

Standard Operating Procedure
Significant Industrial Users
Communication and Compliance Enforcement

INTRODUCTION

On July 24, 1990 (55 Fed. Reg. 30082), the Environmental Protection Agency promulgated regulations to require all Publicly Owned Treatment Works (POTWs) to adopt an enforcement response plan (ERP) as part of their approved pretreatment programs. The regulation as stated in 40 CFR 403.8(f)(5) is as follows:

“The POTW shall develop and implement an enforcement response plan. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of industrial user noncompliance. The plan shall, at a minimum:

- (i) Describe how the POTW will investigate instances of noncompliance.
- (ii) Describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of industrial user violations and the time periods within which responses will take place.
- (iii) Identify (by title) the official(s) responsible for each type of response.
- (iv) Adequately reflect the POTWs primary responsibility to enforce all applicable pretreatment requirements and standards, as detailed in 40 CFR '403.8(f)(1) and (f)(2).”

The City of Valdosta Industrial Pretreatment Program Enforcement Response Plan outlines the procedures that will be used to identify, document, track, and respond to noncompliance. The Enforcement Response Plan also provides guidance for selecting the enforcement action most appropriate for a given violation. The Enforcement Response Plan was approved by the Environmental Protection Division in 2022.

The purpose of this standard operating procedure is to reinforce the Enforcement Response Plan by clearly defining the procedures to be followed and the responsibilities of the various personnel involved in communicating compliance and enforcement issues with the industries that participate in the Industrial Pretreatment Program.

COMPLIANCE MONITORING PERSONNEL RESPONSIBILITIES

Environmental Technician

Screening of Self-monitoring reports

The Environmental Technician is responsible for screening all compliance reports from permitted significant industrial users to identify any violations of the pretreatment permit or the sewer use