

EPA Pretreatment Audits

Al Garcia

Region 8 Pretreatment Workshop

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**SUPER BOWL
CHAMPIONS**



Purpose

- Approval Authority is responsible for ensuring that local program implementation is consistent with applicable Federal requirements and is effective in achieving the National Pretreatment Program's goals.
 - Pretreatment Audits/PCI
 - Annual Reports
- Evaluation of Program Compliance and Effectiveness
- Follow Up- Outreach, Corrective Action Items, NPDES Permit Amendments, Enforcement

Pretreatment Audits and PCIs

- Pretreatment Audits
 - 1 every 5 years or permit life cycle
 - Comprehensive evaluation of the components of a Pretreatment program
- Pretreatment Compliance Inspection
 - 2 every 5 years or permit cycle
 - Evaluation of implementation components

EPA Audit Preparation

- Evaluate:
 - legal Authority/local limits
 - Implementation Procedures and templates
 - ERP
 - Sampling Plan/Protocols, including QA/QC
 - Permit template
 - NPDES compliance history
 - Resources, Budget

Pretreatment Audit

- Opening Conference
- Pretreatment Records Review
- POTW Tour
- SIU and IU site visits
 - Permit adequate for site conditions
 - Knowledge of Pretreatment Regulatory Environment
 - Relationship between CA and SIU
- Closing Conference

Pretreatment Audit Report

- Comprehensive Report of Findings
 - Typically 6 to 8 weeks
 - Identify Strengths and Innovative implementation methods
 - Identify Areas of Improvement/Deficiencies as Action Items
- Evaluate appropriate follow up to help correct findings
- Outreach, Action Items, NPDES Permit Amendments, Enforcement

Region 8 Pretreatment Audit Findings

Legal Authority

- Update legal authority to incorporate Pretreatment Streamlining Regulations
- Implement modified legal authority in permit template, ERP, Sampling plans
- Local limits should be incorporated into the municipal ordinance

Intergovernmental Agreements

- The “Outside Contributing Jurisdiction” agreement has not been updated since the original date of agreement in 1976.
- Evaluate the ordinances for ABC and XYZ Sanitation Districts to ensure they are consistent with the City’s municipal ordinance.

Local Limits

- Update local limits – records do not document technical basis
 - Significant change in service area/POTW
 - NPDES Permit issuance - 40 CFR 122.44(j)(2)(ii) – technical evaluation of local limits following permit issuance or reissuance.
 - Change in Standards - NPDES permit, Water Quality
- MAIL allocation – Ensure facilities are reporting appropriate flow data to calculate mass loading limits.
- Ensure the establishment of any new limit, including site-specific permit limits undergo the appropriate approvals and public notice.
- Technically-based local limits and ordinance limits (BTEX, OG, TPH)

Industrial User Inventory

- Survey and inspect new and existing facilities within its service area, including contributing jurisdictions, to identify, characterize, and notify industrial users.
- **Local Limits** – Verify if the Maximum Allowable Industrial Loadings adopted in 2007 are protective after all unknown SIUs are identified.
- **CIUs/SIUs** – Immediately control XYZ Powder Coatings, a metal finisher that has been operating in the service area without a Pretreatment control mechanism for a significant number of years

Resources and Procedures

- Evaluate staffing levels, resource allocation to the Pretreatment program (both short term and long term), budget levels, sampling equipment and storage, vehicle needs, and general organization of the Pretreatment Program

Pretreatment Permit Records

- Ensure the legal authority is adequately established in the permit template.
- Incomplete or inadequate permit application
- Ensure the permit adequately addresses the site-specific conditions at the facility.
 - Processes/wastewater generation
 - Wastewater treatment/management method
 - Wastewater discharge/Monitoring point

Pretreatment Permit Records

- The permit template 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.
 - Statement of Duration
 - Effluent Limits, including BMPs
 - Statement of non-transferability
 - Self monitoring, sampling, reporting, notification and record keeping requirements
 - Statement of applicable civil and criminal penalties
 - Requirements to control Slug Discharges

Pretreatment Permit Records

- Establishment of *new* limits, outside of the scope of the EPA-approved legal authority, within permits or other procedural documents without appropriate public notice and EPA notification.
- Ensure issued permits are consistently signed and dated.
- Administrative extensions

Data Evaluation/Mgmt

- Ensure SIUs submit the certification statement found in 40 CFR 403.6(a)(ii) with every compliance report.
- The 1st Quarter 2007 compliance report for XYZ was due on April 21, 2007. The complete report was not delivered until June 8, 2007. (More than 30 days past the deadline date, subject to SNC.)
- Evaluate all reported data for compliance

Sampling

- Control Authority Monitoring
- The City did not sample its permitted SIUs in 2008.
- Ensure the sampling is representative
 - SIU sampling protocol.

Inspections

- 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
- Zero Dischargers – Reasonable Potential to discharge

Enforcement

- ERP includes SNC and legal authority.
- Ensure documentation of 24 hour reports upon becoming aware of violations.
- Documentation of all SNC determinations, including the determination of SNC based on narrative criteria

Questions?

Al Garcia

303.312.6382

garcia.al@epa.gov