

A wooden mallet with a dark metal head, symbolizing enforcement. The mallet is positioned diagonally across the frame, with the head pointing towards the upper right. The background is a light blue, textured surface, possibly water or a sky with clouds.

Enforcement Response

The Enforcement Hammer

Objectives of Industrial Pretreatment:

- (a) To protect the plant
- (b) To protect the receiving stream / water body
- (c) To improve opportunities to recycle and reuse.

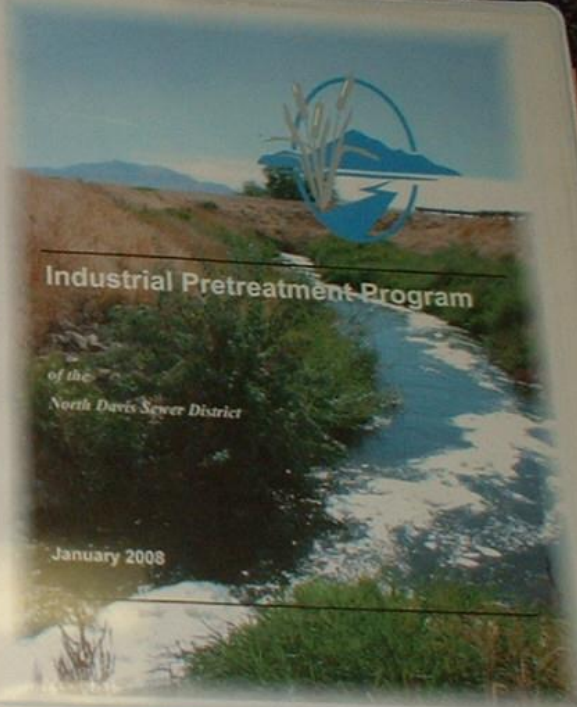


ORDINANCES

*of the
North Davis Sewer District*

JANUARY 2005

Industrial Pretreatment Coordinator #21



Industrial Pretreatment Program

*of the
North Davis Sewer District*

January 2008

United States
Environmental Protection
Agency

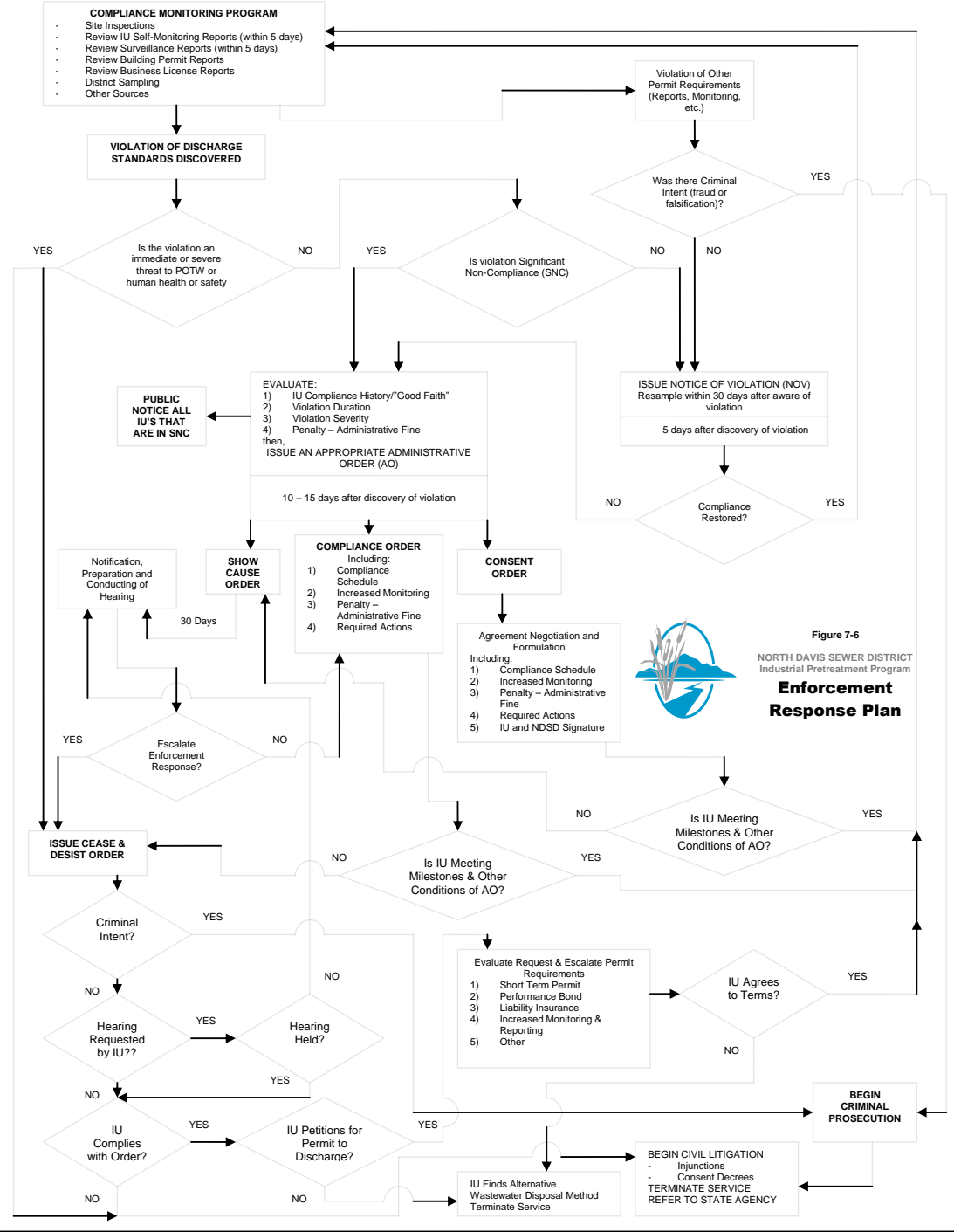
Office of Water
Enforcement and Permits
Washington, DC 20460

September 1986

Water and Waste Management



Pretreatment Compliance Monitoring and Enforcement Guidance



You need to have a hammer in your toolbox

Enforcement Response Guide

| Specific Noncompliance | Nature of Violation | Enforcement Response | Responsible Official |
|--|---|--|--|
| Exceeding limits (categorical, local, or prohibited) | 1 st incidence | NOV | PC |
| | 2 nd incidence (30-day follow-up sample) | NOV AO including penalty up to \$100/day | PC PC |
| | 3 rd incidence (2 nd 30-day follow-up sample) | AO ¹ including penalty up to \$250/day Judicial action if environmental harm resulted, including penalty | PC, PM PM, M, L |
| | Violations that are SNC | AO ¹ with penalty Public Notice in newspaper Judicial action, including penalty Terminate service | PC, PM PC, PM PM, M, L PM, M, B |



NORTH DAVIS SEWER DISTRICT
Industrial Pretreatment Program

Notice of Violation

May 31, 2006

To: ABC Manufacturing
123 Industrial User Avenue
Industrial City, UT 84016
Attn: Joe Blow

Certified Mail

Permit No: 666 ABC Manufacturing

Dear Mr. Blow:

This is a NOTICE OF VIOLATION (NOV) of your wastewater discharge permit for the following Non-Compliant Event(s):

Date Occurred: **Apr-13-2005**
Type Non-Compliance: **NC-P**
Parameter violation non-compliance
pH On Site Daily Limit was exceeded. The Result was 11.4 pH units while the Daily Limit was 6.5-11.0 pH units.
The Violation occurred for Sample '230-041305-23C' on the Sample Date of '4/13/2005' and for Monitoring

Enforcement Action(s): **Written notice of violation (NOV)**

Penalty Amount: **\$0.00**

You must perform the following remedial actions to bring your permit into compliance and avoid further enforcement actions by the district:

Compliance Plan: **Implement operation and maintenance procedures and/or construction activities to remedy cited problem.**

Date Due: **17-May-05**

Follow-up samples will be collected on or before the due date to ensure compliance has been restored.

Please contact me if you have any questions or clarifications regarding this Notice of

Signed:

Jeffrey E Macfarlane
Industrial Pretreatment Coordinator
North Davis Sewer District





Administrative Cease and Desist Order

IN THE MATTER OF
(Name of Industrial User)
(Address of Industrial User)
Respondent.

ADMINISTRATIVE CEASE AND
DESIST ORDER

Case Number _____

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the District Manager, under the North Davis Sewer District's ("District") Wastewater Control Ordinance ("Ordinance"). This Order is based on Findings of violation of the conditions of the Industrial Discharge Permit issued to [Industrial User].

FINDINGS

1. [Industrial User] discharges non-domestic wastewater containing pollutants into the sanitary sewer system of the District.
2. [Industrial User] is a Significant Industrial User as defined by Section 3-1-3 (44) of the District's Ordinance.
3. [Industrial User] was issued an Industrial Discharge Permit on [date] which contains prohibitions, restrictions and other limitations on the quality of the wastewater it discharges to the sanitary sewer.
4. Pursuant to the Ordinance and the above-referenced Permit, data is routinely collected or submitted on the compliance status of [Industrial User].
5. This data shows that [Industrial User] has significantly violated its Industrial Discharge Permit in the following manner:
 - a. [Describe violations as appropriate]

ORDER

THEREFORE, BASED ON THE ABOVE FINDINGS, IT IS HEREBY ORDERED THAT [Industrial User]:



Administrative Compliance Order

IN THE MATTER OF
(Name of Industrial User)
(Address of Industrial User)
Respondent.

ADMINISTRATIVE COMPLIANCE
ORDER

Case Number _____

LEGAL AUTHORITY

The following Findings are made and Order issued pursuant to the authority vested in the District Manager, under the North Davis Sewer District ("District") Wastewater Control Ordinance ("Ordinance"). This Order is based on Findings of violation of the conditions of the Industrial Discharge Permit issued under the Ordinance.

FINDINGS

1. Industrial User (hereinafter referred to as "Respondent") discharges non-domestic wastewater containing pollutants into the sanitary sewer system of the District.
2. Respondent is a Significant Industrial User as defined by Section 3-1-3 (44) of the District's Ordinance.
3. Respondent was issued an Industrial Discharge Permit which contains prohibitions, restrictions and other limitations on the quality of the wastewater it discharges to the sanitary sewer.
4. Pursuant to the Ordinance and the above-referenced Permit, data is routinely collected or submitted on the compliance status of Respondent.
5. This data shows that Respondent has violated the Ordinance in the following manner:
 - a. [Describe violations and appropriate]

THEREFORE, BASED ON THE ABOVE FINDINGS, IT IS HEREBY ORDERED THAT RESPONDENT:

1. [Insert provisions as appropriate]



Administrative Consent Order

IN THE MATTER OF
Kroger Layton Manufacturing
500 Sugar Street
Layton, Utah 84041
Respondent.

ADMINISTRATIVE CONSENT ORDER

Case Number 230-1-07

WHEREAS, the NORTH DAVIS SEWER DISTRICT (DISTRICT) pursuant to the powers, duties and responsibilities vested in the District Manager by provisions of the District's Wastewater Control Ordinance (Ordinance) has conducted an on-going investigation of the Respondent and has determined that:

- A. The District owns and operates a wastewater treatment plant and collection facilities which are adversely impacted by discharges from industrial users, including Respondent, and has implemented a pretreatment program to control and regulate such discharges.
- B. Respondent has consistently violated the pollutant limits in its Industrial Discharge Permit (Permit) as set forth in Exhibit 1, attached hereto, or otherwise violated the Ordinance.

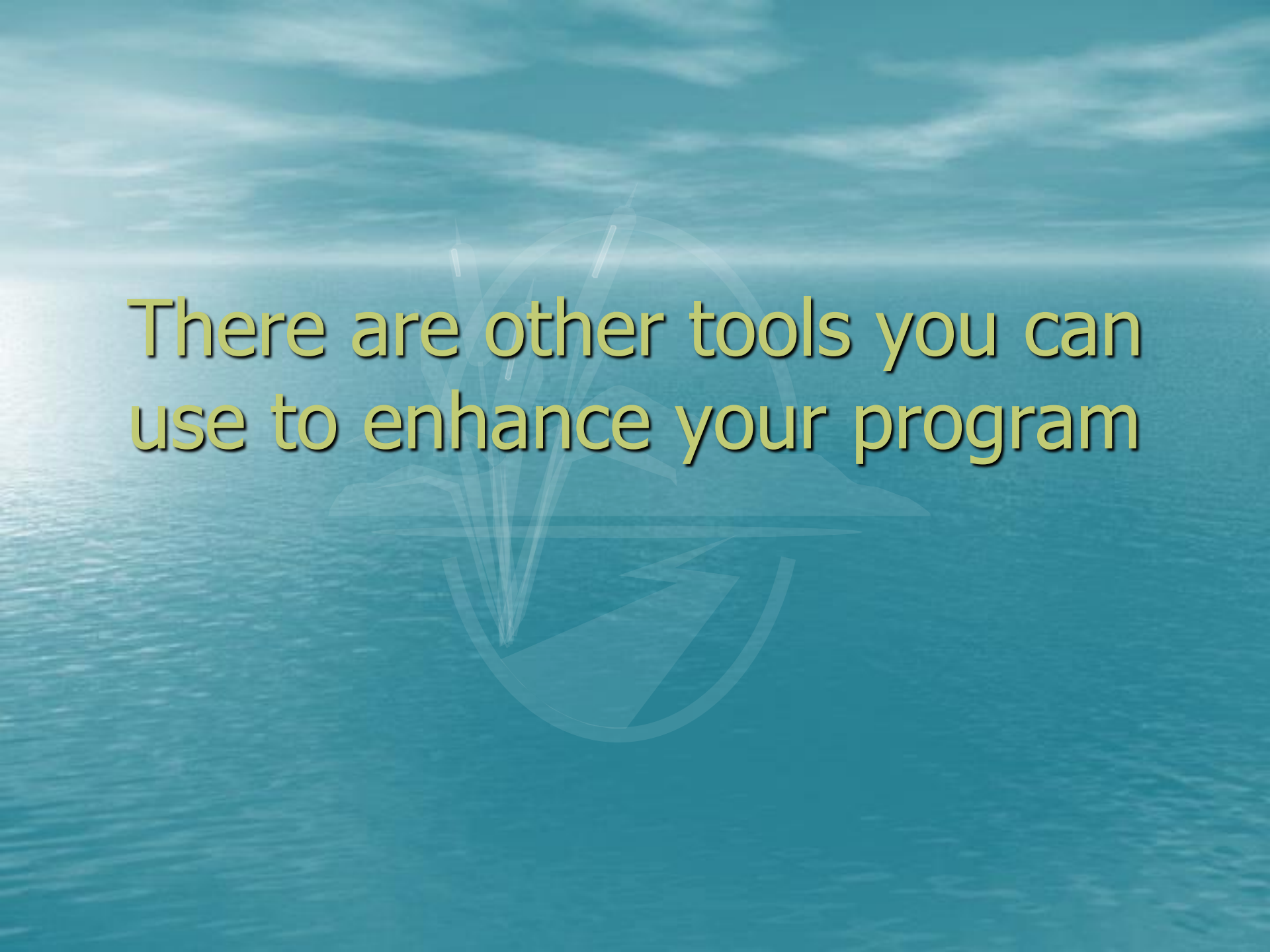
Therefore, to ensure that Respondent is brought into compliance with its Permit at the earliest possible date, IT IS HEREBY AGREED AND ORDERED, BETWEEN RESPONDENT AND THE DISTRICT as follows:

1. [Set forth terms of Agreement as appropriate]
2. In the event Respondent fails to comply with any of the deadlines set forth, Respondent shall within one (1) working day after the expiration of the deadline, notify the District in writing. This notice shall describe the reasons for Respondent's failure to comply, the additional amount of time needed to complete the remaining work, and the steps to be taken to avoid future delays. This notification in no way excuses Respondent from its responsibility to meet such or any later milestones required by this Consent Order.



Questions:

- Does your City Council, Board of Trustees, etc. support the program?
 - Are there SIU owners/operators on the board or council?
- Does your jurisdiction have all of the proper authority to do enforcement?
- Does your manager or supervisor support enforcement?



There are other tools you can
use to enhance your program



“I can live for 2 months
on a good compliment.”

Mark Twain

North Davis County Sewer District
Industrial Pretreatment Program



Outstanding Industrial User Award

ATK Launch Systems Inc.

Presented In Recognition
of Their Commitment to a Cleaner Environment
and The Districts Pretreatment Program.

Ten Years

Without a Violation of Any
Pretreatment Program Standards
2010

Certificate of Recognition

North Davis Sewer District
Industrial Pretreatment Program

is pleased to recognize

Lifetime Manufacturing Inc.

for their commitment to a cleaner environment and the goals of the
District's Pretreatment Program and for having

No Violations for 3 Years

Presented this 16th day of February 2010

Debra Spivey
Executive Manager

Shirley Lawrence
Pretreatment Coordinator



Debra Spivey
District Manager



NORTH DAVIS SEWER DISTRICT
Industrial Pretreatment Program

Criteria For Industrial User Awards

- | | |
|---------------------------------|--------------------|
| 1. No violation for one year | 1-year certificate |
| 2. No violation for two years | 2-year certificate |
| 3. No violation for three years | 3-year certificate |
| 4. No violation for four years | 4-year certificate |
| 5. No violation for five years | 5-year plaque |

After any violation the process and time begins again.

For six to ten years with no violation, the Industrial User receives a 6-year, 7-year, 8-year, or 9-year certificate as the case may be, then a 10-year plaque for ten years with no violations.

We decided to
keep it simple

SIU Awards Luncheon

