

Significant Non-Complier (SNC) List Reference Guide

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What is the change to the SNC List? Why did the SNC List change?

Timeline and background information

For the past few years the Environmental Protection Agency (EPA) has been working to change how the SNC List is calculated to better reflect the health based violations. Particularly Treatment Techniques (TT) and Maximum Contaminant Levels (MCL) violations. Alaska's Drinking Water Program has been involved with this effort along with several other States. In December of 2009 the new version of the SNC List was released and replaces the old version of the SNC List as of October 2010.

What's the Change?

The SNC List is now calculated by determining a total "score" of the violations the PWS has received by using the *enforcement targeting formula*. EPA also assigned each violation to one of three point groups listed in chart on right. **10 point** (acute TT or MCL violations), **5 point** (non-acute TT or MCL) or **1 point violations** (Monitoring and Reporting (M/R)). PWS with a score of 11 or higher is considered a SNC.

The Return to Compliance (RTC) criteria was also changed with the new version of the List. This new criteria is much simpler to follow and typically requires only one sample to come back into compliance.

Why the change?

The focus of the new list is to assist States and Public Water Systems (PWS) to focus their efforts on the violations with the highest potential to impact public health.

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Enforcement Targeting Formula

In order to calculate the System Score 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.

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

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)

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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 SNC score. **Example of calculation below:**

Violations (S)	# of yrs. since first unaddressed violation (n)	SCORE ($\sum S$) + n
1 Nitrate Monitoring Violation (didn't take annual sample) in 2008 (5 points)	4 (Oldest violation in 2006)	(5+1+10)+4=20
1 Stage 1 Monitoring Violation (didn't take distribution chlorine at same time/place as routine bacti) in 2007 (1 Point)		
1 Treatment Technique Violation (Entry Point Chlorine level too low) in 2006 (10 Point)		

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Return to Compliance

The new RTC Criteria is much easier to work with because it is very straight forward, in order to return to compliance for most violations a PWS needs to take 1 sample without any further MCL or M/R violations. This is much easier when compared to the old RTC definitions which included several time-dependant sampling criteria. **Below are examples of where the new criteria has changed significantly from the old version of the SNC List.**

Stage 1

OLD VERSION - RTC is achieved after 12 consecutive months with no Stage 1 violations.

NEW VERSION - RTC is achieved after one monitoring round with additional M&R violations.

Total Coliform Rule

OLD VERSION - RTC is achieved after 6 consecutive months with no TCR violations

NEW VERSION - RTC is achieved once system has collected required (TCR) samples

Surface Water Treatment Rules (SWTR, IESWTR, LT1ESWTR, and LT2ESWTR)

OLD VERSION - RTC is achieved after 6 consecutive months of no SW violations.

NEW VERSION - RTC is achieved after system complies with monitoring requirements during the next month of operation.

Please be sure to also take a look at the How to Read the New SNC List guidance document also posted on the SNC Webpage. For general questions about the SNC List please email Jeanine Oakland or Kelly Cobbs (emails available on SNC Webpage, at bottom of page) If you have specific questions about your system, please contact your Environmental Specialist, contact list at bottom of SNC List.