



WHAT TO EXPECT FROM A PRETREATMENT COMPLIANCE INSPECTION

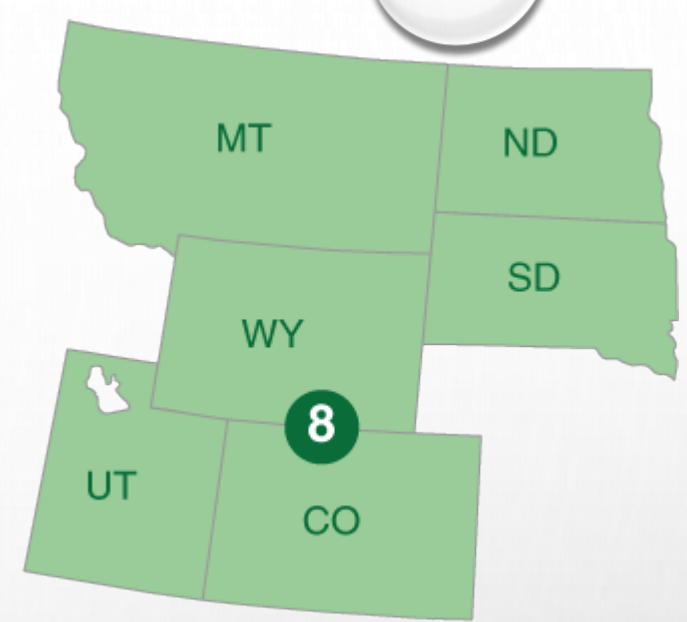
MAY 10, 2018

EMILIO LLAMOZAS

COMPLIANCE MONITORING STRATEGY

- JULY 21 2014 COMPLIANCE MONITORING STRATEGY RECOMMENDED MINIMUM FREQUENCY:
 - PRETREATMENT COMPLIANCE AUDITS (PCA): 1 EVERY 5 YEARS
 - PRETREATMENT COMPLIANCE INSPECTIONS (PCI): 2 EVERY 5 YEARS

PCIS IN REGION 8



- APPROVAL AUTHORITY
 - 38 POTWS IN REGION 8 WHERE EPA IS THE APPROVAL AUTHORITY (26 COLORADO, 6 WYOMING AND 6 MONTANA)
- UTAH, SOUTH DAKOTA AND NORTH DAKOTA ARE DELEGATED THE PRETREATMENT PROGRAMS.

Review of Pretreatment annual reports (to identify pass through or interference)

Attachment C: Description of Each Incidence of Pass Through or Interference

Provide a description of each incidence of Pass Through or Interference at the wastewater treatment plant or collection system during the year, the cause if determined, and any actions taken by the POTW in response to the Pass Through or Interference.

Description of Pass Through/Interference

01 May 17, 2016 our influent composite sample ammonia was 80.6 mg/l . This caused us to violate our
02 permit for ammonia and TIN. On May 17, 2017

03 May 18, 2017 our Influent composite sample ammonia was 61.2 mg/l, This caused us to violate our
04 permit for ammonia and TIN. On May 18, 2017

05 City wastewater staff investigated this abnormal ammonia discharge, by the use of portable samples

06 We were unable to locate the source of this discharge. We have had no other abnormal ammonia

07 readings,

Review of QNCR to determine which POTWs are having metal effluent violations

Environmental Protection Agency

Integrated Compliance Information System

Coordinator's Quarterly Noncompliance Report ***QNCR***

Data Run Date: 09/11/17

Report Date: 09/11/17

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FACILITY:

MAJ/MIN	FACILITY TYPE	FEDERAL GRANT	COMPLIANCE STATUS	State Region	PERMIT RNC STATUS							
					FY Q	FY16 Q1	FY16 Q2	FY16 Q3	FY16 Q4	FY17 Q1	FY17 Q2	FY17 Q3
Major	POTW	\$	Noncompliant		-/-	N/-	E/-	E/-	E/-	R/-	E/-	E/-

DMR VIOLATION(S) SUMMARY

VIOLATION DATE	LIMIT SET	PARAMETER	MON LOC	ENFORCEMENT ACTION IDENTIFIER	CHANGE OF LIMITS STATUS	VIOLATION	RNC DETECTION CODE/DATE/TYPE	RNC RESOLUTION CODE/DATE/DESCRIPTION
5/31/17	003-M	00978-Arsenic, total recoverable	1			E90	T 5/31/17 TRC 1	5/31/17 NC - Unresolved RNC
4/30/17	003-M	00978-Arsenic, total recoverable	1			E90	T 4/30/17 TRC 1	4/30/17 NC - Unresolved RNC
3/31/17	003-M	00978-Arsenic, total recoverable	1			E90	T 3/31/17 TRC 1	3/31/17 NC - Unresolved RNC
2/28/17	003-M	00978-Arsenic, total recoverable	1			E90	T 2/28/17 TRC 1	2/28/17 NC - Unresolved RNC
1/31/17	003-M	00978-Arsenic, total recoverable	1			E90	T 2/28/17 TRC 1	2/28/17 NC - Unresolved RNC

SCHEDULE THE INSPECTION

- VIA PHONE CALL AND FOLLOWED UP WITH AN EMAIL.
- INTRODUCTION AND PURPOSE OF PRETREATMENT INSPECTION
- SCHEDULE DATE
- DOCUMENT REQUEST
- ANSWER QUESTIONS



DOCUMENTS REQUESTED BEFORE THE INSPECTION

- CURRENT PRETREATMENT ORDINANCE/RULES AND REGULATIONS (WEB LINK IS OK)
- ENFORCEMENT RESPONSE PLAN
- SOP OR DESCRIPTION OF SIGNIFICANT NON-COMPLIANCE (SNC) DETERMINATION PROCEDURES
- ACTUAL SNC WORKSHEETS/DETERMINATIONS FOR LAST FOUR (4) QUARTERS, IF APPLICABLE
- INDUSTRIAL WASTE SURVEY PROCEDURE
- PERMIT TEMPLATE OR A SAMPLE PERMIT

**CONTROL AUTHORITY PRETREATMENT
AUDIT CHECKLIST AND INSTRUCTIONS**

833-B-10-001
February 2010




Office of Wastewater Management
Office of Enforcement and Compliance Assurance

Published
February
2010

- [HTTPS://WWW3.EPA.GOV/NPDES/PUBS/FINAL_PCA_CHECKLIST_AND_INSTRUCTIONS_%20FEB2010.PDF](https://www3.epa.gov/npdes/pubs/final_pca_checklist_and_instructions_%20feb2010.pdf)



EPA PRE-INSPECTION REVIEW

- REVIEW NPDES PERMIT FOR PRETREATMENT REQUIREMENTS
 - REVIEW LATEST ANNUAL REPORT
 - REVIEW LATEST AUDIT/PCI REPORTS
 - REVIEW INFORMATION SUBMITTED BY POTW
- 



POTW PREPARATION

- WHAT YOU CAN DO?
- HAVE YOUR FILES IN ORDER
- AKA - GET YOUR STUFF TOGETHER!!!!

PCI FORMAT

- OPENING CONFERENCE
- INTERVIEWS (OVERVIEW OF PROGRAM)
- RECORDS REVIEW (SIU FILES)
- INSPECTION(S) OF SIUS
- CLOSING CONFERENCE

CRITERIA FOR SIU FILE SELECTION AND INSPECTIONS

- SELECTION INTENDED TO BE A REPRESENTATIVE CROSS SECTION OF THE PROGRAM
- BOTH CIUS AND NON-CATEGORICAL SIUS CAN BE CHOSEN, WITH FOCUS ON:
 - CIUS WITH COMPLEX CALCULATIONS (PRODUCTION BASED STANDARDS, CWF)
 - SIUS WITH COMPLIANCE ISSUES
 - NEW SIUS
 - SIUS WHOSE FILES WERE NOT REVIEWED IN A PREVIOUS PCI/PCA

POSSIBLE EVALUATIONS DURING SIU INSPECTIONS

- ADEQUACY OF IU CHARACTERIZATION AND CLASSIFICATION
 - HAS THE POTW CORRECTLY CLASSIFIED THE IU? NEW SOURCE VS. EXISTING SOURCE?
 - HAS THE POTW IDENTIFIED ALL SOURCES OF WASTEWATER?
- PROCESS AREA
 - HOUSEKEEPING OBSERVATIONS
 - CHEMICAL AND HAZARDOUS WASTE STORAGE AND DISPOSAL
- ADEQUACY OF SAMPLING POINTS AND SAMPLING PROCEDURES



COMMUNICATION OF FINDINGS

- CLOSING CONFERENCE
 - EMAIL PRELIMINARY SUMMARY OF FINDINGS
 - INSPECTION REPORT
 - RESPONSE TO REPORT
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DISCLAIMER

- THE FOLLOWING SLIDES ARE EXAMPLES OF FINDINGS FROM PRETREATMENT COMPLIANCE INSPECTIONS. THESE ARE NOT MEANT TO BE COMPREHENSIVE OF ALL FINDINGS AND ARE JUST TO PROVIDE EXAMPLES OF PRETREATMENT COMPLIANCE INSPECTION FINDINGS.



SUMMARY OF FINDINGS (INDUSTRIAL WASTE SURVEY)

- THE CITY COULD NOT PROVIDE THE RELEVANT INDUSTRIAL WASTE SURVEY RECORDS DURING THE INSPECTION.
- THE CITY WAS NOT IMPLEMENTING ITS INDUSTRIAL WASTE SURVEY PROCEDURE.
- NOT CHARACTERIZING THE IU IN THE INDUSTRIAL WASTE SURVEY.

PRETREATMENT PERMIT RECORDS

- THE IU PERMIT NEEDS TO BE UPDATED TO INCLUDE PERMIT CONDITION LANGUAGE FOUND IN 40 CFR PART 403.8(F)(1)(B)(1-6) OF THE GENERAL PRETREATMENT REGULATIONS.
 1. STATEMENT OF DURATION (5 YEARS)
 2. STATEMENT OF NON-TRANSFERABILITY
 3. EFFLUENT LIMITS, INCLUDING BMPS
 4. SELF MONITORING, SAMPLING, REPORTING, NOTIFICATION AND RECORD KEEPING REQUIREMENTS
 5. STATEMENT OF APPLICABLE CIVIL AND CRIMINAL PENALTIES
 6. REQUIREMENTS TO CONTROL SLUG DISCHARGES

SUMMARY OF FINDINGS (PERMIT LANGUAGE)

- PERMITS HAD NOT BEEN UPDATED TO REFLECT THE CURRENT LOCAL LIMITS.
- THE PERMITS DID NOT PROHIBIT BYPASSES OR INCLUDE REPORTING REQUIREMENTS FOR BYPASS EVENTS.
- IU PERMITS WERE NOT CONSISTENTLY SIGNED AND DATED.
- ADMINISTRATIVE EXTENSIONS OF IU PERMITS PAST THE MAXIMUM DURATION OF 5 YEARS.
- CONFLICTING TRANSFERABILITY OF PERMIT REQUIREMENTS IN THE CITY'S PERMITS.
- INCORRECT SAMPLE TYPE REQUIREMENTS FOR TTOS AND CYANIDE SAMPLES IN THE CITY'S PERMITS.

SUMMARY OF FINDINGS (PERMIT LANGUAGE)

- THE CADMIUM LIMIT IN SOME OF THE METAL FINISHING PERMITS WAS INCORRECT.

Pollutant	Existing source daily max (mg/L)	Existing source monthly average (mg/L)	New source daily max (mg/L)	New source monthly average (mg/L)	Local Limit daily max (mg/L)
Cadmium	0.69	0.26	0.11	0.07	0.20

Permit Limit daily max (mg/L)	Permit Limit monthly max (mg/L)
0.11	0.07

Industrial User Permitting Guidance Manual

833-R-12-001A

September 2012




United States Environmental Protection Agency
Office of Water

- [HTTPS://WWW3.EPA.GOV/NPDES/PUBS/PRETREATMENT_IU_PERMITMANUAL.PDF](https://www3.epa.gov/npdes/pubs/pretreatment_iu_permitmanual.pdf)



SUMMARY OF FINDINGS (COMPLIANCE MONITORING)

- THE CITY HAD NOT ANALYZED THE SIU SELF-MONITORING REPORTS.
 - MISSING SELF-MONITORING REPORTS.
 - LABORATORY REPORTS NOT SIGNED AND CERTIFIED BY IU REPRESENTATIVE.
 - MISSING CERTIFICATION STATEMENT IN COMPLIANCE REPORTS.
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SUMMARY OF FINDINGS (COMPLIANCE MONITORING)

- ANALYTICAL METHODS ISSUES
 - SW 846 (SOLID WASTE METHODS) ARE NOT APPROVED FOR WASTEWATER.
 - PH AND TEMP MUST BE ANALYZED IMMEDIATELY (15 MINUTE HOLDING TIME).
 - USING PH PAPER INSTEAD OF AN APPROVED METHOD UNDER 40 CFR 136.
 - SELF-MONITORING SAMPLES WERE RECEIVED BY THE LAB AT A TEMPERATURE ABOVE 6°C.
- CHAIN OF CUSTODY FORMS INCOMPLETE OR INACCURATE
 - TIME, DATE, RELINQUISHED BY.
 - GRABS VS. COMPOSITES.

ADEQUATE COMPLIANCE EVALUATION

- **RECOMMEND CHECKLIST FOR SMR REVIEWS**
- MAY BE ATTACHED TO SELF-MONITORING REPORT AFTER REVIEW
- DUE DATE/DATE RECEIVED
- MONITORING
 - CORRECT PARAMETERS
 - CORRECT SAMPLING FREQUENCY
 - COMPARE TO PERMIT LIMITS, CATEGORICAL AND LOCAL
 - CORRECT SAMPLE TYPE
 - SAMPLING/ANALYSIS MEETS 40 CFR PART 136 (HOLDING TIMES, ANALYSIS METHOD, TEMPERATURE, PRESERVATION, BOTTLE TYPE, ETC.)
 - WERE ANY VIOLATIONS REPORTED ACCORDING TO NONCOMPLIANCE REPORTING REQUIREMENTS?
- CERTIFICATION STATEMENT(S) SIGNED BY AUTHORIZED PERSONNEL



SUMMARY OF FINDINGS (POTW SAMPLING)

- FAILURE TO SAMPLE ONCE PER YEAR FOR ALL POLLUTANTS REGULATED UNDER THE PERMIT.
- CALIBRATION LOGS FOR THE CITY'S PH METER WERE NOT AVAILABLE.
- THE CITY DID NOT DOCUMENT THE 40 CFR 136 METHODS USED FOR ANALYSIS

SUMMARY OF FINDINGS (POTW INSPECTIONS OF SIUS)

- THE CITY DID NOT PERFORM YEARLY INSPECTIONS AT SIUS.
- NO INSPECTION REPORT ASSOCIATED WITH THE INSPECTION.
- THE INSPECTION REPORT CHECKLIST WAS NOT COMPLETELY FILLED OUT.
- INSPECTIONS ARE DECLINING IN QUALITY. INSPECTORS USING LAST INSPECTION AND UPDATING RATHER THAN USING A NEW FORM (COPYING AND PASTING).
- ZERO DISCHARGE STATUS NOT VERIFIED OR DOCUMENTED IN REPORTS.

IU INSPECTION REPORTS

- ENSURE ADEQUATE INFORMATION IS GATHERED IN THE INSPECTION REPORTS
 - CHEMICAL STORAGE/HANDLING/TRANSFER
 - IU PRODUCTION OR SERVICE
 - WASTESTREAM GENERATION
 - WASTE STORAGE
 - WASTEWATER TREATMENT OR MANAGEMENT
 - ACCIDENTAL SPILL AND SLUG DISCHARGE POTENTIAL

U.S. Environmental Protection Agency

Industrial User Inspection and Sampling Manual For POTWs



U.S. Environmental Protection Agency
Office of Compliance
EPA-831B17001 January 2017



- [HTTPS://WWW.EPA.GOV/SITES/PRODUCTION/FILES/2017-01/DOCUMENTS/IUINSPECT.PDF](https://www.epa.gov/sites/production/files/2017-01/documents/iuinspect.pdf)

SUMMARY OF FINDINGS (ENFORCEMENT)

- POTW FAILED TO FOLLOW ITS ENFORCEMENT RESPONSE PLAN (ERP)
POTW FAILURE TO ESCALATE ENFORCEMENT WHEN NECESSARY
- FAILURE TO DOCUMENT ALL SNC DETERMINATIONS, INCLUDING THE DETERMINATION OF SNC BASED ON NARRATIVE CRITERIA.
- THE 1ST QUARTER 2017 COMPLIANCE REPORT FOR XYZ WAS DUE ON APRIL 15, 2017. THE COMPLETE REPORT WAS NOT DELIVERED UNTIL JUNE 8, 2017. (MORE THAN 45 DAYS PAST THE DEADLINE DATE, SUBJECT TO SNC.)
- ERP DOES NOT INCLUDE SNC AND LEGAL AUTHORITY.

THE ERP WAS NOT CONSISTENT WITH THE CITY'S ORDINANCE AND NEEDS TO BE UPDATED.

Legal Authority

Phone Calls
Notice of Violation
Administrative Fines
Administrative Orders
Civil Litigation
Criminal Prosecution
Termination of Service

ERP

Phone Calls
Notice of Violation
Administrative Fines
Administrative Orders
Civil Litigation
Criminal Prosecution
~~Show Cause Hearing~~
Termination of Service





SUMMARY OF FINDINGS (MISCELLANEOUS)

- THE CITY HAD NOT EVALUATED THE NEED FOR SIUS TO DEVELOP SLUG CONTROL PLANS.
 - THE CITY'S PRETREATMENT RECORDS WERE NOT ALL MAINTAINED FOR THREE YEARS.
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CONCLUSION

- RECOMMEND USING CHECKLIST TO REVIEW SELF-MONITORING REPORTS.
- EPA GUIDANCE MATERIALS (INDUSTRIAL USER PERMITTING GUIDANCE MANUAL AND INDUSTRIAL USER INSPECTION AND SAMPLING MANUAL FOR POTW) ARE USEFUL AND AVAILABLE ON THE INTERNET.
- CALL THE STATE OR EPA IF YOU HAVE ANY QUESTIONS.

QUESTIONS

- CONTACT INFORMATION
- EMILIO LLAMOZAS 303-312-6407 LLAMOZAS.EMILIO@EPA.GOV