

Enforcement: Why You Should Do Your Own Reporting

MI-AWWA / MWEA Joint
Conference

August 12, 2010

Soaring Eagle Resort and Conference Center

Adrienne Nemura
Jeremy Grush
Jason Rutyna

LimnoTech
Ann Arbor, MI







**Excuse me 'mam. I'm
with Clean Water Action.
Can I have a few
minutes of your time?**

The New York Times



Toxic Waters *A series about the worsening pollution in American waters and regulators' response*

Find Water Polluters Near You

[+](#) SHARE | [FEEDBACK](#) | [✉ E-MAIL](#)

Across the nation, the system that Congress created to protect the nation's waters under the Clean Water Act of 1972 today often fails to prevent pollution. The New York Times has compiled data on more than 200,000 facilities that have permits to discharge pollutants and collected responses from states regarding compliance. Information about facilities contained in this database comes from two sources: the Environmental Protection Agency and the California State Water Resources Control Board. The database does not contain information submitted by the states. [Full Story »](#)

[What's in your water?](#) | [State enforcement records](#) | [Data and comments from the states](#) | [The discussion](#) | [Series: Toxic Waters »](#)

Search by city or zip code

Search

Alabama
Alaska

Missouri
Montana

In order to view this feature, you must download the latest version of flash player here.

Industrial Waste

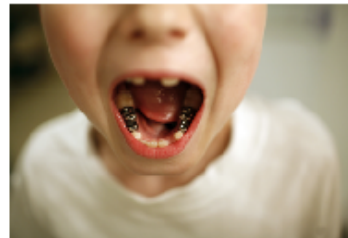
September 12, 2009

Pollution Grows With Little Fear of Punishment

By CHARLES DUHIGG

Almost four decades after Congress passed the Clean Water Act, the rate of water pollution violations is rising steadily. In the past five years, companies and workplaces have violated pollution laws more than 500,000 times. But the vast majority of polluters have escaped punishment.

• [How Safe Is Your Water?](#)



Damon Winter/The New York Times

Ryan Massey, 7, shows his caps. Dentists near Charleston, W. Va. say pollutants in drinking water have damaged residents' teeth.

Clean Water Act Violations:

Find Water Polluters Near You

Select a State



Video: Coal in the Water

Jennifer Hall-Massey explains how water pollution, which she believes is caused by nearby coal companies, has impacted her family and community.

<http://projects.nytimes.com/toxic-waters>

From: Pristine River Watershed Council
To: PRWC Membership
cc:
Subject: Toxic Waters

The New York Times has analyzed enforcement data and found that violations of the Clean Water Act and Safe Drinking Water Act have doubled in Michigan since 1980. The PRWC has been working hard to ensure that NPDES permits are not a license to pollute! But we need to do more. Please take action by...

Why does this keep happening?

1. EPA's system needs an overhaul
 - (which they are doing!)
2. “This is too complicated...”
3. Good news is no news
4. I just want to do my job
 - I don't want to draw attention to my facility...
 - I don't want to be compared to other facilities...



IT'S TIME FOR CHANGE

Not a political endorsement!

EPA is making it easier for people to get data for your facility (even if it's bad data!)



http://www.epa-echo.gov/echo/compliance_report_water_pcs.html

Last updated on Monday, June 07, 2010

Enforcement & Compliance History Online (ECHO)

You are here: [EPA Home](#) [Compliance and Enforcement](#) [ECHO](#) [Search Water Data](#) [PCS Data](#)
search



Search Compliance Data (Water Program - PCS)

Facility Characteristics



Permit Expiration Date: No Restrictions

Combined Sewer Systems: No Restrictions

Watershed Criteria

Search

Watershed (HUC) - Click Map or List to Select Code

(Display only)

Discharging into Impaired Waters (category 4 or 5):

Inspection/Enforcement History

Search

Time Since Last Inspection: No Restrictions

Notices of Violation and Informal Actions: No Restrictions

Formal Enforcement Actions: No Restrictions

Compliance Information

Search

Current Status:

- In Significant Non-Compliance (SNC)**
- Category I Violations (Minors only)**
- RNC/Category II Violations**
- Effluent Exceedances**
- Single Event Violations**
- Compliance Schedule Violation**
- Permit Schedule Violations**
- In Compliance/Undetermined**

History:

of Effluent Exceedances (past 3 years):

No Restrictions

Quarters in SNC or Cat 1 Violation (past 3 years):

No Restrictions

Quarters in Violation (past 3 years):

No Restrictions

Already checked!





Number of Permits in the Huron River Watershed

Facility Type	MDNRE	EPA PCS
Groundwater	5	1
Mobile Home Parks	5	2
Commercial	9	1
Industrial	15	13
Public Services	19	12
Total	53	29

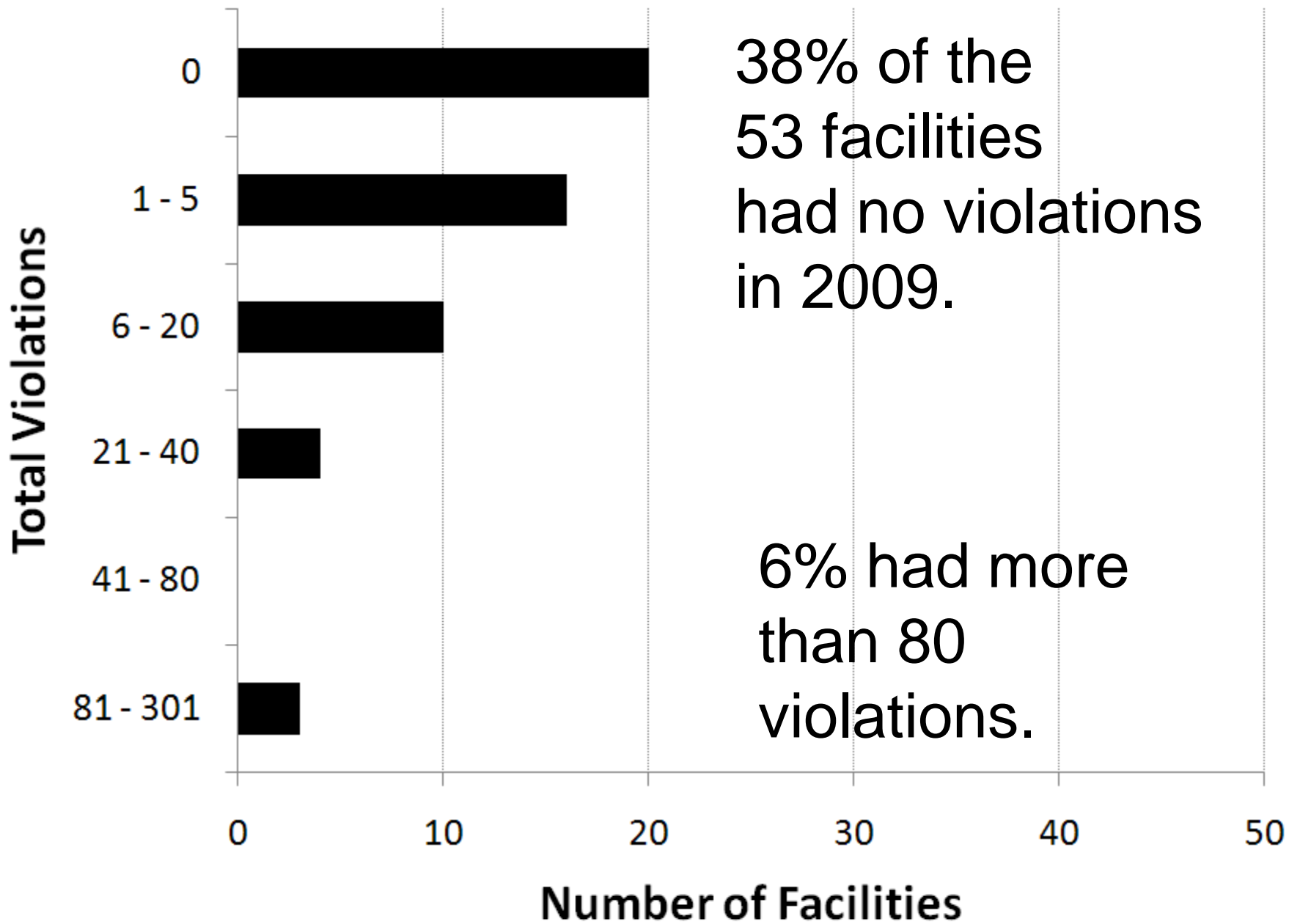


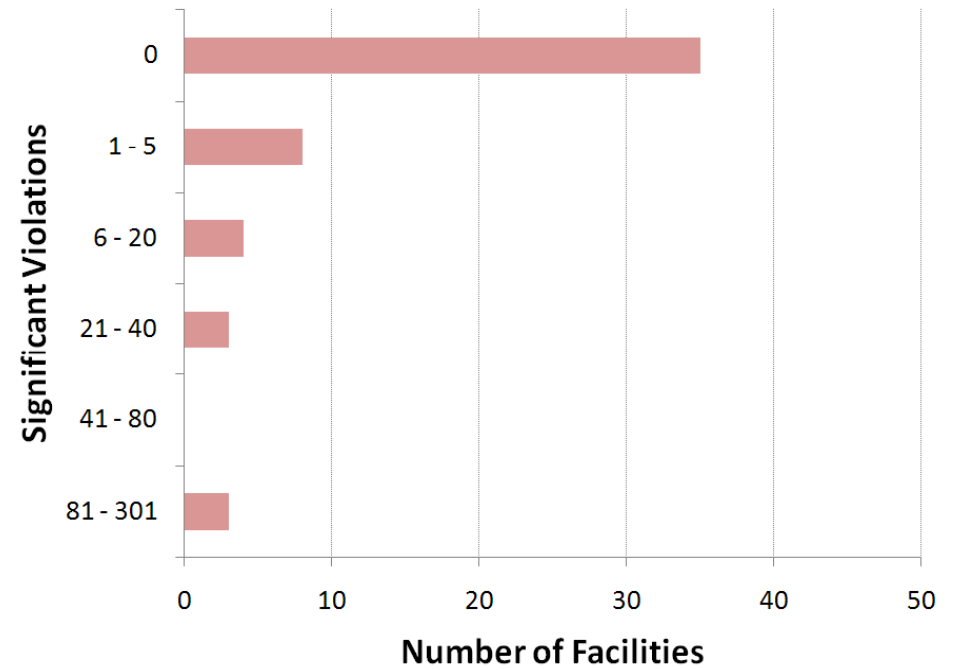
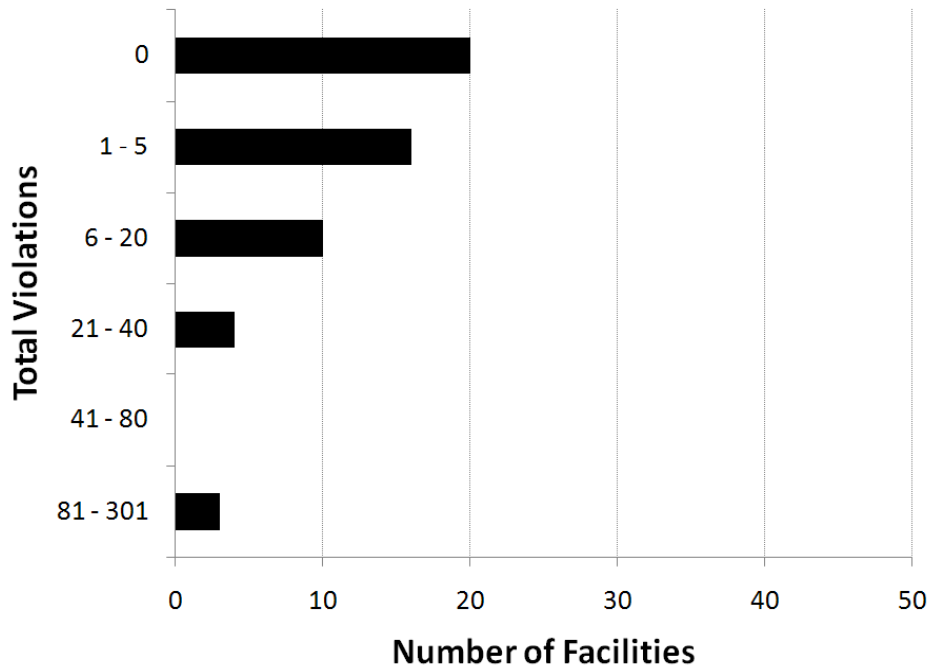
Violation Types

- Significant Violations
 - Exceed maximum concentration limit
 - Exceed maximum loading limit
 - Violate minimum concentration limit

- Less Significant Violations
 - Late DMR
 - Late compliance schedule
 - Wrong sample type
 - Value or unit not reported

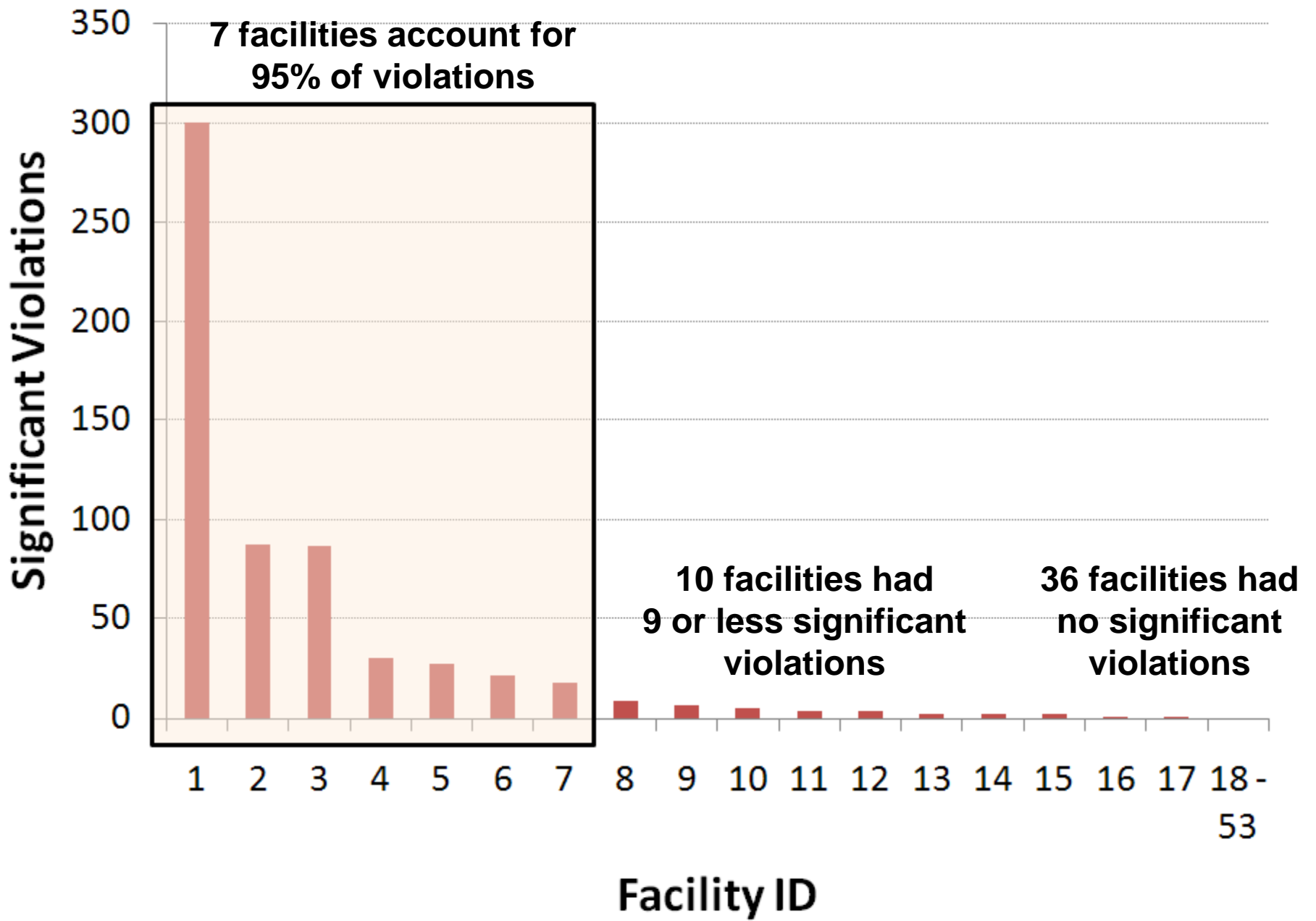




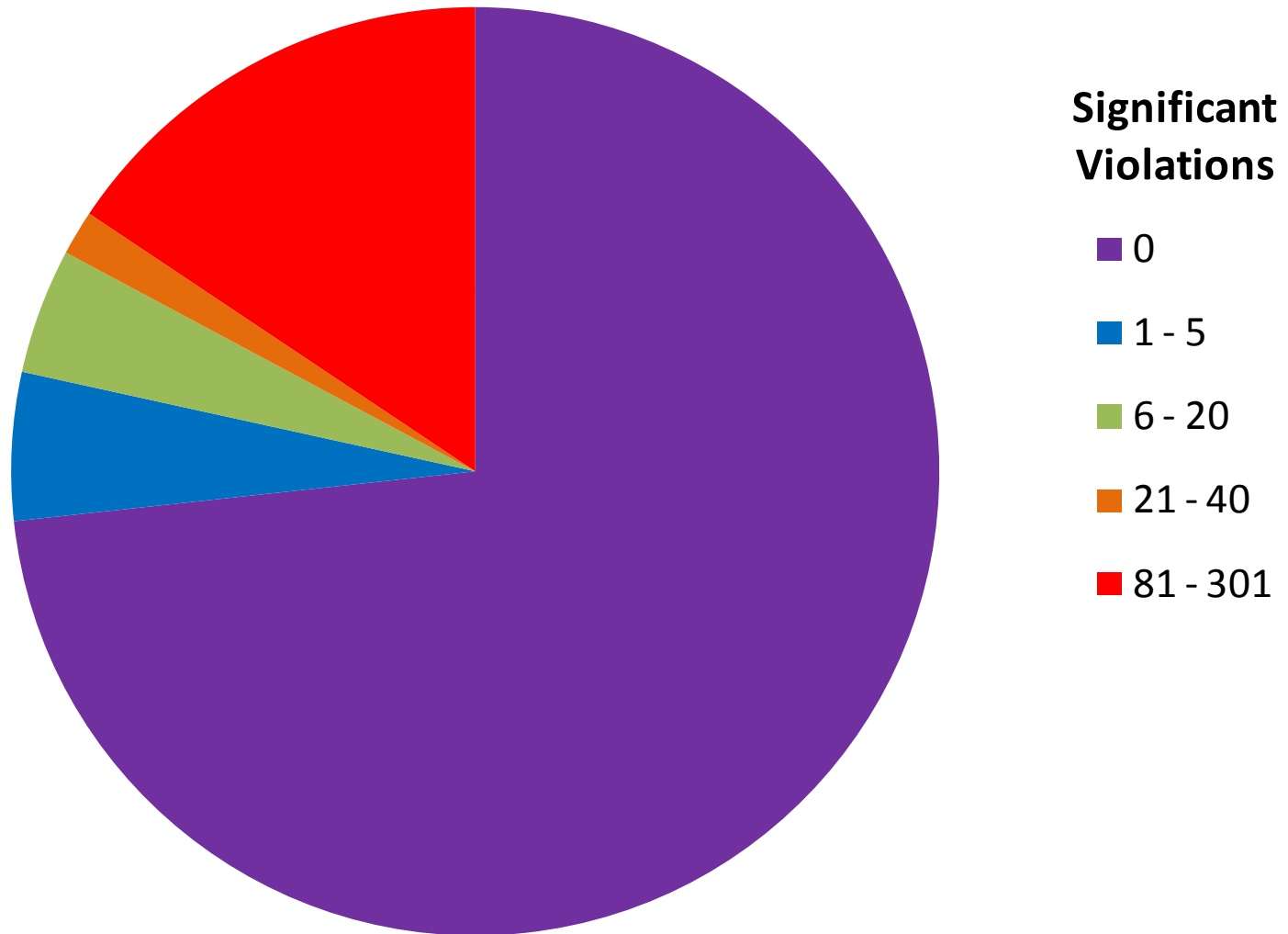


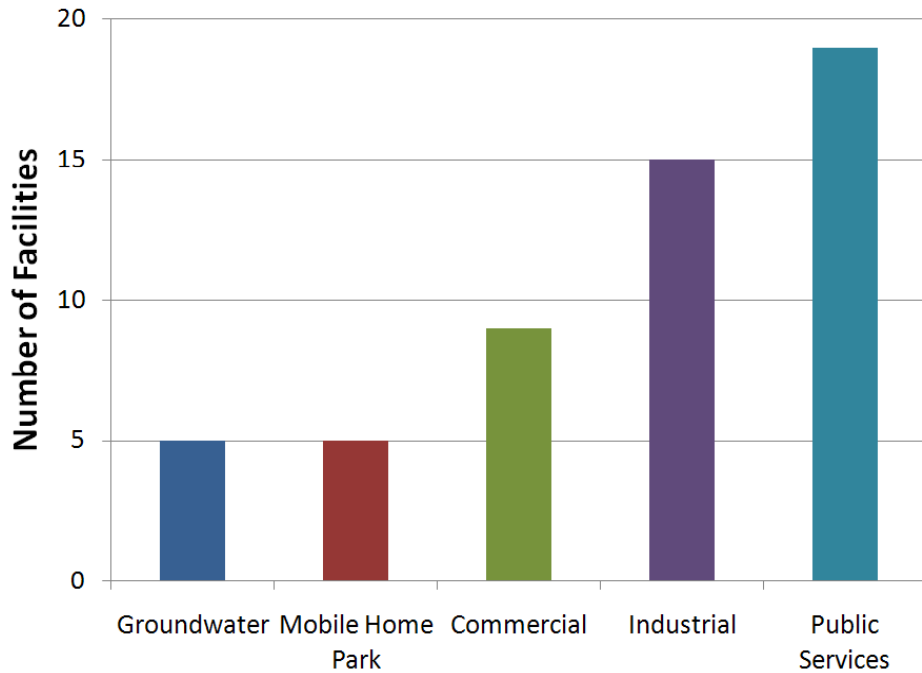
35 facilities (66%) had no significant violations.

The number of facilities with 1 to 20 violations also decreased.



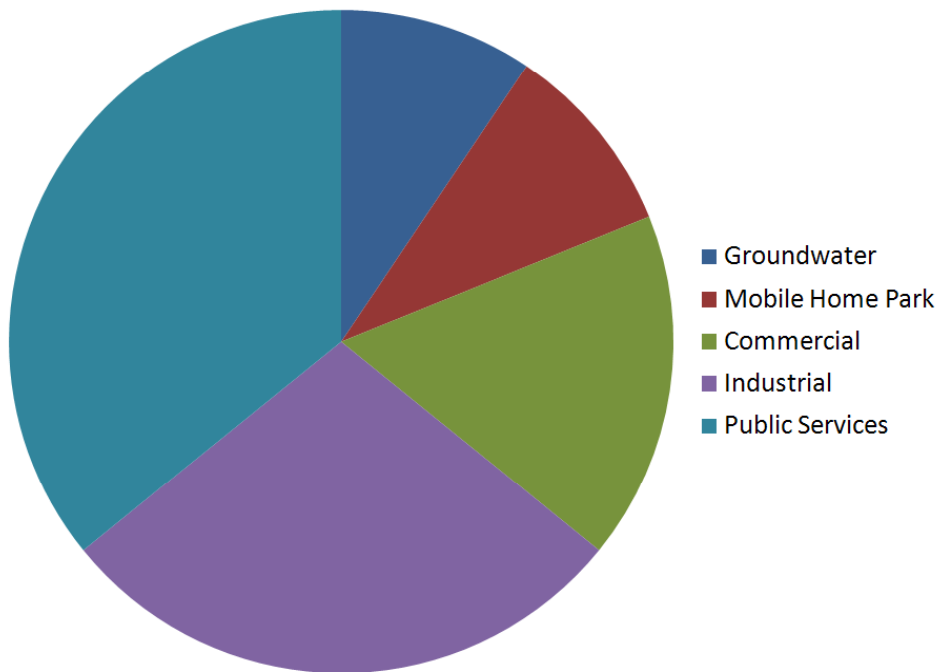
Permitted Discharges to Huron River Watershed (MGD)

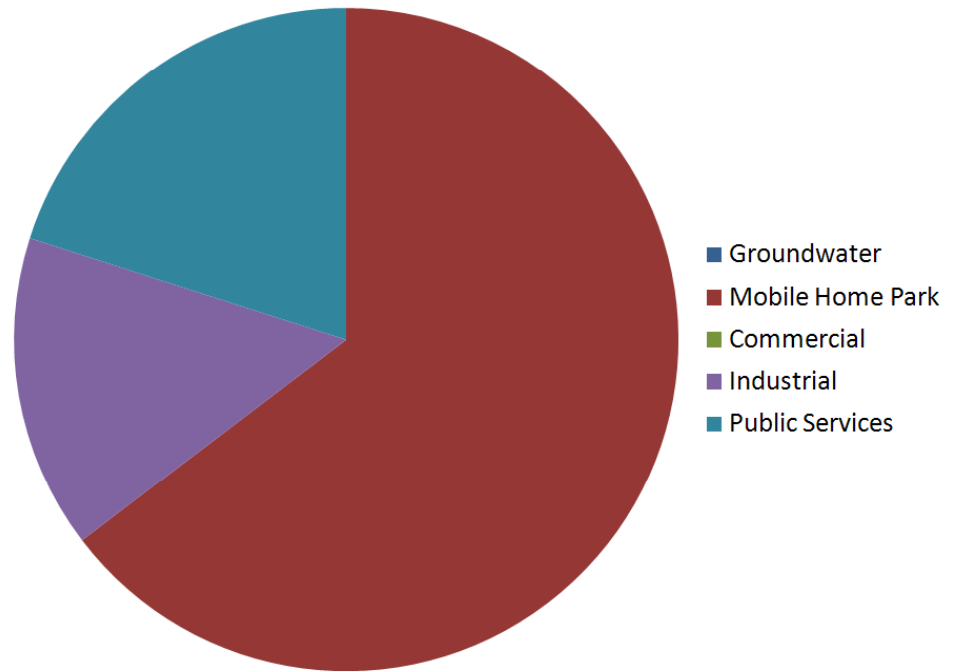
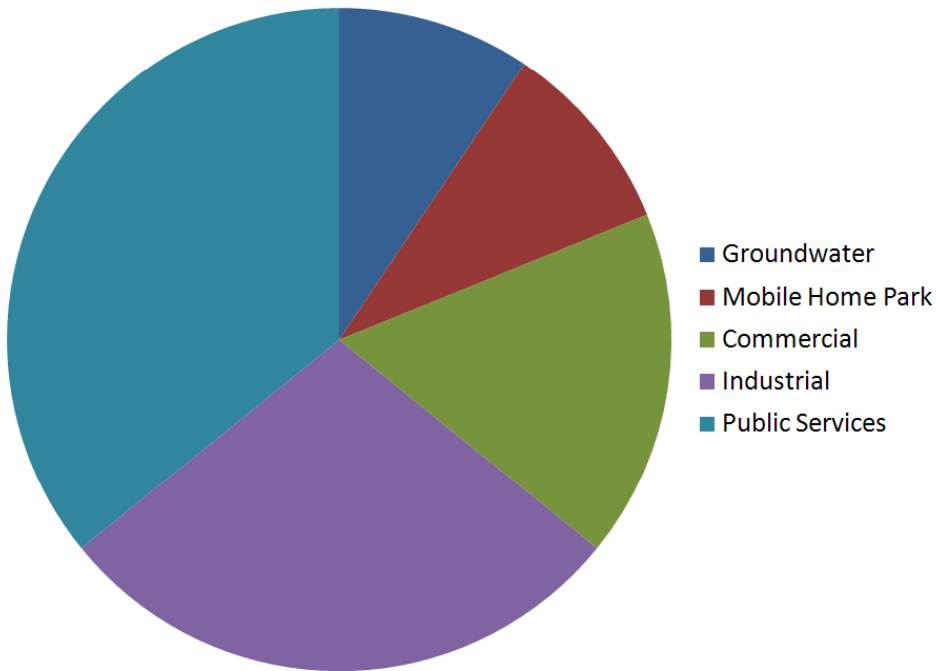
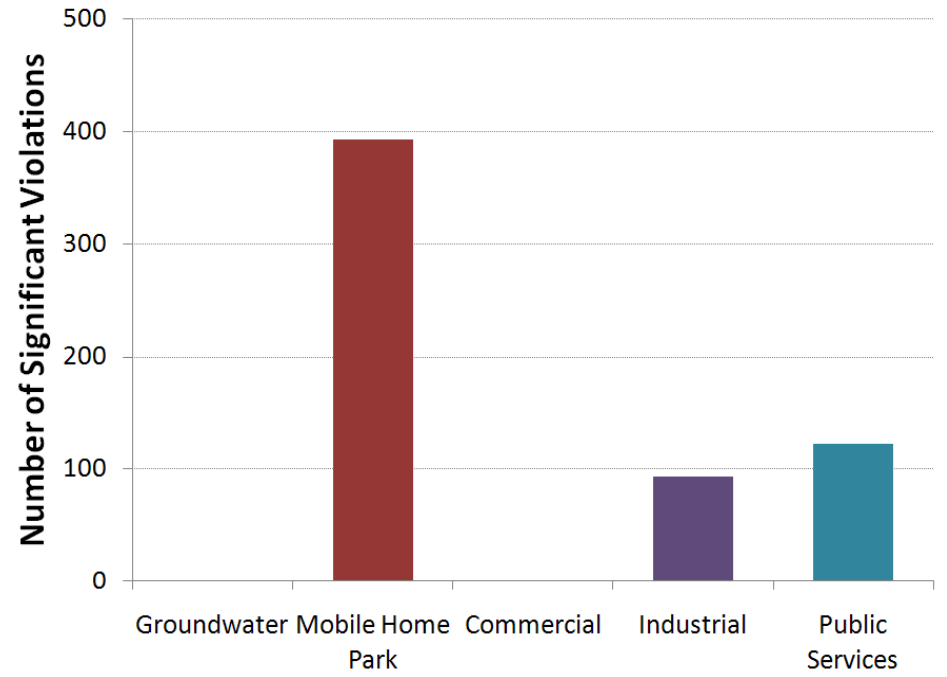
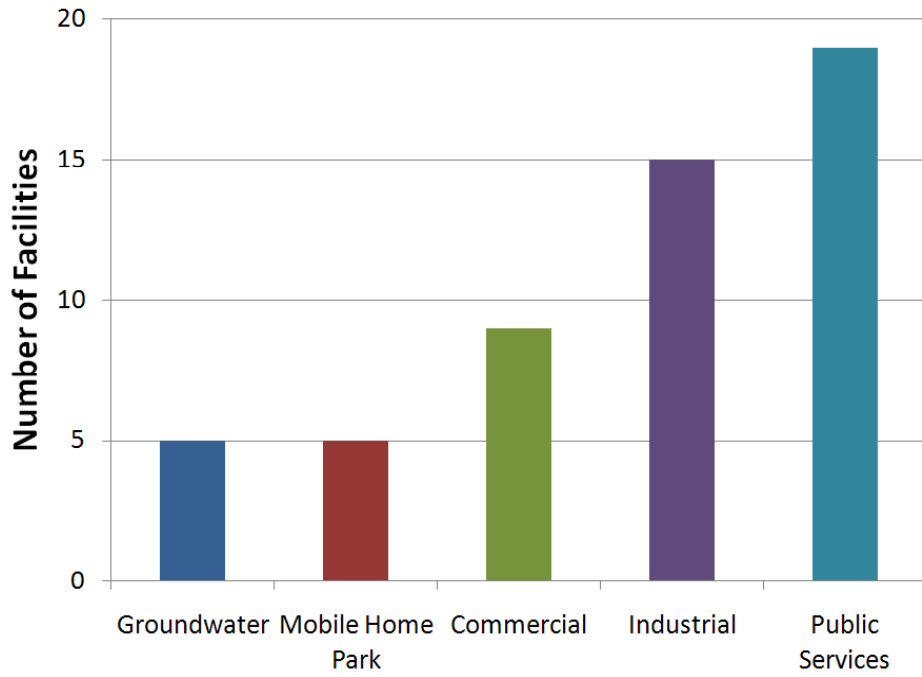




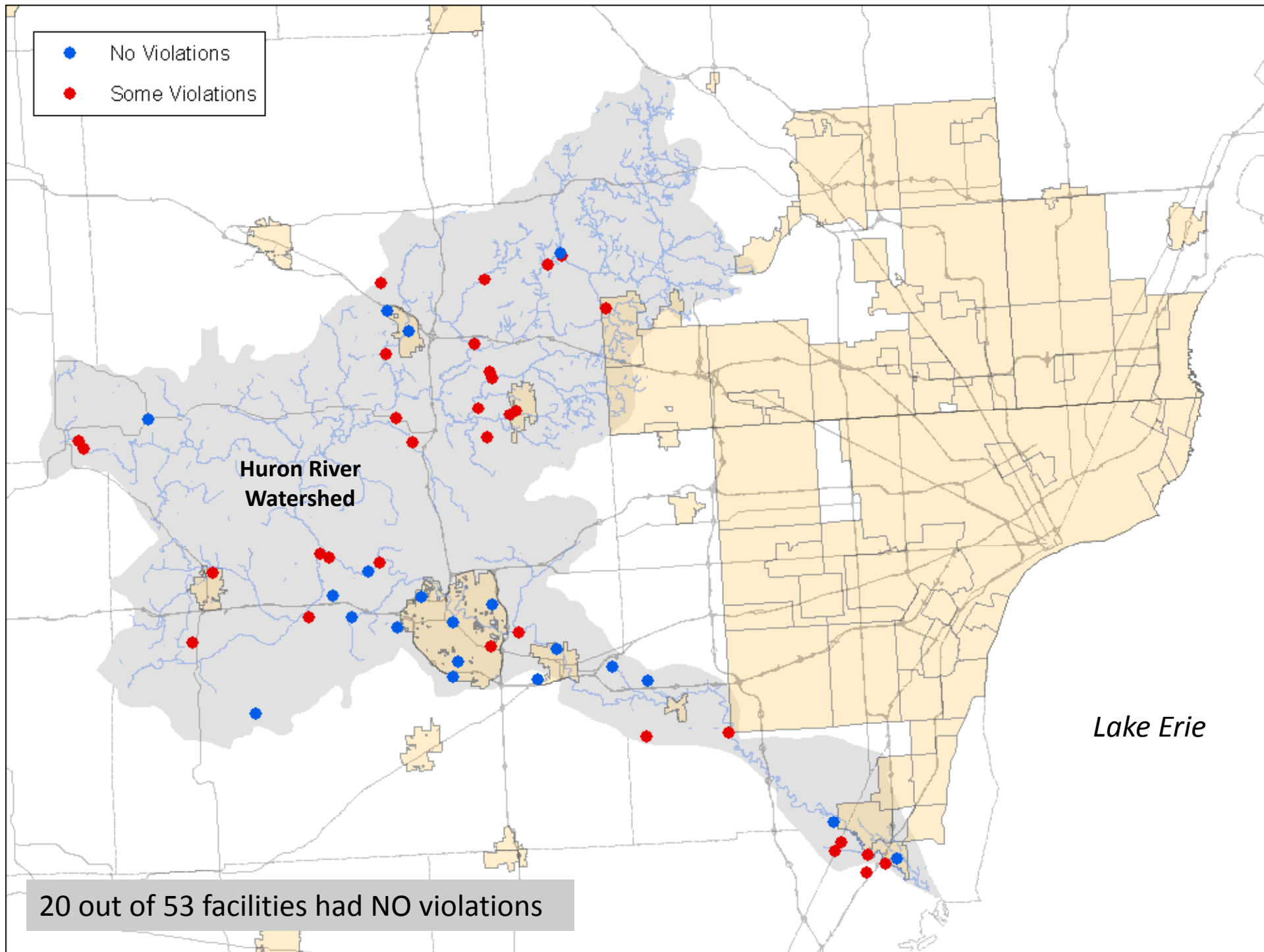
Both charts show the number of facilities.

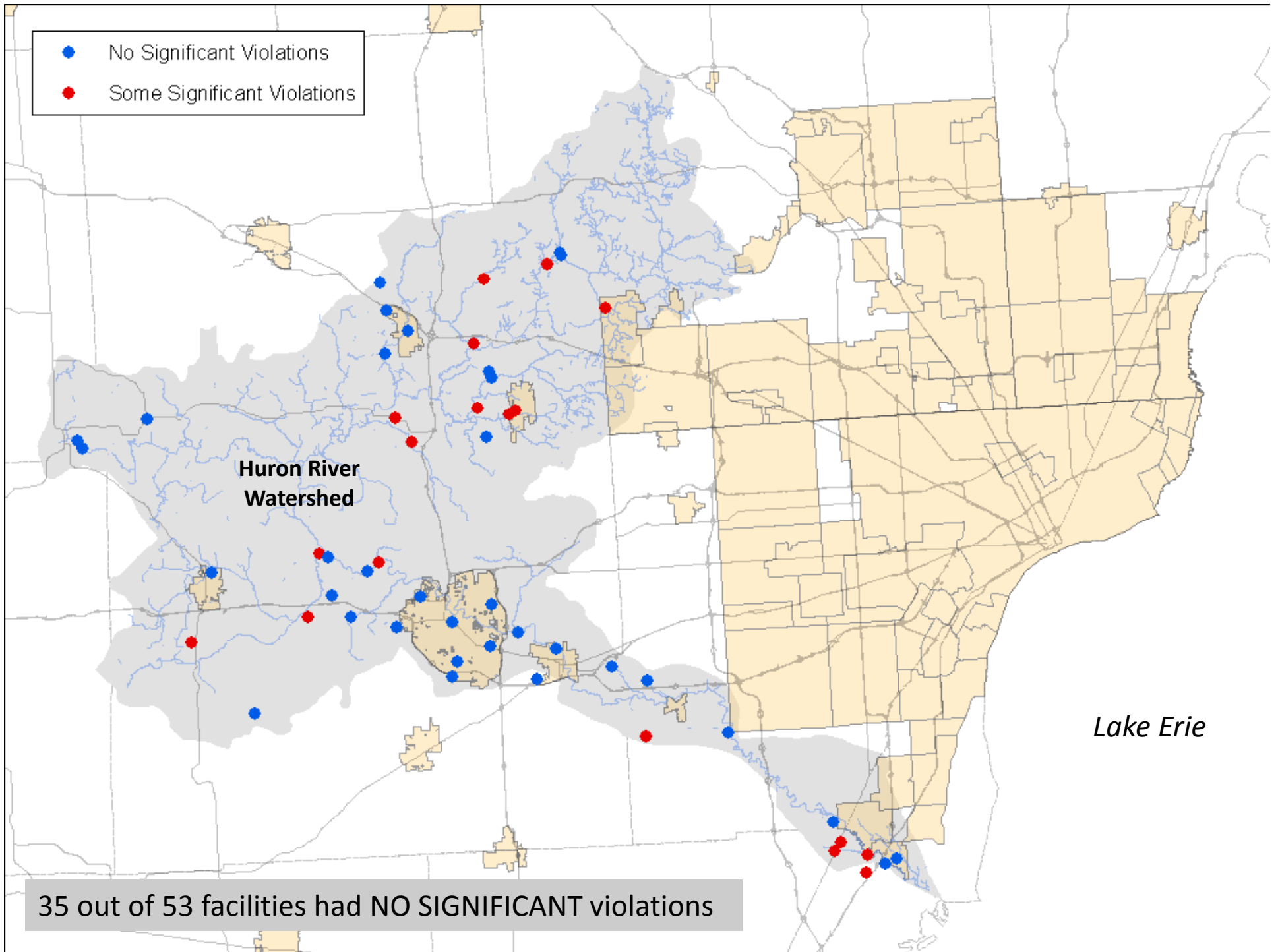
Public services, industrial, and commercial discharges are more prevalent.

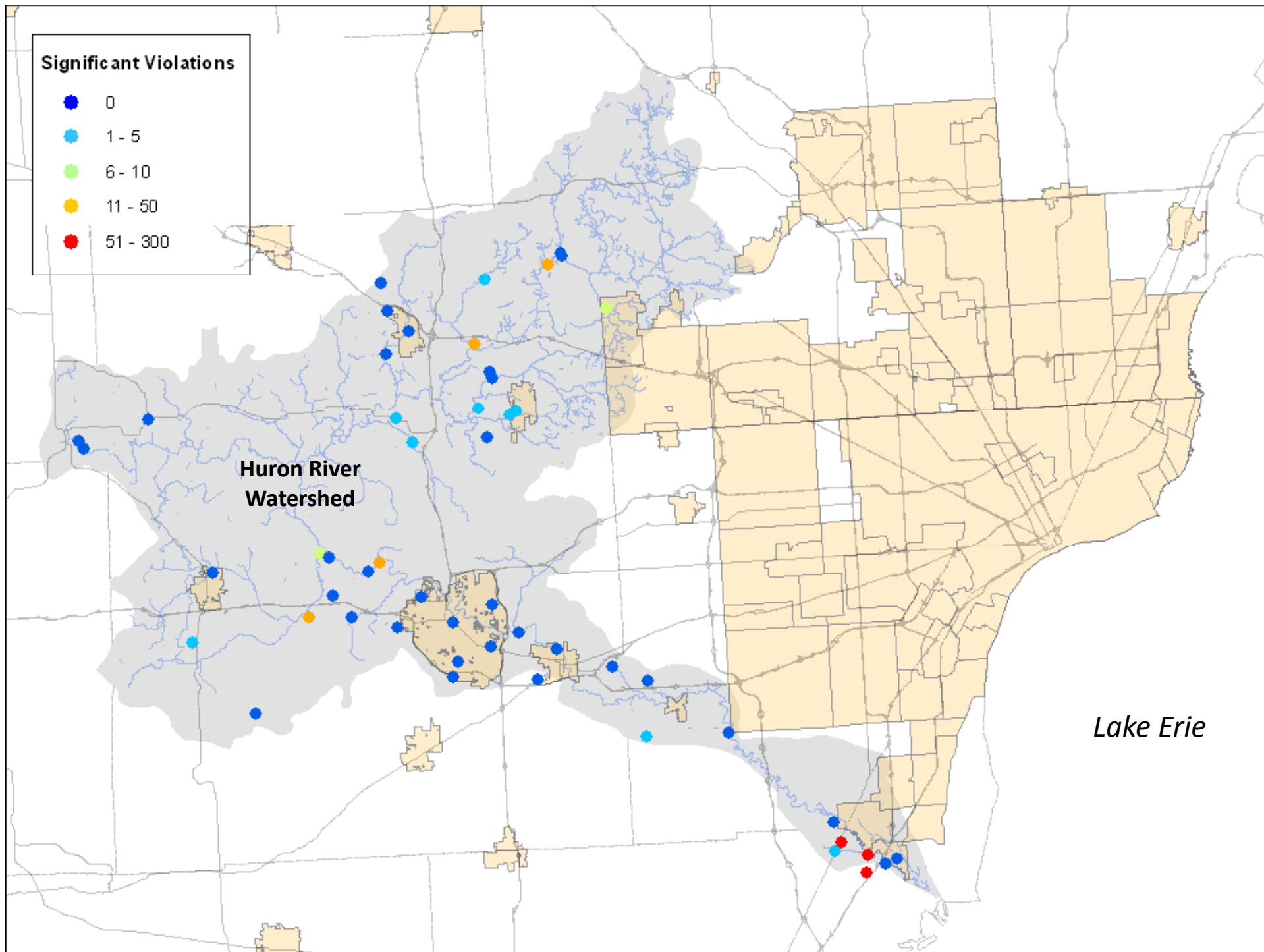


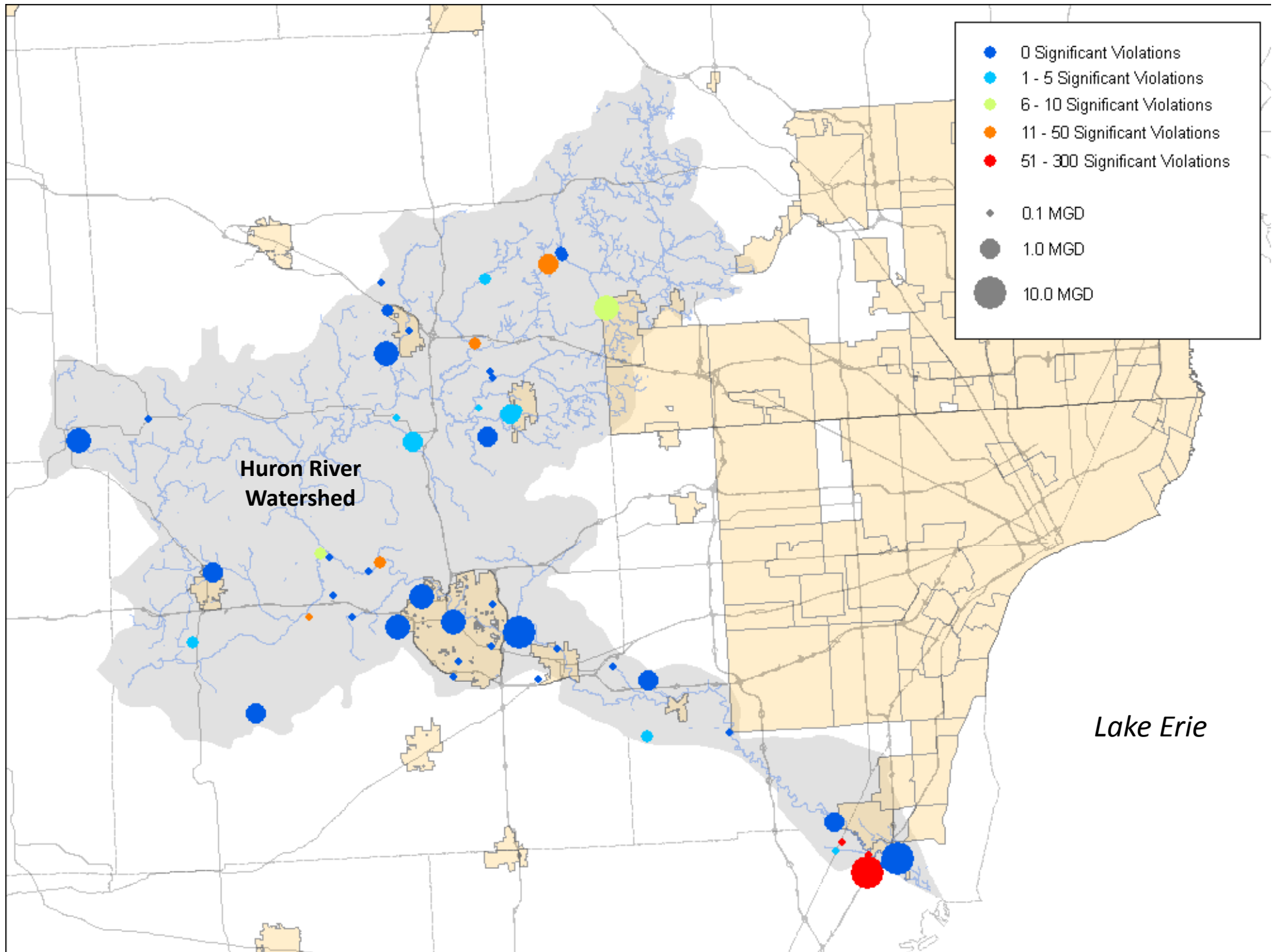


Facility Type	Number	Number with Significant Violations	Total Significant Violations
Mobile Home Park	5	4	394
Public Service	19	9	142
Industrial	15	3	98









Questions?

Adrienne Nemura, P.E., BCEE

Vice President

LimnoTech

501 Avis Drive
Ann Arbor, MI 48108

(734) 332-1200
anemura@limno.com