








1

 **Background** 

Regulations

- Mandated by State Stormwater General Permit (MS4)
- Mandated for Pretreatment Program by City Code 7-02-001-0021.A and EPA 40 CFR 403.8.f.5

2



Background



- ERP includes Pretreatment, Cross-Connection and Stormwater
- Provides direction and clarity to the regulated community
- Provides direction for staff on how to respond to instances of noncompliance
- Explains the escalating enforcement options
- Passed by resolution thru City Council in December 2018

3



Present day




Inspection Reports – Issued by Inspector

Warning Letters – Issued by
Inspector/Supervisor


Notice of Violations – Issued by
Manager

Most frequently used

4



Present day




Significant Non-Compliance – Defined in City Code

Administrative Fines– Defined in ERP


Administrative Order – Coordination with City Attorney

Rarely Used

5



Changes



Proposed changes to the plan

- Update narrative to have the stormwater section match pretreatment and cross-connection in language.
- Update Watershed Specialist to Stormwater Project Manager
- Add in Floodplain language from City Code.
- Update Stormwater and Regulatory Compliance Managers to Water Services Manager/Section Director.
- Listed Scavenger Waste violations for personnel direction.

6

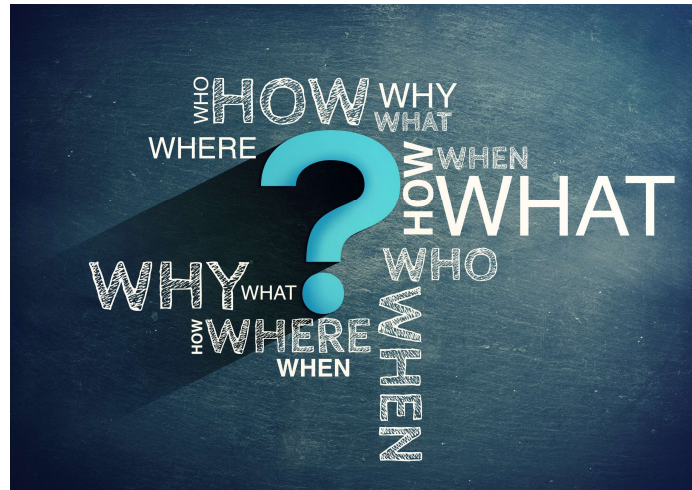
How the ERP has been used

- Cross-Connection – annual backflow testing and correct installations, which protect our water system
- Pretreatment and FOG – Businesses and staff both know what to expect for permit and code violations. Protect our WW collection system and Water Reclamation Plants
- Stormwater – Contractors are put on notice for subpar controls and trackout issues to protect the City’s stormwater system



7

Questions



8