

## Violation and Enforcement Summaries in iPACS

Violation and Enforcement summaries included in the corresponding comment entry field within iPACS are used to populate the Monthly and Quarterly Compliance Report to OC San. Effective immediately the following guidance will be used for entering violation and enforcement summaries into the corresponding comment entry fields in iPACS:

### Requirements for Violation and Enforcement Summaries in iPACS

#### Summaries for each Violation

1. Date of Noncompliance
2. Date Detected
3. Violation Description
  - a. Analysis Result and Regulatory Limit Exceeded
  - b. Reporting Requirement Violated and How
  - c. Other with description

#### Summaries for each Enforcement

4. Date of Enforcement
5. Enforcement Action
6. Enforcement Requirements
7. IU Response Date and Details
8. Compliance Status/Date

Example:

Violation: Permit Limit Exceedance – First Violation within six-month period – Minor Violation  
Comments: On 4/9/2018 (1) SAWPA collected a wastewater sample from Monitoring Point 002. The laboratory analyses results received on 4/30/2018 (2) indicated a Zinc concentration of 3.93 mg/L, which exceeded the Daily Maximum Discharge Limitation of 2.61 mg/L as stated in Permit No D1234-5. (3)

Enforcement: NOV

Comments: On 5/7/2018 (4) a Notice of Violation and Order for Corrective Action (NOV) (5) was issued, which required the permittee to resample for Zinc and provide the analysis results to SAWPA by 5/23/2018. Furthermore, the permittee was required to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation by no later than 5/23/2018. (6) Permittee responded on 5/21/2018 and attributed the cause of the violation to an accumulation of sludge on the bottom of the effluent brine storage tank (Tank). The permittee cleaned the Tank and hauled the sludge off on 5/10/2018 and provided the waste manifest for its disposal in their response. The resample conducted on 5/11/2018 indicated a Zinc concentration of 0.23 mg/L, in compliance with the Daily Maximum Discharge Limitation of 2.61 mg/L as stated in Permit No D1234-5. (7) Enforcement closed on 5/30/2018. (8)