

APPENDIX E

EXAMPLES OF LOCAL GOVERNMENT VIOLATIONS OF ENVIRONMENTAL LAWS (1992-1997)

Local Government	
Township of North Brunswick, NJ (1992)	An intentional disabling of catalytic converters on eight township-owned police vehicles was found. The Township agreed to a \$16,000 penalty.
City of Vero Beach (Indian River County, FL) (1993)	The recorder for a continuous opacity monitoring system had been removed. Subsequent reports were submitted, and the City failed to mention downtime of the recorder. The City chose an in-kind penalty option to pay \$71,528 to be used in construction of a wet lab for a learning center.
New York City Board of Education, NY (1993)	A complaint was filed against the Board of Education and seven contractors for failure to notify EPA of renovations involving asbestos removal in City schools. The defendants violated EPA's asbestos "notification rule." The City is to pay \$200,000 in civil penalties.
New York City, NY (1993)	Of the over 300 gasoline dispensing stations leased and/or operated by the City, approximately 55 of the facilities were not equipped with Stage I and /or Stage II vapor collection systems. The City is to award contracts to construction managers who will provide enforceable work schedules to bring the facilities into compliance. The City is to pay \$200,000 in civil penalties.
Columbus Solid Waste Reduction Plant, Office of Regulatory Enforcement, OH (1994)	Columbus agreed to shut down the Columbus Solid Waste Reduction Plant in response to an administrative order and community concerns about dioxin emissions. The order required the facility to design systems to achieve lowest dioxin emissions. The City decided to authorize closure of facility.
City and County of Denver, CO (1995)	Violations included: an exceedance of performance standards by air emissions from the treatment plant on two occasions; failure to notify EPA and Colorado Department of Public Health and Environment; failure to recycle vapor-phase carbon units and implement changeout procedures; and failure to submit a schedule for proposed corrective measures. The City will pay \$79,550.
City of Providence, Central High School, (1995)	The City failed to meet opacity emissions limits, to operate opacity monitors in accordance with regulations, and to combust fuel with the required sulfur dioxide content under federal regulations. The City agreed to pay a \$91,000 penalty, purchase fuel with the required sulfur dioxide content, and to operate its opacity monitor as required by regulations.
Allegheny County Department of Aviation, PA (1997)	Demolition activities at the airport resulted in a disturbance of asbestos materials. CAA NESHAP regulations were violated. The facility was cleaned up and a work plan was developed.
City of Adrian, MI (1992)	The City must pay a civil penalty of \$25,000. The City will: (1) install a dechlorination system at the wastewater treatment facility [\$15,000]; (2) perform a water quality study of the South Branch of the River Raisin [\$38,937]; and (3) perform a comprehensive study of the Pho-Strip process [\$61,000].

Local Government	
City of Altamonte Springs, FL (1992)	A settlement included a civil penalty of \$55,000 and the construction of a distribution system for reuse of the City's wastewater treatment plant effluent. Construction activities are valued at \$3,300,000.
City of Beaumont, TX (1992)	The City will pay a civil penalty of \$400,000 for failing to implement an industrial pretreatment program.
Clifton Water District, CO (1992)	Clifton Water District will pay a \$20,000 penalty for constructing a municipal water supply diversion structure in the Colorado River in violation of §404 of CWA. The discharges affected the reach of river inhabited by the Colorado Squawfish and the razorback sucker.
Escambia Counties Utilities Authority (ECUA), Pensacola, FL (1992)	Violation of NPDES permit limits of fecal coliform and total residual chlorine at the Main Street wastewater treatment facility, discharging to Pensacola Bay were found. The Authority must pay a civil penalty of \$26,000 and be involved in an eighteen-month water quality data collection effort in Pensacola Bay and parts of contiguous water bodies. The effort is valued at \$50,000.
Township of Franklin Sewerage Authority (1992)	The Township of Woodbridge, the Borough of Carteret and the City of Perth Amboy are to pay a collective civil penalty of \$950,000 for past violations of CWA at sewage treatment plants.
Village of Sauget, IL (1992)	The Village failed to develop an approvable pretreatment program and exceeded NPDES effluent limits for BOD, iron, mercury, TSS and zinc. The Village also failed to demonstrate compliance with the whole effluent toxicity limit. A penalty of \$750,000 was assessed. The Village must also make a payment to EPA of \$50,000 for at least one year that will be used to hire an independent consultant to act as on-site "observer" of the implementation of Sauget's Pretreatment Program.
Washington City, UT (1992)	The City will pay \$70,000 in administrative penalties for unauthorized fill in wetlands. The discharges of fill material affected nearly six acres of spring-fed desert wetlands that contained the uncommon wetland plant Yerba Mansa. The City performed wetland restoration and mitigation work on site.
City of Bossier, LA and State of Louisiana (1993)	The City failed to properly operate and maintain a publicly owned treatment works, to comply with effluent limitations of a NPDES permit, and to fully implement its industrial pretreatment program. The City agreed to pay a civil penalty of \$200,000 and conduct a SEP that will promote EPA's policy of providing beneficial use of municipal wastewater sludge. As part of the SEP, the City will also install sludge treatment facilities that will produce a reusable final product. The cost is estimated at \$375,000.
City of Cocoa, FL (1993)	The City violated §301(a) of the CWA for failure to monitor pH on continuous basis and for exceeding other NPDES permit limitations at various times. The City is to pay \$32,593 and implement SEPs valued at \$1,963,600. The SEPs involve the installation of 5,000 feet of storm water swales; expansion of the City's wastewater reuse; restoration of a 300,000 gallon storage tank and accelerated compliance with the Florida Indian River Lagoon Act.
City of Reading, PA (1993)	The Reading Sewage Treatment Plant had mercury seal trickling filters at the plant for years that have leaked, resulting in an estimated 5 tons of mercury released. DER's policy was changed to prohibit the use of mercury seal filters in any sewage treatment plant in PA. The City is to have the Academy of Natural Science perform a study of the Schuylkill River to determine the effects on fish and to determine the fate of mercury released. The City will replace the mercury seal filters with mechanical seal filters.

Local Government	
City of Rock Springs, WY (1993)	The City was cited on failure to properly implement and enforce federal pretreatment regulations. An order was issued to correct deficiencies of its pretreatment program and comply with the NPDES permit. A civil penalty of \$45,000 is required. The development of a household hazardous waste program, on-site assistance program for small communities, and workshop on pollution prevention assessment and waste minimization for WY pretreatment coordinators is required. The cost is estimated at \$41,000.
City of Starke, FL (1993)	The City had numerous violations of permit limits for BOD, TSS, TN, TRC, pH and fecal coliform, and schedule and reporting violations. The City must pay a penalty of \$10,300. A land application/reuse project to reduce discharge to Alligator Creek by 40% at an estimated cost of \$1.6 million is required.
Easton, PA (1993)	The Easton Area Joint Sewer Authority is to pay a civil penalty of \$389,000 for past violations of the NPDES permit. The Authority is also required to maintain compliance and to implement a pretreatment program. The Authority will pay \$120,000 to the Coalition of Religious and Civic Organizations, Inc. The City is required to pay a \$45,000 penalty for permit effluent and pretreatment violations.
New Albany, IN (1993)	The City violated effluent limits of the NPDES permit, bypassed wastewater, failed to implement and enforce a pretreatment program, failed to provide an adequate alternative power source and violated an administrative order issued by EPA. The city will pay a penalty of \$140,000 to the U.S. Treasury and \$35,000 to Indiana, and will conduct extensive work on the publicly owned treatment works and sewer system at a cost of \$17 million.
Port of Portland, OR (1993)	The Port of Portland had unpermitted toxic discharges posing a potential hazard to human health and the marine environment. A penalty of \$92,000 is required. Port of Portland must also conduct analysis and removal of contaminated sediments by studying priority pollutants in sediments near storm water drains. Costs are estimated at \$58,000.
Town of Fort Gay, WV (1993)	Violations included: numerous effluent limitation violations, failure to submit timely discharge monitoring reports, failure to report bypasses and CSO discharges, and operation and maintenance problems. The town is required to pay a \$10,000 fine.
Town of Taos, NM (1993)	The town failed to adequately treat land-applied sludge with a process to significantly reduce pathogens. The town must pay a civil penalty of \$125,000 and is required to immediately install a temporary means of treating sludge.
Wells County Water Resources District, ND (1993)	The Wells County Water Resources District drained 2,400 acres of prairie pothole wetlands without the necessary authorizations. The County will restore drained wetlands on an acre-for-acre basis.
City and County of Honolulu, HI (1994)	The City and County had poor maintenance of the sewer system, which resulted in over 300 spills of raw or partially-treated sewage, and failed to implement an adequate pretreatment program to regulate the discharge of toxics from industries into the sewer system. Under a consent agreement, the City and County will pay \$1.2 million and improve the operation and maintenance of its sewer system. The City and County agreed to spend \$30 million on SEPs for treating and reusing wastewater and sludge.
City of Bossier, LA and State of Louisiana (LA) (1994)	The City agreed to pay \$200,000 and to conduct a SEP. The City violated the CWA by failing to properly operate and maintain its POTW, failing to comply with its NPDES permit, and failing to implement an industrial pretreatment program. The project cost of the SEP was \$375,000.

Local Government	
City of Hoboken, NJ (1994)	The Hoboken, Union City, Weehawken Sewerage Authority (HUCWSA) agreed to pay stipulated penalties in the amount of \$2.8 million for its violations of a January 1991 consent decree. This \$2.8 million includes a payment of \$1,152,000 that will be made to EPA, \$850,000 to the New Jersey Department of Environmental Protection, and the remainder to the Interstate Sanitation Commission.
City of Kenner, LA and State of Louisiana (LA) (1994)	The City violated its NPDES permit, including failure to adequately implement an approved pretreatment program, which caused an unpermitted discharge of pollutants. The City agreed to pay a civil penalty of \$215,000.
City of Middletown, OH (1994)	The City failed to adequately carry out an approved pretreatment program, had past NPDES effluent limit violations, and filled in the river channel of the Great Miami River. A civil penalty of \$288,000 was assessed by the consent decree.
City of Ocean Shores, WA (1994)	The City placed fill in interdunal wetlands adjacent to the Pacific Ocean. After negotiations, the City removed the unauthorized fill, replanted the site, and restored the adjacent site. The compliance action resulted in a net gain of wetlands functions and values.
City of Philadelphia, PA (1994)	The City intentionally pumped raw sewage into the Pennpack Creek. A consent decree required payment of \$225,000 in civil penalties (evenly divided between the United States and Pennsylvania) and injunctive relief necessary to prevent future violations.
City of Port St. Joe, FL (1994)	St. Joe Forest Products Company violated pretreatment prohibitions by contributing pollutants in excessive quantities that caused interference and pass through of the City facility which caused the City to violate its NPDES permit. A consent decree provided a civil penalty of \$25,000 by the City and a \$325,000 civil penalty by the Company.
City of Sioux Falls, SD (1994)	The City agreed to pay \$26,250 as a civil penalty and to undertake a SEP. The City violated the CWA, its NPDES permit and General Pretreatment regulations. The SEP involves a household hazardous waste recycling program between \$150,000 to \$200,000.
City of Tacoma, WA (1994)	Secondary treatment violations were cited. The City agreed to pay a \$525,000 penalty. In addition, a SEP valued at \$100,000 for the sewage treatment plant hookup of low income housing that discharges untreated wastewater directly to Commencement Bay is required.
County Sanitation Districts of Los Angeles County (CSDLAC), CA (1994)	CSDLAC is required to pay a civil penalty of \$300,000 to the U.S. and \$200,000 to the state, to complete a program to promote the beneficial reuse of its wastewater, and to implement a household hazardous waste collection program at an estimated cost of \$1.2 million.
Delaware County Regional Water Quality Authority (DELCORA), PA (1994)	A consent decree required the construction of an additional secondary clarifier at its wastewater treatment plant which will cost \$3.5 million and a civil penalty of \$350,000.
Jacksonville Beach, FL (1994)	The City agreed to pay a Class I administrative penalty of \$3,500 for failure to submit a timely and complete storm water permit application for the City's municipal storm water system.
Manatee County, FL (1994)	The County agreed to pay a Class II administrative penalty of \$60,000 for discharging from its wastewater treatment plant into the receiving stream.

Local Government	
Metropolitan Dade County, et. al., FL (1994)	The County entered a consent decree to address an emergency claim, contingency plans and short term measures due to concern of the structural integrity of sewage pipelines under the Biscayne Bay. A grand jury investigation concluded that the aged and corroded sewer system presented the greatest threat to the health of the river. Claims also addressed system-wide unpermitted discharges, improper operation and maintenance, and reporting violations.
Municipality of Penn Hills, PA (1994)	The municipality was sentenced to 5 years probation and a \$150,000 fine for illegally disposing sewage sludge and other pollutants from three of five sewage treatment plants.
Polk County, FL (1994)	Discharges occurred from the Wilson Acres wastewater treatment plant without an NPDES permit. The County agreed to pay a \$100,000 penalty under the consent agreement and order. \$15,000 will be credited to the County if the Wilson Acres WWTP connected to the City of Auburndale collection system.
Wayne County-Wyandotte, MI (1993 and 1994)	Wayne County and 13 tributary communities that illegally discharged untreated wastewater into Detroit River and Lake Erie will pay a civil penalty of \$413,000. The injunctive relief involves rehabilitation of the sewer system, plant improvements, and the construction of a tunnel storage system to hold rain water during storms at an estimated \$230 million. The implemented project plan will expand carrying capacity of the sewer collection system and increase capacity of the Wyandotte POTW.
City of Akron, OH (1995)	The City must pay a civil penalty of \$290,000 for violations of the CWA related to the discharge of inadequately treated wastewater to Cuyahoga River, and the discharge of raw sewage from the City's separate sanitary sewer during storm events. The City must improve its wastewater treatment facility to meet NPDES permit limits. The City will perform a \$1.5 million SEP to eliminate septic tank systems by providing connections to sanitary sewers.
Clay County, FL (1995)	Several violations of NPDES permit conditions and the discharge of 2 million gallons of wastewater from a break in an onsite pond berm were found. Settlement included a \$12,000 penalty and completion of a SEP. The SEP was to construct a force main from the Ridaught Landing WWTP to a nearby re-use facility to eliminate discharge to the Little Black Creek. After tax net, the present value of the project is \$1.879 million with a capital outlay of \$2.149 million.
Metropolitan Dade County, et. al., FL (1995)	The deteriorated condition of a large sewage pipeline running under the Biscayne Bay, as well as chronic and widespread overflows of raw sewage into homes, streets, businesses and public waterways, including the Biscayne Bay and the Miami River were cited. Short-term preventative measures are required in addition to a cash penalty of \$2 million. The County is expected to pay more than \$800 million rehabilitating its system to prevent chronic overflows of sewage. A water reuse and conservation SEP totaling at least \$5 million is required.
City of Fort Morgan, CO (1995)	There was a failure to implement a pretreatment program to the degree that one of its industrial users caused the City to violate its own discharge permit. The penalty includes payment of \$268,000 in civil penalties in addition to taking significant steps to achieve compliance with federal pretreatment regulations under the CWA. A payment of \$110,000 to the Colorado Department of Public Health and Environment is also required.

Local Government	
City of Lynn, MA (1995)	Combined sewer overflows occurred near a shellfish bed and onto a public beach. An agreement was reached to add a schedule for the construction of combined sewer overflow controls, at a cost of approximately \$50 million, to an existing consent decree.
City of New Bedford, MA (1995)	The City refused to construct the secondary treatment plant that was required in an earlier consent decree. The City must construct the secondary treatment plant, pay a \$51,000 penalty to the United States, and pay \$51,000 to the Commonwealth of Massachusetts. The payment to the Commonwealth of Massachusetts could be waived if New Bedford complies with certain terms of the modified consent decree.
City of Pensacola, FL (1995)	City failed to submit a complete NPDES Part II storm water permit application. The settlement was for \$35,000.
City of Watertown, SD (1995)	As the result of a consent agree, the City agreed to come into full compliance with the terms of its permit by December 31, 1997. Costs in excess of \$17.3 million were estimated for a new POTW. The City agreed to properly staff, operate and maintain the facility; adopt legal authority to enforce requirements of Sections 307 and 402 of CWA; implement its industrial pretreatment program as approved by EPA; issue permits to all SIUs providing for the payment of not less than \$500 per day per violation for any noncomplying SIU; and conduct and document inspections and independent compliance monitoring of all its SIUs.
Kiski Valley Water Pollution Control Authority, PA (1995)	The Authority failed to conduct sampling visits to its significant industrial users (SIUs) during 1992 and failed to adequately enforce violations of one of its categorical SIUs. The POTW also violated its NPDES permit effluent limitations for suspended solids, BOD ₅ , and flow.
Town of Brookline, MA (1995)	Illicit connections of sewer lines to storm drains resulted in discharges of sewage into the Muddy River in violation of the CWA. A consent agreement was to locate and remove all such connections by 1997, and undertake a variety of storm water management practices. The town will pay a \$25,000 penalty if it does not comply with the schedule.
City of Blackhawk, CO (1996)	The City allowed the illegal construction of a water supply pump station on Clear Creek (without an U.S. Army Corps of Engineers Clean Water Act permit), including excavation and backfilling of about 1,800 square feet of river bed on the north fork of Clear Creek. The result was a temporary loss of wetlands and destruction of aquatic life. The penalty payment is \$61,515.
Cobb County Department of Community Development, GA (1996)	Failure to adequately implement and/or maintain erosion and sedimentation control devices for a road widening project resulted in erosion of road fill into tributaries of Willeo Creek, degrading stream water quality and resulting in sediment deposition in downstream lakes. Payment of \$10,000 and training for its employees and road contractors for land disturbing activities is required.
Jefferson County Commission, AL (1996)	The Commission had effluent violations of NPDES permits, intentional bypass of treatment works resulting in discharges of untreated sanitary sewage into the Cahaba and Black Warrior Rivers, and discharge without a NPDES permit. A penalty of \$750,000 is required. The Commission will also undertake a \$30,000,000 Greenway project to acquire and maintain protected areas along designated rivers and streams. A three-phase approach to improve and correct infiltration/inflow problems will be used. A sewer system evaluation will also be initiated.

Local Government	
New Orleans Sewerage & Water Board, LO (1996)	Unpermitted discharges of contaminated water to surface waters due to the poor condition of sanitary sewer and collection system of New Orleans was found. An alternative dispute resolution for technical dispute was used. Non-binding mediation was unsuccessful. The case was settled in FY 1998.
Town of Essex, MA (1996)	Septic system problems (i.e., failing systems and illegal connections to town storm drains) resulted in bacterial contamination of the Essex Bay estuary and local clam flats. The town must initiate a comprehensive program to inspect and correct septic system and illegal connection problems and institute a town-wide oversight and management program.
Borough of Naugatuck, CT (1997)	An administrative complaint was for violations of effluent limits contained in an NPDES permit for a publicly owned treatment plant. The penalty was for \$70,000.
City of Erie and Erie Coke Corp., PA (1997)	Erie Coke, a significant industrial user of a sewer system, violated national pretreatment categorical standards for iron and steel and the city of Erie local pretreatment limits. A consent decree requires a \$450,000 cash penalty and the installation of pretreatment technology that meets discharge limits. This technology will cost over \$2 million.
City of San Diego, CA (1997)	A stipulated final order settled an enforcement action that addressed deficiencies with San Diego's sewage treatment facilities. The order calls for the City to continue work on infrastructure projects, replace 200 miles of decaying concrete sewers, audit pump stations and force mains, increase efforts to reduce grease loadings to the system and upgrade its data collection and modeling capabilities. The order also requires \$60-\$200 million for projects.
City of Sedalia, MO (1997)	Administrative orders for compliance and complaint were issued due to the City's failure to develop and implement an enforcement response plan; failure to implement procedures to ensure that industrial users are in compliance with pretreatment standards and requirements; failure to issue permits or other mechanisms containing correct discharge limits for two industrial users; and failure to perform local limit analyses for two pretreatment plants. The City must correct the violations and pay a penalty of \$50,000.
City of Watertown, SD (1997)	The discharge of pollutants from the City's wastewater treatment plant exceeded acceptable levels. A consent decree required the City to pay a penalty of \$550,000.
Crook Creek Farms, Inc., City of Destin, and the Niceville, Valparaiso, Okaloosa County Regional Sewer Board, Inc., FL (1997)	APOs were issued to a land application site operating company and two municipalities that transport their biosolids to the land application site for disposal. Violations of vector/pathogen attraction, operational standards and recordkeeping were found. Penalties ranged from \$6,000-\$16,466.
Onondaga County, NY (1997)	A consent decree requires a 15-year plan for the POTW upgrade, combined sewer overflow elimination and other measures in the range of \$300-\$400 million to ensure that water quality standards are met for Lake Onondaga. The County must pay a penalty of \$50,000 and SEPs worth at least \$387,500 to control non-point source pollution to the lake.
Puerto Rico Aqueduct and Sewer Authority, PR (1997)	CACOs issued require a \$200,000 SEP to install telemetry equipment at 20 pump stations in the San Juan Region that will allow for the monitoring of equipment at the pump stations and will detect malfunctions. Equipment will help to reduce the instances of bypasses and discharges of inadequately treated sewage. The Authority must pay a penalty of \$35,000.

Local Government	
Puerto Rico Aqueduct and Sewer Authority, PR (1997)	A CACO required a penalty of \$10,000 and the completion of \$30,000 SEP. Under the SEP, the Authority will conduct workshops to inform industrial users of pretreatment requirements and methods to comply.
Puerto Rico Aqueduct and Sewer Authority, PR (1997)	The Authority violated its permit by discharging 10 million gallons per day of primary level treated sewage from the Mayaguez Regional Wastewater Treatment Plant. A consent decree was for \$150,000 in civil penalties and \$400,000 to the Mayaguez Watershed Initiative. The Authority must construct facilities to bring the plant into compliance.
Puerto Rico Aqueduct and Sewer Authority, PR (1997)	A payment of \$375,000 represents a settlement of uncontested and contested dollar amounts requested as penalties as identified in 27 quarterly motions to enforce 1985 and 1988 orders. The Authority must pay \$83,800 in stipulated penalties for violations of a 1985 court order and \$251,400 for violations of the pump station stipulation entered in 1995.
Puerto Rico Aqueduct and Sewer Authority, PR (1997)	An administrative penalty complaint was issued for the Arecibo sewage treatment plant. Violation of effluent limits in the NPDES permit and instances of improper operation and maintenance of the plant were found. The complaint seeks a penalty of \$100,000.
Puerto Rico Aqueduct and Sewer Authority, PR (1997)	An administrative penalty complaint was issued for the Lares sewage treatment plant. Violation of effluent limits in the NPDES permit and instances of improper operation and maintenance of the plant were found. The complaint seeks a penalty of \$125,000.
Virgin Islands Department of Public Works, VI (1997)	An amended 1996 consent decree set a compliance schedule for the DPW to construct improvements at eleven existing POTWs, construct two new POTWs, and pay \$675,000 in stipulated penalties for violations of a prior court order. The estimated cost of the injunctive relief is expected to cost between \$35 and \$40 million.
City of North Adams, MA (1992)	The City violated maximum contaminant levels for turbidity and coliform and for violating monitoring requirements. The City must pay a civil penalty of \$67,200. An order requires the City to construct a water filtration plant and achieve compliance with SDWA and implement significant interim measures to ensure delivery of safe water until the treatment plant is operational.
Bethlehem Village District, NH (1993)	The district voted not to provide necessary funding to comply with the Surface Water Treatment Rule, but now has voted to comply with state and federal regulators. Approximately \$2.5 million will be spent on a filtration plant and other system improvements to comply. The district agreed to pay a civil penalty.
Selleck Water System, WA (1993)	An injunctive relief against Selleck Water System was to remedy an imminent and substantial endangerment to public health caused by the fecal contamination of drinking water provided to 150 people, including a day-care facility. An emergency administrative order directed Selleck to properly operate and maintain a treatment system, advise users to boil water, and submit a corrective action plan. Selleck refused to comply and court action followed.
Virgin Islands Housing Authority (VIHA) (1993)	Under an amended decree, VIHA was to undertake capital and O&M improvements at six of its housing projects encompassing over 60 public water supplies and imposed a monitoring program for various contaminants subject to MCLs. VIHA is to pay a \$12,000 penalty from original decree.

Local Government	
Town of Meeteetse, WY (1994)	An administrative order was issued to the town when tests indicated a presence of Giardia in finished drinking water. The test, after the order was issued, detected Cryptosporidium in finished water. An emergency order required the town to: provide an alternate source of potable water; provide public notice; issue a boil water notice; perform an evaluation of the system; and submit quarterly reports on progress.
Cities of Abilene, Axtell, Attica, Beverly, Kirwin, Osborne, Portis, Preston, and Raymond, KS (1995)	Exceedances of nitrate maximum contaminant level of 10 mg/L were found in the public water supply. Within a 24-month period, the cities must undertake tasks to achieve compliance such as provision of alternate water supply to pregnant woman and children aged six months or less and public notification for each prior violation of the Act.
City of Marianna, FL (1995)	The City failed to comply with the monitoring and reporting requirements of the lead and copper rule. A payment of \$50,000 in civil penalties is required.
Fort Thompson Water System, Fort Thompson, SD and Lower Brule Water System, Lower, SD (1995)	Filtration systems at both sites are ineffective. EPA Region 8 issued emergency administrative orders under Section 1431 of the SDWA.
Kansas Bureau of Water (1995)	The Kansas' Bureau of Water issued 25 wastewater treatment orders against various municipalities and trailer courts in Kansas. The consent orders to cities, including Lawrence, Topeka and Leavenworth, initiate projects to eliminate the discharge of water treatment sludge to streams. The orders to trailer courts in Pittsburg, KS, have resulted in ongoing efforts to form sewer districts that will be connected to the Pittsburg wastewater treatment plant. The sewer districts will help to eliminate sewage discharges into abandoned mine shafts.
Town of Cushman, AR (1995)	The town violated the state order to install a filtration treatment system to treat unprotected spring water prior to consumer use. The penalty was for \$15,000 and agreement to install a filtration system and hire a state certified operator.
City of New York, NY (1997)	In 1992, the City entered into an administrative stipulation that provided that the City would construct and operate necessary filtration facilities for the City's Croton Water Supply by 2000. Construction is not expected to be finished by 2000. The government is seeking a schedule for the construction of a filtration plant, interim watershed protection measures, and an expeditious penalty.
Town of Hempstead, NY (1997)	The town had violations of unpermitted discharge into an underground injection well and the endangerment of a Department of Highways facility in Roosevelt. An AOC was issued that requires the town to implement a compliance/closure plan, pay a \$5,500 penalty, perform a facility audit, and provide employee training. The town will inventory and address facilities where there may be Class V injection wells, test for pesticides, and keep the public informed of the status of closure implementation at the Roosevelt facility.

Local Government	
Port Authority of New York and New Jersey (1993)	The Port Authority had a permit to dredge dioxin-contaminated material from the New York Bay, ocean-dispose of it at a specific site, and cap it with clean material. Authority contractors dredged material and disposed 5000 cubic yards worth in the wrong location and capped it with 30,000 cubic yards of clean fill. The Authority must pay a penalty of \$35,000 and perform a SEP. The SEP involves providing a \$15,000 grant to a private, non-profit organization for the purpose of purchasing and preserving wetlands in the New York Harbor area.
Westchester County, NY (1995)	The County must achieve long-term compliance through implementation of a beneficial use sludge management program. Payment of \$200,000 in penalties evenly divided between the United States and New York is required.
Bergen County Utilities Authority, NJ (1993 and 1997)	Bergen County Utilities Authority was ordered to pay a penalty of \$55,000 in one order. A second order required a penalty of \$500,000, and to deposit \$780,000 into an escrow account, to be returned if it complies with the consent decree. A third action was brought for violations of a long term schedule for alternative sludge disposal, which required New York City to pay \$1.5 million into an escrow account to be recovered if it commences construction of Phase II facilities, pay \$250,000 to the U.S., and \$750,000 to an escrow account to purchase wetlands or open space in New York City. A stipulation and order required all sludge to be available for beneficial use by composting. In 1997, a stipulated penalty of \$75,000 was assessed for violations of the earlier consent decree that required that sludge be available for beneficial use.
Port Authority of New York and New Jersey (1997)	Administrative penalties were for violations of a dredge material disposal permit. The Authority disposed of material at unspecified locations and failed to report improper disposal. Civil penalties totaled \$125,000.
City of Columbus, OH, and Solid Waste Authority of Central Ohio (SWACO) (1994)	An administrative order was issued to the City and SWACO to conduct measures to abate a potentially imminent threat to public health and the environment posed by emissions of dioxin as a result of the burning of trash in an incinerator.
Westchester County, Sportsmen's Center, NY (1994)	Under an administrative order, the County was required to assess the contamination (predominantly lead) from shooting activities at the Sportsmen's Center. The County was required to design and implement a plan for the remediation of the contamination and to devise a plan to prevent re-contamination.
City of New York Department of Transportation, NY (1995 and 1997)	During bridge repainting operations, the City generated and transported hazardous paint chips without a RCRA identification number and manifests, and stored wastes without a permit or authorization. A joint penalty (with contractor) of \$25,000 was assessed. An administrative CACO was issued. The City drafted a lead-based paint removal protocol, the implementation of which will cost the City over \$5 million. The City must pay a civil penalty of \$145,000.
Land Authority of Puerto Rico, PR (1997)	The Authority failed to provide leak detection for underground storage tanks and failed to permanently close a tank. An administrative complaint requires penalty of \$165,310.

Local Government	
New Jersey Transit Corp., NJ (1997)	The Transit Corp. failed to properly close underground storage tank systems in accordance with applicable rules; failed to satisfy release detection requirements for underground storage tanks and associated piping; and failed to use spill and overfill equipment. An administrative CACO required a civil penalty of \$130,000 and completion of two SEPs at a cost of \$190,000. The SEPs will involve the removal and disposal of asbestos insulation at two facilities.
Puerto Rico Aqueduct and Sewer Authority, PR (1997)	An administrative complaint was for failure to comply with underground storage tank requirements at 19 facilities. The complaint seeks a civil penalty of \$305,297.
City of Algoma, Algoma Municipal Landfill, WI (1992)	The consent decree requires the City of Algoma Municipal Landfill for the City and eight PRPs to implement the remedy selected by ROD. Defendants will reimburse EPA and the state for their future oversight costs and pay 90% of EPA's past oversight costs. Settlement is for \$1.3 million. Monitoring detected an exceedance of MCLs for cadmium, iron, and manganese.
City of Jacksonville, FL et. al., Pickettville Road Landfill Site, FL (1992)	Thirteen defendants, including the City of Jacksonville, agreed to undertake implementation of a remedy valued at \$9 million at the Pickettville Road Landfill Site and to pay the U.S. 100% (roughly \$400,000) of its remaining unreimbursed costs.
Elkhart, Indiana (Main Street Well Field Site) (1992)	UAO's were issued to 9 PRPs to conduct remedial activities including soil vapor extraction, installation of interceptor wells, and continued operation and maintenance of an air stripper. Costs were estimated at \$1.5 million in construction costs plus \$130,000 in annual operation and maintenance costs.
Lexington County, SC (1992)	The County accepted hazardous wastes at the Lexington County Landfill. The County will perform an RI/FS and pay all of EPA's past costs totaling approximately \$174,233, as well as future oversight costs.
Municipal Landfill, Dover, NH (1992)	A RD/RA action consent decree for the Dover Municipal Landfill is for 24 PRPs to perform cleanup activities at the site and reimburse EPA response costs.
Washington and Ramsey Counties, MN (1992)	A UAO requires Washington and Ramsey counties to continue operating a pump-and-treat system at Washington County Landfill to prevent contamination from moving toward drinking water wells offsite.
Augusta/Hyde Park (Augusta, GA) (1993)	EPA Region 4 expended \$1 million to address groundwater contamination in the area of the Park and the surrounding area that is a lower income and predominantly African-American neighborhood. Over 1,000 samples of surface soils, surface water, groundwater and sediments were taken in 18 industrial sites within the neighborhood that tested for up to 176 constituents.
AVX Corporation, et. al. (1993)	The City of Bedford owned and operated the dump for local industrial waste and solid waste. The City agreed to perform a remedy along with 15 entities with varying degrees of involvement. AVX agreed to perform all work consisting of remedial action plus operations and maintenance. The City agreed to perform specific portions of remedial action and secure access and institutional controls. The settlement required PRPs to excavate an ecologically sensitive marsh, where sediments are to be disposed of beneath a cap to be constructed at the first operable unit.

Local Government	
City of Newport, et. al., KY (1993)	Two civil consent decrees representing partial settlement of CERCLA cost recovery litigation for the Newport Dump Superfund site, Wilder, Kentucky, involved five of six PRPs named in the original complaint. Settlement provides for recovery of \$2.4 million, representing 50% of total past costs and for performance of operation and maintenance activities.
Town of Bedford, MA (1993)	Six defendants agreed to pay a penalty assessed by a consent decree of \$1.17 million in the settlement of past costs incurred at the Katonah Well Superfund site, which settled an action filed in 1990. The town performed remedial design pursuant to a 1988 EPA consent decree and completed remedial action construction under the terms of an earlier consent decree. Other defendants had previously declined to participate in clean up work at the site.
City of Cedartown, Polk County, GA (1994)	A UAO issued to the City, County, and 12 companies required them to maintain existing landfill cover, repair seeps, maintain institutional controls, and monitor groundwater quality.
City of Clinton, IA (1994)	The City has held title to the Chemplex Superfund Site since 1967 as part of an industrial development bond sale-leaseback arrangement. There was no evidence the City had any involvement with the site other than nominal title holder. The City is required to provide site access to EPA and other PRPs, and comply with deed restrictions; in exchange, the City received a covenant not to sue and contributions protection.
City of Jacksonville, AR (1994)	Two consent decrees were lodged for the Jacksonville and Rogers Road Municipal Landfill Superfund Sites. Both sites have soils that are contaminated with dioxin that was produced by a herbicide manufacturer. An estimated 800 cubic yards of soil are contaminated. The City agreed to pay \$100,000 in past costs.
Town of North Hempstead, NY (1994)	The town recovered \$2.64 million in past EPA cleanup costs incurred at the Port Washington Landfill. The town undertook the remedial work at the landfill at an estimated cost of \$45 million.
City and County of Denver, CO - Lowry Landfill Site (1995)	A UAO was issued for the landfill site based on the refusal of Denver and other parties to implement a remedy selected in the ROD and pay more than 76% of the US's past response costs. Most of the 31 <i>de maximus</i> PRPs have been sued by Denver and other parties in private cost recovery litigation and have settled with those parties.
City of Cedartown and Polk County, GA (1995)	The City and County, with eight industrial generator PRPs, agreed to pay \$668,302 for past remedy costs at a municipal landfill site.
City of Wichita, KS (1995)	A state de-listing pilot project was based on the state and city agreeing to address the contamination at the 29th and Mead Superfund Site. The city is to take responsibility for clean-up activities at the site with the Kansas Department of Health and Environment.
City of Wilmington and New Hanover County, NC (1995)	Reimbursement, by three responsible parties, of \$545,723 plus interest of \$19,269 to EPA and Department of Justice is required.
Lexington County Landfill Site, SC (1995)	A UAO was issued for the landfill site. Selected remedies include: consolidation/containment/gas recovery/groundwater extraction and treatment and disposal at the POTW/monitoring.
Mason City, IA (1995)	The City agreed, jointly with another non-performing respondent, to contribute money towards the cost of the response action and payment of EPA's costs to conduct a non-time critical removal action of buried coal tar.

Local Government	
Pike County Drum Site, MS (1995)	Cost recovery agreement for the reimbursement of \$198,292 to Superfund by responsible parties is required.
Board of County Commissioners for Cecil County, (1996)	A consent order called for a \$6 million cost recovery regarding the Woodlawn Landfill. Payment of \$4.75 million plus interest in installments over 5 years is required.
City of Burbank, CA (1996)	A consent decree is for the City to co-construct and/or fund the capital portions of Burbank Operable Unit interim remedy. This requires the extraction of 12,000 gpm, blending to reduce nitrate concentrations, and delivery of treated water to the City of Burbank water supply system for 20 years.
City of Marianna, FL (1996)	A consent decree is for the payment of \$500,000 towards past response costs for the incineration of pesticide-contaminated soil removed from one of the City's municipal airport runways (S&S Flying Service site).
City of Memphis, TN (1996)	A consent decree is for cost recovery incurred at the City-operated North Hollywood Dump for the dumping of toxic wastes. The ROD requires a number of remedial measures, including the solidification and/or removal of contaminated sediments in the surface impoundments and the installation of a permanent cap on the landfill.
City of Somersworth et. al., NH (1996)	A consent decree is for the remedial design and action at a landfill Superfund site.
Montgomery County Solid Waste District (MCSWD), Moraine, OH (1996)	Excess waste from an MCSWD-operated incinerator was sent to a municipal landfill. Thirty-one municipalities are members of MCSWD. The landfilled waste contained commercial or industrial waste containing hazardous substances. The defendants will pay \$60,000 for previous oversight costs and 50% of remaining oversight costs.
North Facility Soils/Wastewater Treatment Plant, Magna, UT (1996)	An AO on consent to conduct a non-time critical response action at the Kennecott North Facility Soils/Wastewater Treatment Plant was issued.
Davie Landfill Site, FL (1997)	The site was used as a disposal site for sludge from a municipal wastewater treatment plant and other wastes. A consent decree settled the case against Broward County, FL. \$66,368 was recovered in past response costs incurred and \$65,000 for 1995. In addition, \$25,000 was recovered for 1996 and subsequent years.
North Hollywood Operable Unit, CA (1997)	A consent decree recovered \$4.8 million in site costs. The costs are attributable to construction and operation of the North Hollywood Operable Unit interim remedy groundwater extraction and treatment system. The unit is operated through a cooperative agreement with the State of California and the Los Angeles Department of Water and Power.
Puerto Rico Electric Power Authority, PR (1997)	An analysis of soil and sediment samples collected at the Palo Seco Ward Plant Site revealed the presence of hazardous substances at elevated concentrations. A UAO was issued requiring a remedial investigation and feasibility study. The study is designed to determine: (1) nature and extent of contamination and threat caused by release or threatened release and (2) alternatives for remediation or control of release or threatened release.

Local Government	
City of Garland, TX (1992)	A TSCA PCB administrative order was issued to the City of Garland. The order required expenditures of \$500,000 and a 10% case penalty of \$14,200. The City must implement a PCB identification program which identifies through sampling and laboratory testing and label inspection all transformers that contain PCBs at 2 ppm or greater.
The Housing Authority of New Haven, Connecticut (1993)	The Authority was cited for failing to properly dispose of PCBs, failing to maintain records concerning PCBs, and failing to properly mark and store PCB transformers. The Authority is required to spend \$112,000 on an environmental compliance program to protect public housing residents from future environmental risks.
City of Boston, Boston City Hospital, MA (1994)	Failure to comply with the marking and recordkeeping requirements pertaining to PCB transformers was found. The City agreed to pay \$117,300 in civil penalties from a consent decree and final order. The removal of ten underground storage tanks located throughout the City is estimated to cost over \$80,000.
Town of Wallingford, CT (1994)	The town agreed to pay \$40,050, test all town-owned transformers for PCBs at a cost of over \$1 million, and remove all that were previously improperly disposed.
Memphis/Shelby County Airport Authority, TN (1995)	Payment of \$9,000 to resolve past violations of EPCRA Section 304 and CERCLA Section 103 is required. Implementation of a \$475,000 pollution prevention SEP that involves the purchase of equipment that will assist in the de-icing of runways is also required.
City of Hearne, TX (1996)	A violation of PCB regulations was found. The City must identify all existing oil-filled electrical equipment within the City of Hearne electrical system. The City must also remove and dispose of all PCBs and PCB equipment that contain PCBs at 50 ppm or greater within 2 years. The estimated cost is \$99,000.
City of Providence, KY (1996)	An AOC was issued for past removal costs at the Gray PCB site. Settlement, based on Ability to Pay Determinations, of \$25,000 in two payments of \$12,500 was required.
City of Wrangell, AL (1996)	The City must pay a penalty of \$1,359 and spend \$2,258 to remove and properly dispose of three large high voltage capacitors containing 257 pounds of PCBs.
New York City, NY Board of Education (1995 and 1996)	The case involved an allegation that the head of the Board's Asbestos Task Force knowingly submitted false information on 375 AHERA management plans. A CA/CO was issued under AHERA. It requires a payment of \$1,500,000, systematically reinspecting each of 1,069 schools for asbestos, and preparing new management plans to ensure that all buildings are in compliance.
Bill Anskis Company, Inc. and the Panther Valley School District, PA (1997)	Violations of Asbestos NESHAP and AHERA occurred while renovation work was performed in the district. An administrative action assessed a penalty of \$77,000.

Local Government	
New Jersey Sports and Exposition Authority and Atlantic City Convention Center Authority, NJ (1996 and 1997)	The Authority failed to comply with TSCA regulations concerning the management of PCBs and equipment containing PCBs. With respect to certain PCB containing equipment, the Authority failed to take the following actions: compile annual documents; conduct quarterly and annual inspections; register with the fire department; mark PCB capacitors; and store PCBs for disposal in an appropriate storage area. A CACO was issued in settlement of TSCA administrative proceeding. PCBs are to be removed from the Convention Center. The complaint seeks a civil penalty of \$98,000.
Puerto Rico Department of Education, PR (1997)	A CACO was issued for failure to affix PCB mark, register the PCBs with the fire department, maintain records of quarterly inspections and maintenance history, compile and maintain annual documents and dispose of PCBs in a proper manner. The Department must pay a civil penalty of \$15,000 and perform a SEP costing more than \$95,000. The SEP involved the removal of PCB transformers at locations where violations occurred.
School District of Philadelphia, PA (1997)	A complaint and consent decree was filed that seeks to demand the cleanup and disposal of PCBs that are in 29 transformers located at 12 schools. The school must also comply with the PCB Rule and implement a PCB Management Plan. The Plan would provide for the repair, inspection, cleanup, and proper disposal of PCB contaminated materials. The school district must remove or upgrade all of the PCB transformers within three years. Bi-monthly progress reports must be submitted to EPA which will provide for the monitoring of the school districts cleanup efforts.
City of Gary, IN (1992 and 1993)	The Court issued an order entering a Second Modified Consent Decree in this case, that involves both CWA and TSCA claims regarding the POTW. Gary is to undertake and complete capital and operational improvements at its wastewater treatment plant, adequately fund operations and maintenance, and pay a civil penalty of \$1.25 million. The City must (1) repair, rehabilitate, and maintain the wastewater treatment plant and sewer system pursuant to a schedule; (2) implement a pretreatment program to control industrial discharges; and (3) remediate a PCB-containing sludge lagoon. Due to previous violation of settlements, the County will appoint a Special Administrator to oversee compliance with the Decree. A SEP, at an estimated cost of \$1.7 million, for the study and development and implementation of remedial plan for sediments in Grand Calumet River, covering area of submerged lands, must be completed.
City of Independence, MO (1996)	CWA/RCRA violation of special terms of the City's NPDES permit, which allowed the City to accept for treatment trucked-in hazardous and other wastes at its POTW plant, was found. RCRA violations of permit-by-rule provisions and storage of drums of hazardous wastes without a permit and failure to have interim status for POTW were also found. A payment of a civil penalty is required. In addition, the City must make available a household hazardous waste program to City residents.
City of Haverhill, MA (1997)	Violations of RCRA included storing or disposing of hazardous waste without a license and land disposal restrictions. Violations of CWA included failure to have a SPCC plan in violation of Oil Pollution Prevention regulations. A consent agreement and final order required a \$17,000 penalty and a minimum of \$104,580 as a SEP. The SEP includes building a permanent household hazardous waste collection facility and conducting quarterly household hazardous waste collections.

Local Government	
Puerto Rico Electric Power Authority, PR (1997)	Violations of CAA, CWA, UST requirements of RCRA, EPCRA, SPCC requirements of CWA and notice of provisions of CERCLA were found at five facilities throughout Puerto Rico. A consent decree issued requires a payment of a \$1.5 million civil penalty, Land Conservation Acquisition for \$3.4 million and HazMat Training for a local fire department for \$100,000. The Authority is required to spend over \$1 million on an environmental review contractor to oversee compliance with the consent decree. The Authority must conduct an overhaul of compliance programs where violations occurred.