



# **Allegheny County Sanitary Authority (ALCOSAN)**

## **Pretreatment Enforcement Response Plan**

# ALLEGHENY COUNTY SANITARY AUTHORITY (ALCOSAN)

## PRETREATMENT ENFORCEMENT RESPONSE PLAN

**Introduction:** Pursuant to the requirements of 40 CFR 403.8(f)(5) and the Publicly Owned Treatment Works Penalty Law, the Allegheny County Sanitary Authority (ALCOSAN) issues this Pretreatment Enforcement Response Plan (ERP). The purpose of the ERP is to formalize and provide notice of the procedures to be followed and actions to be taken to maintain Industrial User compliance with Federal Pretreatment requirements. The ERP contains detailed procedures indicating how ALCOSAN will investigate and respond to instances of Industrial User noncompliance. The ERP is incorporated into the ALCOSAN Pretreatment Regulations. In instances where the ERP may be construed as conflicting with Pretreatment Regulations, the Pretreatment Regulations will supersede the ERP.

This plan is organized into six sections:

- A. Investigation of Noncompliance
- B. Criteria for Selecting Enforcement Response
- C. Enforcement Guide
- D. Civil Penalties
- E. Consent Penalties
- F. Criteria for Scheduling Sampling and Inspection
- G. Tracking System
- H. Forms for Documenting Noncompliance

### A. Investigation of Noncompliance

Compliance information is generated by five mechanisms:

1. Industrial User (IU) Self-Monitoring Compliance Reports
2. ALCOSAN sampling
3. ALCOSAN field inspections
4. Reports from other governmental agencies
5. Reports from employees or concerned citizens

With respect to items 1 through 3, as information is received it is reviewed promptly by the Industrial Waste Department Manager (Manager) and/or Compliance Officer. An evaluation of compliance is made by comparing the information received with the provisions contained in the IU's Discharge Permit and with applicable pretreatment regulations. When a violation has been detected, the reviewer shall examine the compliance and action history of the violator and take appropriate action consistent with this ERP.

The IU's file shall indicate the action to be taken, the basis upon which the decision to respond was made and the time period within which actions will take place. At least monthly, the Director of Environmental Compliance (Director) shall review the IU-related activities of the department with the Manager. The purpose of this review is to discuss issues arising regarding IU regulation and to ensure that enforcement is conducted consistent with this ERP.

With respect to items 4 and 5, a field investigator shall be dispatched to the violating facility as soon as possible to confirm the report and gather sufficient information to determine whether a violation has occurred. The Manager and/or Compliance Officer shall then evaluate the information in the same manner as for items 1 through 3 (above).

Timeframes for identifying noncompliance and determining initial enforcement response are discussed in Section C of this ERP. When an enforcement action has been initiated, the Compliance Officer shall institute follow-up activities to monitor the progress of corrective measures required of the IU. These activities shall include, as appropriate, scheduling periodic inspections/sampling and reviewing results, reviewing of IU progress reports, and corresponding/communicating with the violator. Such activities shall produce information sufficient to assess final compliance by the violator. Supplemental enforcement action may be taken on the basis of these monitoring activities, as appropriate.

## **B. Criteria for Selecting Enforcement Response**

In determining the appropriate response to a violation of an IU's permit and/or federal or ALCOSAN pretreatment regulations, the following criteria are to be considered:

1. Magnitude of the violation
2. Duration of the violation
3. Frequency of the violation
4. Harm or potential harm to the POTW or environment
5. Economic benefit gained by the violator
6. Cooperation/good faith of the violator
7. Compliance history of the violator
8. Violator response to previous enforcement

Factors to consider for each criterion are described below.

1. **Magnitude of the violation** – The magnitude of the violation is based on the degree of variance from the applicable regulation or permit. Intentional noncompliance will be considered to be of the highest magnitude. Unintentional violations that significantly vary from the applicable regulation or permit will be considered lower in magnitude. Unintentional violations that do not significantly vary from the applicable regulations or permit will be of the lowest magnitude.
2. **Duration of the violation** – Violations that continue for an extended period of time will be subject to more severe enforcement response. Violations should be corrected as soon as possible following discovery. Noncompliance instances that do not meet the agreed upon schedule or Consent Agreement will be subject to heightened enforcement response.
3. **Frequency of the violation** – Violators with recurring instances of noncompliance will be subject to more stringent enforcement response than “first time” violators. This factor will consider and evaluate all identified violations, regardless whether the violations are similar in nature or pertain to the same parameters.

4. **Harm or potential harm to the Publicly Owned Treatment Works (POTW) or environment** – A violation which causes or threatens harm to persons, health, property, the environment or ALCOSAN is to be considered an emergency. Enforcement must therefore be swift and successful. The response must also be designed to deter a reoccurrence of such a violation. The reviewer should therefore consider a severe enforcement action involving municipal action and other regulatory agencies.
5. **Economic benefit gained by the violator** – Economic benefit is the financial gain to the violator that is realized from not complying with applicable pretreatment regulations and/or the violator’s pretreatment permit. ALCOSAN has discretion to require payment by the violator of any economic gain realized by the violator’s noncompliance. ALCOSAN has discretion to consider financial gain that is beyond five years, but, as a matter of policy, will typically consider the financial gain realized by the violator based on the five-year statute of limitations for prosecuting violations. Economic benefit includes, but is not limited to, the delayed/avoided costs of monitoring, sampling, and reporting. It also includes the delayed/avoided costs related to capital improvements, repairs, operation, and maintenance.
6. **Cooperation/good faith of the violator** - The good faith of a violator is a significant consideration in the determination of appropriate enforcement responses. While good faith is a subjective characteristic, certain indicia of intent can be evaluated to make a determination, including the following:
  - Whether the violator reported the violation upon discovery
  - Whether the violator provides a reasonable explanation for the violation
  - Whether the violator cooperates during investigation and resolution
  - Whether circumstances beyond the IU's control contributed to the violation
  - Whether the violator has been generally diligent in complying with requirements
  - Reliable information indicating good faith from outside the command structure of the violator
  - Compliance history of the violator

If a determination of bad faith has been made, the most severe enforcement measures will be considered.

7. **Compliance History** - A violator’s compliance history can be an indication of the adequacy of or the need for treatment as well as the need for improved environmental management by the IU. As a violator's compliance history deteriorates, enforcement actions should become both more severe and more specific with regard to actions to be taken by the violator. While the violator must ultimately select the means by which it will maintain compliance, enforcement actions should be designed to provide sufficient inducement to select appropriate strategies to maintain compliance.
8. **Violator response to previous enforcement** - In selecting an appropriate enforcement response, consideration must be given to the likelihood that the response will result in renewed violator compliance. When a review of the violator’s history reveals that the violator has been reluctant to act or unresponsive to previous enforcement initiatives, the reviewer should consider more severe enforcement

actions involving municipal action and other regulatory agencies. Such an action will bring greater pressure to bear upon the violator to promptly correct its violation(s).

### C. Enforcement Guide

This enforcement guide (Guide) establishes a range of escalating enforcement actions ALCOSAN will take in response to a broad range of violations, the official responsible for each type of response, and the time periods within which required responses must take place. Due to the limited enforcement powers available to municipal authorities in the Commonwealth of Pennsylvania, this Guide utilizes, as appropriate, other agencies with jurisdiction over environmental matters related to Pretreatment issues. The terms and abbreviations used in the Guide are defined below:

ACHD	Allegheny County Health Department
Civil Action	Civil litigation brought by ALCOSAN against the violator seeking penalties, equitable relief, or damages
Supervisor	Sampling and Compliance Supervisor
Consent Agreement	Agreement between ALCOSAN and the violator to take specific corrective measures with Consent penalties for breach
Director	Director of Environmental Compliance
PADEP	Pennsylvania Department of Environmental Protection
Manager	Manager, Industrial Waste Department
Municipal Action	Enforcement of Pretreatment requirements by the Municipality through prosecution under its sewer use ordinance
NOV	Notice of Violation
Penalty	Civil: for discharge, compliance activity and reporting violations  Consent: limited to violations which have not caused significant harm to the public, municipal or ALCOSAN employees, the environment or the ALCOSAN facilities including the collection system.
Phone	Verbal notice of violation by telephone
SNC	Significant Noncompliance; defined as in Section 7 (a-h) of ALCOSAN's Pretreatment Regulations
TRC	Technical Review Criteria; as defined in Section 7(b) of ALCOSAN's Pretreatment Regulations

Violator	An Industrial User who has not meet the terms of a permit of Consent Agreement
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The below table summarizes violations and possible responses based on investigation performed by the Supervisor and decision of the Manager and Director.

## ALCOSAN ENFORCEMENT GUIDE

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
Unauthorized Discharges			
1. Unpermitted/illegal Discharge	Violator unaware of requirement; no harm	Phone/NOV Submit application	Manager/Supervisor
	Violator unaware of requirement; harm/threatened harm	Order to cease and correct harmful activity and apply for permit Penalty Refer to ACHD/PADEP/EPA Injunction Municipal Action Criminal Action Terminate Service	Manager/Supervisor
	Violator aware of requirement; no harm	Phone/ NOV Compliance Meeting	Manager/Supervisor
	Violator aware of requirement; harm/threatened harm	Phone/ NOV Compliance Meeting Penalty	Manager/Director/Supervisor
	Failure to apply continues after notice	Order to cease discharge Penalty	Manager/Director

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
		Refer to PADEP for investigation Injunction Municipal Action Criminal Action Terminate Service	
2. Unpermitted discharge (failure to renew)	Violator has not submitted application within 10 days of due date	Phone/NOV Penalty	Manager/Supervisor
Discharge Limit Violation			
1. Exceedance of local or Federal Standard (Permit Limit)	Isolated <sup>1</sup> ; not significant (no harm, less than TRC)	Phone/NOV Additional Sampling Required Penalty	Manager/Supervisor
	Isolated; significant (no harm, greater than TRC)	NOV requiring compliance schedule Additional Sampling Required Penalty	Manager/Supervisor
	Isolated, harm/threatened harm	Order to correct violation and prevent recurrence Penalty	Manager/Director

<sup>1</sup> Isolated events occur only once at a facility.



NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
		Refer to ACHD/PADEP/EPA Injunction Criminal Action	
	Recurring, no harm; not SNC	NOV requiring compliance schedule Penalty Consent agreement Suspend process discharge until corrected Terminate service	Manager/Supervisor/Director  Manager/Director
	Recurring; SNC; no harm	Order to correct within fixed time period Penalty Consent agreement Suspend process discharge until corrected Terminate service	Manager/Director
	Recurring harm/threatened harm	Order to cease process discharge Refer to PADEP/EPA Penalty Consent Agreement	Manager/Director

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
		Revoke permit Injunction Criminal Action Terminate Service	
Other Violations			
1. Waste streams are diluted in lieu of treatment	Initial violation  Recurring	Consent Agreement Penalty Refer to PADEP/ACHD/EPA Criminal Action Revoke permit	Manager/Supervisor Manager/Director  Manager/Director
2. Failure to mitigate noncompliance or halt production	Does not result in harm  Does result in harm/threatened harm  Recurring	NOV Penalty Consent Agreement to correct Refer to PADEP/ACHD/EPA Criminal Action Revoke permit	Manager/Supervisor  Manager/Director  Director
Monitoring and Reporting Violations			
1. Improper monitoring/sampling	Unintentional failure to monitor/sample all pollutants as	NOV requiring immediate resampling	Manager/Supervisor

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
	required by permit, including frequency, method, location	Compliance Meeting /Schedule Penalty	Manager/Director
	Intentional failure to monitor/sample all pollutants as required by permit, including frequency, technique, method, location	NOV requiring immediate resampling Compliance Meeting /Schedule Revoke Permit Criminal Action Penalty Refer to PADEP/ACHD/EPA Suspension of service Termination of service	Manager/Director
	Failure to resample as required	NOV Penalty	Manager/Supervisor/Director
2. Failure to install monitoring equipment	Delay of less than 30 days  Delay of 30 days or more	NOV Penalty Consent Agreement Penalty Refer to ACHD/PADEP/EPA	Manager/Supervisor Manager/Director  Manager/Director
3. Compliance Schedules	Missed milestone or affects final milestone by less than 30 days (good cause for delay)	NOV Consent Agreement	Manager/Supervisor

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
	<p>Missed milestone or affects final milestone by more than 30 days (good cause for delay)</p> <p>Missed milestone by less than 30 days or will affect final milestone by less than 30 days (no good cause for delay)</p> <p>Missed milestone or affects final milestone by more than 30 days (no good cause for day)</p> <p>Recurring violation or violation of schedule in order</p>	<p>Penalty</p> <p>Refer to PADEP/ACHD/EPA</p> <p>Criminal Action</p>	<p>Manager/Director</p>
Other Violations			
<p>1. Failure to properly operate and maintain pretreatment facility</p>	<p>Does not result in harm</p> <p>Does result in harm/threatened harm</p> <p>Recurring</p>	<p>NOV</p> <p>Penalty</p> <p>Consent Agreement to correct</p> <p>Refer to PADEP/ACHD/EPA</p> <p>Criminal Action</p> <p>Revoke permit</p>	
Violations Detected during Site Visits			

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
1. Entry to IU Denied	Entry denied or consent withdrawn; Copies of records denied	Contact PADEP/EPA for assistance Obtain warrant and return to facility	Manager
Monitoring and Reporting Violations			
1. Reporting Violation	Report is improperly signed or certified	Phone/NOV	Manager/Supervisor
	Report is improperly signed or certified 10 days after notice	Order to resubmit report to be in compliance Penalty	Manager/Supervisor/Director
	Isolated late report, not significant	Phone/NOV	Manager/Supervisor
	Isolated late report, significant	Order to submit report Penalty	Manager
	Two or more late reports	NOV Publication Consent Agreement Penalty Municipal Action Permit Revocation	Manager/Director

<b>NONCOMPLIANCE</b>	<b>NATURE OF VIOLATION</b>	<b>ENFORCEMENT RESPONSES</b>	<b>PERSONNEL</b>
	No reports submitted within one reporting year or SNC	NOV Publication Consent Agreement Penalty	Manager/Director/Supervisor
	Unintentional failure to report additional monitoring  Recurring	NOV Penalty Publication Order to cease process discharge Refer to PADEP/EPA/ACHD Penalty Consent Assessment Revoke permit Injunction Criminal Action Terminate Service	Manager/Supervisor Manager/Director
	Intentional failure to report additional monitoring	NOV Penalty Publication Order to cease process discharge Refer to PADEP/EPA/ACHD	Manager/Supervisor Manager/Director

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
		Penalty Consent Agreement Revoke permit Injunction Criminal Action Terminate Service	
	Failure to report spill or changed discharge quality or quantity; no harm	NOV Penalty Municipal Action Refer to ACHD/PADEP/EPA Order immediate report and corrective action	Manager/Supervisor Manager/Director
	Failure to report spill or changed discharge quality or quantity; harm/threatened harm	Order immediate report and corrective action NOV Municipal Action Refer to ACHD/PADEP/EPA Penalty	Manager/Director
	Repeated failure to report spills or change in discharge quality or quantity	Order immediate report and corrective action NOV	Manager/Director

NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
		Municipal Action Penalty Refer to ACHD/PADEP/EPA Revoke permit	
	Falsification of any information or record provided to ALCOSAN	Order immediate report and corrective action NOV Municipal Action Revoke Permit Criminal Action Penalty Refer to ACHD/PADEP/EPA	Manager/Director
2. Recordkeeping Violation	Files incomplete or missing (no evidence of intent)	NOV Penalty	Manager/Supervisor Manager/Director
	Files incomplete or missing (evidence of intent)	NOV Consent Agreement Penalty	Manager/Supervisor Manager/Director
	Recurring	NOV Consent Agreement Penalty	Manager/Director



NONCOMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSES	PERSONNEL
Other Violations			
1. Failure to report noncompliance within 24 hrs. of discovery	<p>Does not result in harm</p> <p>Does result in harm/threatened harm</p> <p>Recurring violation</p>	<p>NOV</p> <p>Penalty</p> <p>Refer to PADEP/ACHD/EPA</p> <p>Injunction</p> <p>Criminal Action</p> <p>Revoke Permit</p>	<p>Manager/Supervisor</p> <p>Manager/Director</p> <p>Manager/Director</p>
2. Failure to provide written notice of noncompliance within 5 days of discovery	<p>Isolated violation</p> <p>Recurring violation</p>	<p>NOV with order to report</p> <p>Penalty</p> <p>NOV</p> <p>Penalty</p>	<p>Manager/Supervisor</p> <p>Manager/Director</p> <p>Manager/Director</p>

**Timeframes for Responses.**

- A. All violations will be identified within fourteen days of receiving compliance information unless the nature of the violation requires more immediate response.
- B. Initial enforcement responses will occur within thirty days of violation identification unless the nature of the violation requires more immediate response.
- C. Follow-up actions for continuing or reoccurring violations will be taken within thirty days of detection of missed compliance deadlines or detection of recurring violations unless the nature of the violation requires more immediate response. All actions addressing continuing violations shall include compliance schedules.

- D. Violations which cause or threaten harm to persons, health, property, the environment or ALCOSAN are considered to be emergencies and will receive immediate action to mitigate potential harm.
- E. All violations meeting the criteria for Significant Noncompliance shall be addressed with an enforceable order within thirty days of the identification of significant noncompliance.

#### **D. Civil Penalties**

Violations are discovered through a variety of mechanisms. When a violation has occurred, ALCOSAN shall determine the category of violation, as set forth in the Guide. When a civil penalty (penalty or penalties) is warranted, ALCOSAN will initiate an investigation to determine the appropriate civil penalty amount based on the same factors that are used to determine whether an enforcement action is warranted. The results of the investigation shall be documented, and the appropriate penalty calculated, based on the Daily Penalty Assessment Guidance Table (Table 1).

When the amount of the penalty has been determined, ALCOSAN will prepare a fact sheet, which shall contain the name and address of the violator, the specific violation, or violations for which the penalty is sought, the penalty amount proposed and a brief description of the circumstances surrounding the violation(s), the factors evaluated to determine the penalty, and any other enforcement actions to be taken in addition to the penalty. Attached to the fact sheet shall be a checklist of documents to be provided to substantiate the penalty sought, including, but not limited to, notice of the regulation(s) violated, notice of ALCOSAN's penalty policy, and documentation of the violation (laboratory analyses with chain of custody, field investigation reports, customer submissions, etc.).

The fact sheet and checklist shall be submitted to the Director of Environmental Compliance for approval. Upon approval, the Industrial Waste Department Manager shall assess the penalty by written notice, with proof of service, to the violator. The notice shall identify the date and nature of the violation including reference to the relevant regulations(s), the amount of the penalty, the date notice is issued, and the date by which the penalty is to be submitted payable to ALCOSAN. The date payable shall be thirty (30) days from the date the notice is issued. The notice shall also describe the procedure for appealing the amount of the penalty assessment including the time period within which the appeal is to be filed and the name, address, and telephone number of the person with whom the appeal is to be filed. The date of payment shall be the date posted as indicated by the U.S. Postal Service post mark, if mailed, the date mailed if sent via overnight delivery service, or the date received, if hand delivered.

Penalties shall be large enough to deter future noncompliance and reasonably consistent for similar instances of noncompliance. ALCOSAN reserves the right to waive any penalties.

The Director may recover reasonable attorneys' fees, court costs and other expenses associated with enforcement activities, including sampling and monitoring expenses and the costs of any actual damages incurred by ALCOSAN.

## TABLE 1

### DAILY PENALTY ASSESSMENT GUIDANCE TABLE

The daily penalty assessment for discharge, compliance activity and reporting violations shall be calculated using the following formula:

$$\text{Daily Penalty} = \text{Base (A + B + C)} + \text{Harm} + \text{Benefit}$$

### DEFINITIONS

Base: the base penalty assessment established for a category of violations. For the purposes of calculating penalties, violations shall fall into three broad categories:

1. Discharge Violations: including (but not limited to) violations of permit limits; unauthorized or illegal discharges; improper sampling or monitoring; failure to correct or mitigate noncompliance; failure to properly treat where required.
2. Compliance Activity Violations: failure to properly execute any required activities pursuant to the permits, regulations, compliance schedules, orders or other directives issued under the auspices of the Pretreatment Program.
3. Reporting Violations: failure to perform and/or submit any required report, notice, recordkeeping or laboratory analysis in the time, manner, format, or to the location specified by ALCOSAN under the auspices of the Pretreatment Program.

The base penalty for each category shall be determined by ALCOSAN from consideration of the relative severity of each category of violation, the need for deterrence of such violations, and the administrative costs associated with taking enforcement actions. The base penalty to be established shall be a fixed range of values for all violations within a given category and serve as the basis for the particular penalty to be imposed upon consideration of the additive factors to be defined herein and as incorporated into the relevant Daily Penalty Formula.

Factor	Cause of Violation	Value
A	Improper operation and maintenance of the production facility or treatment system	1.0
	Inadequate treatment due to improper design or a change in production resulting in a discharge violation	2.0
	Failure to provide treatment where required to meet discharge limits	4.0
	Illegal dumping	8.0

Factor	Cause of Violation	Value
B	Magnitude of violation	1+ (result - limit)/limit
C	Successive violations of different limits	X - 1*
	Successive violations of the same limit	X*
	* X = number of violations within the previous fifteen months (the SNC year)	
	Harm	The cost associated with the determined abatement, remediation, damage, penalties, injury to persons and/or property and/or the environment accruing as a direct or indirect result of an illegal discharge by any person to the sewage collection system.
	Benefit	The economic benefit derived as a determined result of the violation as determined by applicable USEPA guidance regarding economic benefit determinations
		Case-by-Case Determination
		Case-by-Case Determination

The penalty assessment for reporting violations shall be determined using the following formula:

$$\text{Penalty} = \text{Base} + 0.25 * \text{Base} * (\text{number of days of violation})$$

Any penalties assessed for reporting violations shall be applied in addition to any concurrent discharge or compliance activity penalties.

**E. Consent Penalties**

In addition to the unilateral Civil daily penalty assessment described above, the Industrial Waste Department Manager may negotiate consent penalties in lieu of the Civil daily penalty assessments. Discretion to obtain consent penalties shall be limited to violations which have not caused significant harm to the public, municipal or ALCOSAN employees, the environment or the ALCOSAN facilities including the collection system.

The procedures established herein for discovering and classifying violations shall be used for determining and obtaining consent penalties. In addition to the information required to be included in the fact sheet and document checklist, the Industrial Waste Department Manager shall also include a brief description of the circumstances which justify a negotiated penalty. Negotiated penalties may be less than the guideline penalties with justification, but the initial penalty sought must fall within guideline values as determined from Table 1. As with assessed penalties, proposed consent penalties must be reviewed and approved by the Director of Environmental Compliance.

Factors to be considered in determining whether to seek a consent penalty include the nature and severity of the violation, compliance history, recalcitrance of the violator, undue economic distress caused by assessment of the penalty according to the guidelines, and the negative impact which the penalty would have upon the violator's ability to achieve compliance. Consent penalties shall be incorporated into binding and enforceable compliance agreements negotiated to achieve timely and effective correction of the violation. All compliance agreements shall stipulate further penalties for breach of any terms of the agreement. As consent penalties are negotiated, there shall be no appeal of the penalties once agreed to in writing by the violator.

#### **F. Criteria for Scheduling Sampling and Inspection**

Sampling and inspections are to be scheduled to ensure that each violator is monitored at least once per year within one year of the previous sampling or inspection visit. Priority will be given to those violators which were not in compliance during the previous monitoring period. As indicated previously, additional sampling and inspection shall be scheduled to monitor activities required by an enforcement action.

#### **G. Tracking System**

ALCOSAN utilizes Computerized Tracking System which is the Linko Compliance Software and data system to track, schedule and monitor all Pretreatment and Industrial Users compliance, sampling and inspecting activities. Information is entered into this system by the department clerks as received and reports are generated on a regular basis. A second system has been written for ALCOSAN which provides a broader range of scheduling and reporting functions as well as tracking data and activities. This system is used as a management tool by the Manager and Sampling and Compliance Supervisor.