

Attachment 2

Table 2 – Enforcement Response Plan – Revisions

Page	Description
Page 4	City Records Retention Schedule Updated language to include the requirement to retain and destroy documents in accordance with the City Records Retention Schedule.
Page 11	Responsible Personnel Updated titles, responsibilities and implementation authorities.
Page 12	Enforcement Response Actions Table Updated to include Penalty Exceedance Fees (PEF) and Referral to EPA, State, or County Agency.
Page 16	Civil Penalty Order Added language supporting the City's capability to recover costs incurred for investigation, monitoring, legal assistance, cleanup or repair resulting from violation.
Page 20	Enforcement Penalty Schedule Table Updated limits maximum fines be consistent with state law and the proposed revisions to the RMC
Page 36	Permit Sampling Frequencies Permit Class or Category minimum sampling frequencies modified to address specific risk and to effectively utilize resources.
Page 40	Responding to Pollutant Violations Added language to impose requirement to notify in cases of release of material to the sanitary sewer that would otherwise be considered hazardous, in accordance with 40 CFR 403.12(p)&(j).
Appendix 1	Escalating Enforcement Actions Protocol Edited to update protocols and include additional stormwater and surface discharge violations response.