

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



WARREN AVE



Lesson's learned

- ❑ Regional facilities will have to subsidize ailing city/town infrastructures
- ❑ Due process????????
- ❑ No penalties doesn't really mean no penalties