



St. Vrain Sanitation District

Enforcement Response Plan

REVISED

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Section 1. Purpose

This Enforcement Response Plan (ERP) is used by the St Vrain Sanitation District (SVSD/District), Industrial Pretreatment and Collections employees to apply consistent enforcement responses for similar violations and circumstances.

This ERP provides guidance for identifying, tracking, documenting, and selecting the enforcement action most appropriate for a given violation. This ERP describes anticipated 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 initializing and finalizing enforcement responses. This ERP shall not limit the ability of the District to undertake any appropriate enforcement action.

This ERP is developed with the following primary objectives in mind:

- Ensuring that violators return to compliance as quickly as possible
- Penalizing noncompliant users for pretreatment violations
- Deterring future noncompliance
- Recovering expenses incurred by the District due to noncompliance
- Recovering damages to the District and environment caused by noncompliance

This ERP is written to support the following fundamental activities:

- Assuring a systematic flow of compliance information
- Accomplishing orderly and consistent compliance screening activities
- Supporting a consistent enforcement response to comparable violations to the greatest degree possible
- Establishing appropriate enforcement responses for different types of pretreatment program violations

This ERP has been developed pursuant to the requirements set forth in 40 CFR 403.8(f)(5) and in accordance with the authority set forth in Section 10 of the SVSD

Rules and Regulations. This ERP is based on the District's authority established by the Rules and Regulations and Federal Regulations and does not create any new legal authorities. This ERP may be revised as needed to clarify or define possible responses to user violations.

The EPA approved SVSD Industrial Pretreatment Program is implemented to enforce all applicable pretreatment requirements and standards and to protect the publicly owned treatment works (POTW), protect worker health and safety, prevent pollutant pass-through to the St Vrain Creek, prevent pollutants from entering the environment, prevent operational interference, and to improve the opportunity to recycle and reclaim biosolids from the system.

Section 2. Scope and Applicability

2.1 Scope

This plan encompasses the entire 208 service area of SVSD, which includes, but is not limited to Frederick, Firestone, Dacono, Mead, Longmont.

2.2 Applicability

This plan applies to all the District's Users and its application of enforcement practices related to Users with the intent to discharge such regulated wastewater to the POTW.

Section 3. Definitions and Acronyms

3.1 Definitions

Authority Monitoring – Sampling and analyses performed at an Industrial User (IU) facility or other location that is performed by the control authority.

Best Management Practices – Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 10.2.1 A and B [40CFR 403.5(a)(1) and (b)]. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage. Best management practices (BMPs) may be developed to implement the provisions of this section. Such BMPs shall be considered local limits and pretreatment standards for the purposes of this section and section 307(d) of the Act

Categorical Pretreatment Standard or Categorical Standard - Any regulation containing pollutant discharge limits promulgated by EPA in accordance with Sections 307(b) and (c) of the Act (33 U.S.C. Section 1317) which apply to a specific category of users, and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.

Categorical Industrial User - An Industrial User subject to a Categorical Pretreatment Standard or Categorical Standard.

Dental Discharger – A facility where the practice of dentistry is performed, including, but not limited to institutions, permanent or temporary offices, clinics, home offices, and facilities owned and operated by Federal, state, or local governments, that discharge wastewater to the POTW. New source means a dental discharger whose first discharge to the POTW occurs after July 14, 2017. Existing source means a dental discharger that is not a new source.

District – The St Vrain Sanitation District (SVSD or District).

Fees – A schedule of charges imposed to recover treatment costs or costs associated with operating the Industrial Pretreatment program (not punitive in nature).

Fines – A punitive monetary charge for a violation of the law. Often used synonymously with “penalty,” although the term “fine” generally implies the use of administrative rather than civil (judicial) procedures.

Indirect Discharge or Discharge - The introduction of pollutants into the POTW from any nondomestic source regulated under Section 307(b), (c) or (d) of the Act.

Industrial User or IU - A source of Indirect Discharge

Penalty – A monetary or other punitive measure usually associated with a court action. For purposes of this ERP, the term is used synonymously with fine.

Publicly Owned Treatment Works (POTW) – A treatment works, as defined by Section 212 of the Act (33 U.S.C. Section 1292), which is owned by the District. This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature and any conveyances, which convey wastewater to a treatment plant. The term also means the entity as defined by Section 502(4) of the Act, which has jurisdiction over the indirect discharges to and the discharges from such a treatment works.

Self-Monitoring – Sampling and analyses performed by the IU as required by a permit, sector control program, or as otherwise established by the control authority.

Significant Industrial User – An industrial user who meets significance criteria as outlined in 40 CFR 403.3(v), which includes but is not limited to, those users who are subject to EPA’s categorical pretreatment standards, a user that discharges an average of 25,000 gpd or more of process wastewater, contributes a process waste stream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW or a user that the control authority has determined has a reasonable potential to adversely affect the POTW.

Significant Noncompliance – An elevated noncompliance status of either an SIU or IU as defined in 40 CFR 403.8 (f)(2)(viii) that requires public notification of that status. Defined further in Section 7.4 of this ERP.

User – Any person who contributes, causes, or permits the contribution of wastewater into the POTW.

3.2 Acronyms

AO – Administrative Order
BMP – Best Management Practices
CFR – Code of Federal Regulations
CO – Consent Order
COC – Chain of Custody
CP – Judicial Civil Penalty
ERG – Enforcement Response Guide
ERP – Enforcement Response Plan
FOG – Fats, Oils, and Grease
IPC – Industrial Pretreatment Coordinator
IU – Industrial User
NON – Notice of Non-Compliance
NOV – Notice of Violation
PC – Phone Call
PM – Pretreatment Meeting
POTW – Publicly Owned Treatment Works
SC – Sector Control Program
SCH – Show Cause Hearing
SIU – Significant Industrial User
SOG – Sand/Oil Interceptor
SNC – Significant Noncompliance
SVSD – St. Vrain Sanitation District
WL – Warning Letter

Section 4. Roles and Responsibilities

The following list identifies key individuals by title and general areas of responsibilities as related to enforcement.

District Board of Directors

- Oversees District business and approves high level decisions.

District Attorney

- The District staff utilize Attorneys for consultation on legal aspects of the Pretreatment program relating to enforcement of the Rules and Regulations.

District Manager

- Oversees District work pertaining to Pretreatment Enforcement.
- Coordinates changes to the Pretreatment Program requiring Board approval.

- Oversees administrative penalties and judicial enforcement actions.
- Signs off on new and existing permits.

District Engineer/Collections System Superintendent

- Oversees Pretreatment Coordinator and related activities and tasks.

Pretreatment Coordinator

- Oversees the Industrial Pretreatment Program.
- Implements program and manages enforcement actions.
- Evaluates Industrial User impacts to the SVSD.
- Reviews IU monitoring compliance.
- Works with collection staff and facility staff on discharge issues.
- Acts as primary contact for EPA/State.

WWTP Staff

- Operates WWTP to ensure treatment efficiency.
- Communities with Pretreatment Coordinator for incidents related to the facility.

Contract Laboratory Services

- Contract laboratory services from a State-certified laboratory are utilized for District sample analyses.

Section 5. Identification and Characterization of Industrial and Commercial Users

All IUs and businesses within the District's 208 service area are identified and characterized by business name, location/address, business type, any industrial processes, significance to the pretreatment program, inspection frequency if needed, and any other pertinent information. An Industrial Waste Survey (IWS) is used to obtain information and characterize IUs. IWSs are either mailed to businesses, emailed, or hand delivered by the District upon referral or discovery. Completed surveys are evaluated by the District to determine if the business requires an initial inspection or follow up information is needed. The IWS and inspections are used to identify potential SIUs and identify IUs subject to sector control programs and/or other Pretreatment Requirements.

If the IWS indicates the user has an industrial process, chemical inventory, or other item of concern that may result in the user being regulated, the user is inspected.

If the user is classified as an SIU, it is issued an Industrial Wastewater Permit. If the User is not an SIU but is covered by a sector control program, the staff issues applicable sector control program requirements to the user. Methods used by the District to determine when and where IWS's are required to be delivered to a business are:

- Periodic projects and referrals of new connectors from local municipalities within our boundary.
- Ongoing planning department reviews/referrals from the cities within our boundary.
- Notifications from new users
- Discovery of new users during physical inspections and/or other service area site visits

Electronic records are maintained for all non-residential connectors within Laserfiche. This is organized by District Tap number and has other applicable information such as plan sets and historical documents. SVSD has developed a database for maintaining and organizing IWS information, inspection results, instances of noncompliance, and other information gathered.

Self-Monitoring Reporting and Notification

Permitted Users are bound by the terms of the Wastewater Contribution Permit. This permit includes required sample monitoring, frequency of sample monitoring, and limitations for discharge parameters. The permit also includes reporting requirements that include what, when, and where to submit the periodic monitoring report. Failure to follow these permit requirements can result in various violations listed in Table 8.0.

Section 6. Inspections and Sampling

Inspections and monitoring are critical elements in evaluating the compliance status of IUs and SIUs. This section describes the Districts inspection and sampling strategy. All permitted IUs are inspected at least annually. Sector control program inspections occur on a frequency defined by the District. These frequencies may be increased in response to instances of noncompliance, unusual discharge, operational activities, or other factors.

Inspections are used to determine compliance with pretreatment standards and requirements, confirm the accuracy of the information submitted, identify process changes, evaluate compliance with construction schedules, verify records retention, update information in the IU's file, and identify potential problem areas including spill prevention implementation. The District performs inspections as outlined in Table 6.1

Table 6.1 – Inspection Types

Inspection	Scheduling	Comments
Compliance Inspections	Annually – May be announced or unannounced	These are the routine inspections required by the Federal Pretreatment Regulations and the sector control programs. The user may be pre-notified to ensure that proper staff are present. These may also be unannounced inspections to see “real time” operations, follow-up on compliance issues or inspection requirements, perform sampling, or evaluate the user for permit issuance or sector control program applicability. User inspections are typically conducted in response to known or suspected violations discovered through self-monitoring reports, routine inspections or sampling events, public complaints, unusual influent conditions at the POTW, or emergency situations including plant upsets, sewer line blockages, fires, and explosions.
Incident Inspections	Unannounced	User inspections are typically conducted in response to known or suspected violations discovered through self-monitoring reports, routine inspections or

		sampling events, public complaints, unusual influent conditions at the POTW, or emergency situations including plant upsets, sewer line blockages, fires, and explosions. These inspections may be interdepartmental or interagency inspections.
Sector Inspections	May be announced or unannounced	Sector inspections may include Dental, FOG/SOG sector, or any other routine inspection the District is tracking for compliance purposes.

All discharging SIUs are sampled at least annually. Sampling is used to determine compliance with applicable Pretreatment Permits and to independently confirm data submitted by SIUs in self-monitoring reports. The District performs sampling and reviews submitted sampling reports as outlined in Table 6.2.

Table 6.2

Type of Sampling	Scheduling	Comment
District Monitoring	Announced or Unannounced	These are generally part of the routine sampling that is required by the Federal Pretreatment Regulations and sector control programs. Sampling is utilized for independently verifying information reported by the user, determining compliance with pretreatment permitting requirements, and District discharge limitations.
Industrial User Monitoring	Permit/Sector Specific Requirements	These sampling events are generally part of the routine sampling that is required by the Federal Pretreatment Regulations. Sampling is utilized for independently verifying information reported by the user, determining compliance with pretreatment requirements and standards.
Surveillance Monitoring	Unannounced	Where the District believes a discharge is occurring or may occur which violates permit requirements, pretreatment standards, or District Rules and Regulations. This sampling may or may not occur at the same monitoring point used by the industry but instead may be a designated point to assure a representative sample is taken.
Categorization	Unannounced or Scheduled	Miscellaneous sampling for determining characterization of IU's waste streams.

Section 7. Enforcement Strategy

7.1 Discovery of Violations

The enforcement process is typically initiated when the user notifies the District of a violation or:

- SVSD identifies a violation through an inspection
- SVSD identifies a violation through compliance monitoring or sampling
- SVSD identifies a violation through reporting
- SVSD identifies a violation through other means

7.2 Enforcement Authorities

Levels of Authority listed from the lowest level to the highest level:

- Pretreatment Coordinator (PC)
- Collections System Superintendent (CSS)
- District Engineer (DE)
- District Manager (DM)
- Board of Directors (BoD)

7.3 Descriptions of Enforcement Actions

The District has the enforcement authorities outlined in Table 7.3 for violations of any Pretreatment Standard or Requirement. Table 7.3 describes the types of enforcement responses the District may take and the time frame objectives within which responses should be initiated. Table 7.3 is generally listed in order of lesser response to greatest response. The District may contact, for the purpose of investigation and enforcement, any Federal, State or Local governmental agency. The level of authority is listed by the lowest level employee that is permitted to take the action.

Table 7.3

Enforcement Response	Description of Response	Response Timeframe	Level of Authority
Verbal Notification	Informal notification in person or by phone call. Used for minor issues on an infrequent basis.	Within 10 working days of becoming aware of the violation or non-compliance.	PC
Warning Letter	Informal notification by written letter or email. Minor isolated violations including permit violations.	Within 10 working days of becoming aware of the violation or non-compliance.	PC
Notice of Violation	Written violation that contains non-compliance violations and outlines corrective actions, compliance schedules, additional self-monitoring to reestablish compliance.	Issued at time of inspection or within 10 working days of becoming aware of the non-compliance.	PC
Pretreatment Meeting	The User and District may hold a meeting to gather more information or explanation	Held within 30 days of becoming aware of a violation or noncompliance	PC

	on pretreatment requirements and enforcement options.		
Compliance Order	Specifies the violations and directs the User to establish compliance within a specified timeframe. Failure to comply with the Order may result in additional escalation including fines or severance or service.	Initiated within 60 days of becoming aware of the violations or as the violations escalate.	CSS
Administrative Fines	The District may impose fines of up to \$2,000/day in administrative costs, and up to \$5,000/day in civil fines.	Initiated within 60 days of becoming aware of the violations or as the violations escalate.	DE
Cease and Desist Orders	The District may immediately and effectively halt or prevent discharge of pollutants to the Districts collections system by any means necessary.	Immediately or after additional investigations or meetings.	DE
Revocation of Permit / Suspension of Service	The District may revoke the Discharge Permit and/or suspend service to protect the WWTP and collection system from further discharges by any reasonable means.	Immediately or after additional investigations or meetings.	DE, BoD
Judicial Criminal Penalties	The District may seek civil penalties up to \$5,000 per day, per violation of Pretreatment Standards or Requirements. The District may recover reasonable attorneys' fees, court costs, and other expenses associated with enforcement activities and the cost of actual damages incurred by the District.	Civil, Criminal, and Judicial penalties will be assessed within judicial process time frames.	DM, BoD

7.4 Significant Noncompliance (SNC)

Federal general pretreatment program regulations require the District to publish annually a list of all industrial users that violate any SNC criteria. According to 40 CFR 403.8(f)(2)(viii), significant noncompliance is a violation(s) which meets one or more of the following criteria:

- A. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all the measurements taken for the same pollutant parameter taken during a six (6) month period exceed by any magnitude a numeric pretreatment standard or requirement, including instantaneous limits as defined in Section 10.2 (40 CFR 403.3(1));
- B. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six (6) month period equals or exceeds the product of the numeric pretreatment standard or requirement including instantaneous limits, as

- defined by Section 10.2 (40 CFR 403.3(l)) multiplied by the applicable criteria (1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH);
- C. Continuous recorder monitoring for pH compliance shall utilize pH range excursions of greater than fifteen (>15) minutes duration for determination of violation. An industry shall be in Significant Noncompliance (SNC) when the total violations incurred during a semi-annual review period exceed sixty-six percent (66%) of the total pH analytical results during the same time period.
 - D. Any other violation of a Pretreatment Standard or Requirement as defined by Section 10.2 (40 CFR 403.3(l)), (daily maximum, long-term average, instantaneous limit, or narrative standard), that the District 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;
 - E. Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the District's exercise of its emergency authority to halt or prevent such a discharge;
 - F. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;
 - G. Failure to provide within thirty (30) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with Categorical Pretreatment Standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;
 - H. Failure to accurately report noncompliance; or
 - I. Any other violation(s), which may include a violation of Best Management Practices, which the District determines will adversely affect the operation or implementation of the local pretreatment program.

Significant Noncompliance and associated public notification may be applicable to any industrial user for any violation(s) or continuance of violation(s) which meet any SNC criteria. Violations including but not limited to a major violation of the District's Rules and Regulations and/or failure to meet compliance requirements of an enforcement action may result in SNC.

7.5 Selecting the Appropriate Response

The enforcement actions and responses specified in Section 7.3, Table 7.3, and Section 8.0 are typically implemented according to an escalating enforcement approach. However, a higher level of response may be the first response if warranted by the violation. The following factors are considered in determining the appropriate response:

- Magnitude of the violation

- Duration of the violation
- Effect of the violation on the receiving stream
- Effect on the collections system
- Effect of the violation on the POTW (including worker health and safety) or environment
- Compliance history of the industrial user
- Good faith of the industrial user

The District may take any, all, or a combination of the enforcement actions. Assessing the response level and associated penalties, if applicable, will be based on the guidance provided in this document and the best professional judgment of the District.

8.0 Enforcement Response Guide (ERG)

The following enforcement response guide (ERG) provides in table format anticipated types of user violations and the range of appropriate enforcement actions and District response. This table is no all-encompassing. Any and all penalties are at the Districts Discretion. See Table 8.0 for enforcement response guide (ERG).

Table 8.0

User Classification	Nature of Violation	Potential Enforcement Response
Violations to District Rules and Regulations, Pretreatment Standard or Requirements		
Any SVSD User	Illicit Discharge to Sewer or Environment	NOV, AO, Penalty, Judicial Enforcement as determined by District
	Operating without a required Industrial Wastewater Discharge Permit	NOV, AO with Industrial Permit Application, Penalties, Judicial Enforcement as determined by District
	Failure to submit Industrial Wastewater Permit Application or another requirement within District established deadline.	NOV, AO, Penalties
	Refusal or Denial of Entry to District employees during official District business.	
Dental Discharges		
Existing and New Sources	Failure to install, operate, or maintain amalgam separators.	NOV, AO, Penalties, Industrial Wastewater Permit Application, Termination of Services
	Discharge of waste amalgam from chair side traps, screens, vacuum pump filters, dental tools, cuspidors, or collection devices to the POTW. Cleaning of water lines, chair-side traps and vacuum lines that discharge amalgam process wastewater to the POTW with oxidizing or acidic cleaners.	NOV, AO, Penalties, Termination of Service

	Failure to submit a One-Time Compliance Report within the deadline.	NOV, AO, Penalties, Dental Certification Form, SNC if after 30 days
Sector Control		
FOG, SOG, Dental User	Failure to Correct Violation after NOV	2 nd NOV, Inspection fee may be assessed
	Failure to Correct Violation after 2 nd NOV	NOV, AO
	Failure to Comply with AO	AO and additional fees
	Failure to Comply with Rules and Regulations	NOV, AO, Penalties, Industrial Wastewater Permit Application, Termination of Services
Permitted Industries		
Permittee	Violation of a Pretreatment Standard or Requirement	WL, NOV, AO, Judicial Enforcement determined by the District
	Failure to Maintain Treatment, Control, or Monitoring Equipment	WL, NOV, AO, Judicial Enforcement determined by the District
	Failure to Comply with a Pretreatment Requirement (including requirement as a result of an inspection)	WL, NOV, AO, Judicial Enforcement determined by the District
	Failure to Develop, Submit, or Implement a Control Plan	NOV, AO, Judicial Enforcement determined by the District
	Failure to Comply With Terms of AO	NOV, AO, Judicial Enforcement determined by the District, Termination of Services
	Dilution in lieu of Treatment	NOV, AO, Judicial Enforcement determined by the District Termination of Services
	Failure to Submit Required Documentation, or failure to properly keep required records.	WL, NOV, AO, Judicial Enforcement determined by the District
Discharge Limit Violation		
Permittee or User	Monitoring Parameter Violation	NOV, AO, Judicial Enforcement determined by the District, Termination of Services
	Failure to Report Self-Monitoring Parameter Violation within 24 hours of Becoming Aware	WL, NOV, AO
	Failure to Re-sample and Submit Report within 30 days	WL, NOV, AO
Reporting Violation		
Permittee	Incomplete, Late, or Inaccurate (minor) Report	WL, NOV, AO
	Failure to Immediately notify the District of a Spill, Accidental Discharge, Bypass, Discharge of a Non-Routine/Episodic Nature, Change in Discharge, Non-Customary Batch Discharge,	WL, NOV, AO, Judicial Enforcement determined by the District, Termination of Services

	Slug Discharge, Plant Upset, or a Discharge that May Cause Potential Problems to the POTW	
	Failure to Report Discharge of Hazardous Wastes	WL, NOV, AO, Judicial Enforcement determined by the District, Termination of Services
	Falsification of Report (intentionally, knowingly, or willingly)	WL, NOV, AO
	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	WL, NOV, AO
	Failure to accurately report noncompliance	WL, NOV, AO, Judicial Enforcement determined by the District, SNC
Discharge Monitoring		
Permittee	Failure to Monitor	WL, NOV, AO
	Improper Sample monitoring, preservation or analytical methods which including analytical deficiencies	WL, NOV, AO
	Tampering with Monitoring equipment	NOV, AO Judicial Enforcement determined by the District
Compliance Schedule		
Permittee	Failure to Comply with Compliance Schedule Requirements	WL, NOV, AO
Significant Non-Compliance (SNC)		
Industrial Users	Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(l)	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services
	Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH)	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services
	Continuous recorder monitoring for pH compliance shall utilize pH range excursions of greater than fifteen (>15) minutes duration for	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated

	determination of violation. An industry shall be in Significant Noncompliance (SNC) when the total violations incurred during a semi-annual review period exceed sixty-six percent (66%) of the total pH analytical results during the same time period.	cost of publication (SNC), Termination of Services
	Any other violation of a Pretreatment Standard or Requirement as defined by Section 10.2 (40 CFR 403.3(1)), (daily maximum, long-term average, instantaneous limit, or narrative standard), that the District 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	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services
	Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment, or has resulted in the District's exercise of its emergency authority to halt or prevent such a discharge	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services
	Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services
	Failure to provide within thirty (30) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with Categorical Pretreatment Standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services
	Failure to accurately report noncompliance.	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services
	Any other violation(s), which may include a violation of Best Management Practices, which the District determines will adversely affect the operation or implementation of the local pretreatment program.	NOV + Remedy Requirements, AO + Remedy Requirements; and SNC publication plus payment of associated cost of publication (SNC), Termination of Services

9.0 References

St Vrain Sanitation District Rules and Regulations Section 10
EPA Guidance for Developing Control Authority Enforcement Response Plans
40 CFR, Part 403

10.0 Review and Revisions Schedule

This procedure shall be reviewed and revised, if necessary, every 5 years or earlier.

11.0 Approval and Issuance

This Enforcement Response Plan was reviewed and approved by SVSD and EPA prior to issuance.