EPA SSO Enforcement

carrot and stick approach

...a mixed bag of veggies and twigs....
Why Rhode Island for pilot program?

- tourism & fishing industries
- 400 miles of coastline
- smallest state
EPA PLAN
RI SSO Integrative Initiative

traditional enforcement

strong technical assistance
Chronology

- January 2007: announcement letters
- February/August 2007: AOs issued
  - Self-assessment checklist (180)
  - Corrective Action plan (270)
  - Implementation schedule
  - CMOM submittal (365)
  - Annual reports
Enforcement

AOs – Compliance Orders with no penalties

- Staff time & resources
- Ineligible for EPA award
- Cost of consultants and construction
Strong technical assistance

workshops

training sessions

templates

guidance

on-site assistance
And just when you thought you were in the clear....

......April 2008....another AO issued against NBC & a member town for a particular SSO problem

- joint liability
- no hearing process
- NBC problem
Lesson's learned

- Regional facilities will have to subsidize ailing city/town infrastructures

- Due process??????????

- No penalties doesn’t really mean no penalties