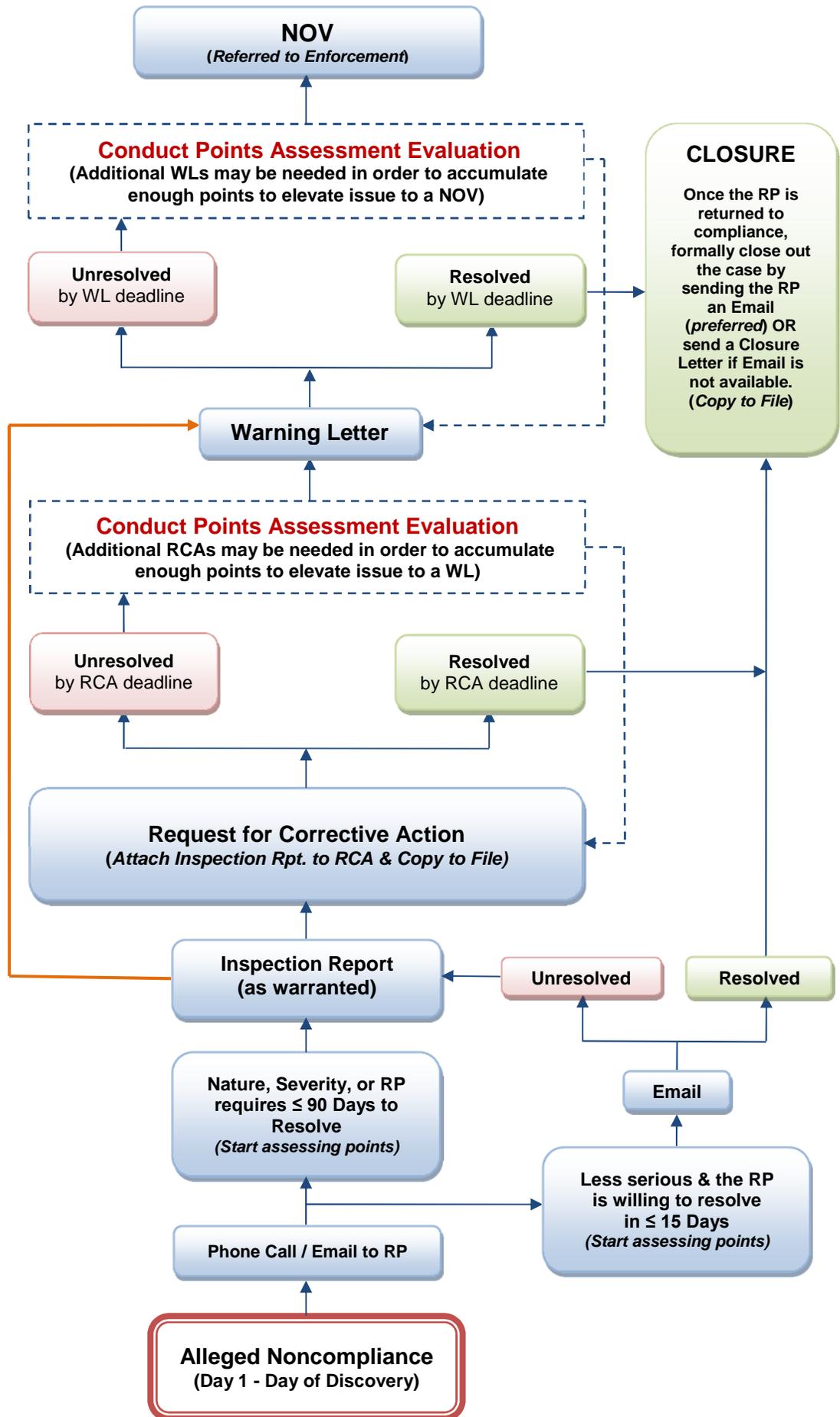


Attachment 1 – OWS Compliance Workflow

Internal Target:
Issue **NOV** within
20 Days AFTER
the WL deadline
has past.

Internal Target:
Issue **WL** within
15 Days AFTER
the RCA deadline
has past.

Internal Target:
Issue **RCA** &
Inspection Rpt.
(as warranted)
within 30 Days
from Day 1.



Attachment 1 – OWS Compliance Workflow

Day 1 – Day of Discovery

Day 1 is generally the date the alleged noncompliance was discovered by Compliance staff and starts the compliance timeline. The discovery may occur as the result of an on-site inspection, file review, complaint, monthly or quarterly report audit, or an issue self-reported by the facility. Compliance staff should consider the issue, nature and severity, history of the facility and then utilize the Compliance Workflow Flowchart and the PAC in all compliance cases to make an appropriate compliance determination and proceed with the proper compliance action.

In all cases, compliance assistance should be offered to the RP. Compliance assistance is generally defined as clarifying issues, explaining regulatory requirements, presenting response timelines or answering any questions giving the RP every opportunity to return to compliance as quickly as possible.

Day 30 (Day 45 for Alleged WMR Alleged Noncompliance)

By Day 30 (or Day 45 for alleged WMR noncompliance), a corrective action letter should be issued. Compliance staff will determine the nature of the alleged noncompliance, the severity, the history of alleged noncompliance, regulatory requirements and/or other pertinent information to complete the following items:

- Attempt to contact a facility representative by making a courtesy phone call or email in the attempt to clarify the issue, answer any questions and inform the responsible party of the action being issued.
- Complete a Point Assessment Evaluation (form) and the VAHYDRO Point Assessment Module;
- Complete an Inspection Report; and
- Issue the appropriate compliance letter with the Inspection Report (as warranted) attached, allowing up to 30 days for the responsible party to respond to DEQ.

Depending on points accumulated from the Point Assessment Evaluation, the compliance correspondence may be in the form of a RCA or WL.

Day 75 (Day 90 for Alleged WMR Alleged Noncompliance)

If the responsible party has not returned to compliance or responded to DEQ within the appropriate timeline, Compliance staff should complete an additional Point Assessment Evaluation (form), assess any additional points, and issue an additional compliance letter. Depending on the points accumulated, an additional RCA may be warranted before an alleged noncompliance issue is elevated to a WL.

If a WL was issued between Day 1-30 and the responsible party had not returned to compliance and/or responded to DEQ within the appropriate timeline, Compliance staff should complete an additional Points Assessment Evaluation (form), assess any additional points and issue an additional compliance letter. Depending on the points accumulated, an additional WL may be warranted before an alleged noncompliance issue is elevated to a NOV. Enforcement staff and the OWS Director should be notified of ongoing compliance issues through the OWS Water Withdrawal Permitting & Compliance Manager.

If a NOV appears warranted based on the accumulated points, the compliance action is referred through the Division Director to the Division of Enforcement.

Attachment 1 – OWS Compliance Workflow

Day 115 (Day 130 for Alleged WMR Alleged Noncompliance)

If the responsible party has not returned to compliance and/or responded to DEQ within the appropriate timeline, Compliance staff should complete an additional Points Assessment Evaluation (form), assess any additional points and issue an additional compliance letter. Depending on the points accumulated the compliance letter could be an additional WL or a NOV. Enforcement staff and the OWS Director should be notified of ongoing compliance issues through the OWS Water Withdrawal Permitting & Compliance Manager.

If a NOV appears warranted issued based on the accumulated points, the compliance action is referred through the Division Director to the Division of Enforcement.