovi/Upper Mishangnov)   49   N   C/VS   426   122   22   Not on Path       6   09   090000156   Filter Signulovi/Upper Mishangnov)   49   N   C/VS   226   Not on Path        Not on Path       Not on Path          Not on Path <td>3</td> <td>D DIA/Gliama</td> <td>CTT.</td> <td>Sue heel D</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>-</td> <td></td> <td></td> <td></td> <td></td> <td></td>	3	D DIA/Gliama	CTT.	Sue heel D						-					
5 05 06 06 06040034 Mishongnovi (Upper Sipaulovi/Upper Mishongnovi) 104 N CVWS 426 122 122 124 Idd on Path   6 06 06060513 Tores-Madrinez, Clinic. 99 N NTNOWS 266 128172009 117 221 Nd on Path   7 09 05 06040010 Spaulovi/Lower Mishongnovi) 49 N CVWS 223 Mick on Path   7 09 05 060400156 Tile River Researation Main 24 N CVWS 2240 Mick on Path   10 09 09 093200164 FL McDermit Patiate-Shoshone - Upper 23 N CVWS 8100 1231/2014 64 41 Net on Path   10 09 094040206 Molecon259 Strungapain 21 N CVWS 329 12/21/2014 64 41 Net on Path   10 09 094040206 Molecon259 Strungapain 21 N CVWS 329 12/21/2014 31 20 Not on Path	5   6   9   9   9   9   N   CVS   24   22   22   12	Region			Tier 1	ws type P	op sivu	Since Date			OliPadi					
8 09 09 09400106 Polacca 26 N CVVS 2.600 560.02013 135 23 Not on Path   10 09 09 093000166 FL McDermitt Paiute-Shoshone - Upper 23 N CVVS 2.500.550.550.150.101 64 41 New 1   11 09 09 093000165 Nume CVVS 2.500.550.150.101 64 41 New 1 </td <td>8   99<!--</td--><td>5 09 09 09040</td><td>0394 Mishongnovi (Upper Sipaulovi/Upper Mishongnovi)</td><td>104</td><td>N C</td><td></td><td>450</td><td>12/31/2009</td><td>122</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></td>	8   99 </td <td>5 09 09 09040</td> <td>0394 Mishongnovi (Upper Sipaulovi/Upper Mishongnovi)</td> <td>104</td> <td>N C</td> <td></td> <td>450</td> <td>12/31/2009</td> <td>122</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td>	5 09 09 09040	0394 Mishongnovi (Upper Sipaulovi/Upper Mishongnovi)	104	N C		450	12/31/2009	122							
b   0.9	8   09 </td <td>6 09 09 09060 7 09 09 09040</td> <td>5130 Torres-Martinez Clinic 0107 Sipaulovi (Lower Sipaulovi/Lower Mishongnovi)</td> <td>49</td> <td>N C</td> <td>WS</td> <td>523</td> <td>9/30/2013</td> <td>121</td> <td>2</td> <td>4 Not on Path</td> <td></td> <td></td> <td></td> <td></td> <td></td>	6 09 09 09060 7 09 09 09040	5130 Torres-Martinez Clinic 0107 Sipaulovi (Lower Sipaulovi/Lower Mishongnovi)	49	N C	WS	523	9/30/2013	121	2	4 Not on Path					
11 09 09 09400308 Numogani 21 N CWS 1.500 9/30/2014 54 14 Not on Path   13 09 09 09400308 Moenawe Community 14 N CWS 1/200 9/30/2014 56 43 Not on Path   14 09 09 09400208 White Meas - NTUA 14 N CWS 3/30 2/12/214 41 28 Not on Path Image Community - BiA 12 N N/NTCWS 3/36 2/12/21/214 41 28 Not on Path Image Community - BiA 12 N CWS 5/50 3/31/2014 30 20 Not on Path Image Community - BiA 12 N CWS 5/50 3/31/2014 30 20 Not on Path Image Community - BiA 12 N CWS 5/50 3/31/2014 30 20 Not on Path Image Community - BiA 10 N CWS 1,095 18 8 Not on Path Image Community - BiA Image	11 09 09 09400259 Shungopani 21 N CWS 15.00 930/2014 54 14 No PM	9 09 09 09040	0106 Polacca 0156 Tule River Reservation Main							2	3 Not on Path 3 Not on Path					
14 09 09 090400261 White Mesa - NTUA 14 N C/WS 380 373/2014 20 10 Not on Path   15 09 09 093534020 Fort Wingate Conter 13 N NTN/CWS 325 1/31/2014 30 20 Not on Path 10   16 09 09 09300676 Coccopah Bend RV& Golf Resort 10 N CWS 55 1/31/2014 30 20 Not on Path   19 09 094000676 Coccopah Bend RV& Golf Resort 10 N CWS 900 18 8 Not on Path 10 N CWS 900 18 9 Not on Path 10 N CWS 900 18 9 Not on Path 10 N CWS 300 19 11 11 N N CWS 300 19 11 11 12 10 N CWS 300 19 11 11 11 N N N 13 S4 48 Not on Path 12 10 90	14   09   09   09400209   White Mesa. NTLA   14   N   CWS   380   031/2014   20   10 Not on Path     15   09   09   09400209   Hopic Unitral Center   13   N   NTINCWNS   325   12/231/2014   41   28   New   Image: Comparison of the Comparison of	10 09 09 09320 11 09 09 09040	0164 Ft. McDermitt Paiute-Shoshone - Upper 0259 Shungopavi						64 54							
14 09 09 090400261 White Mesa - NTUA 14 N C/WS 380 373/2014 20 10 Not on Path   15 09 09 093534020 Fort Wingate Conter 13 N NTN/CWS 325 1/31/2014 30 20 Not on Path 10   16 09 09 09300676 Coccopah Bend RV& Golf Resort 10 N CWS 55 1/31/2014 30 20 Not on Path   19 09 094000676 Coccopah Bend RV& Golf Resort 10 N CWS 900 18 8 Not on Path 10 N CWS 900 18 9 Not on Path 10 N CWS 900 18 9 Not on Path 10 N CWS 300 19 11 11 N N CWS 300 19 11 11 12 10 N CWS 300 19 11 11 11 N N N 13 S4 48 Not on Path 12 10 90	14   09   09   09400209   White Mesa. NTLA   14   N   CWS   380   031/2014   20   10 Not on Path     15   09   09   09400209   Hopic Unitral Center   13   N   NTINCWNS   325   12/231/2014   41   28   New   Image: Comparison of the Comparison of	12 09 09 09040 13 09 09 09040	3008 Moenave Community	16	N C	WS	32	12/31/2013	19		7 Not on Path					
16 09 09 093324020 Fort Wingste Community - BIA 12 N CWS 550 37312014 30 20 Not on Path   17 09 09 090400676 Cocopah Bend RV & Golf Resort 10 N CWS 1,095 18 8 Not on Path 10 10 N CWS 10,095 18 8 Not on Path 10 10 N CWS 900 18 9 Not on Path 10 N CWS 900 18 9 Not on Path 10 N CWS 900 18 9 Not on Path 10 N CWS 900 18 9 Not on Path 10 N CWS 30 19 11 10 10 10 10 N CWS 30 19 11 10 10 10 10 10	16 (09 09 09534020 [Fort Wingate Community - BIA 12 N CWS 550 (331/2014) 30 20 [Not on Path   17 (09 09 099060741 Jack Noton School 11 N NTIXCWS 551 (41) Not on Path   18 (09 09 099060747 [Gostnet (Upper) 10 N CWS 1,095 18 8 Not on Path   19 (09 09 093200172 [Gostnet (Upper) 10 N CWS 40 559 50 Not on Path   21 (09 09 093200172 [Gostnet (Upper) 10 N CWS 40 559 50 Not on Path   22 (09 09 09403011 Dzil Libei (Cameron) Elementary School 7 N CWS 30 19 11   23 (09 09 094040316 Hopi Vetrans Center 7 N CWS 314 14 7   24 (09 09 0990405062 [Montgomery Creek Rancheria 7 N CWS 334 14 7   26 (09 09 099040103 [Havasupai Village 7 N CWS 344 14 7   26 (09 09	14 09 09 09040	0209 White Mesa - NTUA	14	N C	WS	380	3/31/2014	20	1	0 Not on Path					
18 09 09 090400376 Cocopan Bend RV & Golf Resort 10 N CWS 1,905 18 8 [Not on Path]   19 09 09 093200177 Goshute (Upper) 10 N CWS 900 18 9 Not on Path   20 09 09 093200177 Goshute (Upper) 10 N CWS 400 59 50 [Not on Path]   20 09 09 093200177 Yomba Indian Reservation 8 N CWS 30 19 11     20 09 09 090400311 Dzi Libei (Cameron) Elementary School 7 N NTNCWS 133 54 48 Not on Path    20 09 09 090400102 Harasupai Vintary 7 N CWS 315 14 11 [Not on Path]    20 09 090400102 Harasupai Village 7 N CWS 373 54 48 Not on Path]    25 09 090400102 Harasupai Village 5 N CWS 90	18 09 09 09400076 Cocopah Bend RV & Colf Resort 10 N CWS 1,095 18 8 Not on Path   19 09 09 093200360 Schurz (Walker River) 10 N CWS 900 18 9 Not on Path 10 N CWS 400 59 50 Not on Path 10 N CWS 40 59 50 Not on Path 10 N CWS 40 59 50 Not on Path 10 N CWS 40 59 50 Not on Path 10 N CWS 40 59 50 Not on Path 10 N CWS 30 19 11 10 N CWS 30 19 11 10 N CWS 30 19 11 Not on Path 10 N CWS 30 19 11 Not on Path 10 N CWS 31 54 48 Not on Path 10 10 N NCWS 103 Not on Path 10 10 10 N <t< td=""><td>16 09 09 09353</td><td>4020 Fort Wingate Community - BIA</td><td>12</td><td>N C</td><td>WS</td><td>550</td><td>3/31/2014</td><td>30</td><td>2</td><td>0 Not on Path</td><td></td><td></td><td></td><td></td><td></td></t<>	16 09 09 09353	4020 Fort Wingate Community - BIA	12	N C	WS	550	3/31/2014	30	2	0 Not on Path					
20 09 09 09200177 Goshute (Upper) 10 N CWS 40 59 50 Not on Path   21 09 09 093200172 Yomba Indian Reservation 8 N CWS 30 19 11   21 09 09 09403011 Dial Label (Cameron) Elementary School 7 N NTNCWS 133 54 48 Not on Path   26 09 09 090605062 Montgomery Creek Rancheria 7 N CWS 315 14 11 Not on Path   26 09 090605062 Montgomery Creek Rancheria 7 N CWS 315 14 11 Not on Path   26 09 090400102 Havasupai Village 7 N CWS 713 54 48 Not on Path   26 09 090400102 Havasupai Campground 6 N TNCWS 200 6 1 Not on Path   27 09 0904002013 Havasupai Campground 5 N CWS 90 24 20 Not on Path<	20 69 093200172 Gostude (Upper) 10 N CWS 40 59 50 Not on Path   21 69 09 093200172 Gostude International Indian Reservation 8 N CWS 30 19 11   21 09 09 094040311 Dzil Libei (Cameron) Elementary School 7 N NTNCWS 133 54 48 Not on Path   23 09 09 094040316 Hoji Veterans Center 7 N CWS 315 14 11 Not on Path   24 09 09 094040010 Havasupai Village 7 N CWS 34 14 7   25 09 09 094040102 Havasupai Village 7 N CWS 73 54 48 Not on Path   26 09 09 094040102 Havasupai Village 7 N CWS 73 54 48 Not on Path   27 09 09 094040102 Havasupai Vallage Admin. Complex 5 N CWS 90	18 09 09 09040	0676 Cocopah Bend RV & Golf Resort	10	N C	WS	1,095		18		8 Not on Path					
22 09 09 090400311 Dzil Libei (Cameron) Elementary School 7 N NINCWS 133 54 48 Not on Path   23 09 09 090400316 Hopi Vetrans Center 7 N CWS 315 144 11 Not on Path   24 09 09 090400316 Havasupai Cameground 7 N CWS 344 14 7   25 09 09 090400102 Havasupai Cameground 6 N NCWS 73 54 48 Not on Path   26 09 09 090400102 Havasupai Cameground 6 N NTNCWS 200 6 1 Not on Path   27 09 09 090605128 Round Valley Admin. Complex 5 N CWS 90 24 20 Not on Path   28 09 09 090400121 Havasupai Cametha 5 N CWS 450 108 8 Not on Path   28 09 09 0904002151 Narino Nath 5 N CWS	22 09 09 090403011 IZ21 Libei (Cameron) Elementary School 7 N NTNCWS 133 54 48 Not on Path   23 09 09 090400316 Hopi Vetrans Center 7 N CWS 315 14 41 Not on Path   24 09 09 090400102 Havasupal Village 7 N CWS 314 44 7   25 09 09 090400102 Havasupal Village 7 N CWS 373 54 48 Not on Path   25 09 09 090400102 Havasupal Village 7 N CWS 773 54 48 Not on Path   26 09 090400102 Havasupal Village 7 N CWS 90 24 20 Not on Path   27 09 090400102 Havasupal Vater System 5 N CWS 90 24 20 Not on Path   29 09 090400120 Yavasi Apache - Tuniii 5 N CWS 450 108 80 Not on Path   29 09 090	20 09 09 09320	0177 Goshute (Upper)	10	N C	WS	40		59	5	0 Not on Path					
24 09 09 090605062 Montgomery Creek Rancheria 7 N CWS 34 14 7   25 09 09 090400102 Havasupai Village 7 N CWS 773 54 48 Not on Path   26 09 09 090400102 Havasupai Campground 6 N TNCWS 200 6 1 Not on Path   27 09 09 090605128 Mitomkai Tibal Water System 5 N CWS 90 24 20 Not on Path   26 09 09 090605128 Mandy Alley Admin. Complex 5 N NTNCWS 100 24 23 Not on Path   26 09 09 090400120 Yavapai Apache - Tunli 5 N CWS 450 108 8 Not on Path   30 09 090400215 Yavapai Apache - Tunli 5 N CWS 70 14 9   31 09 090400215 TOCC 5 N CWS 1574 12 8 Not on Path	24   09   09   090605062   Montgomery Creek Rancheria   7   N   CWS   34   14   7     25   09   09   090400102   Havasupal Village   7   N   CWS   73   54   48 Not on Path     25   09   09   090400102   Havasupal Campground   6   N   TRCWS   200   6   1 Not on Path     27   09   09   090605120   Micomkai Tinbal Water System   5   N   CWS   90   24   20 Not on Path     26   09   09   090605128   Round Valley Admin. Complex   5   N   NTXCWS   100   24   23 Not on Path     26   09   09   090605121   Anxiso - Mobile Home Park   5   N   CWS   70   14   9   10   109   09   09300302   Rock Springs Community - NTUA   5   N   CWS   500   6   1   1   10   10   09   09300000215   Rock Springs Community - NTUA<	22 09 09 09040	3011 Dzil Libei (Cameron) Elementary School	7	N N	TNCWS	133		54	4	8 Not on Path					
26   09   09   090001013   Havasupai   Campground   6   N   TNCWS   200   6   1   Not on Path     27   09   09   090605120   Mitomkai Tribal Water System   5   N   CWS   90   24   20   Not on Path     28   09   09   090605128   Round Valley Admin. Complex   5   N   NTNCWS   100   24   23   Not on Path     29   09   09   090605121   Aniso - Mobile Home Park   5   N   CWS   450   108   8   Not on Path     30   09   09   0904002151   Toxico - Mobile Home Park   5   N   CWS   70   14   9	26 (99   09   09400103   Havasupai Campground   6   N   NCWS   200   6   1 Not on Path     27 (93   09   090605120   Mitomkai Tibal Water System   5   N   CWS   90   22   20 Not on Path     27 (93   09   090605120   Mitomkai Tibal Water System   5   N   CWS   90   22   20 Not on Path     29 (99   09   090605120   Maugai Apache - Tunhii   5   N   CWS   450   108   8 Not on Path     29 (99   09   0906005120   Anosai Apache - Tunhii   5   N   CWS   450   108   8 Not on Path     30 (99   09   090400120   Yavasai Apache - Tunhii   5   N   CWS   700   14   9     31 (99   09   0930400215   TOCC   5   N   CWS   500   6   1     32 (90   09   0930400215   Second Masa Day School - BIA   5   N   CWS   376   27   3 Not on	23 09 09 09040 24 09 09 09060	0316 Hopi Veterans Center 5062 Montgomery Creek Rancheria	7	N C	WS	34		14		7					
27   09   09   0900605120   Mitomkai Tibai Water System   5   N   CWS   90   24   20   Not on Path     28   09   09   0900605128   Mitomkai Tibai Water System   5   N   NTNCWS   100   24   23   Not on Path     29   09   09   090400120   Yavapai Apache - Tunlii   5   N   CWS   450   108   8   Not on Path     30   09   09   090400120   Yavapai Apache - Tunlii   5   N   CWS   450   108   8   Not on Path     30   09   09   090400215   Torkin   5   N   CWS   70   14   9     31   09   09   090400215   Torkin   5   N   CWS   70   14   9     32   09   09   090400215   Torkin   5   N   CWS   1574   12   8   Not on Path     32   09   09	27   09   09   090605120   Minimize Tystem   5   N   CWS   90   24   20 Not on Path     28   09   09   090605128   Round Valley Admin< Complex	26 09 09 09040	0103 Havasupai Campground	7	N C'	WS NCWS	773		54 6		1 Not on Path					
29   09   090400120   Yavapai Apache - Tunlii   5   N   CWS   450   108   8 Not on Path     30   09   09   090606121   Aviso - Mobile Home Park   5   N   CWS   70   14   9     31   09   09   090400215   TOCC   5   N   CWS   70   14   9     32   09   09   090400215   TOCC   5   N   CWS   500   6   1     32   09   09   090400025   Second Mesa Day School - BIA   5   N   CWS   376   27   3   Not on Path     34   09   09   09060015   Second Mesa Day School - BIA   5   N   CWS   336   16   13	29   09   09   09400120   Yaxapa Apache - Tunlii   5   N   CWS   450   108   8 Not on Path     30   09   0906005121   Aniso - Mobile Home Park   5   N   CWS   70   14   9     31   09   09   0936003215   FOCC   5   N   CWS   500   6   1     32   09   09   093600322   Rock Springs Community - NTUA   5   N   CWS   500   6   1     32   09   09   093600302   Rock Springs Community - NTUA   5   N   CWS   1,574   12   8 Not on Path     33   09   09   093600302   Rock Springs Community - NTUA   5   N   CWS   3,76   2,77   3 Not on Path     34   09   09   093600302   Mose Paive Travel Plaza   5   N   CWS   335   16   13     35   09   09   093200208   Bodee Flat Mobel Home Park   4	27 09 09 09060	5120 Mitomkai Tribal Water System	5	N C	WS	90		24	2	0 Not on Path					
32   09   09   090400057   Second Mesa Day School - BIA   5   N   CWS   1,574   12   8 Not on Path     33   09   09   090400057   Second Mesa Day School - BIA   5   N   CWS   376   27   3 Not on Path     34   09   09   090600138   Lone Pine   5   N   CWS   335   116   13	32   09   09   09320032   Rock Springs Community - NTUA   5   N   CWS   1.574   12   8 Not on Path     33   09   09   09340037   Second Mesa Day School - BIA   5   N   CWS   376   27   3 Not on Path     34   09   09   090600138   Lone Pine   5   N   CWS   335   16   13     35   09   09   93200200   Magaa Paiute Travel Plaza   5   N   NTNCVUS   410   411   37 Not on Path     36   09   093200208   Bodie Flat Mobie Home Park   4   N   CWS   400   445   42 Not on Path	29 09 09 09040	0120 Yavapai Apache - Tunlii	5	N C	WS	450		108							
33 09 09 09400057 Second Mesa Day School - BIA 5 N CWS 376 27 3 Not on Path 34 09 09 090600138 Lone Pine 5 N CWS 335 16 13	33 (09   09   09 (09400057)   Second Mesa Day School - BIA   5   N   CWS   376   27   3 Not on Path     34 (09   09   090600138   Lone Pine   5   N   CWS   335   16   13     35 (09   09   093200200   Moapa Paiute Travel Plaza   5   N   NTNCWS   410   41   37 Not on Path     36 (09   0932002808   Bodie Flat Moble Home Park   4   N   CWS   40   445   42 Not on Path	31 09 09 09060 31 09 09 09040	0212 I JAIVISU - MODIle Home Park 0215 TOCC	5	N C	WS	500		6		9 1					
34 109 109 1090600138 Lone Pine 5 N CWS 335 16 13	34 (09   09   090600138   Lone Pine   5   N   CWS   335   16   13     35 (09   09   093200200   Moapa Paiute Travel Plaza   5   N   NTNCWS   410   41   37   Not on Path     36 (09   09   093200368   Bodie Flat Moble Home Park   4   N   CWS   40   45   42   Not on Path	33 09 09 09040	0057 Second Mesa Day School - BIA	5	N C	WS	376		27		8 Not on Path 3 Not on Path					
35 09 09 093200200 Moapa Paiute Travel Plaza 5 N NTNCWS 410 41 37 Not on Path	36 09 09 093200368 Bodie Flat Moble Home Park 4 N CWS 40 45 42 Not on Path	34 09 09 09060 35 09 09 09320	0138 Lone Pine 0200 Moapa Paiute Travel Plaza	5	N N	TNCWS	410		41	1	3 7 Not on Path					
	37 09 09 090400206 Tuba City Community - NTUA 4 N CWS 6 762 13 11		0368 Bodie Flat Moble Home Park		N C	WS			45	4						

### **Enforcement Response Policy Objectives**

- EPA and States take formal enforcement actions within 6 months of a PWS appearing on the ERP list
- Resolve drinking water violations
- Take steps to address public water systems that are out of compliance

#### How do you get off the Enforcement Radar?

• Return to Compliance

• Formal Enforcement Action(s)

### **Return to Compliance**

• A public water system has completed monitoring, reporting or implementation of treatment or other activities to be in compliance with the regulations

#### **Formal Enforcement Action(s)**

- (1) contain a description of the non-compliant violation, a citation to the applicable State, or federal law or rule, a statement of what is required to return to compliance, and a compliance schedule; and
- (2) provide the State with authority to impose penalties for violation(s) of the State's enforcement document.

# **EPA-NDEP Coordination**

• EPA's Office of Enforcement & Compliance Assurance (OECA)

**Produces quarterly Enforcement Tracking Tool** 

• EPA Region 9

Sends ETT to NDEP

• EPA Region 9 and NDEP

Quarterly discussion on systems 11 and above

• NDEP

Addresses systems within 6 months of appearing on the ERP list

• Cycle Repeats