

Enforcement Response Plan & Significant Industrial User Policy

Board of Public Utilities

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Enforcement Response Plan (ERP)

- Current version last updated in 2010
- General enforcement plan covering all wastewater users
- Mandatory for EPA approved pretreatment program to include:
 - Pretreatment staff responsibilities and workflow
 - Administrative enforcement tools and guidelines
 - Fine ranges for industrial user non-compliance
- ERP is referenced in and supported by Santa Rosa City code and the Regional Partner's codes
- ERP establishes enforcement procedural uniformity in regional system

ERP Revision Overview

- Changes made to ERP:
 - Staff titles and enforcement responsibilities updated
 - Added waste haulers as a type of industrial user
 - Updated Department name

Significant Industrial User Enforcement Response Policy (SIU Policy) Review

- Current Version was last updated in 2010
- Specific SIU policy for users that meet the EPA definition of an SIU
- Defines user actions that result in non-compliance
- Prescribes enforcement escalation process
- Outlines fine structure for administrative and reporting violations

SIU Policy Revision Overview

Changes made to SIU Policy are in response to most recent Pretreatment program audit findings

- Definition of Significant Non-Compliance changed to match the EPA definition
- Updated acceptable user discharge pH range to match the City code changes resulting from local limit study
 - Was 5.5-12.5
 - Now changed to 5.0-12.5

Recommendation

It is recommended by the Water Department that the Board of Public Utilities, by motion, approve updates to the Water Department's Enforcement Response Plan and Significant Industrial User Policy.