



Pretreatment Compliance Inspections: What to Expect and Common Findings

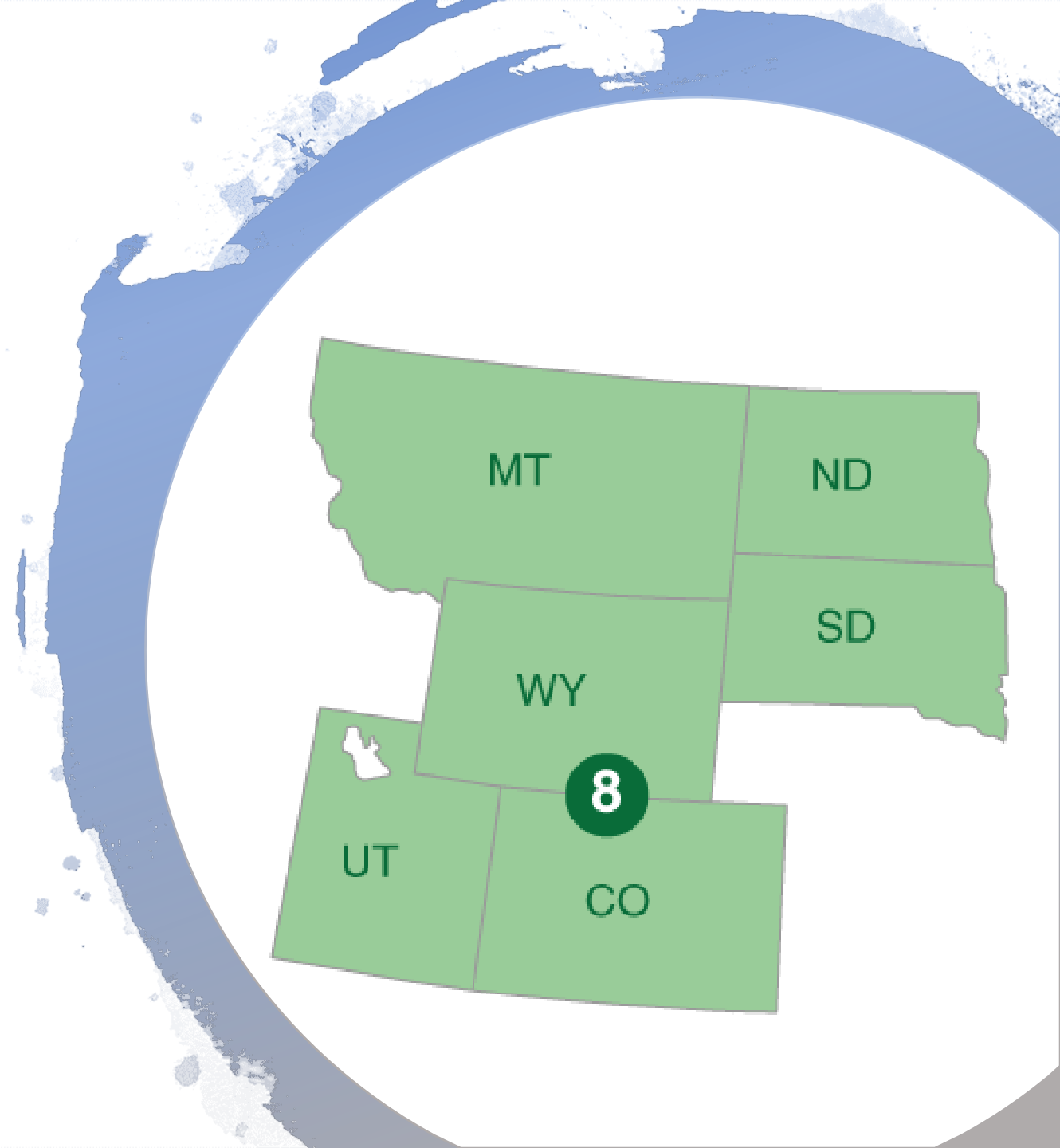
October 22, 2020

Kristin Ratajczak

Emilio Llamozas

PCIs in Region 8

- EPA as the Approval Authority
 - 38 POTWs in Region 8 (26 Colorado, 6 in Wyoming, and 6 in Montana)
- Utah, South Dakota, and North Dakota have delegated authority.



Documents Requested Before the PCI



- Current Pretreatment Ordinance/Rules and Regulations
- Enforcement Response Plan (ERP)
- Significant Non-Compliance (SNC) determination procedures
- SNC worksheets/determinations for last 4 quarters
- Industrial Waste Survey (IWS) procedure
- Permit template or a sample permit

EPA Preparation

- NPDES permit pretreatment requirements
- Latest PCA/PCI reports
- Latest annual report
- Documents submitted by the POTW

A photograph of a very cluttered office space. The room is filled with stacks of papers, boxes, and various items on desks and shelves. A large, semi-transparent white circle is overlaid on the left side of the image, containing text. In the background, there are bookshelves filled with books and a floor lamp with a white shade.

POTW Preparation

What can you do?

- Have your files in order
- Know your program

PCI Format



Criteria for SIU file Selection and Inspections

Selection intended to be representative of the program

- CIUs with complex calculations
- SIUs with compliance issues
- New permittees
- SIUs whose files were not reviewed in a previous inspection
- IUs classified as NSCIUs

SIU Inspections

- IU Characterization
 - Has the POTW correctly classified the IU? New source vs. existing source?
 - Has the POTW identified all sources of wastewater?
- Process area
 - Housekeeping
 - Chemical and hazardous waste storage and disposal
 - Slug discharge potential
- Sampling points and procedures

Communication of Findings

- Closing conference
- Email summarizing preliminary findings
- Inspection report



Pandemic PCIs

- **POTW preparation**
 - Scanning program records
 - Electronic submittals
- **Remote format**
 - Microsoft Teams and OneDrive
 - Opening conference
 - Regularly scheduled check-ins
 - Closing conference
- **Onsite IU inspection(s)**
- **Longer duration than an onsite PCI**

Disclaimer

The following slides are examples of findings from pretreatment compliance inspections. These are not meant to be comprehensive of all findings and are intended to provide examples of pretreatment compliance inspection findings.

Common Findings: IU Inventory

- **The POTW could not produce IWS records**
- **The POTW was not implementing its IWS procedure**
- **No characterization in the IU inventory**

Recommendation: IU Inventory

- Review procedures regularly and implement them
- Ensure new IUs receive surveys and completed IWSs are returned
- Review returned surveys for accuracy and completeness
 - Follow-up if needed
- Maintain records
- Keep the IU inventory updated
- Characterize IUs from information in the IWS and onsite presence

Common Findings: Permits

- Permits don't reflect current local limits
- Incorrect permit limit applied
- IU permits inconsistently signed and dated
- Administrative extensions longer than 5 years
- Incorrect sample type requirements
- Inadequate sample frequency

Industrial User Permitting Guidance Manual

833-R-12-001A
September 2012



United States Environmental Protection Agency
Office of Water



EPA guidance can be found at:

https://www3.epa.gov/npdes/pubs/pretreatment_iu_permitmanual.pdf

Common Findings: Compliance Evaluation

- Electronic receipt of reports without CROMERR certification
- Missing or incomplete Self-Monitoring Reports (SMRs)
- Submitted SMRs were not analyzed
 - Identification of violations
 - Reporting
 - Effluent exceedances
 - Missing parameters
 - Incorrect sample frequency
 - Missing certification statement or signature

Common Findings: Compliance Evaluation (cont'd)

- Submitted SMRs were not analyzed
 - Chains-of-custody incomplete or inaccurate
 - Time, date, sampler
 - Sample type
 - Preservation
 - Analytical methods issues
 - Inappropriate method
 - SW 846
 - pH paper for compliance
 - Hold time exceedance
 - Improper preservation

Recommendations: Compliance Evaluation

An SMR review checklist can guide the evaluation.

- Due date/date received
- Monitoring
 - parameters
 - sampling frequency
 - comparison to permit limits, categorical and local
 - sample type
 - sampling/analysis meets 40 CFR Part 136 (holding times, analytical method, temperature, preservation, bottle type, etc.)
 - Violation identification
- Appropriate certification statement(s) and signature



Common Findings: POTW Sampling

- Samples collected less frequently than once per year
- Calibration logs unavailable
- No documentation of analytical methods
- Incorrect sample type
- Holding time exceedances
- Missing flow data for mass loading calculations

EPA guidance can be found at:

<https://www.epa.gov/sites/production/files/2017-01/documents/iuinspect.pdf>

U.S. Environmental Protection Agency

Industrial User Inspection and Sampling Manual For POTWs



Recommendations: POTW Sampling

- Develop site-specific sampling plans
- Use chain-of-custody templates for each IU
 - Update regularly to ensure the template is up-to-date
- Calibrate field equipment in accordance with the manufacturer's recommendations
- Develop a checklist to review laboratory reports
- Maintain records

Common Findings: Inspections

- SIUs inspected less frequently than once per year
- No inspection reports
- Inspections are declining in quality
 - Inspectors using last inspection and updating rather than using a new form
- Zero discharge status unverified
- No evaluation of slug discharge potential

Recommendations: IU Inspections

- **EPA Guidance: Industrial User Inspection and Sampling Manual for POTWs**
- **Develop an inspection checklist template**
- **Update IU information each year**
- **Ensure adequate information is gathered and documented in inspection reports**
 - **Chemical storage/handling/transfer**
 - **IU production or service**
 - **Wastestream generation**
 - **Waste storage**
 - **Wastewater treatment or management**
 - **Spill and slug discharge potential**

Common Findings: Enforcement

- The ERP does not address all possible violations
- POTW did not identify violations
- POTW did not follow its ERP
- POTW does not evaluate SNC
- SNC determinations are not documented, including those based on narrative criteria
- ERP SNC criteria do not align with the federal regulations or POTW's legal authority
- IUs in SNC were not published in the newspaper

Recommendations: Enforcement

- Develop a checklist to review SMRs and other reports submitted by IUs
- After identifying a violation, follow the ERP
- Evaluate SNC criteria
- Ensure the ERP aligns with the ordinance
- Note: modifications to the ERP must be submitted to EPA for approval

Conclusion

- **Maintain organized records**
- **Know your program**
- **Regularly evaluate program templates and procedures**
- **Use a checklist to review IU-submitted reports**
- **Use an inspection checklist to conduct inspections**
- **Develop site-specific sampling plans**
- **Implement your ERP**
- **Utilize EPA guidance materials available online**
- **Call the State or EPA if you have any questions**



Questions?

Emilio Llamozas

- 303-312-6407
- Llamozas.Emilio@epa.gov

Kristin Ratajczak

- 303-312-6310
- Ratajczak.Kristin@epa.gov