Colorado Industrial Pretreatment Coordinators Association

Industrial User Inspections

Date September 22, 2022

What is an Inspection?

Site visit is to determine compliance:

- Industrial Wastewater Discharge Permit & Sewer Use Ordinance
  - Permit Limits
  - Prohibited Discharges

- Federal Regulations
  - 40 CFR Part 403 and Part 136

Role of the Inspector

- Ambassador

- Compliance Assistance vs. Enforcement
  - We carry a big stick, but shouldn't always use it as a first step

- Four Questions the Inspector must know:
  - What does the industry make?
  - How is it made?
  - What wastes are generated by the production of this product?
  - How are wastes treated or disposed?

Preparation for Inspection

- Safety Equipment

- Calibrated pH meter

- pH Buffer Solution

- Permit Review

- Previous Inspection Review

- Proper Credentials

- Inspections can be announced or unannounced

Safety

- Abide by all Industry safety policies

- No Confined Space Entry (unless trained and approved)

- PPE
  - Hardhat
  - Safety Shoes
  - Safety Vest
  - Safety Glasses
  - Goggles
  - Hearing Protection
  - Gloves
  - Site-Specific PPE

Performing an IU Inspection

- Interview Representative
  - Discuss the Industrial Process/Processes
  - Discuss Pretreatment System
  - Hours of Operations
  - Contact Updates
- Walk through Facility
  - Where wastewater is generated
  - Where wastewater is treated
- Summarize Findings with Representative
  - Where Industry could make improvements
  - Discuss items they do a good job with

Questions to Ask

- How is business?
- What are the raw materials used?
- Have you had any violations recently?
- Have you had any spills?
- How would you handle a spill?
- What kind of training do employees receive?
- Have you introduced any new products or services?
- Has wastewater discharge increased or decreased?
- How do you dispose of off spec product?
- Do you have pretreatment equipment?
- How often do you calibrate the pH meter/flow meter?
- Do you have a record of pH meter calibration?

Questions to Ask (cont.)

- Are there open drains that receive storm water?
- What areas produce wastewater?
- Where do you store waste material?
- Is there any non process water that combines with the process water before the monitoring location?
- Where/how is the flow measured?
- How many flow meters do you have?
- Do you send in Self Monitoring Reports (SMRs)?
- Do you have a copy of your Industrial Wastewater Discharge Permit (IWDP)?
- Are you reporting all the reporting parameters?
- Let the industry know about calibration and reporting requirements.
- Do you have bulk chemical storage?

What are you looking for?

- Permit Compliance
  - Operations are as stated in permit and permit application
  - Proper Pretreatment
  - pH within limits
  - Sampler functioning and clean tubing
- Permit Noncompliance
  - Bypassing Pretreatment
  - Illegal Discharges
  - Lack of Spill Protection
  - Dilution in lieu of Treatment
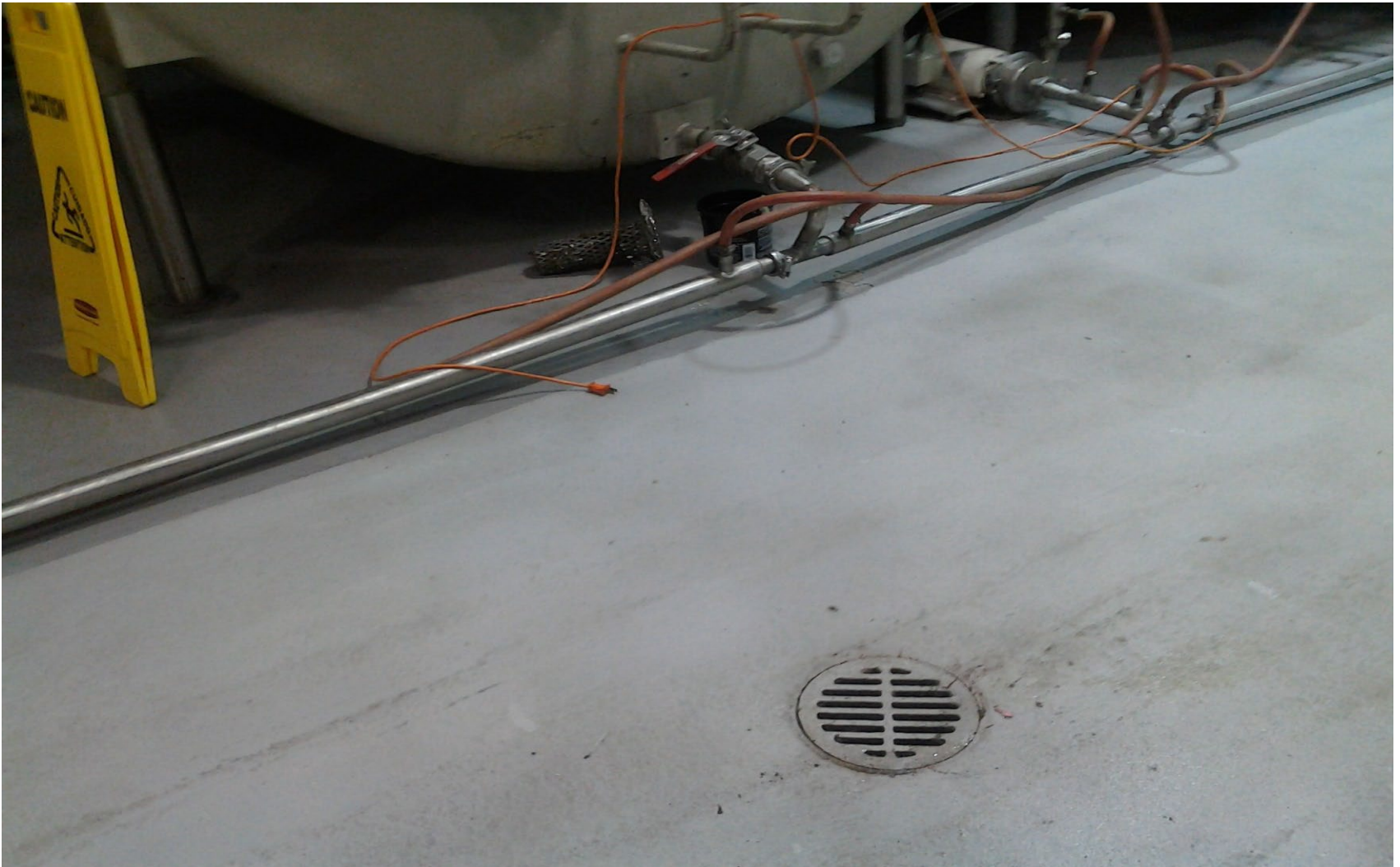
What are you looking for? (cont.)

- Floor Drains near chemical storage, Haz. Waste
- Chemical Storage with Secondary Containment
- Cleanliness/Housekeeping
- Proper Haz. Waste Accumulation, Storage, & Disposal
- Effluent pH
- Pretreatment System Functioning Properly

Inspection Form

INDUSTRIAL USER INSPECTION CHECKLIST

I. General Inspection Information			
Name of industry:			
Date of visit:		Visit start time:	Visit end time:
Inspection Type/Purpose	☐ Scheduled ☐ Complaint ☐ Permit Renewal	☐ Unscheduled ☐ New Company ☐ Spill/Slug	☐ Enforcement ☐ Follow-up
Name of inspectors/affiliation:			
Printed name:		Signature Date:	
Last inspection date:			
Inspected by:			
Did the previous inspection identify deficiencies that the industrial user was required to correct? ☐ Yes ☐ No			
Were deficiencies corrected? ☐ Yes ☐ No	Explain:		
List all observed noncompliance issues and any corrective action that has been taken, or is planned:			
Provide the name(s) and title(s) of industry representative(s)			
Printed Name(s)		Title/Phone number(s)	
Email(s)			
Signature		Date:	
II. General Facility Information			

What are you looking for? (cont.)

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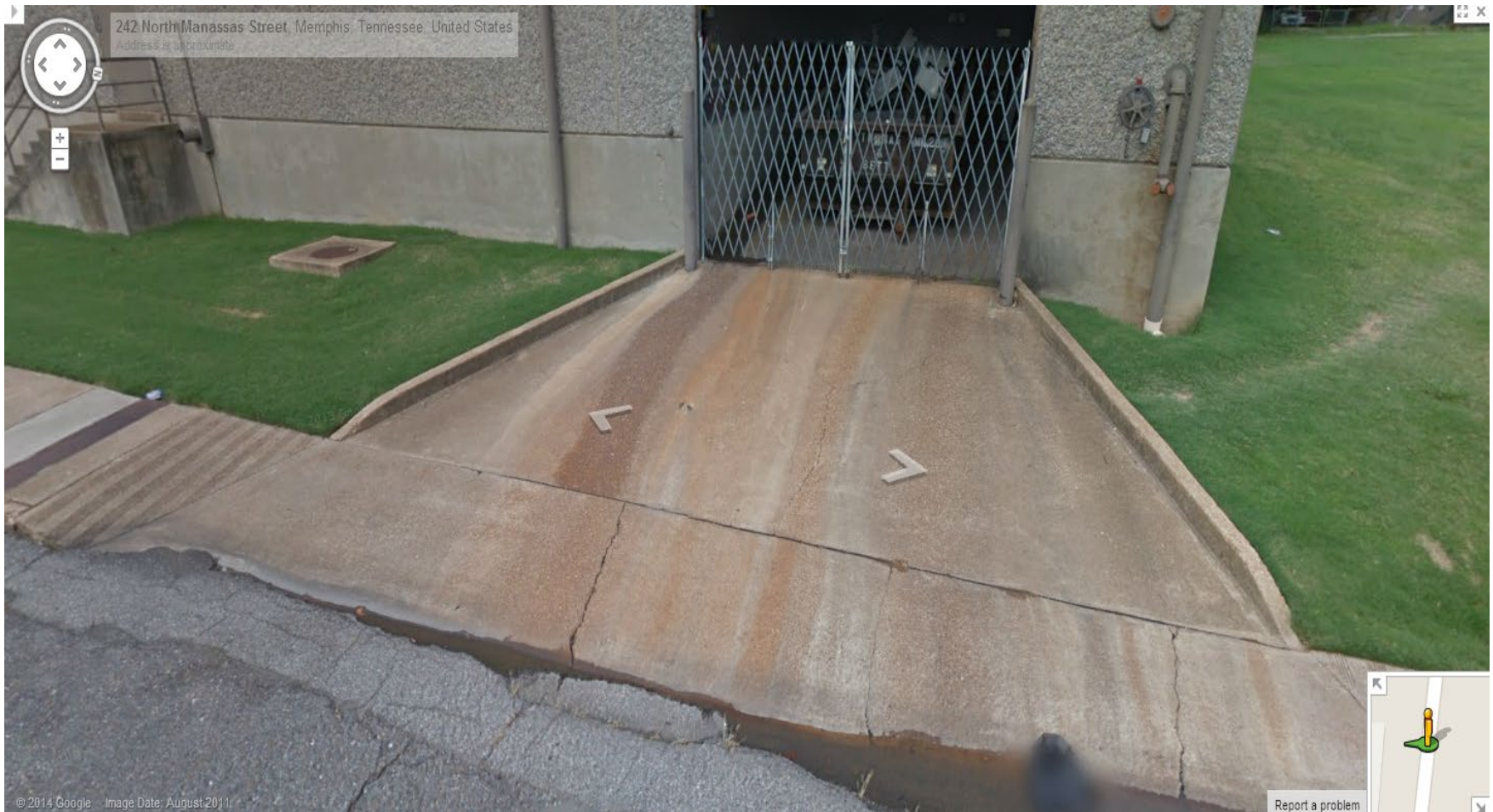# What are you looking for? (cont.)

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Thank you.
Questions?

Brown AND Caldwell