

**MAYOR**  
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**ALDERMEN**  
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Collinda J. Lee  
Richard Mullins, Jr.  
Walter Reynolds  
Denese R. Shinholster  
Jeanette H. Walden



**CITY MANAGER**  
Hank Griffeth

## *The City of Milledgeville*

March 31, 2021

ATTN: Shiva Hemati, Environmental Engineer  
Industrial Compliance Unit, Watershed Protection Branch  
Georgia Department of Natural Resources, Environmental Protection Division

2 Martin Luther King Jr. Drive  
Suite 1152, East Tower  
Atlanta, GA 30334

RE: Industrial Enforcement Response Plan (ERP)

Dear Ms. Hemati,

Please see attached for the Revision of the City of Milledgeville's Enforcement Response Plan for its Industrial Pretreatment Program. This revision was approved and adopted by City Council and replaces the prior Enforcement Response Plan.

The City requests that the Georgia Environmental Protection Division (GA EPD) review and approve this Revision. If you have any questions or comments regarding this revision, you can contact my office at (478) 414 – 4052 or email [jcrawford@milledgevillega.us](mailto:jcrawford@milledgevillega.us).

Sincerely,

Robert L. Hadden

Water & Sewer Director

City of Milledgeville

CC: Sidney Newton, MWPCP Superintendent

Jeanette Crawford, MWPCP Assistant Superintendent



**INDUSTRIAL PRETREATMENT COMPLIANCE  
ENFORCEMENT RESPONSE PLAN  
(ERP)**

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## **1. Introduction**

This Enforcement Response Plan (ERP) was created as part of the requirements of 40 CFR 403.8(f)(5) which states:

The Publicly Owned Treatment Works (POTWs) shall develop and implement an Enforcement Response Plan. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of Industrial User non-compliance. The plan shall, at a minimum:

- (i) Describe how the POTW will investigate instances of non-compliance;
- (ii) Describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of Industrial User violations and the time periods within which responses will take place;
- (iii) Identify (by title) the officials responsible for each type of response;
- (iv) Adequately reflect the POTWs primary responsibility to enforce all applicable pretreatment requirements and standards, as detailed in 40 CFR 403.8(f)(1) and (f)(2).

This City of Milledgeville ERP outlines the procedures that will be used to identify, document, track, and respond to Industrial Pretreatment non-compliance. The ERP shall provide guidance for selecting the enforcement action most appropriate for a given violation.

The sources of reference used in the compilation of this response are the Enforcement Guidance Manual (July 1986), the EPA Guidance for Developing Control Authority Enforcement Response Plans (September 1989), and the EPA Model Enforcement Response Plan (April 1998).

## **2. Purpose**

The purpose of the ERP is to provide consistent enforcement responses for similar violations and circumstances. The ERP describes violations, defines a range of appropriate enforcement actions based on the nature and severity of the violation and other relevant factors, and identifies personnel responsible for finalizing enforcement responses.

## **3. Administration and Jurisdiction**

All entities discharging nondomestic waste to the City of Milledgeville POTW are subject to the provisions of the ERP. The City of Milledgeville consistently administers and implements all elements of the ERP. The ERP does not preclude the City of Milledgeville from taking any, all, or any combination of actions against a noncompliant Industrial User.

#### **4. Abbreviations and Definitions**

City of Milledgeville – The entity directly administering and enforcing the Pretreatment Standards and requirements for Industrial Users.

Domestic Wastewater – Wastewater from normal residential activities including, but not limited to, wastewater from kitchen, bath, and laundry facilities; wastewater from the personal sanitary conveniences (toilets, showers, bathtubs, fountains, non-commercial sinks, and similar structures) of commercial, industrial, or institutional buildings, provided that the wastewater exhibits characteristics which are similar to those of wastewater from normal residential activities. Specifically excluded from this definition is wastewater from commercial, industrial, or institutional laundries or food preparation facilities.

Industrial User (IU) – Any source that introduces pollutants to a POTW from any non-domestic source.

Publicly Owned Treatment Works (POTW) – Devices and systems used in the storage, treatment, recycling, and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances only if they convey wastewater to a POTW treatment plant.

#### **5. Personnel Responsibilities**

##### ***5.1 Water & Sewer Director***

The Water and Sewer Director has the responsibility to monitor the IPCs and Superintendent's actions and to initiate enforcement actions at the recommendation of the IPC or Superintendent. The enforcement response carried out by the Water and Sewer Director includes informal notices, notices of violations, meetings, consent agreements, and referrals for civil or criminal litigation.

##### ***5.2 Superintendent or Assistant Superintendent***

The Superintendent or Assistant Superintendent has the responsibility to monitor the IPCs actions and to initiate the enforcement actions at the recommendation of the IPC. The enforcement response carried out by the Superintendent or Assistant Superintendent includes informal notices and referral to the Water and Sewer Director for notices of violation, meetings, consent agreements, and referrals for civil or criminal litigation.

### ***5.3 Industrial Pretreatment Coordinator***

The Industrial Pretreatment Coordinator is responsible for the day-to-day implementation of the Industrial Pretreatment Program. The enforcement response carried out by the IPC includes informal notices and referral to the Superintendent, Assistant Superintendent, or Water and Sewer Director for notices of violation, meetings, consent agreements, and referrals for civil or criminal litigation.

### ***5.4 POTW Attorney or Consultant***

The POTW Attorney or Consultant shall provide legal consultation, as requested by the Water and Sewer Director, on consent agreements and administrative orders and will take the lead on all referrals for civil or criminal investigations.

## **6. Identifying and Investigating Non-compliance**

There are many activities associated with the identification and investigation of non-compliance. A brief description of these activities is provided in this ERP. Detailed discussions and procedures for these activities can be found in 40 CFR, City of Milledgeville Utilities Ordinance, and Industrial User Pretreatment Permits. These activities facilitate the identification and investigation of non-compliance as follows:

### ***6.1 Industrial User Inventory***

An essential step for identifying non-compliance is knowing who is discharging nondomestic waste to the POTW, where they are located, and the nature of the nondomestic waste being discharged. The Industrial Pretreatment Coordinator maintains a current inventory of all nondomestic sources of waste to the POTW.

### ***6.2 Monitoring and Inspection Plan***

The Industrial Pretreatment Coordinator prepares an annual monitoring and inspection plan. Each Significant Industrial User (SIU) is monitored at least once per year to verify compliance status and determine if enforcement response must be initiated or continued. The City of Milledgeville performs all sampling and analysis in accordance with 40 CFR Part 136. Sampling procedures, including Quality Assurance and Control procedures, are discussed in the City of Milledgeville Laboratory Quality Assurance Manual and followed to maximize sample integrity.

### **6.3 Compliance Screenings**

All reports from Industrial Users and reports generated by the City of Milledgeville are carefully reviewed, on an as-received basis for timelines, completeness, and accuracy. The screening process includes an evaluation of compliance with report due dates, numerical standards, standard handling and analysis requirements, signatory/certification requirements, and monitoring frequency.

## **7. Enforcement Mechanisms**

In order to achieve a maximum degree of compliance by Industrial Users, the City will need to use a range of enforcement mechanisms. These mechanisms may range from a simple reminder call to imposing significant criminal penalties. The City of Milledgeville recognizes that some egregious or intentional violations may constitute criminal violations of Federal (and State) law, and that under such circumstances, the City may seek the assistance of the Georgia EPD. The purpose of this section is to describe the range of available enforcement mechanisms.

### **7.1. Informal Actions**

#### **7.1.1. Informal Notice**

Informal notice is the least coercive of the enforcement mechanisms. An informal notice may consist of a telephone call, electronic mail (email), or letter to an appropriate official of an Industrial User. Such a call may be used to notify officials of a minor violation and to seek an explanation, suggest that more care be exercised, and/or notify the Industrial User that subsequent violations of the same type may be dealt with more severely. Such informal notice may be used to correct minor, inadvertent non-compliance and to demonstrate that the City will note and follow-up all instances of non-compliance.

#### **7.1.2. Informal Meetings**

If a telephone call or electronic mail (email) does not produce compliance or an adequate explanation of the reason for the non-compliance, a meeting between City officials and the Industrial User may produce the desired results. At such a meeting, the City officials should emphasize the importance of maintaining compliance. The City officials should inform the Industrial User that if informal meetings are unsuccessful in obtaining the firm's commitment to complying with its' pretreatment obligations, stronger enforcement mechanisms are available. The City must record all informal contacts, notices, and meetings with representatives of Industrial Users.

### 7.1.3. Notice of Violation (NOV) or Warning Letter

The warning letter is a written notice to the Industrial User that the City has observed a violation of pretreatment requirements and expects the violation to be corrected and explained. The letter can also require specific corrective actions and schedules to which the City expects the Industrial User to adhere as well as a statement that additional enforcement action may be pursued if corrective actions are not accomplished as scheduled. Warning letters should be sent by certified mail with return receipt requested and/or by electronic mail (email) with delivery and read receipt requests. Certified mail or direct email will more likely bring the notice to the attention of the appropriate officials. The return, delivery, or read receipt will serve as proof that the Industrial User received the notice in the event that more formal enforcement action is necessary.

### 7.1.4. Notices or Meetings to Show Cause (SC)

The City may wish to consider meeting with the Industrial User or issue a notice to "Show Cause" in which the Industrial User would be asked to "show cause" to the City as to why it should not initiate formal action or discontinue sewer service. However, this action is not a pre-requisite to taking a formal enforcement action or to discontinue sewer service.

## **7.2. Formal Actions**

### 7.2.1. Administrative Orders (AO) and Compliance Schedules

Section 309(a)(3) of the Clean Water Act authorizes EPA to issue orders without prior notice or opportunity for prior hearing, known as Administrative Orders (AOs), requiring compliance with standards or other requirements developed under the authority of the Act. The City may issue similar orders under Section 403.8(f)(1)(iii) of the General Pretreatment Regulations. These orders can be used to place an Industrial User on an enforcement schedule to comply with pretreatment standards, including appropriate interim limits. The City of Milledgeville currently issues "Orders" in the form of a letter. The distinct difference in such an "Order" and a warning letter is that specific requirements and dates for compliance are demanded rather than requested. For the purpose of clarity in this Guide, "Orders" by the City of Milledgeville in the form of a letter are synonymous with Administrative Orders.



### 7.2.2. Penalties

Penalties, fines, and surcharges may be used by the City to enforce its' Industrial Pretreatment Program. The City of Milledgeville has the authority to assess penalties and fines in an amount not exceeding One Thousand Dollars (\$1,000.00) per day of violation. However, this limit may be inadequate for some spills and short-term violations that interfere with treatment or pass-through the POTW. Appropriate action may involve seeking the assistance of the Georgia EPD for obtaining penalties under State or Federal law. Fines or surcharges may be used for minor violations that may be detected during inspections or compliance review of self-monitoring data. Such fines or surcharges may be used in conjunction with billing procedures and should appear as a separate item on a bill with the violation identified. The amount of civil penalty imposed will depend on the specific nature of the violation. The City may consider the range of options available under State authority to collect penalties, including small claims court.

### 7.2.3. Termination of Service

The City of Milledgeville has the authority to immediately halt any actual or threatened discharge to the wastewater sewerage that may represent an endangerment to the public health, the environment, or the POTW, upon notifying the Industrial User of a violation (40 CFR 403.8 (t) (vi)(B)). The City can deny or condition new or increased discharges by an Industrial User. Changes in the nature of pollutants discharged to the City by the Industrial User can be denied if the discharge does not meet applicable pretreatment standards or will cause the City to violate its' NPDES permit.

### 7.2.4. Civil Suit for Injunctive Relief and/or Civil Penalties

The civil suit for injunctive relief is used when the Industrial User is unlikely to successfully execute the steps that the City of Milledgeville believes are necessary to achieve or maintain compliance, when the violation is serious enough to warrant court action to deter future similar violations, or when the danger presented by an Industrial User's non-compliance does not permit lengthy negotiation of a settlement. In a civil suit for injunctive relief, the City collects pertinent information sufficient to prove the violations at issue and turns the information over to the City attorney for case filing. The City attorney asks the Court to order a discharger to take specific actions or refrain from specific actions. If the City is able to show irreparable harm to the POTW operation, its' workers, or the receiving stream, as a result of an ongoing Industrial User violation and is likely to succeed on the merits of the case, a Court may issue a temporary restraining order or preliminary injunction restraining the Industrial User from violating standards pending the outcome of the suit.

### 7.2.5. Criminal Suit

The City of Milledgeville must consider several factors to determine when violations should be addressed by criminal action. These factors include the willfulness of the violation, knowledge of the violation, nature and seriousness of the offense, need for deterrence, compliance history of the subject, adequacy of the evidence, and the adequacy of the penalties and sanctions available through civil or administrative enforcement actions. For criminal cases, the City must provide proof beyond a reasonable doubt that the violation occurred through "willful or negligent action" of the discharger. A sentence containing penalties would be assessed by the court based on, among other considerations, its' perception of the harm, damage, or potential threat, attributable to the violation.

### 7.2.6. Referral to EPA or the State

Referral to the State or EPA may be made for further action. Circumstances that trigger EPA or state referrals include evidence of willfulness, evidence of negligence, and lack of good faith shown by the Industrial User.

## **8. Definition of Significant Non-compliance (SNC)**

Any violation of pretreatment requirements (limits, sampling, analysis, reporting and meeting compliance schedules, and regulatory deadlines) is an instance of non-compliance for which the Industrial User is liable for enforcement, including penalties. The purpose of this section is to identify violations or patterns of violations by an Industrial User that are instances of Significant Non-compliance. This classification allows the City to establish priorities for formal enforcement actions. Unresolved instances of Significant Non-compliance deserve formal enforcement action. A range of enforcement actions for different types of non-compliance is provided in the Pretreatment Enforcement Guide, Addendum I.

### ***8.1. Violations of wastewater discharge limits.***

Instances of SNC are Industrial User violations which meet one or more of the following criteria:

#### 8.1.1. Chronic Violations.

Sixty-six percent or more of the measurements exceed the same daily maximum limit or the same average limit in a 6-month period (any magnitude of exceedance).

8.1.2. Technical Review Criteria (TRC) Violations.

Thirty-three percent or more of the measurements exceed the same daily maximum limit or the same average limit by more than the TRC in a 6-month period. There are two groups of TRCs:

Group I for conventional pollutants (BOD, TSS, Oil and Grease) TRC= 1.4

Group II for all other pollutants TRC = 1.2

8.1.3. Effluent Violations.

Any other violation(s) of an effluent limit (average or daily maximum) that the City believes has caused, alone or in combination with other discharges, interference or pass-through, or endangered the health of the sewage treatment personnel or the public.

8.1.4. Pollutants Violations.

Any discharge of a pollutant that has caused imminent endangerment of human health/welfare or to the environment and has resulted in the POTW's exercise of its' emergency authority to halt or prevent such a discharge.

8.1.5. Compliance Violations.

Violations of compliance schedule milestones, contained in a local control mechanism or enforcement order, for starting construction, completing construction, and attaining final compliance by 90 days or more after the schedule date.

8.1.6. Report Violations.

Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.

8.1.7. Failure to Report Non-compliance.

Failure to report a violation, spill, slug, or changed discharge that has the potential to, alone or in combination with other discharges, cause an interference or pass through, or endanger the health of the sewage treatment personnel or the public.

8.1.8. Other Violations.

Any other violation or group of violations that will adversely affect the operation or implementation of the pretreatment program.

## ***8.2. Publishing Lists of Industrial Users with Significant Violations.***

Section 403.8(1)(2)(vii) of the General Pretreatment Regulations requires that the City publish, at least annually, in the largest daily newspaper located in the municipality serviced by the City, a list of Industrial Users which at any time during the previous 12 months were in significant non-compliance with applicable pretreatment requirements.

## **9. Enforcement Response Guide (ERG)**

Addendum I is an Enforcement Response Guide (ERG) which designates several enforcement options for each type (or pattern) of non-compliance. The ERG was outlined using the Enforcement Guide model in the EPA manual Pretreatment Compliance Monitoring and Enforcement Guidance (July 1986) and tailored to the enforcement practices of the City of Milledgeville.

The intent of the ERG is to provide direction for appropriate enforcement response and ensure consistent enforcement for similar violations and circumstances. The guide is not intended to cover all types of violations, create legal rights or obligations, or to limit the enforcement discretion of the City of Milledgeville. Factors which will be evaluated to determine the appropriate response are as follows:

- 1.) Good faith of the user;
- 2.) Compliance history of the user;
- 3.) Previous success of the enforcement against the user,
  - a. E.g.: If historically NOV's have not been effective in returning the Industrial User to compliance then an administrative order would be the more appropriate response;
- 4.) Violations effect on the environment and/or public health; and
- 5.) Violations effect on the POTW.

## **10. Levels of Response and Factors**

For any violation, there are three possible levels of response to all violations available to the City: no response, an informal response, or a formal response. For any violation, the City must review the violation and determine the appropriate response.

The measure of the effectiveness of an enforcement response includes:

- 1) Whether the non-complying source returns to compliance as expeditiously as possible;
- 2) Whether the enforcement response establishes the appropriate deterrent effect for the particular violator and for other potential violators; and
- 3) Whether the enforcement response promotes fairness of government treatment as between comparable violators, as well as between complying and non-complying parties.

The terms major and minor violations are used in the Enforcement Response Guide, Addendum I, to describe violations. Major violations are those that exceed the limits frequently and/or by a large quantity (i.e., equal to or greater than the technical review criteria (TRC) described in section 8.1.2.), impede the determination of compliance status, have the potential to cause or may have actually caused harm to the environment, health, or the POTW treatment capability. Any violation that meets the definition of Significant Non-compliance should be considered a major violation.

When monetary penalties are to be assessed, the following four goals should be considered:

- 1) Penalties should recover the economic benefit of non-compliance plus some amount for the gravity of the violation;
- 2) Penalties should be large enough to deter future non-compliance;
- 3) Penalties should be uniform or reasonably consistent for similar instances of non-compliance; and
- 4) A logical basis for the calculation of penalties should exist.

Selection of the appropriate enforcement response will relate to whether the violation is major or minor and such other factors as duration of the violation, compliance history, good faith of the Industrial User, and the harm caused by the violation.

#### ***10.1. Duration of the Violation and Compliance History of the Industrial User***

The City should review the Violation Summary to evaluate the duration of the violation and the compliance history of the Industrial User. The effectiveness of the enforcement response that was used for the previous violation should also be considered. Isolated violations will usually be attributed to a relatively simple problem that can be easily corrected. However, the persistence of minor violations could indicate a more serious problem and necessitate an escalated enforcement response. When several minor excursions occur, either consecutively or several months apart, it may suggest that operating practices are inadequate to meet the limits and additional controls are needed.

More aggressive enforcement actions should be taken against Industrial Users that frequently exceed numerical pretreatment standards than those that have isolated excursions (unless the isolated excursions are large and troublesome). Informal meetings or an NOV should seek specific explanations of the cause of frequent excursions. If inadequate operating practices are found to be the cause, the City should seek specific commitments and deadlines to improve operating practices. If additional treatment is necessary, an enforceable compliance schedule should be issued to the Industrial User.

### ***10.2. Apparent Good Faith of Responsible Industrial User***

If Industrial User personnel appear to be attempting in good faith to comply with pretreatment requirements, the City's enforcement actions should be on a more cooperative level. However, the Clean Water Act (CWA) requires extraordinary efforts to comply with its' requirements in a timely way. Good faith must be measured against this standard. The efforts that Congress expects are stated below:

“The Act requires industry to take extraordinary efforts if the vital and ambitious goals of the Congress are to be met. This means that business-as-usual is not enough. Prompt, vigorous, and in many cases, expensive pollution control measures must be initiated and completed as promptly as possible. In assessing the good faith of a discharger, the discharger is to be judged against these criteria. Moreover, it is an established principle, which applies to this act, that administrative and judicial review are sought on the discharger's own time” (Legislative History of the Clean Water Act No. 95-14, Vol. 3, p. 463).

### ***10.3. Non-compliance That Causes Interference or Pass-Through***

If Industrial User non-compliance causes interference with treatment plant performance or a pass-through of pollutants, such violations should be addressed through formal enforcement action and penalties to ensure that adequate treatment and compliance are achieved promptly. In some cases, injunctive measures will also be appropriate.

## **11. Timeframes for Enforcement Responses**

All violations shall be identified and documented within five (5) workdays of receiving compliance information. Initial enforcement responses (informal or formal) shall occur within thirty (30) workdays of identifying a violation. Follow-up actions for continuing or reoccurring violation will be taken within sixty (60) workdays of the initial enforcement response. Violations which threaten health, property, or environmental quality are considered emergencies and will receive immediate response such as halting the discharge or terminating service. All violations meeting the criteria for significant non-compliance will be addressed through formal enforcement quarterly or annually upon identification of significant non-compliance.

## 12. **Reasonable Judgement**

The City of Milledgeville is obligated by Federal, State, and Local regulations to enforce its' Industrial Pretreatment Program. The City should make certain that its' employees and corresponding industrial representatives are fully aware of their requirements and responsibilities. The City should seek to establish a friendly, professional relationship with all its' Industrial Users. However, relationships with industry personnel, good or bad, should not cloud the commonsense judgement needed to administer proper enforcement. The ultimate goal of the Industrial Pretreatment Program is to preserve and protect public health and the environment.

### Addendum 1 – Enforcement Response Guide

Unauthorized	Type of Non-Compliance	Circumstance	Suggested Enforcement
	Discharge Without A Permit	IU unaware of requirement; no harm to POTW or environment	NOV with Application Form
	Failure to Submit Permit Application	IU has not submitted application within 10 days of the due date	Phone call; Email; Warning Letter
		IU has not submitted application after notice by the POTW	NOV;AO
		Failure to submit application	Refer to Discharge Without a Permit
Unauthorized Discharge Through A Manhole	No harm to POTW or environment	NOV; AO; AO with fine; Civil Action; Criminal Investigation	
	Harm to POTW or environment	AO with fine; Civil Action; Criminal Investigation	
	Recurring	Criminal Investigation	
Waste Discharged Not Authorized In Permit	No harm to the POTW or environment	NOV; AO; AO with fine; Civil Action; Criminal Investigation	
	Harm to the POTW or environment	AO with fine; Civil Action; Criminal Investigation	
	Recurring	Criminal Investigation	



	<b>Type of Non-Compliance</b>	<b>Circumstance</b>	<b>Suggested Enforcement</b>
<b>Discharge Limit</b>	Exceedance of Discharge Limitation or Prohibition in Permit or Ordinance	Results in SNC	AO; AO with Fine; Civil Action; Termination of Service
<b>Reporting Violations</b>	Document is Improperly Signed or Certified	Isolated Incident	Phone Call; Email; WL; NOV
		Previous Notice by POTW	NOV; AO; AO with Fine
	Document is Incomplete or Inaccurate	Isolated Incident	Phone Call; Email; WL; NOV
		Recurring Problem	AO; AO with Fine
	Document is Late	5 to 29 Days	Phone Call; Email; WL; NOV
		30 Days or More	AO; AO with Fine
		Documents Repeatedly Late	AO with fine; Civil Action
	Failure to Report Violation, Spill/Slug or Changed Discharge	No Actual or Potential Harm to POTW or Environment	NOV; AO
		Actual or Potential Harm to POTW	AO with fine; Civil Action
		Recurring Problem	AO with fine; Civil Action; Terminate Service
Failure to Report Additional Monitoring	Isolated Incident	Phone Call; WL; NOV	
	Recurring	AO; AO with fine	
Falsification of Information or Data	Any instance	Criminal Investigation; Terminate Service	

	<b>Type of Non-Compliance</b>	<b>Circumstance</b>	<b>Suggested Enforcement</b>
<b>Sampling Violations</b>	Failure to Monitor for all Required Parameters	Isolated	Phone Call; WL; NOV
		Recurring	AO; AO with fine; Civil Action
	Improper Sample Handling/Analytical Procedures	Isolated	Phone Call; WL; NOV
		Recurring	NOV; AO; AO with Fine
	Failure to Re-sample Within Required Timeframe	Isolated	Phone Call; WL; NOV
		Prior Notification	AO with Fine
		Recurring	AO; AO with Fine
	Failure to Install Monitoring Equipment/Sampling Point	Delay less than 30 days	NOV
Delay greater than 30 days		AO with fine; Civil Action	
Tampers with Monitoring Equipment/Sample	Any incident	Criminal Investigation; Termination of Discharge	
Sampling at Incorrect Location	Isolated Incident	NOV	
	Recurring	AO with Fine; Civil Action; Criminal Investigation	
<b>Compliance Schedules</b>	Missed Milestone	Less than 30 Days Late or Will Not Affect Final Compliance Date	NOV; AO
		Less than 30 Days Late	NOV; AO
	Not in Compliance As of Final Compliance Date	Greater than 30 days late; reasonable cause for delay	AO; AO with Fine
		Greater than 30 days late, no reasonable cause for delay	Show Cause; Civil Action; Termination of Discharge

	<b>Type of Non-Compliance</b>	<b>Circumstance</b>	<b>Suggested Enforcement</b>
<b>Inadequate Recordkeeping</b>	Files Incomplete or Missing (No Evidence of Intent)	Isolated	NOV
		Recurring	AO; AO with Fine
<b>Other Violations</b>	Entry Denied or Consent Withdrawn	Any Instance	Obtain Warrant and Return to IU