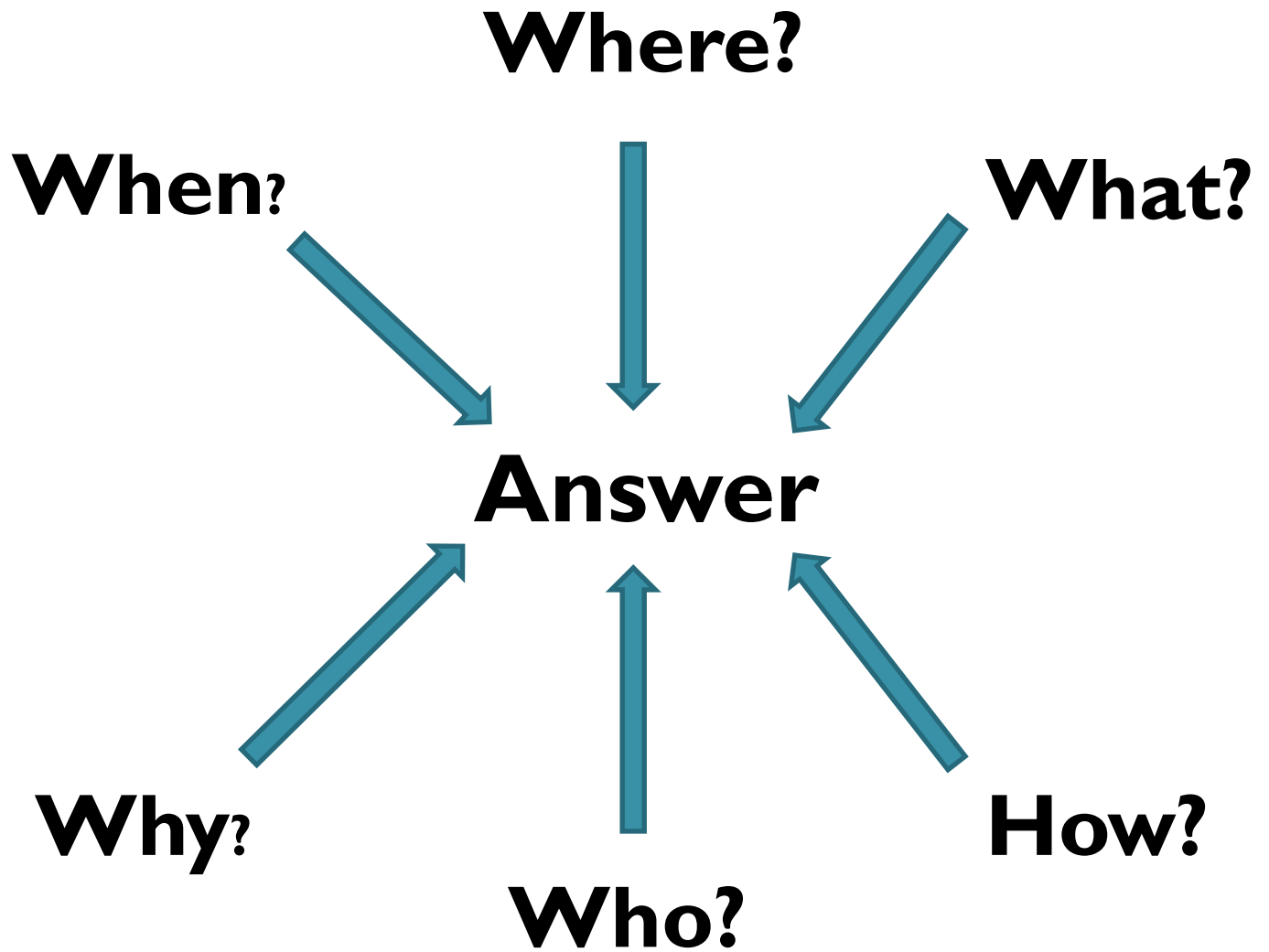


Essential Pretreatment program knowledge and requirements in accordance with 40 CFR 403 from “the Walking 40 CFR”





Definitions

Act	Water Management Division Director	NPDES Permit	Pretreatment Requirements
Approval Authority	Indirect Discharge	NPDES State	Regional Administrator
Approved POTW Pretreatment Program	Industrial User	Pass Through	Significant Industrial User
Best Management Practice(BMP)	Interference	Publicly Owned Treatment Works(POTW)	Submission
Control Authority	National Pretreatment Standard	POTW Treatment Plant	
Director	New Source	Pretreatment	

Purpose (Who)

It establishes responsibilities of Federal, State, and local government, industry and the public to implement National Pretreatment Standards to control pollutants which pass through or interfere with treatment processes in Publicly Owned Treatment Works (POTWs) or which may contaminate sewage sludge.

Objectives (Why)

- (a) To **prevent** introduction of pollutants into POTWs which will interfere with the operation of a POTW, including **interference** with use or disposal of municipal sludge.
- (b) To **prevent** the introduction of pollutants into POTWs which will **pass through** the treatment works or otherwise be incompatible with such works; and
- (c) To improve opportunities to **recycle and reclaim** municipal and industrial wastewaters and sludge.

Applicability (What)

To **pollutants from non-domestic sources** covered by Pretreatment Standards which are indirectly discharged into or transported by truck or rail or otherwise introduced into POTWs as defined below in 403.3;

Applicability (Where)

To POTWs which receive wastewater sources subject to National Pretreatment Standards;

Public Owned Treatment Works

means a treatment works which is owned by a State or municipality. This definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It includes sewers, pipes and other conveyances only if they convey wastewater to a POTW Treatment Plant.

State or Local Law

Nothing in this regulation is intended to affect any Pretreatment Requirements, including any standards or prohibitions, established by State or local law as long as the State or local requirements are not less stringent than any set forth in National Pretreatment Standards, or any other requirements or prohibitions established under the Act or this regulation.

The 6 reasons for requiring a Pretreatment Program (When)

Total design flow of 5 MGD for POTW	Nature or volume of industrial wastewater entering influent of wastewater facility
Upsets	Violations of NPDES permit limits
Sludge contamination	Interference or pass-through

If program is just starting when do I need to have a program submitted?

- Upon Approval Authority notification of requirement as soon as possible but **no later than one year.**

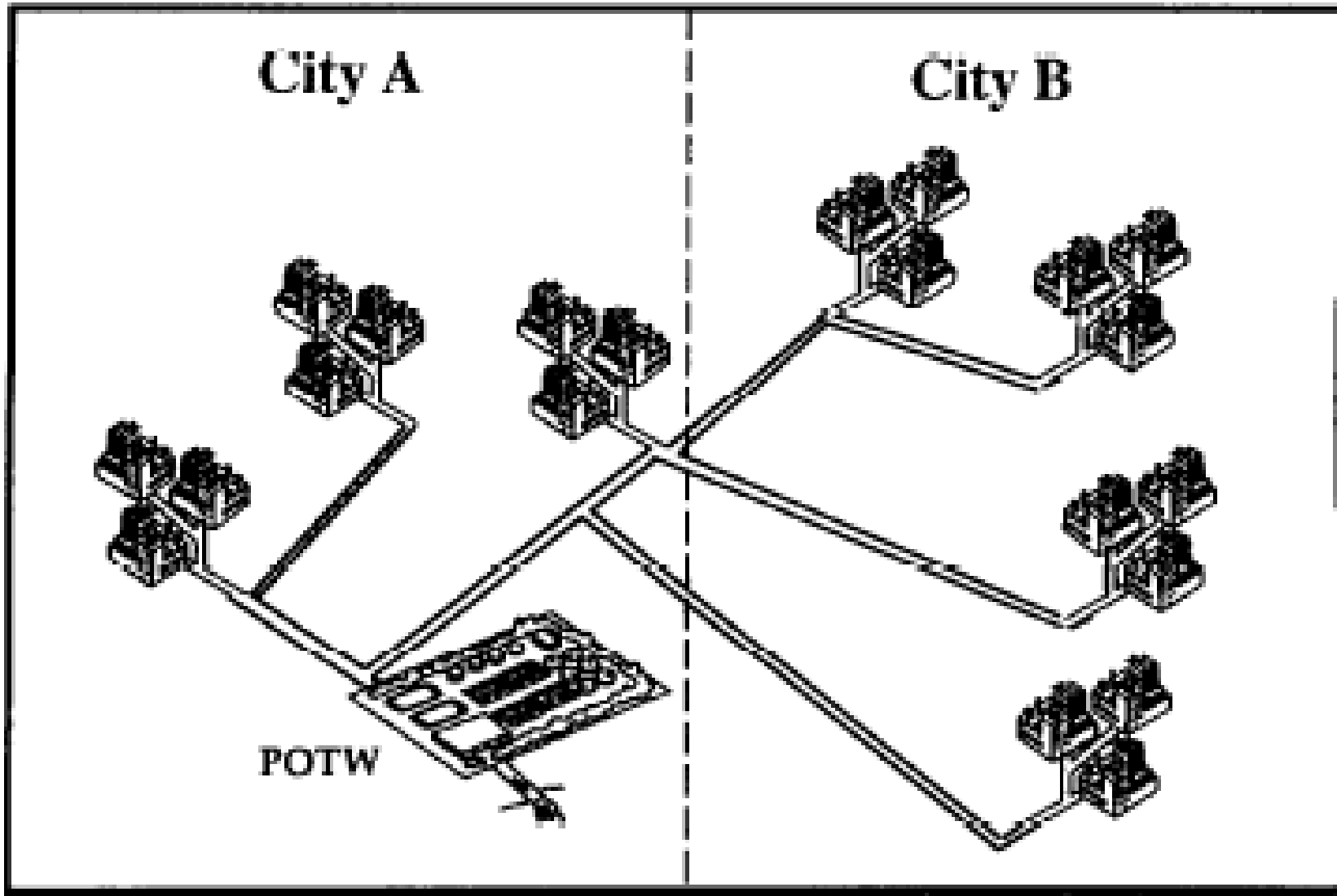
The How. So, What's First?



Legal Authority (How)

- Rules/Regulations
- Ordinances
- Multijurisdictional agreements

Rules & Regulations

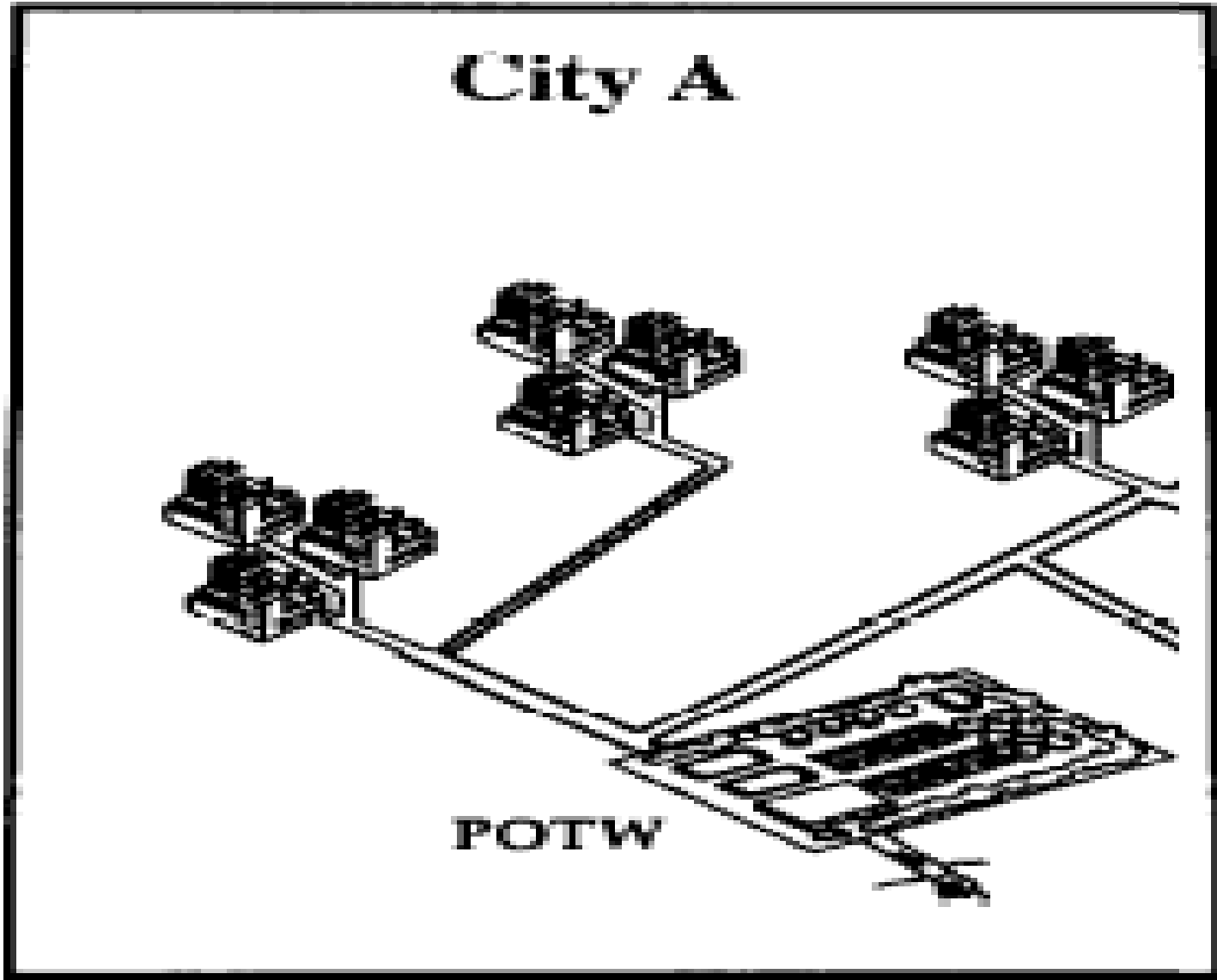




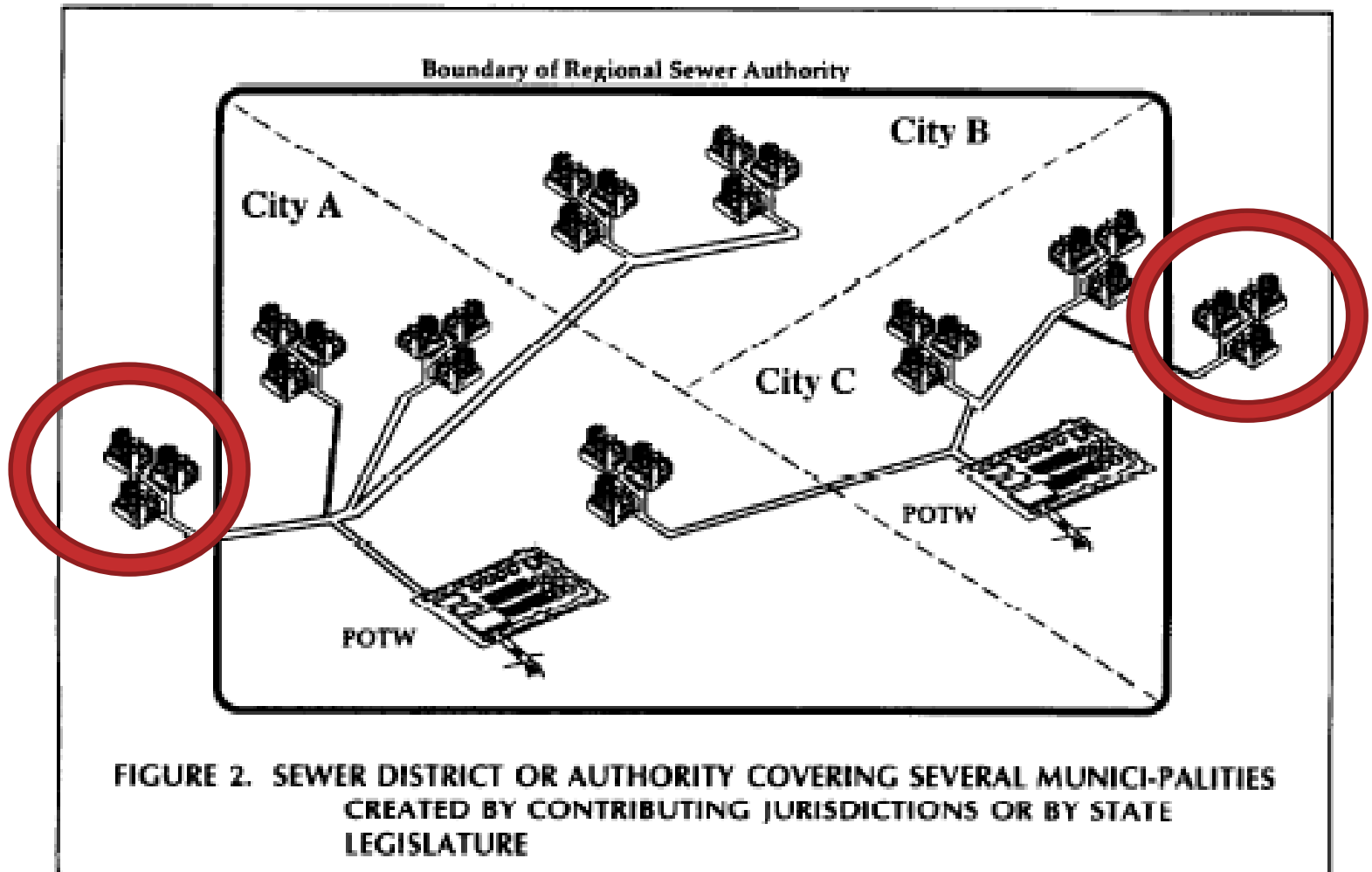
Rules & Regulations

- Must get all cities to adopt the Rules & Regulations

Ordinances



Multijurisdictional Agreements



United States
Environmental Protection
Agency

Office Of Water
(4203)

EPA 833-B-94-005
June 1994



Multijurisdictional Pretreatment Programs

Guidance Manual

Legal Authority

Important things to consider:

- Provides you the right to act.

40 CFR 403.8(f)(1)

- The review of any documents submitted for approval for new program or revisions:
 1. Attorney
 2. Approval Authority(State/EPA)
 3. Public Comment (minimum 30 days in accordance with 40 CFR 25, recommended 45 days)
- Approval Authority looks at this prior to an audit



This might take a while

EPA requires 7 essential things in a legal authority

- i. Control of discharges
- ii. Requirement for compliance with Pretreatment Standards
- iii. Permit and/or other control mechanisms (Right of Issuance and conditions)
- iv. Require the development of a compliance schedule for the installation of technology required to meet applicable Pretreatment Standards and Requirements
- v. Right of entry (Inspections, surveillance, and monitoring)
- vi. Remedies for non-compliance (injunctive relief, civil, and criminal penalties)
- vii. Confidentiality requirements



i.

Control of Discharges

Control of Discharges

How to control:

- Deny: No discharge / Haul away
- Condition: Treatment required for discharge
- Allow: No Treatment

Control of Discharges

When to Control:

- National Pretreatment Standard
- New discharge
- Increase contribution (flow or concentration)
- Changes in the nature of pollutants
- Reassessment of Local Limits

New Pretreatment Standard

- Within 180 days after the effective date of a categorical Pretreatment Standard or final administrative decision made upon a categorical determination submission...




New Discharge of Pretreatment Standard

- At least 90 days prior to commencement of discharge, New Sources, and sources that become Industrial Users subsequent to the promulgation of an applicable categorical Standard....

Control of Discharges

- Include a specific provision requiring IUs to provide **timely notice** of any substantial change in the quantity or quality of their industrial waste discharge to the POTW.
- **Be specific, be consistent**



ii.

Requirement for compliance
with Pretreatment Standards



National Pretreatment Standards

General Prohibitions

Specific Prohibitions

Significant Industrial Users

Local Limits(POTW developed)

Best Management Practices

General Prohibition

- A User may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference

Specific Prohibition

1. Pollutants which create a **fire or explosion hazard** in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than **140 degrees Fahrenheit or 60 degrees Centigrade** using the test methods specific in 40 CFR 261.21
2. Pollutants which will cause **corrosive structural damage** to the POTW, but in no case discharges with **pH lower than 5.0**, unless the works is specifically designed to accommodate such Discharges.
3. **Solids or viscous pollutants** in amounts which will cause obstruction to the flow in the POTW resulting in Interference
4. Any pollutant, including **oxygen demanding pollutants (BOD, etc.)** released in a discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW
5. **Heat** in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant **exceed 40 degrees C (104 degrees F)** unless the Approval Authority, upon request of the POTW, approves alternate temperature limits
6. **Petroleum oil, nonbiogradable cutting oil, or products of mineral oil origin** in amounts that will cause interference or pass through
7. Pollutants which results in the presence of **toxic gases, vapors, or fumes** within the POTW in a quantity that may cause acute worker health and safety problems
8. **Any trucked or hauled pollutants** except at the discharge points designated by the POTW

Significant Industrial User

- Industrial User that meets any of the following:
 1. Is a **CIU (Categorical Industrial User)**
 2. Any Industrial User that discharges an average of **25,000 gallons per day or more of process wastewater excluding sanitary, non-contact cooling water and boiler blow down wastewater.**
 3. Contributes a **process** wastestream which makes up **5 percent or more** of the average dry weather **hydraulic capacity** of the WRF.
 4. Contributes a process wastestream which makes up **5 percent or more of the organic capacity** of the WRF.
 5. The Industrial User has a **potential for adversely affecting** the POTW's operation or for violating any Pretreatment Standard or requirement. (in accordance with 40 CFR 403.8(f)(6))

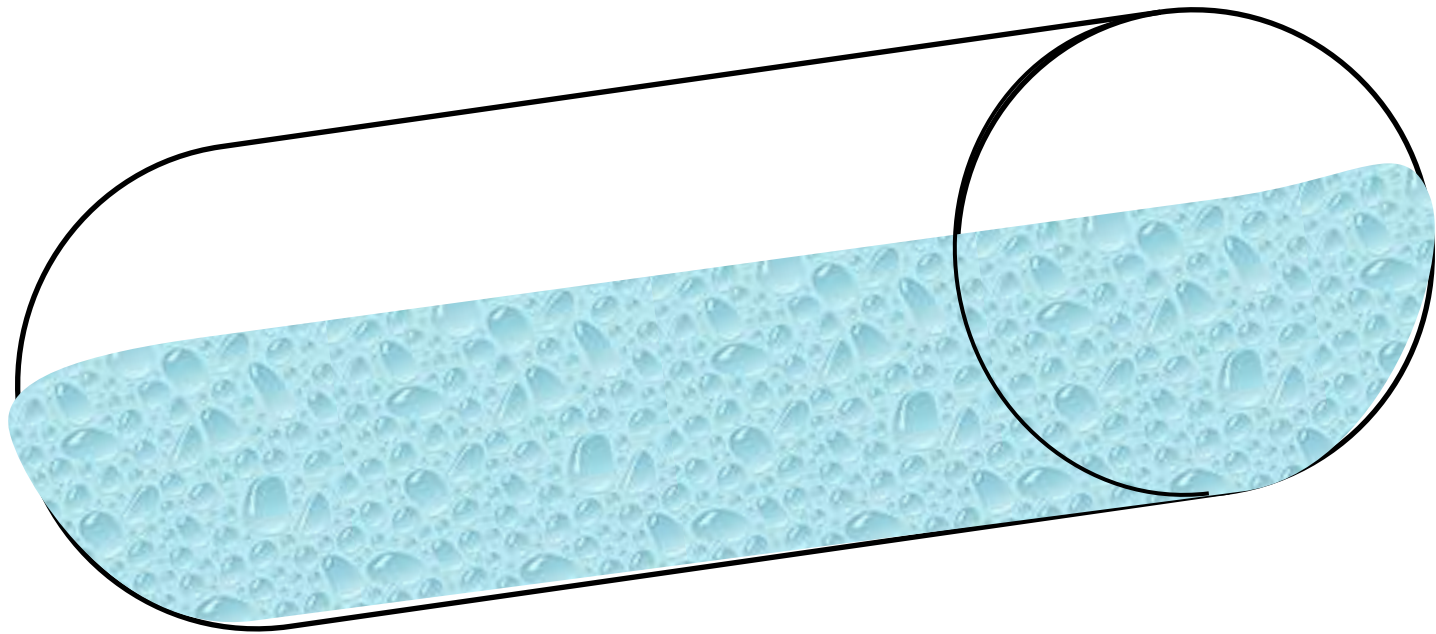
CIU (Categorical Industrial Users)

405 - Dairy Products	420 - Iron and Steel Manufacturing	436 - Mineral Mining and Processing	454 - Gum and Wood Chemicals Manufacturing
406 - Grain Mills	421 - Nonferrous Metals Manufacturing	437 - Centralized Waste Treatment	455 - Pesticide Chemicals
407 - Canned and preserved fruits and vegetables	422 - Phosphate Manufacturing	438 - Metal Products and Machinery	457 - Explosive Manufacturing
408 - Canned and preserved seafood	423 - Steam Electric Power Generating	439 - Pharmaceutical	458 - Carbon Black Manufacturing
409 - Sugar Processing	424 - Ferroalloy Manufacturing	440 - Ore Mining and Dressing	459 - Photographic
410 - Textile Mills	425 - Leather Tanning and Finishing	441 - Dental Office	460 - Hospital
411 - Cement Manufacturing	426 - Glass Manufacturing	442 - Transportation Equipment Cleaning	461 - Battery Manufacturing
412 - Concentrated Animal Feeding Operations	427 - Asbestos Manufacturing	443 - Paving and Roofing Materials	463 - Plastics Molding and Forming
413 - Electroplating	428 - Rubber Manufacturing	444 - Waste Combustor	464 - Metal Molding and Casting
414 - Organic Chemicals, Plastics, and Synthetic Fibers	429 - Timber Products	445 - Landfills	465 - Coil Coating
415 - Inorganic Chemicals	430 - Pulp, Paper, and Paperboard	446 - Paint Formulating	466 - Porcelain Enameling
417 - Soap and Detergent Manufacturing	432 - Meat and Poultry Products	447 - Ink Formulating	467 - Aluminum Forming
418 - Fertilizer Manufacturing	433 - Metal Finishing	450 - Construction and Development	468 - Copper Forming
419 - Petroleum Refining	434 - Coal Mining	451 - Aquatic Animal Production	469 - Electrical and Electronic Components
	435 - Oil and Gas Extraction		471 - Nonferrous Metals Forming and Metal Powders

Categorical Limits - 40 CFR 404 through 471

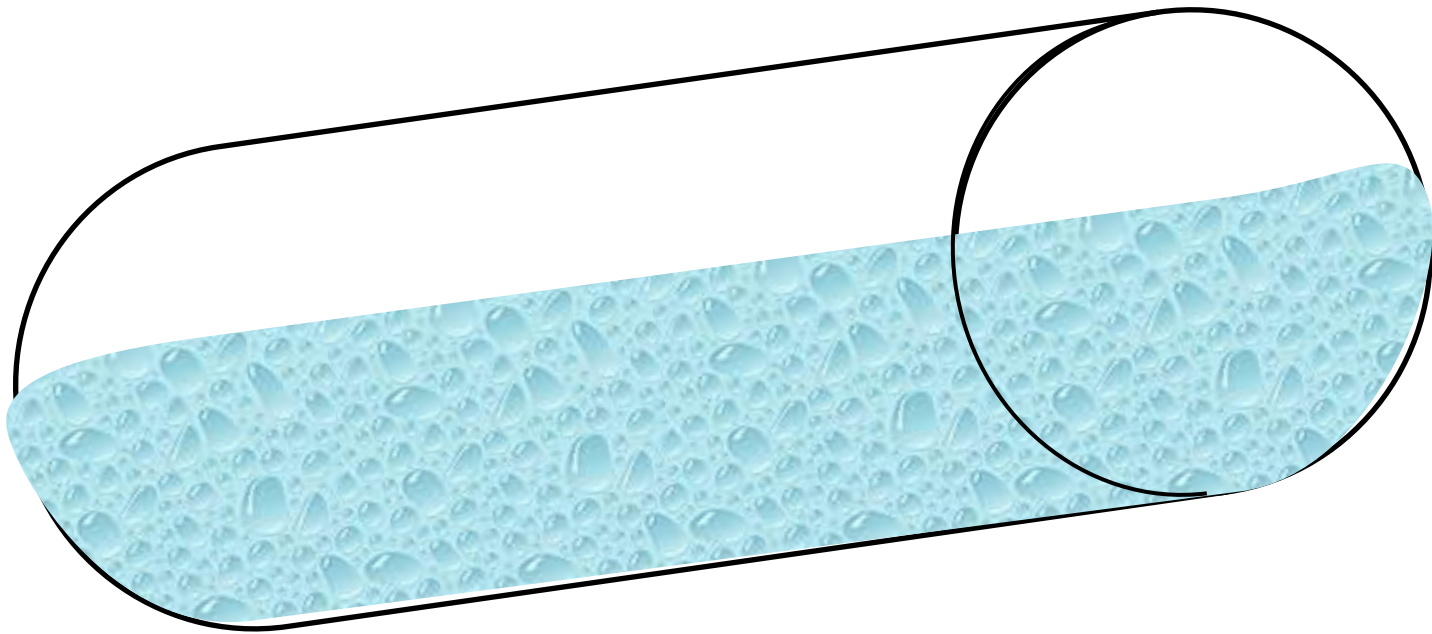
- a. Direct discharge control only (no POTW control)
- b. New (PSNS) or Existing (PSES) Source
- c. Concentration based
- d. Production based
- e. Zero discharge
- f. One Time compliance certification (Dental Rule)

SIU: 25,000 gallons per day



40 CFR 403.8(f)(1)(ii)

SIU: 5% or more of Hydraulic capacity during dry weather



SIU: 5% or more of Organic Capacity



40 CFR 403.8(f)(1)(ii)

SIU catch all: Potential to adversely affecting the POTW Treatment



40 CFR 403.8(f)(1)(ii)

Pretreatment Standards compliance

- Local Limits - POTW developed
 1. Sludge capacity
 2. POTW plant effluent
 3. Flow



Reassessment of Local Limits

- New water quality standards set in your National Pollution Discharge Elimination System permit such as Nutrients
- Changing the use of wastewater plant discharge or sludge disposal

Pretreatment Standards compliance

- **Best Management Practices**
 - POTWs may develop Best Management Practices to implement elimination of specific limits, prohibitions, pass-through and interference violations. Such BMPS shall be considered local limits and Pretreatment Standards
 1. Fats, Oils, and Greases (F.O.G.)
 2. Dental Amalgam (Mercury)



iii.

Permit and/or other control
mechanisms

Who do we permit?

- Categorical Industrial Users Required
- Significant Industrial Users Required
- Food Service Establishments Optional
- Auto Service Establishments Optional
- Dental Offices Required Optional

Exception

- Non-Significant Categorical Industrial User
 - Reduce sampling and inspections
- EPA/State required to Permit

Permit and/or Other Control Mechanisms

- **Right to issue permits**
- What **type of control mechanism** will be issued(individual or general permits, compliance orders, etc.)
- **Duration** (no longer than 5 years)
- **Non-transferability** without, at a minimum, prior notification to the POTW and provision of a copy of the existing control mechanism to the new owner or operator

Permit and/or Other Control Mechanisms

- **Effluent limits** (General Prohibition, Specific Prohibition, Categorical, Local, Best Management Practices, Flow)
- **Sampling** (POTW, Self Monitoring)
 1. Pollutants
 2. Frequency
 3. Method (40 CFR 136)



Permit and/or Other Control Mechanisms

- **Reporting** (90 Day Compliance, Periodic Compliance reports, etc.)
- **Recordkeeping** (Minimum of 3 years)
- **Applicable civil and criminal penalties**
- **Requirements to control Slug Discharges**

Change in Ownership only

- At least 30 days in advance of proposed transfer date Industrial User must:
 - A signed and certified document
 - Certified Document must include:
 - Description of the anticipated transaction
 - Specific transfer date
 - Written agreement between the current and future owner/operator that the current permit be transferred
 - Statement of intention to not modify operations.

POTW must

- **Modify existing permit:**
 - **New owner**
 - **New Permit effective date**

If Industrial User makes changes

- POTW must act as if user is a new Industrial User:
 - Require applications
 - Possibly new sources standards



iv.

Require the development of a
compliance schedule

Compliance Schedule

- Development of a compliance schedule for the installation of technology required to meet applicable Pretreatment Standards...



Compliance Schedule

- Submission of all notices and self-monitoring reports from Industrial Users as are necessary to assess and assure compliance, including but not limited to reports required in 403.12, which are:
 1. Baseline Report
 2. 90 Day Compliance Report
 3. Periodic Compliance Report
 4. Slug Load notices
 5. Certification Statements

Compliance Schedule

- Reports for compliance schedule shall contain increments of progress in the form of dates for the following:
 - Hiring an engineer
 - Completion of plans
 - Executing contracts
 - Commencing Construction
 - Completing Construction

40 CFR 403.12(c)



Compliance Schedule

- No increment shall exceeded 9 months
- Progress reports are due no later than 14 days following each date whether or not it complied with the intended target date.
- If the compliance schedule is not being meet than included in the report shall be:
 - The reason for delay.
 - Steps being taken by the Industrial User to get construction back on schedule.

Compliance Schedule

- Submission of all notices and self-monitoring reports from Industrial Users as are necessary to assess and assure compliance, including but not limited to reports required in 403.12, which are:
 1. Baseline Report
 2. 90 Day Compliance Report
 3. Periodic Compliance Report
 4. Slug Load notices
 5. Certification Statements



V.

Right of entry

Right of Entry

- The ability to be allowed on the facility's property to perform:
 1. Inspection
 2. Surveillance
 3. Monitoring

40 CFR 403.8(f)(1)(v)

Never use the words “reasonable time” be
specific.



vi.

Remedies for non-compliance

Remedies for Non-Compliance

- Injunctive Relief – Prohibit/stop a discharge
- Civil Penalties – Sought as compensation for damages
- Criminal Penalties – Punish the person for wrong doing

40 CFR 403.8(f)(1)(vi)

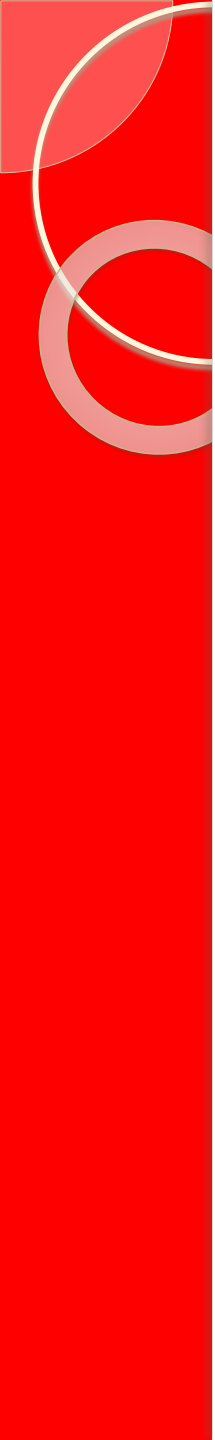


- Injunctive Relief

All POTW's shall be able to seek injunctive relief....

- Civil or Criminal Penalties

All POTWs shall also have authority to seek or assess civil or criminal penalties in at least the amount of \$1,000 a day for each violation....



When are you allowed to use
injunctive relief?



- Endangerment to Health and Welfare

The POTW shall have authority and procedures (after informal notice to the discharger) immediately and effectively to **halt or prevent any discharge of pollutants** to the POTW which reasonably appears to present an **imminent endangerment to the health and welfare** of persons.

- Environmental or Interference with POTW

The POTW shall have authority and procedures (which shall include notice to the affected industrial users and opportunity to respond) to **halt or prevent any discharge** to the POTW which presents or may present and **endangerment to the environment or which threatens to interfere** with the operation of the POTW.

Caution!!!!

- The Approval Authority shall have authority to seek judicial relief and may also use administrative penalty authority when the POTW has sought a monetary penalty which the Approval Authority believes to be insufficient.



vii.

Confidentiality requirements

Confidentiality Requirements

- Pretreatment programs shall comply with 40 CFR 403.14.
 1. Claims must be asserted at time of submission.
 2. Stamping of “confidential business information” on each page containing such information
 3. Confidentiality claims shall be treated in accordance with 40 CFR part 2
 4. Effluent data shall be available to the public without restriction

40 CFR 403.8(f)(1)(vii)



What's next?





EPA requires these 8 Essential Procedures

- i. Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program
- ii. Identify the character and volume of pollutants contributed by Industrial Users
- iii. Notify Industrial Users identified as Significant Industrial User of status
- iv. Receive and analyze self-monitoring reports and other notices submitted by Industrial Users
- v. Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities
- vi. Evaluate whether each SIU needs a Slug Discharge Control Plan
- vii. Investigate instance of noncompliance with Pretreatment Standards and Requirements,
- viii. Comply with public participation requirements of 40 CFR part 25 in the enforcement of National Pretreatment Standards.



i.

Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program, which are:

1. Categorical Industrial Users
2. Significant Industrial Users
3. Industrial Users that may adversely affect the POTW such as F.O.G. or Mercury programs



Industrial Waste Survey

EPA recommended minimum

- Name of Industry
- Address of facility
- Standard Industrial Classification code(SIC) or North American Industrial Classification Standard (NAICS)
- Wastewater flow
- Types and concentrations of pollutants contained in discharge
- Major products manufactured or services supplied
- Description of existing on-site pretreatment facilities and practices



Standard Industrial Classification (SIC) North American Industry Classification System (NAICS)

Local Limits Guidance appendices

- Appendix B - Industrial Categories with Pretreatment Standards

Transportation Equipment Cleaning (4491, 4499, 4741, 7699) [484230, 488320, 488390, 488210]	442 (A-C)
---	-----------



Industrial Waste Survey

Additional information for better evaluation:

- Locations of discharge points
- Raw materials use or stored at the site
- Flow diagram or sewer map for the industry
- Number of employees
- Operation and production schedules
- Spill Prevention Control and Countermeasures (SPCC) plan description



List of Industrial Users

- A list of Industrial Users shall be prepared and maintained. The list shall identify the Industrial Users that meet the Significant Industrial User criteria or why Industrial Users do not meet the Significant Industrial User criteria.

ii.

Identify the character and volume of pollutants contributed by Industrial Users identified under paragraph (f)(2)(i)





iii.

Notify Industrial Users identified as Significant Industrial User of status and applicable Pretreatment Standards within 30 days of determination.

iv.

Receive and analyze self-monitoring reports and other notices submitted by Industrial Users in accordance with the self-monitoring requirements in 403.12

	<u>Result</u>	<u>Units</u>	<u>Minimum Reporting Limit</u>	<u>Method</u>	<u>Preparation Date/Time</u>	<u>Analysis Date/Time</u>	<u>Flag(s)</u>
Inorganic							
Cyanide, Total	ND	mg/L	0.002	SM 4500 CN-E	12/15/21	12/15/21	
Metals							
Cadmium, Total	0.0003	mg/L	0.0002	EPA 200.8	12/15/21	12/15/21	
Chromium, Total	0.0014	mg/L	0.0005	EPA 200.8	12/15/21	12/15/21	
Copper, Total	0.0062	mg/L	0.0010	EPA 200.8	12/15/21	12/15/21	
Lead, Total	0.0086	mg/L	0.0005	EPA 200.8	12/15/21	12/15/21	
Nickel, Total	ND	mg/L	0.0005	EPA 200.8	12/15/21	12/15/21	
Silver, Total	ND	mg/L	0.0005	EPA 200.8	12/15/21	12/15/21	
Zinc, Total	0.01	mg/L	0.01	EPA 200.8	12/15/21	12/15/21	

V.

Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify occasional and continuing noncompliance with Pretreatment Standards.



V.

40 CFR 403.8(f)(2)

Inspect and sample the effluent from each Significant Industrial User at least once a year

(Note: Understand the Control Authority's interpretation. Example: In Utah, the UDEQ requires within 365 days of previous inspection or sample.)





vi.

Evaluate whether each Significant Industrial User needs a **Slug Discharge Control Plan** or other action to control Slug Discharges. Significant Industrial Users must be evaluated within one year of being designated a Significant Industrial User.



Slug Discharge Control Plan

- A. Description of discharge practices, including non-routine batch Discharges;
- B. Description of stored chemicals;
- C. Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition with procedures for follow-up written notification within five days;
- D. If necessary, procedures to prevent adverse impact from accidental spills, including
 1. Inspection and maintenance of storage areas,
 2. Handling and transfer of materials,
 3. Loading and unloading operations,
 4. Control of plant site run-off,
 5. Worker training,
 6. Building of containment structures or equipment,
 7. Measures for containing toxic organic pollutants(including solvents) and/or
 8. Measures and equipment for emergency response;

vii

Investigate instance of noncompliance with Pretreatment Standards and Requirements, as indicated in the reports and notices or indicated by analysis.



40 CFR 403.8(f)(2)



viii

Comply with public participation requirements of 40 CFR part 25 in the enforcement of National Pretreatment Standards. These procedures shall include provision for at least annual public notification in a newspaper(s) of general Circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW of Industrial Users which, at any time during the previous 12 months, were in **significant noncompliance**...

Significant Noncompliance(SNC)

- A. Chronic violations – 66 percent or more during a 6-month period exceed
- B. Technical Review Criteria (TRC) violations- 33 percent or more during a 6-month period exceed the numeric standard multiplied by the applicable TRC
 - 1. TRC= 1.4 for BOD,TSS, fats, oil, and grease
 - 2. TRC= 1.2 for all other pollutants except pH

Significant Noncompliance(SNC)

- C. Any other violation of a Pretreatment Standard or requirement that the POTW determines has caused , alone , or in combination with other Discharges, Interference or Pass Through(including endangering the health of POTW personnel or the general public)
- D. Any discharge of a pollutant that has cause imminent endangerment to human health, welfare or to the environment or has resulted in the POTWs exercise of its emergency authority to halt or prevent such a discharge



Significant Noncompliance(SNC)

- E. Failure to meet, within 90 days after the schedule date, a compliance schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction or attaining final compliance;
- F. Failure to provide, within 45 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;
- G. Failure to accurately report noncompliance



Significant Noncompliance(SNC)

- H. Any other violation or group of violations, which may include a violation of Best Management Practices, which the POTW determines will adversely affect the operation or implementation of the local Pretreatment Program.

Significant Noncompliance(SNC)

Table I - SNC Time Frames

SNC Quarter	Chronic Effluent and TRC Violations 40CFR '403.8(f)(2)(vii)(A&B)	Reporting Requirements and Other Criteria 40 CFR '403.8(f)(2)(vii)(C-H)
1st Quarter	October-March	January-March
2nd Quarter	January-June	April-June
3rd Quarter	April-September	July-September
4th Quarter	July-December	October-December

US EPA Region VIII
April 15, 1997

Funding

- The POTW shall have sufficient resources and qualified personnel to carry out the authorities and procedures.

EPA POTW Pretreatment Program Development Table 7.2

POTW Flow Range (MGD)	Relative Number of Indirect Dischargers	Range of Personnel Requirements for Pretreatment Program
5	small large	1-3 2-5
5-25	small large	2-4 4-8
25-50	small large	4-6 8-10
50	small large	6-8 10-15
100	large	15-50*



EPA POTW Pretreatment Program Development 7.1.2.4

Staff Qualifications:

- Education and experience should be appropriate for the tasks that the person will be expected to perform.
- The pretreatment program is likely to require support from personnel with experience in:
 - Engineering (Environmental, civil, sanitary, or chemical)
 - Chemistry
 - Public Administration
 - Accounting and Finance
 - Law

Local Limits

- The POTW shall develop local limits or demonstrate that they are not necessary.

<u>Pollutants</u>	<u>Daily Maximum (mg/l)</u>
Cyanide	8.7
Aluminum	865.9
Arsenic	16.1
Cadmium	2.4
Chromium	9.3
Copper	33.0
Lead	46.2
Mercury	0.0055
Nickel	188.8
Selenium	4.4
Silver	8.8
Zinc	181.6

40 CFR 403.8(f)(4)

Enforcement

- The POTW shall develop and implement an enforcement response plan.

Enforcement Response Plan

- i. Describe how instances of noncompliance will be investigated
- ii. Types of escalating enforcement that will be taken to anticipated types of industrial user violations and the time responses will take place.
- iii. Identify the authorized representative responsible for each type of response.
- iv. Adequately reflect the POTW's primary responsibility to enforce Pretreatment Standards

REPORTING VIOLATIONS

Violation	Enforcement Action	Responsible Personnel	Time Goal (Days)
Report is Improperly Signed or Certified	Telephone Call	Pretreatment Coordinator	7
	Notice of Violation		7-14
Report is Improperly Signed or Certified After Notice by CA	Notice of Violation	Pretreatment Coordinator	7-14
	Show Cause Hearing	Treatment Facility Manager	30
Isolated, Not Significant, (For Example Five Days Late)	Telephone Call	Pretreatment Coordinator	7
	Notice of Violation	Treatment Facility Manager	7-14
Significant, (For Example 30/45 Days or More Late)	Show Cause Hearing	Treatment Facility Manager	30
	Compliance Order w/ Penalty	Treatment Facility Manager	30
Reports are Always Late or No Reports at All Enforcement Response	Show Cause Hearing	Treatment Facility Manager	7-14
	Administrative Order w/ Penalty	Treatment Facility Manager	30
	Civil Action	Attorney*	30
Failure to Report Spill or Changed Discharged, (No Harm)	Notice of Violation	Pretreatment Coordinator	7-14
Failure to Report Spill or Change in Discharge, (Results In Harm)	Show Cause Hearing	Treatment Facility Manager	7-14
	Compliance Order w/ Penalty	Treatment Facility Manager	30
	Civil Action	Attorney*	30
Repeated Failure to Report Spills	Show Cause Hearing w/ Penalty	Treatment Facility Manager	30
	Administrative Order Cease and Desist	Treatment Facility Manager	14
	Termination of Service	Treatment Facility Manager*	0-30
Falsification of Data, Reports, Application, etc.	Criminal Investigation	Refer to DEQ/EPA	30
	Termination of Service	Treatment Facility Manager*	0-30

*In consultation with General Manager



Electronic Documents

- Electronic reporting must meet requirements in 40 CFR Part 3.

QUESTIONS

Who?

Why?

What?

When?

Where?

How?