

Appendix E.
Enforcement Response Plan

RESOLUTION NO. 5093

**RESOLUTION OF THE BOARD OF DIRECTORS OF
EASTERN MUNICIPAL WATER DISTRICT OF RIVERSIDE
COUNTY, ESTABLISHING THE ENFORCEMENT
RESPONSE PLAN PERTAINING TO ORDINANCE NO. 59**

WHEREAS, the Waste Discharge Requirements issued to Eastern Municipal Water District (EMWD) requires that EMWD adopt an ordinance regulating the discharge of wastewater to each EMWD Regional Water Reclamation Facility (RWRF) in accordance with all provisions of 40CFR403.8(f)(1); and

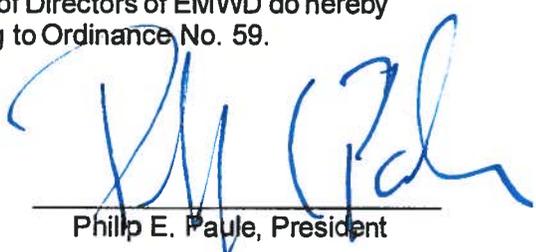
WHEREAS, the Waste Discharge Requirements issued to EMWD requires that EMWD adopt an enforcement response plan in accordance with all provisions of 40CFR403.8; and

WHEREAS, EMWD has adopted an ordinance which regulates the discharge of wastewater to EMWD's RWRF; and

WHEREAS, it is necessary to periodically investigate and respond to instances of industrial user non-compliance with said ordinance.

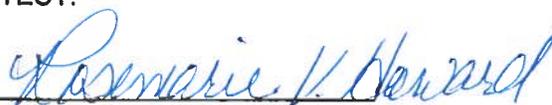
NOW THEREFORE, BE IT RESOLVED that the Board of Directors of EMWD do hereby establish the following Enforcement Response Plan Pertaining to Ordinance No. 59.

ADOPTED this 16th day of January, 2013.



Philip E. Paule, President

ATTEST:



Rosemarie V. Howard, Secretary

(SEAL)

Resolution No. 5093

EASTERN MUNICIPAL WATER DISTRICT

ENFORCEMENT RESPONSE PLAN

PERTAINING TO

ORDINANCE 59

JANUARY 2013

INTRODUCTION

The Eastern Municipal Water District Source Control Division is responsible for implementing the Pretreatment Program as described in Title 40 Code of Federal Regulations (CFR) 403 *et seq.*, Government Code sections 54739, 54740, and 54740.5, and Regulations for Waste Discharge and Sewer Use Ordinance No. 59. The definitions and acronyms in Ordinance 59 apply to this document. The goal of the Division is to maintain compliance through a pro-active program of monitoring and education. In order to deal with noncompliance that may occur, in a just, efficient, and effective manner, the Division has developed this Enforcement Response Plan.

It is the policy of the Division to:

1. Identify and respond to noncompliance as quickly as possible, in order to minimize impact on the Publicly Owned Treatment Works (POTW);
2. Document all noncompliance;
3. Investigate noncompliance thoroughly and expeditiously;
4. Insure that enforcement response is dictated by the severity of the Violation including magnitude of Violation, duration of Violation, effect on POTW compliance, effect on POTW operation, and compliance history of the User;
5. Take enforcement action in a timely manner; and
6. Respond to noncompliance in a consistent and objective manner. The Enforcement Response Guide is employed to realize this policy objective.

The District may take any, all or any combination of enforcement response(s) against a non-compliant User.

DUTIES OF EASTERN MUNICIPAL WATER DISTRICT PERSONNEL

Source Control Inspector's Responsibilities

1. Source Control Inspector(s) identify, investigate, and document noncompliance. Investigations may include but are not limited to, site inspection, sampling the waste discharge, records review, Material Safety Data Sheet (MSDS) review, interviewing personnel, process flow verification, Pretreatment records, calibration of monitoring equipment, chemical budgets, water budgets, waste minimization audits, Integrated Waste Management Plans, and Interceptor Maintenance Plans.
2. Source Control Inspector(s) initiate enforcement activity during inspection.
 - a. If the Violation is immediately correctable, the Inspector documents return to compliance on the inspection report;
 - b. If the Violation is correctable in 30 days and non-recurring (*e.g.*, Interceptor requires pumping, paperwork must be submitted, Interceptor plumbing must be repaired, report is late, etc) the Inspector documents the Violation in the inspection report and documents the enforcement in the Source Control data management system. The Inspector performs a compliance

- inspection and documents that the User met compliance. If the User fails to meet compliance, Inspector forwards file to the Source Control Manager for further enforcement evaluation;
- c. When Violations are identified by file review, the Inspector may notify the User by telephone/E-mail and note in the file;
 - d. If the Violation has resulted in, or affected the compliance of the POTW, or affects the operations of the POTW, the Inspector may refer the issue to the Source Control Manager for further enforcement evaluation; and
 - e. If the Violation presents imminent hazard to public health, safety, or welfare, to the environment, to the POTW, or to District personnel, the Inspector shall immediately inform the Source Control Manager, and an emergency suspension will be immediately issued.

Enforcement Officer Responsibilities

1. Enforcement Officer assists Source Control Inspectors on enforcements.
2. Enforcement Officer monitors all enforcement to determine if compliance dates have been met.
3. Enforcement Officer drafts Notices of Violation.
4. Enforcement Officer coordinates and plans Compliance Status Review Meetings with the Source Control Manager.
5. Enforcement Officer drafts Administrative Orders.
6. Enforcement Officer drafts Emergency Suspensions.
7. Enforcement Officer drafts Permit/Authorization/Special Agreement Terminations.
8. Enforcement Officer drafts Termination of Services.
9. Enforcement Officer assists the Source Control Manager and the District's Legal Counsel during various enforcement responses.
10. Source Control Manager may delegate any of the above duties to the appropriate staff for further action.

Source Control Manager's Responsibilities

1. Source Control Manager will evaluate options including further enforcement responses upon referral by the Inspector.
2. Source Control Manager may hold Compliance Status Review Meetings with the User to determine the facts and how compliance can be achieved quickly and responsibly.
3. Source Control Manager reviews and issues Notice of Violations.
4. Source Control Manager reviews and issues Administrative Orders.
5. Source Control Manager reviews and issues Administrative Penalties.
6. Source Control Manager reviews and issues Emergency Suspensions.
7. Source Control Manager reviews and issues Permit/Authorization/Special Agreement Terminations.
8. Source Control Manager reviews and issues Termination of Service(s).
9. Source Control Manager may refer enforcements to the District's Legal Counsel.

Resolution No. 5093

10. Source Control Manager has the ability to negotiate a suitable resolution as to actions and penalties
11. Source Control Manager may delegate any of the above duties to the appropriate staff for further action.

Hearing Officer Responsibilities

1. Hearing Officer conducts administrative show cause hearings as required by a Show Cause Order to determine the appropriate action the District should take.
2. Hearing Officer's decisions may be appealed to the District's Board of Directors per Ordinance 59 section 6.113.

District's Legal Counsel

1. District's Legal Counsel will advise Source Control Manager on enforcement options available.
2. District's Legal Counsel files civil action against the User.
3. District's Legal Counsel refers Violations to the Riverside County District Attorney for criminal filings.

FACTORS IN SELECTING APPROPRIATE RESPONSES

When determining an appropriate enforcement action the following factors will be evaluated:

1. Magnitude of the Violation which may range from immediate danger to public health, to Violation of permit requirements, to lower magnitude violations such as requirements to maintain interceptors;
2. Duration of the Violation, which could range from prolonged periods of time to immediate correction;
3. Effect of Violations upon the POTW's waste discharge requirements;
4. Effect of Violation upon the POTW's facilities and their proper operation;
5. Compliance history of the User, as to past or reoccurring Violations; and
6. Good faith of the User, the User's honest intention to remedy its non-compliance, coupled with actions which support the intention.

TYPES OF ENFORCEMENT RESPONSES

DIRECT RESPONSES:

Inspection Notification

1. Source Control Inspector notifies User of Violation during an inspection or complaint investigation.
2. Source Control Inspector sets time limit for compliance to be achieved.

Resolution No. 5093

3. Source Control Inspector documents the Violations on a written inspection report for the User file, and gives a copy to the User.
4. Source Control Inspector updates the Source Control data management system.

Phone Call / E-mail

1. Source Control staff notifies User by telephone/E-mail of a Violation (e.g., late report).
2. Source Control staff documents the communication with the User to the User file and the Source Control data management system.

Compliance Status Review Meeting (CSR)

1. User is invited to meet with the Source Control Manager and staff to discuss the Violation(s) and possible compliance response(s).
2. User may bring additional staff to discuss the Violation.
3. Upon completion of the meeting, a letter will be sent to the User from the Source Control Division documenting the meeting and all action items agreed upon.

Notice of Violation

1. When a Violation requires a more extensive plan developed by the User, a Notice of Violation will be written which describes the Violation, the legal authority applied to the Violation, and the requirement for a plan to be submitted to the Source Control Division.
2. The plan to achieve compliance will be submitted by the User within 30 days of the receipt of the Notice of Violation.

Administrative Orders (AO)

1. An AO can be:
 - a. A Consent Order which describes actions which the User has agreed to undertake and the time frames for completion;
 - b. A Compliance Order which describes actions which must be taken by the User with a specific time limits; or
 - c. A Show Cause Order which sets a hearing before a Hearing Officer to show cause why a proposed enforcement action should not be taken.
2. The following elements are common to all AOs
 - a. Title of the Order;
 - b. Legal authority;
 - c. Finding of noncompliance;
 - d. Ordered activity;
 - e. In the case of a Show Cause Order, User is required to appear;
 - f. Milestone dates for corrective actions; and
 - g. Standard clauses (e.g., compliance with terms and conditions of the AO will not be construed to relieve the User of its obligation to comply with Federal, State, or local law.)

Emergency Suspensions

Resolution No. 5093

1. When it is determined that Violations by the User may cause immediate threat to the public health and welfare, Violations of discharge orders, or harm to the POTW facilities, an Emergency Suspension will be issued.
2. The Emergency Suspension will include the Violation, legal authority, and the immediate action requiring suspension of the discharge to the POTW.

Permit/Authorization/Special Agreement Termination

1. When it is determined that the User has refused to correct noncompliance, the User's Waste Discharge Permit, Authorization, or Special Agreement may be terminated by the Source Control Division.
2. Termination of the Waste Discharge Permit, Authorization, or Special Agreement may be appealed using the appeal process in Ordinance 59.

Termination of Service

1. Termination of service(s) may include physical severance from the collection system.
2. Appropriate agencies (e.g., Health Dept., Code Enforcement) will be notified.

ADMINISTRATIVE RESPONSES:

Administrative Penalties

1. Administrative penalties are monetary penalties assessed by the Source Control Manager for Violations, and are intended to recapture full or partial economic benefit of the noncompliance and to deter future Violations.
2. The amount of an administrative penalty shall be determined in accordance with Resolution 2963 as amended, and as set forth below.
3. The Source Control Manager may issue an administrative complaint to any User for Violations pursuant to Government Code section 54740.5.
4. The administrative complaint shall allege:
 - a. The act or failure to act that constitutes the Violation;
 - b. The provisions of law authorizing civil liability to be imposed; and
 - c. The proposed administrative penalty.
5. The administrative complaint shall be served on the User by personal service or certified mail.
6. The administrative complaint shall give notice of a hearing to be conducted within 60 days after service before the Hearing Officer, unless waived by the User.
7. Decisions of the Hearing Officer may be appealed to the Board of Directors within 30 days of the Hearing Officer's decision.
8. Upon finding of a Violation, the Hearing Officer or Board of Directors may assess an administrative penalty against the User. In determining the amount of the administrative penalty, the Hearing Officer or Board of Directors may take into account all relevant circumstances, including without limitation:
 - a. The extent of harm caused by the Violation;

Resolution No. 5093

- b. The economic benefit derived through any noncompliance;
 - c. The nature and persistence of the Violation;
 - d. The length of time over which the Violation occurred; and
 - e. Corrective action, if any, attempted or taken by the User.
9. Administrative penalties may be imposed as follows:
- a. In an amount which shall not exceed two thousand dollars (\$2,000) for each day for failing or refusing to furnish technical or monitoring reports;
 - b. In an amount which shall not exceed three thousand dollars (\$3,000) for each day for failing or refusing to timely comply with any compliance schedule established by the District;
 - c. In an amount which shall not exceed five thousand dollars (\$5,000) per Violation for each day for discharges in Violation of any waste discharge limitation, permit condition, or requirement issued, reissued, or adopted by the District;
 - d. In an amount which does not exceed ten dollars (\$10) per gallon for discharges in Violation of any suspension, cease and desist order or other orders, or prohibition issued, reissued, or adopted by the District;
 - e. The amount of any administrative penalties imposed under this section which have remained delinquent for a period of 60 days shall constitute a lien against the real property of the User from which the discharge originated resulting in the imposition of the administrative penalty. The lien provided herein shall have no force and effect until recorded with the county recorder and when recorded shall have the force and effect and priority of a judgment lien and continue for 10 years from the time of recording unless sooner released, and shall be renewable in accordance with the provisions of Code of Civil Procedure sections 683.110-683.220.
10. All moneys collected under this section shall be deposited in a special account of the District and shall be made available for the monitoring, treatment, and control of discharges into the District's sanitation or sewer system or for other mitigation measures.
11. Unless appealed, orders setting administrative penalties shall become effective and final upon issuance, and payment shall be made within 30 days. Copies of these orders shall be served by personal service or by registered mail upon the User served with the administrative complaint and upon other persons who appeared at the hearing and requested a copy.
12. The District may refer the matter to District Legal Counsel to petition the superior court to confirm any administrative order establishing administrative penalties and to enter judgment in conformity therewith in accordance with the provisions of Code of Civil Procedure sections 1285-1287.6.
13. No liability shall be recoverable through administrative penalties for any Violation for which civil liability is recovered through Civil Responses.

CIVIL RESPONSES:

Injunctive Relief

Resolution No. 5093

The District may petition the Superior Court of the County of Riverside for the issuance of a temporary restraining order, preliminary injunction, and/or permanent injunction, as appropriate, to enjoin or compel the specific performance of the activities of the User causing such Violation.

Civil Liability

1. Upon consultation with the District's Legal Counsel, the District's Legal Counsel may file suit on behalf of the District in court pursuant to Government Code section 54740.
2. Civil liability shall be a sum of not to exceed twenty-five thousand dollars (\$25,000) a day for each Violation.
3. In determining the amount of the civil liability, the court shall take into consideration all relevant circumstances, including without limitation:
 - a. The extent of harm caused by the Violation;
 - b. The economic benefit derived through any noncompliance;
 - c. The nature and persistence of the Violation;
 - d. The length of time over which the Violation occurred; and
 - e. Corrective action, if any, attempted or taken by the User.
4. Civil liability imposed by the court for a Violation shall be distributed to the District.
5. No liability shall be recoverable through civil liability for any Violation for which administrative penalties are recovered through Administrative Responses.

CRIMINAL RESPONSES:

Criminal Prosecution

1. District's Legal Counsel may submit a request to the Riverside County District Attorney for filing of a criminal case against the User.

RESPONSE TIMEFRAMES

To promote consistent application of enforcement measures, the following guidelines for enforcement are:

1. Initial enforcement shall occur within 30 days of Violation detection.
2. In the case of Inspection Notification, Violations shall be corrected within 30 days.
3. In the case of a Notice of Violation, the User shall be required to respond within 30 days.
4. In the case of a Show Cause Order, the User shall be required to appear on a date, at least 15 days from the date of the Order.
5. In the case of Consent Orders or Compliance Orders, response timeframes shall be documented in the Order.

Resolution No. 5093

6. **Violations which threaten public health, property, or environmental quality are considered emergencies, and shall receive an immediate response as required.**

ENFORCEMENT RESPONSE GUIDE

This guide is a listing of possible types of enforcement and enforcement responses usually indicated. It is just a guide and all types of enforcement responses are available on any enforcement. The District may take any, all or any combination of enforcement response(s) against a non-compliant User.

Noncompliance	Nature of Violation	Enforcement Response	Personnel		
Unpermitted or unauthorized discharge	User unaware, no harm	Phone Call / E-mail	Inspector, Enforcement Officer		
		Compliance Status Review Meeting	Source Control Manager		
		Notice of Violation	Enforcement Officer, Source Control Manager		
	User unaware, harm	Administrative Order	Source Control Manager		
		Administrative Penalties	Source Control Manager		
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager		
		Injunctive Relief	Source Control Manager District's Legal Counsel		
	Failure to apply after notice by POTW	Civil Liability	Source Control Manager District's Legal Counsel		
		Criminal Prosecution	Source Control Manager District's Legal Counsel		
		Termination of Service	Source Control Manager		
	Failure to renew permit	Phone Call / E-mail	Inspector, Enforcement Officer		
		Notice of Violation	Enforcement Officer, Source Control Manager		
	Discharge Limit Violation	Isolated, no harm	Phone Call / E-mail	Inspector, Enforcement Officer	
Notice of Violation			Enforcement Officer, Source Control Manager		
Isolated, harm		Compliance Status Review Meeting	Source Control Manager		
		Administrative Order	Source Control Manager		
		Administrative Fine	Source Control Manager		
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager		
Recurring, no harm		Injunctive Relief	Source Control Manager District's Legal Counsel		
		Compliance Status Review Meeting	Source Control Manager		
Recurring, harm		Administrative Order	Source Control Manager		
		Administrative Penalties	Source Control Manager		
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager		
		Injunctive Relief	Source Control Manager District's Legal Counsel		
		Civil Liability	Source Control Manager District's Legal Counsel		
		Criminal Prosecution	Source Control Manager District's Legal Counsel		
		Termination of Service	Source Control Manager		
		Discharge of prohibited substance	Isolated, no harm	Phone Call / E-mail	Inspector, Enforcement Officer
				Notice of Violation	Enforcement Officer, Source Control Manager
Isolated, harm		Compliance Status Review Meeting	Source Control Manager		
		Administrative Order	Source Control Manager		
	Administrative Penalties	Source Control Manager			
	Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager			
	Injunctive Relief	Source Control Manager			

Resolution No. 5093

			District's Legal Counsel
	Recurring, no harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
	Recurring, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager
		Injunctive Relief	Source Control Manager District's Legal Counsel
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
Reporting Violations	Report is improperly signed	Phone Call / E-mail	Inspector, Enforcement Officer
	Report is 5 days late	Phone Call / E-mail	Inspector, Enforcement Officer
	Report is more than 45 days late	Administrative Order	Source Control Manager
	Reports are always late or no reports at all	Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
	Failure to report spill or changed discharge, no harm	Phone Call / E-mail	Inspector, Enforcement Officer
		Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
	Failure to report spill or changed discharge, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
	Falsification	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
Administrative Penalties		Source Control Manager	
Civil Liability		Source Control Manager District's Legal Counsel	
Criminal Prosecution		Source Control Manager District's Legal Counsel	
Termination of Service		Source Control Manager	
Inadequate Recordkeeping	Isolated	Inspection Notification	Inspector
		Phone Call / E-mail	Inspector, Enforcement Officer
	Recurring	Compliance Status Review Meeting	Source Control Manager
		Notice of Violation	Enforcement Officer, Source Control Manager
Failure to report additional monitoring	Isolated	Inspection Notification	Inspector
		Phone Call / E-mail	Inspector, Enforcement Officer
	Recurring	Compliance Status Review Meeting	Source Control Manager
		Notice of Violation	Enforcement Officer, Source Control Manager
Failure to install pretreatment or monitoring equipment	Delay of less than 30 days	Phone Call / E-mail	Inspector, Enforcement Officer
	Delay over 30 days	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager

Resolution No. 5093

	Recurring	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
	Violation of Order Milestone	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
	Termination of Service	Source Control Manager	
Failure to maintain pretreatment or monitoring equipment	Isolated, no harm	Inspection Notification	Inspector
		Compliance Status Review Meeting	Source Control Manager
	Isolated, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
	Recurring, no harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
	Recurring, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager
		Injunctive Relief	Source Control Manager District's Legal Counsel
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
	Removal of pretreatment or monitoring equipment	User unaware, no harm	Inspection Notification
User unaware, harm		Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager
		Injunctive Relief	Source Control Manager District's Legal Counsel
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
User aware, no harm		Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
User aware, harm		Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager
		Injunctive Relief	Source Control Manager District's Legal Counsel
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
Bypass of pretreatment or monitoring equipment	User unaware, no harm	Inspection Notification	Inspector
	User unaware, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager

Resolution No. 5093

		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager
		Injunctive Relief	Source Control Manager District's Legal Counsel
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
	User aware, no harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
	User aware, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Emergency Suspension	Inspector, Enforcement Officer, Source Control Manager
		Injunctive Relief	Source Control Manager District's Legal Counsel
		Civil Liability	Source Control Manager District's Legal Counsel
Criminal Prosecution		Source Control Manager District's Legal Counsel	
Termination of Service	Source Control Manager		
Failure to follow Integrated Waste Management Plan or Interceptor Maintenance Plan	Isolated, no harm	Inspection Notification	Inspector
		Compliance Status Review Meeting	Source Control Manager
	Isolated, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
	Recurring, no harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
	Recurring, harm	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
Failure to submit required documents	Up to 5 days late	Inspection Notification	Inspector
		Phone Call / E-mail	Inspector, Enforcement Officer
	Over 5 days late	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager
Submitted required documents are incomplete	Isolated	Phone Call / E-mail	Inspector, Enforcement Officer
	Recurring	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager
		Permit/Authorization/Special Agreement Termination	Source Control Manager
		Civil Liability	Source Control Manager District's Legal Counsel
Failure to pay fees	Isolated	Phone Call / E-mail	Inspector, Enforcement Officer
	Recurring	Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
		Administrative Penalties	Source Control Manager

Resolution No. 5093

		Permit/Authorization/Special Agreement Termination	Source Control Manager
		Civil Liability	Source Control Manager District's Legal Counsel
Wastestreams diluted in lieu of treatment	Isolated	Phone Call/E-mail	Inspector, Enforcement Officer
		Compliance Status Review Meeting	Source Control Manager
		Administrative Order	Source Control Manager
	Recurring	Civil Liability	Source Control Manager District's Legal Counsel
		Criminal Prosecution	Source Control Manager District's Legal Counsel
		Termination of Service	Source Control Manager