SUPPLEMENT TO THE ENFORCEMENT RESPONSE PLAN

PART I: Reporting (FLOW CHART #I-3)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
	Minor deficiency (computational or typographical)	Written and e-mailed NOD requiring a corrected report within 5 days.	requiring a corrected report EMS, FC		Compliant
	No response received for NOD.	Written and e-mailed NOV requiring a report within 10 days.	EMS, FC	5-Days from Discovery	NC
ies	No response received for NOV.	SM called, AO issued.	DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC
Reporting Deficiencies	Major deficiency - isolated or infrequent incident (missing info, late report)	Written and e-mailed NOV, requiring a report within 10 days. RM requested.	EMS, FC	5-Days from Discovery	NC
Repo	No response received for NOV.		DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC
	Second major deficiency in a row - (missing info, late report)	Written and e-mailed FNOV, requiring a report within 10 days. RM requested.	EMS, FC	5-Days from Discovery	NC
	No response received for FNOV.	SM called, AO issued.	DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC

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DDO	= Deputy Director of Operations	NOV	= Notice of Violation	SCH	= Show Cause Hearing
EQPM	= Environmental Qual. Program Manager	FNOV	= Final Notice of Violation	JA	= Judicial Action
EMS	= Environmental Monitoring Supervisor	RM	= Review Meeting	TPS	= Terminate Permit & Service
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PART I: Reporting (FLOW CHART #I-6)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
Report false	Any instance	SCH called, JA (including civil penalties), TPS.	DU, DDO, EQPM, EMS,LS	5-Days from Discovery	SNC

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
Failure to	Failure to respond to request or submit any required report later than 45 days of the due date	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	50-Days from Due Date	SNC

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PART II: Effluent Limits & BMPs (FLOW CHART #II-1)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
SMPs	Exceedance caused known environmental (inhibition or pass-through) or POTW damage, 1-time event.	SCH called, AO issued, AP assessed. DU, DDO, EQPM, EMS, FC		5-Days from Discovery	SNC
	Exceedance caused known environmental (inhibition or pass-through) or POTW damage, multiple times	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	5-Days from Discovery	SNC
Exceed permitted effluent limits or failed to follow BMPs	Exceedance caused known environmental (inhibition or pass-through) or POTW damage, continuous	SCH called, TPS.	DU, DDO, EQPM, EMS, LS	15-Days from Initial Discovery	NA
effluent limits o	Isolated or infrequent exceedance, 1-time. < TRC	Written and e-mailed NOV requiring a report within 10 days.	EMS, FC	5-Days from Discovery	NC
eed permitted	No response received for NOV.	SM called, AO issued.	DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC
Exc	Second exceedance in a row.	Written and e-mailed FNOV, requiring a report within 10 days. RM requested.	EMS, FC	5-Days from Discovery	NC
	No response received for FNOV.	SM called, AO issued.	DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC

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PART II: Effluent Limits & BMPs (FLOW CHART #II-1: Continued)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
	No response received for the SM or AO.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	45-Days from Initial Discovery	SNC
	Working towards but not in compliance and not yet SNC	AP assessed until compliant or reached SNC	DDO, EQPM, EMS, FC	Ongoing	NC
follow BMPs	Does not follow through on written agreement AO.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	45-Days from Initial Discovery	SNC
Exceed permitted effluent limits or failed to follow BMPs	Not working towards compliance.	SCH called, TPS.	DU, DDO, EQPM, EMS, LS	90-Days from Initial Discovery	SNC
tted effluent lin	Isolated or infrequent exceedance, 1-time.	Written and e-mailed NOV, requiring a report within 10 days. SM called.	EQPM, EMS, FC	5-Days from Discovery	NC
Exceed permi	No response received for NOV.	SM called, AO issued.	DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC
	Second exceedance in a row.	Written and e-mailed FNOV, requiring a report within 10 days. SM called.	DDO, EQPM, EMS, FC	5-Days from Discovery	NC
	No response received for FNOV.	SM called, AO issued.	DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC

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PART II: Effluent Limits & BMPs (FLOW CHART #II-1: Continued)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
	No response received for the SM or AO.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	45-Days from Initial Discovery	SNC
	FSE working towards but not in compliance and not yet SNC	SM called, AP assessed until compliant or reached SNC	DDO, EQPM, EMS, FC	Ongoing	NC
ollow BMPs	Does not follow through on written agreement AO.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	45-Days from Initial Discovery	SNC
Exceed permitted effluent limits or failed to follow BMPs	Not working towards compliance.	SCH called, JA (including civil penalties), TPS.	DU, DDO, EQPM, EMS, LS	90-Days from Initial Discovery	SNC
ed effluent limi	Frequent or continued violation, puts FSE in SNC.	SM called, AO issued, AP assessed.	DDO, EQPM, EMS, FC	90-Days from Initial Discovery	SNC
Exceed permitt	No response received for the AO or SM.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	45-Days from Initial Discovery	SNC
	FSE working towards but not in compliance but in SNC	SM called, AP assessed until compliant or reached SNC, Consent Schedule in permit.	DDO, EQPM, EMS, FC	Ongoing	SNC
	FSE refuses or will not come into compliance.	SCH called, JA (including civil penalties), TPS.	DU, DDO, EQPM, EMS, LS	30-Days from Initial Discovery	SNC

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PART II: Effluent Limits & BMPs (FLOW CHART #II-3)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
	Discharge has no known environmental (inhibition or pass-through) or POTW damage, 1-time event.	SM called, AO issued. DDO, EQPM, EMS, FC		5-Days from Discovery	NC
'al	Discharge has no known environmental (inhibition or pass-through) or POTW damage, multiple times.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	5-Days from Discovery	SNC
permit or approv	Discharge has no known environmental (inhibition or pass-through) or POTW damage, continuous.	SCH called, TPS.	DU, DDO, EQPM, EMS, LS	15-Days from Initial Discovery	SNC
Discharge without a permit or approval	Discharge caused known environmental (inhibition or pass-through) or POTW damage, 1-time event.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	5-Days from Discovery	SNC
Di	Discharge caused known environmental (inhibition or pass-through) or POTW damage, multiple times	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	5-Days from Discovery	SNC
	Discharge caused known environmental (inhibition or pass-through) or POTW damage, continuous	SCH called, TPS.	DU, DDO, EQPM, EMS, LS	15-Days from Initial Discovery	SNC

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PART III: Non-compliance Detected Through Inspection/Field Investigation (FLOW CHART #III-2)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
	No evidence of negligence or intent	Verbal, written and e-mailed NOV requiring immediate correction and a report within 10 days.	EMS, FC	5-Days from Discovery	NC
	No response received for NOV.	SM called, AO issued.	DDO, EQPM, EMS, FC	20-Days from Initial Discovery	NC
ons	No response received for the SM or AO.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	45-Days from Initial Discovery	SNC
Violation of permit conditions	Does not follow through on written agreement AO.	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	45-Days from Initial Discovery	SNC
Violation of	Evidence of negligence or intent (not deemed extreme)	SCH called, JA (including civil penalties).	DU, DDO, EQPM, EMS, LS	5-Days from Discovery	SNC
	Evidence of negligence or intent (deemed extreme)	SCH called, TPS.	DU, DDO, EQPM, EMS, LS	10-Days from Discovery	SNC
	FSE works towards compliance	AP assessed until compliant.	DDO, EQPM, EMS, FC	Ongoing	Maybe SNC
	FSE refuses or will not come into compliance.	SCH called, TPS.	DU, DDO, EQPM, EMS, LS	90-Days from Initial Discovery	SNC

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PART III: Non-compliance Detected Through Inspection/Field Investigation (FLOW CHART #III-3)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
Refuse access to City	personnel for the purpose of inspection, sampling, or	Obtain search warrant, SCH called, TPS.	DU, DDO, EQPM, EMS, LS	ASAP	SNC

PART III: Non-compliance Detected Through Inspection/Field Investigation (FLOW CHART #III-4)

	Circumstances	Response	Personnel	Time Frame of Response	Compliance Status
Failure to comply with repeated	Failure to comply with	SCH called, TPS.	DU, DDO, EQPM, EMS, LS	ASAP	SNC

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PART I: Reporting FLOW CHART #I-3 Start Sampling, monitoring, or reporting deficiencies End Yes Written and e-mailed Notice Minor of Deficiency requiring Follow-up Yes (computation response report corrected in 5 days. report submit or typographical) on time No No Written and e-mailed FNOV requiring report to be Major Follow-up isolated Yes submitted in 10 days. Yes response -(missing info, report submit late report) on time No No Written and e-mailed FNOV SM called, AO issued requiring report to be Major submitted in 10 days. . RM 2nd continued Yes requested. (missing info, 20-Days from Initial (EQPM, EMS, FC) late report) No Respond to Major Yes SM & AO in continued, No 45 days uncorrected for 45 days No Yes FSE adhered No to written AO SCH called, AO issued, JA agreement (including civil penalties) (SNC) (DU, DDO, EQPM, EMS, LS) 50-Days from Initial Yes AP assessed until compliant (SNC) End Ongoing from Initial = Director of Utilities NOD = Notice of Deficiency AP = Administrative Penalties End DDO NOV = Deputy Director of Operations = Notice of Violation SCH = Show Cause Hearing

= Environmental Qual. Program Manager **EQPM** FNOV = Final Notice of Violation = Judicial Action JΑ **EMS** = Environmental Monitoring Supervisor RM = Review Meeting TPS = Terminate Permit & Service = Noncompliant = FOG Coordinator SM = Standards Meeting = Legal Staff AO = Significant Noncompliance = Administrative Order Rev 10/2015

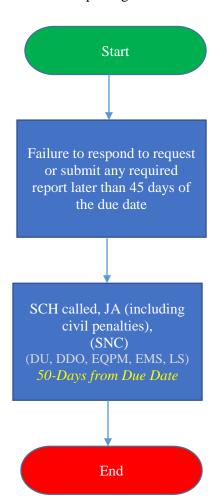
PART I: Reporting:

Report false information (any instance) SCH called, JA (including civil penalties), TPS (SNC) (DU, DDO, EQPM, EMS, LS) 5-Days from Discovery

End

FLOW CHART #I-6

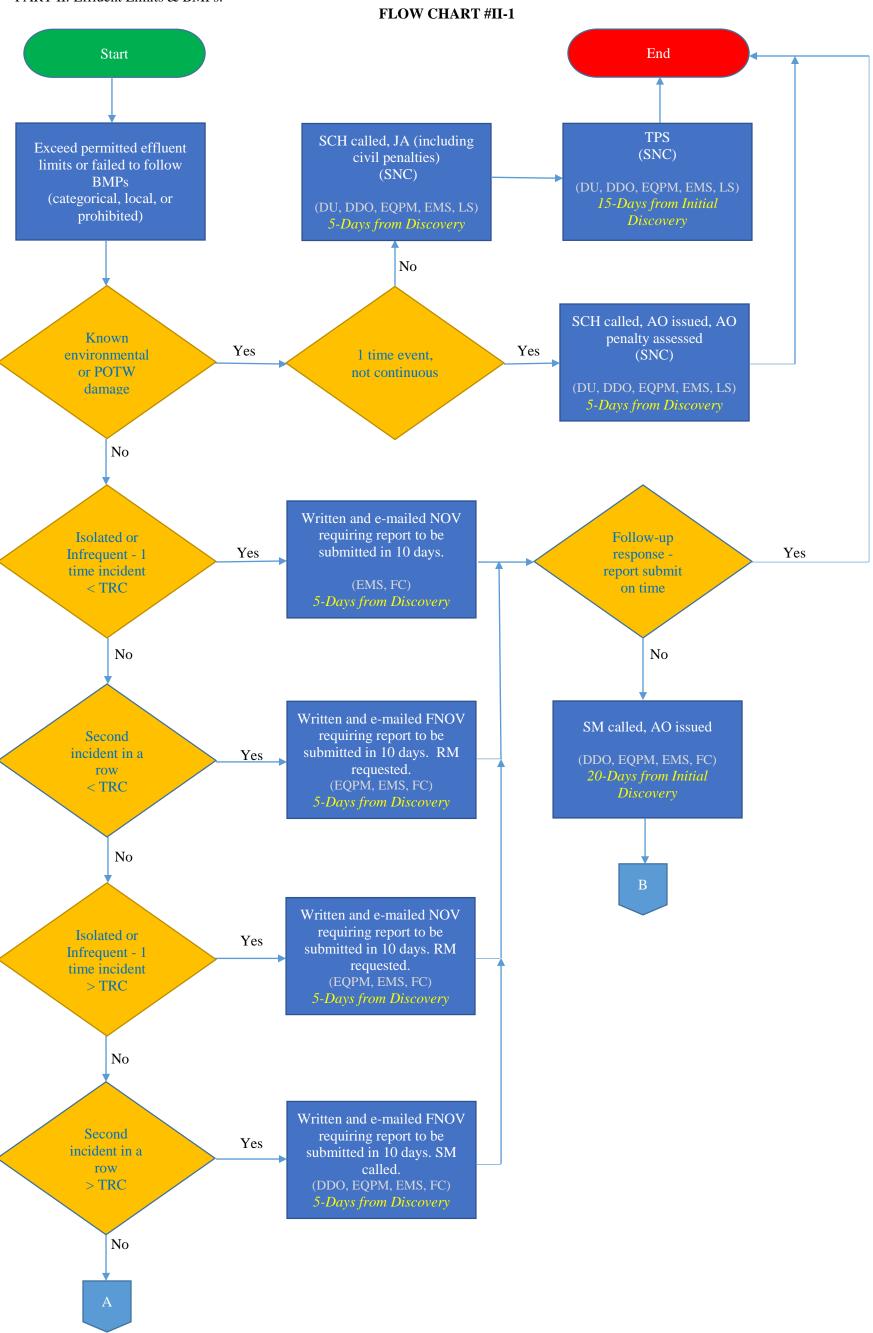
PART I: Reporting:



FLOW CHART #I-7

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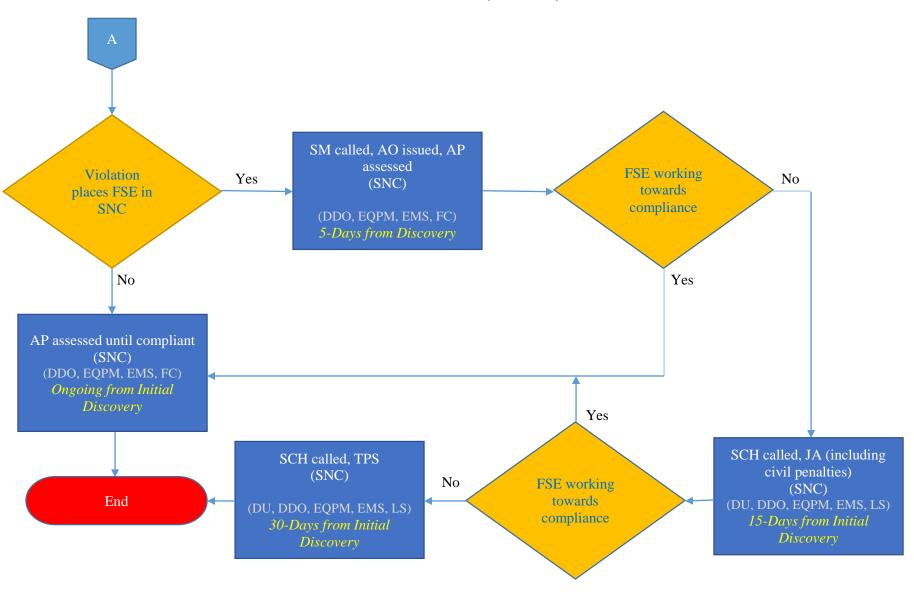
PART II: Effluent Limits & BMPs:

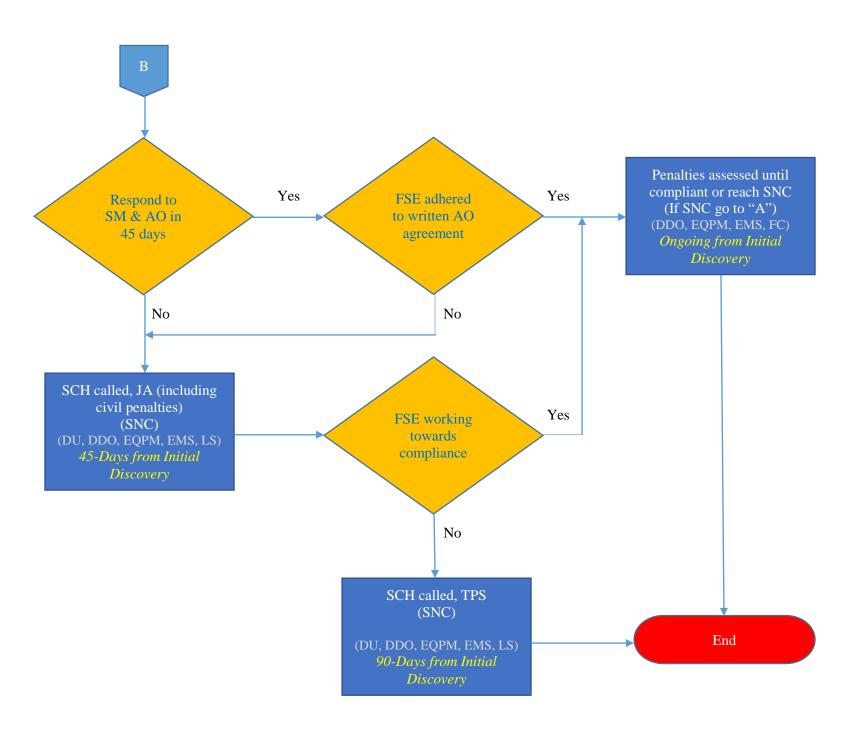


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PART II: Effluent Limits & BMPs:

FLOW CHART #II-1 (Continued)

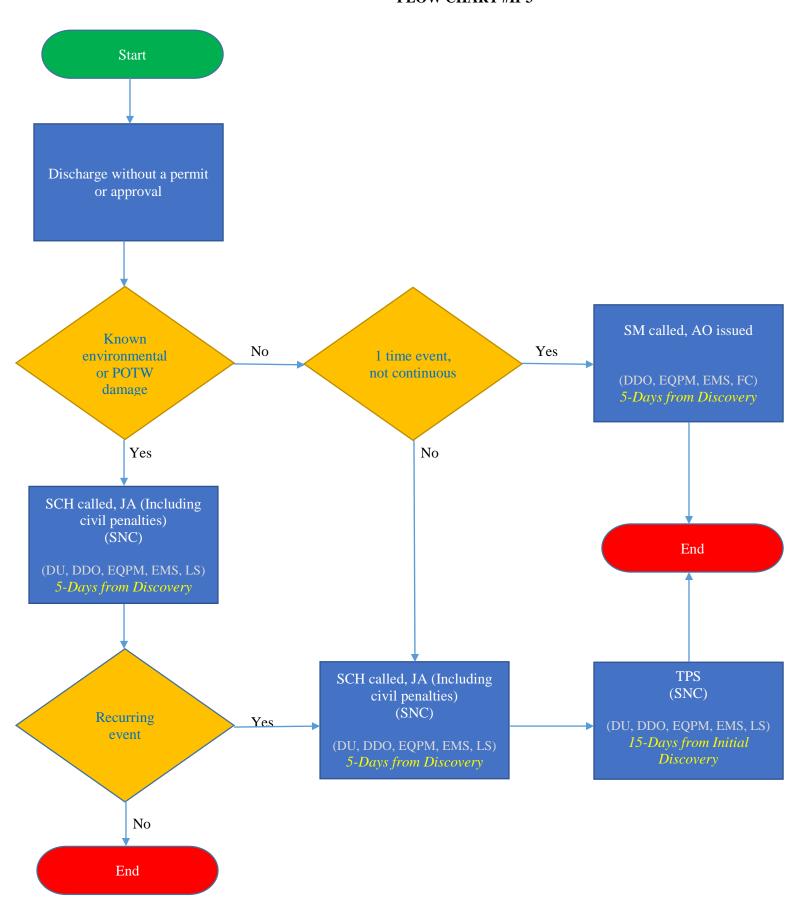




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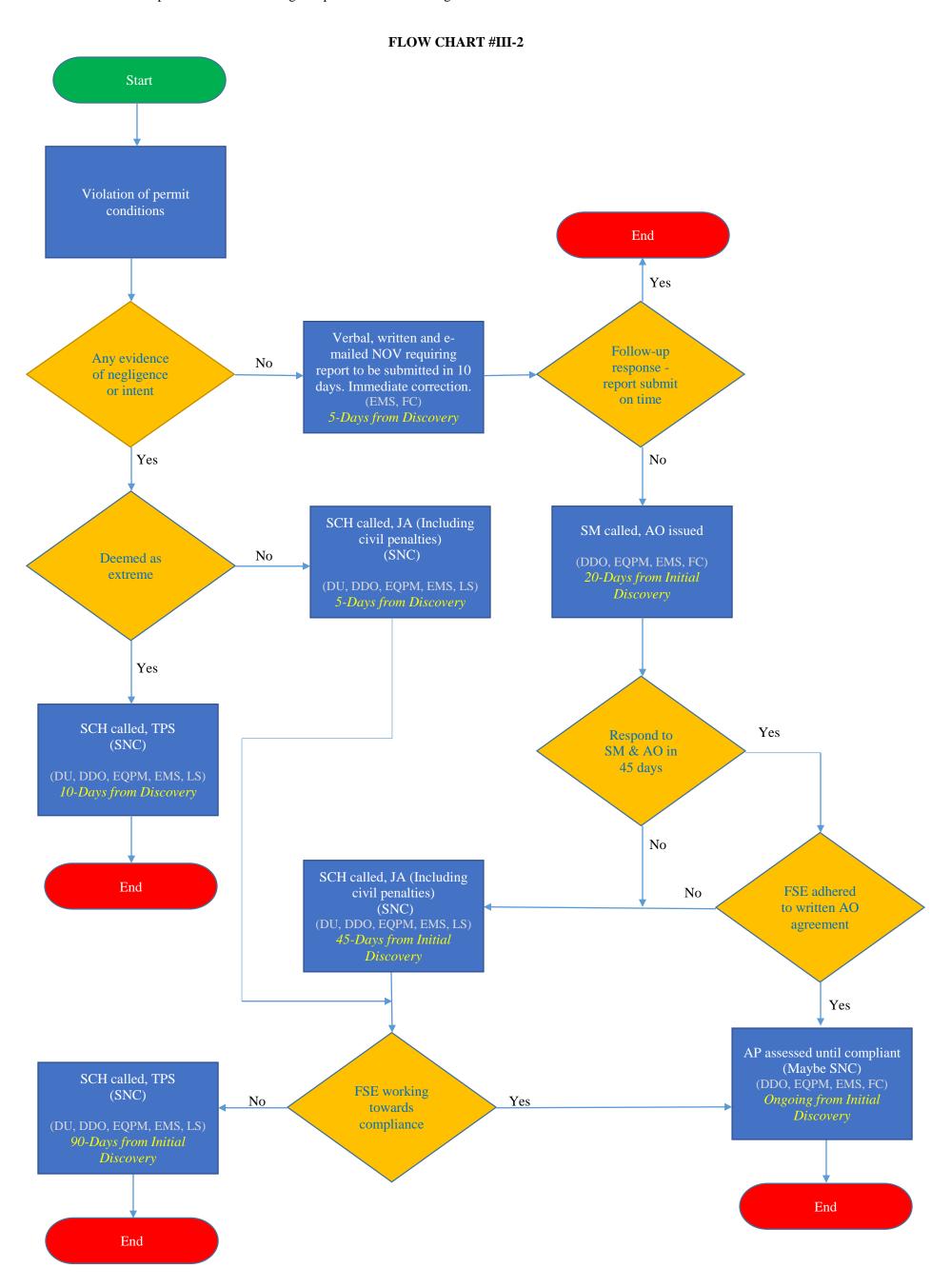
PART II: Effluent Limits & BMPs:

FLOW CHART #II-3



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PART III: Non-compliance Detected Through Inspections/Field Investigations:



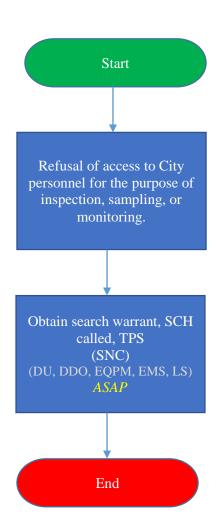
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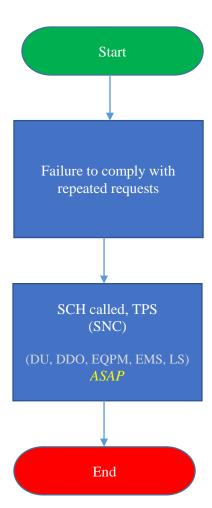
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PART III: Non-compliance Detected Through Inspections/Field Investigations:

FLOW CHART #III-3



FLOW CHART #III-4



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