

ATTACHMENT A-1

Public Water Supply

The following violations are PWS violations for which TCEQ has agreed with EPA to take formal enforcement action upon discovery of the violation (Category A8).

a. Public Water Supply

- (1) In accordance with EPA's revised Enforcement Response Policy (ERP) for the Public Water System Supervision Program under the Safe Drinking Water Act and implementation of EPA's Enforcement Targeting Tool (ETT), any public water system with a score resulting from the application of the ETT which is greater than or equal to 11 points will escalate to formal enforcement action.

Calculation method utilizing the ETT formula:

For each public water system, a point score of noncompliance is calculated using the following formula:

$\text{Sum } (S1 + S2 + S3 + \dots) + n$
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The total points for each violation are added together, and a time factor is added to achieve the total score for the water system, where:

S = violation severity factor

10 points for each acute health-based violation

5 points for each of the following:

Total Coliform Rule (TCR) repeat monitoring violation

Nitrate monitoring and reporting violation

Other health-based violation

1 point for any other violation or monitoring and reporting violation

n = Calculated as the number of months between the violation date and the current date divided by 12. After calculating for n, all digits after the decimal point shall default to 0 (i.e., if n is 3.8, then n = 3, if n = 0.9, then n = 0).

The following table illustrates **examples** of how a public water system may exceed the 11-point threshold:

Violations (S)	Years since first unaddressed violation (n)	Score ($\sum S$) + n	Total Score
2 acute turbidity exceedances	8 months between first violation and current date ($8/12 = 0.6$)	$(10+10) + 0$	20
2 non-acute TCR MCL violation 2 non-acute TCR MCL violation	12 months between the first violation date to current date ($12/12 = 1$)	$(5+5) + 1$	11
11 monthly TCR monitoring violations	11 months between first violation to current date ($11/12 = 0.91$)	$(1+1+1+1+1+1+1+1+1+1+1) + 0$	11
6 quarterly TCR monitoring violations, 1 annual nitrate monitoring violation	18 months between the first violation to the current date ($18/12 = 1.5$)	$[(1+1+1+1+1+1) + 5] + 1$	12
Failure to monitor annual VOC, SOC, IOC, Stage 1 DBP and 2 TCR MCL	28 months between the first violation to the current date ($28/12 = 2.3$)	$[(1+1+1+1) + 5+5] + 2$	16