

COLA Enforcement Response Table

Noncom Nature of the violation	Enforcement Response	Authority
Unauthorized Discharge		
Unpermitted Discharge		
IU unaware of the requirements with no harm to POTW or environment	Response within 15 days. 1. Phone call 2. NOV with application	CoLA Representative or Inspector CoLA Representative or Inspector
IU unaware of requirements with harm to the environment or POTW	Response within 15 days 1. administrative Order Response with 60 days 1. Civil Action	CoLA Representative or ED ED
Failure to apply continues after notice from POTW	Response in 60 days 1. Initiation of civil action 2. Initiation of criminal prosecution 3. Termination of Service	ED ED ED
Failure to submit industrial discharge permit renewal application		
Renewal application has not been submitted within 10 days of due date.	Response within 15 days 1. Phone Call 2. NOV	Inspector or CoLA Representative Inspector or CoLA Representative

Noncom Nature of the violation	Enforcement Response	Authority
Discharg		
Exceedance of Local or Federal Standard		
Isolated occurrence and not significant	Response within 15 days 1. Phone call 2. NOV	Inspector or CoLA Representative Inspector or CoLA Representative
Isolated by significant - No harm	Response within 15 days 1. AO to develop SPCC plan	CoLA Representative
Isolated with harm to environment or POTW	Response within 60 days 1. Show Cause Order 2. Initiation of Civil action	ED ED
Recurring with no harm to environment or POTW.	Response within 15 days 1. AO	CoLA Representative
Recurring and with harm to environment and/or POTW	Response within 15 days 1. AO Response within 60 days 1. Show Cause Order 2. Initiaion of civil action. 3. Terminatin of service.	CoLA Representative ED ED ED

Noncom Nature of the violation	Enforcement Response	Authority
Monitoring and Reporting Violations		
Reporting Violations		
Report is improperly signed or certified.	Response within 15 days 1. Phone call 2. NOV	Inspector or CoLA Representative Inspector or CoLA Representative
Report is improperly signed or certified after notice by POTW.	Response within 15 days. 1. AO Response within 60 days 1. Show cause order	CoLA Representative ED
Late report, isolated and not significant (less than 45 days)	Response within 15 days. 1. Phone call 2. NOV	Inspector or CoLA Representative Inspector or CoLA Representative
Late report, isolated but significant (more than 45 days late).	Response within 15 days 1. AO	CoLA Representative

Noncom	Nature of the violation	Enforcement Response	Authority
	Reports are frequently late or not submitted at all.	Response within 15 days 1. AO Response within 60 days 1. Show Cause 2. Initiation of Civil Action	CoLA Representative ED ED
	Failure to report a spill or changed discharge (no harm).	Response within 15 days 1. NOV	Inspector or CoLA Representative
	Failure to report a spill or changed discharge (results in harm).	Response within 15 days 1. AO Response within 60 days 1. Initiation of Civil Litigation	CoLA Representative ED
	Repeated failure to report spills.	Response within 60 days 1. Show cause order 2. Termination of service	ED ED

Noncom	Nature of the violation	Enforcement Response	Authority
	Falsification of reports	Response within 60 days 1. Initiation of criminal prosecution 2. Termination of service	ED ED
Failure to Correctly Monitor - Accidental			
	Failure to monitor all pollutants specified in permit	Response within 15 days 1. NOV 2. AO	Inspector or CoLA Representative CoLA Representative
	Recurring failure to monitor	Response within 15 days 1. AO Response within 60 days 1. Initiaion of civil litigation	CoLA Representative ED
Failure to Correctly Monitor			
	Evidence of Intent	Response within 60 days 1. Initiaion of criminal prosecution 2. Termination of service	ED ED

Noncom Nature of the violation	Enforcement Response	Authority
Failure to Install Monitoring Equipment		
Delay of less than 30 days	Response within 15 days 1. NOV	Inspector or CoLA Representative
Delay of more than 30 days	Response within 15 days 1. AO	CoLA Representative
Recurring violation of AO	Response within 60 days 1. Initiation of civil litigation 2. Initiation of criminal prosecution 3. Termination of service	ED ED ED
COMPLIANCE SCHEDULES (In permit)		
Missed milestones by less than 30 days or will not affect milestone.	Response within 15 days 1. Phone call 2. NOV	Inspector or CoLA Representative Inspector or CoLA Representative
Missed milestone by more than 30 days, or will affect final milestone (good cause).	Response within 15 days 1. AO	CoLA Representative

Noncom	Nature of the violation	Enforcement Response	Authority
	Missed milestone by more than 30 days, or will affect final milestone (no good cause for delay).	Response within 60 days 1. Show Cause order 2. Initiaion of civil litigation 3. Termination of service	ED ED ED
	Recurring violation or violations of schedule in AO.	Response within 60 days. 1. Show Cause order 2. Initiaion of civil litigation 3. Termination of service	ED ED ED
OTHER PERMIT VIOLATIONS			
WASTESTREAMS ARE DILUTED IN LIEU OF TREATMENT			
	Initial violation	Response with 15 days 1. AO	CoLA Representative
	Recurring violation	Response within 60 days 1. Show cause 2. Termination of service	ED ED
FAILURE TO MITIGATE NONCOMPLIANCE OR HALT PRODUCTION			
	Does not result in harm	Response within 15 days 1. NOV	Inspector or CoLA Representative

Noncom	Nature of the violation	Enforcement Response	Authority
	Results in harm	Response within 15 days 1. AO Response within 60 days 1. Initiaion of civil litigation	CoLA Representative ED
	Failure to properly operate and maintain a pretreatment facility.	Response within 15 days 1. AO Response within 60 days 1. Initiaion of civil litigation	CoLA Representative ED

VIOLATIONS DETECTED DURING SITE VISITS

ENTRY DENIAL

Entry denied or consent withdrawn	Response as soon as possible 1. Obtain warrant and return to IU	ED
Copy of records denied	Response as soon as possible 1. obain warrant and return to IU	ED

ILLEGAL DISCHARGE

No harm to environment or POTW	Response with 15 days 1. AO	CoLA Representative
Discharge causes harm or there is evidence of intent	Response within 60 days 1. Initiaion of civil litigation 2. Initiaion of criminal prosecution	ED ED

Noncom	Nature of the violation	Enforcement Response	Authority
	Recurring violation of AO	Response within 60 days 1. Termination of service	ED
IMPROPER SAMPLING			
	Unintentionally sampling at the wrong location.	Response within 15 days 1. NOV	Inspector or CoLA Representative
	Unintentionally using the wrong sample type	Response within 15 days 1. NOV	Inspector or CoLA Representative
	Unintentionally using the wrong sample collection techniques	Response within 15 days 1. NOV	Inspector or CoLA Representative
INADEQUATE RECORD KEEPING			
	Inspector finds files incomplete or missing with no evidence of intent.	Response within 15 days 1. NOV	Inspector or CoLA Representative
	Recurring	Response within 15 days 1. AO	CoLA Representative

Noncom	Nature of the violation	Enforcement Response	Authority
FAILURE TO REPORT ADDITIONAL MONITORING			
	Inspector finds additional files	Response within 15 days 1. NOV	Inspector or CoLA Representative
	Recurring	Response within 15 days 1. AO	CoLA Representative