

The Enforcement Targeting Tool (ETT) Reference Guide

What is the ETT?

The ETT is a tool created by the Environmental Protection Agency (EPA) to help State Drinking Water (DW) Programs track Public Water Systems (PWSs) that are deemed by EPA to be significantly out of compliance with the Safe Drinking Water Act (SDWA) regulations.

How is the list generated?

This list is generated quarterly by EPA based on the PWS information transferred from the state of Alaska's DW Program database, SDWIS/State. The ETT is calculated by determining the total "score" of the violations the PWS has received by using the *enforcement targeting formula*. EPA assigned each violation to one of three point groups listed in chart on right and including **10 point** (acute TT or MCL violations), **5 point** (non-acute TT or MCL) or **1 point violations** (Monitoring and Reporting (M/R)). **The PWS with a score of 11 or higher is considered a national enforcement priority and will be listed on the ETT.**

How does a system come off the list?

In order to be removed from the ETT the PWS will need to take the appropriate steps in order to return to compliance (example: submit sample or report).

Enforcement Targeting Formula

In order to calculate the ETT Score for a PWS, the EPA came up with the following formula.

NOTE TO READER: You will NOT need to calculate these yourself so don't worry about trying to memorize the calculation. We included this so that you have an idea about how the scores are being calculated.

$$\text{ETT SCORE} = (\sum S) + n$$

n = number of years the system's oldest violation have been unaddressed (0 to 5)
 S = Violation Severity Factor

S	Violation Types
10	Acute violations, TTs and MCLs.
	Nitrate MCLs, Acute MRDL (Violation Code 13), TCR Acute (21), Turbidity TT (43, 44), SWTR TT (41).
5	Other health-based violations including non-acute TTs, MRDL and MCLs
	Also, TCR Monitoring/ Reporting (M/R) Repeats (25), and Nitrate M/R (03)
1	Monitoring/reporting violation, or any other violation
	All M/R violations (except Nitrate monitoring and TCR Repeat samples, which are 5 points)

Example of the Enforcement Targeting Formula

The formula calculates the score for each system based on open violations and violations that have remained open over the past five years. The severity factor (S) of a violation is assigned either a 1, 5, or 10 point value. Then the n-factor (number of years that the oldest violation has remained "open" i.e. not returned to compliance) is added for the total ETT score.

Example of calculation below:

Violations (S)	# of yrs. since first unaddressed violation (n)	SCORE ($\sum S$) + n
<p>1 Nitrate Monitoring Violation - didn't take annual sample in 2013 (5 points)</p> <p>1 Stage 1 Monitoring Violation - didn't take distribution chlorine at same time/ place as routine total coliform sample in 2017 (1 Point)</p> <p>1 Treatment Technique Violation - Entry Point Chlorine level too low in 2017 (10 Point)</p>	<p>4 (Oldest violation in 2013)</p>	<p>(5+1+10)+4=20</p>

Please be sure to also take a look at the How to Read the ETT guidance document also posted on the ETT Webpage.

For general questions about the ETT please email Jeanine Vance or Rachel Westbrook (emails available on ETT Webpage, at bottom of page). If you have specific questions about your system, please contact your Environmental Specialist (contact list available at bottom of the ETT).