



**Inspections
101**

Steps for completing a successful Inspection:

1. Pre-inspection preparation
2. Inspection:
 - A. Pre-inspection Facility Walk around
 - B. Pre-inspection monitoring point check
 - C. Check in with Facility
 - D. Pre-inspection meeting with Industrial User
 - E. Facility Walk-Through
 - F. Post Inspection meeting with Industrial User
3. Post Inspection follow up

Pre-inspection preparation

1. Industrial User File review
 - A. Sample Results
 - B. Enforcement Actions
 - C. Previous Inspections
 - D. Permit Application
 - E. Possibly review water usage
2. Equipment
 - A. Safety Equipment (Hard Hats, Safety Vest, Safety Glasses, etc.)
 - B. Cameras
 - C. Sampling Equipment (Autosamplers, pH meter, etc.)

Sample Results

1. Review the sample results to verify compliance with permit
2. Making sure the Industrial User is sampling all pollutants indicated in the permit
3. Verify samples are sampled according to permit frequency
4. Verify samples were sampled and tested in accordance with methods in 40 CFR 136

Enforcement Actions

1. Verify Industrial User is not in **Significant Non-Compliance**
2. Verify Industrial User has meet all requirements specific to any enforcement action
 - A. Compliance Schedule Dates
 - B. Treatment Installation
 - C. Resampling

Permit Application

1. Review the pollutants that were identified
2. Review the processes that were described in the Permit Application submittal
3. Review the facility diagram
4. Review flow diagram
5. Review discharge flow estimates
6. Review number of Employees

Safety Equipment

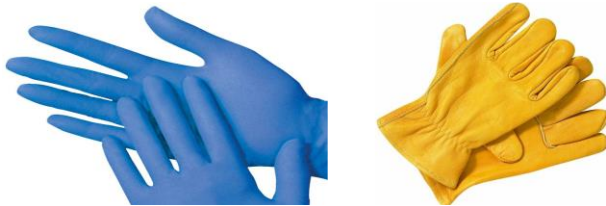
Hard Hats



Steel Toe Shoes



Gloves (latex and leather)



Safety Vests



Safety Glasses



Flashlight



Other Equipment

Inspection Equipment

Camera



Pens



Clipboards



Chain of Custody

CHAIN OF CUSTODY FORM									
Investigator		Requestor		Requestor organization		Address			
Name		Name		Name		Address			
Title		Title		Title		Address			
Date		Date		Date		Date			
Time		Time		Time		Time			
Location		Location		Location		Location			
Description of sample		Description of sample		Description of sample		Description of sample			
Quantity		Quantity		Quantity		Quantity			
Container		Container		Container		Container			
Remarks		Remarks		Remarks		Remarks			
Signature		Signature		Signature		Signature			
Date		Date		Date		Date			
Time		Time		Time		Time			
Location		Location		Location		Location			
Signature		Signature		Signature		Signature			
Date		Date		Date		Date			
Time		Time		Time		Time			
Location		Location		Location		Location			

APPENDIX A. CHAIN OF CUSTODY FORM

Sampling Equipment

Automatic Sampler



Poles



pH meter



Sample Bottles



Now onto the Inspection!!!



Facility Walk Around

1. Identify chemicals stored outside



2. Look for any possible accidental discharges



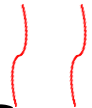
3. Identify all discharge points

Check Monitoring Points

1. Check current discharge
2. Look for possible accidental discharges
3. Identify any issues of performing sampling of the discharge. Such as:
 - A. Flow rate
 - B. Blockage
 - C. Not all required discharges come to the monitoring point
4. If **abnormal** discharge is present, grab samples

Abnormal discharges factors

1. **Color** can be an indicator if the discharge is normally gray than a **blue** discharge is found, this may warrant a sample



2. **Smell**: If the discharge usually smells like sewage and instead smells of cleaners or oils, this may warrant a sample



3. **Significant flow variation**

Check in with Facility



1. Ask for the listed contact from the Permit or Permit Application
2. Provide proper identification if requested
3. Front Desk **must** not delay you for too long
4. If denied access, contact supervisor

Pre-Inspection Meeting

1. Meet with the Industrial User to review the Facility Information. Such as:
 - A. Number of Employees
 - B. Hours of Operation
 - C. Description of operations
 - D. Discharge information
 - E. Compliance Status
2. Provide Industrial User with any relevant information. Such as:
 - A. Permit Expiration/Need for Permit Renewal
 - B. New Federal Regulations
 - C. Changes in Legal Authority (Rules and Regulations)

Facility Walk-Through

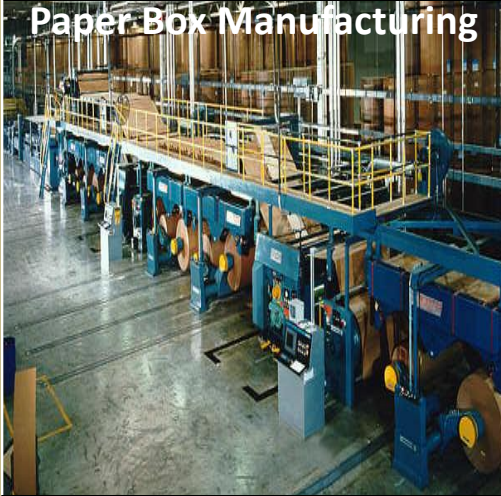
1. Production or Services area
2. Raw Material Storage
3. Chemical Storage
4. Treatment System
5. Offices
6. Maintenance Area
7. Facility Property

Watch for Hazards



Production Area

Paper-Box Manufacturing



Food Manufacturing



Circuit Board Manufacturing



Service Area

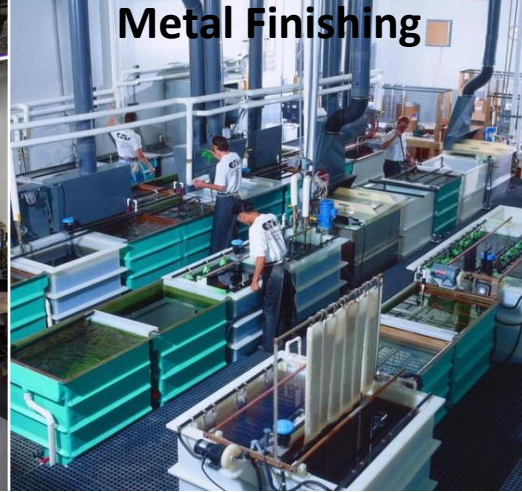
Car Wash



Repair Shop



Metal Finishing



So what to look for in Production or Service areas?

1. The chemicals being used
 - A. Cleaners (acid, solvent, detergents, etc.)
 - B. Coatings
 - C. Polymers
2. The raw materials being used
 - A. METALS
 - B. Powders
 - C. Liquids
3. The process
 - A. What is being done
 - B. The waste material from the process
 - C. The contact water makes to materials or chemicals
4. Any wastewater that is discharged
5. Where the wastewater goes

Raw Material Storage



So what to look for in Raw Material Storage?

1. Any materials not described in the Production Area
2. Storage of liquids and proximity to drains
3. Secondary Containment or other containment practices
4. Possible discharge locations

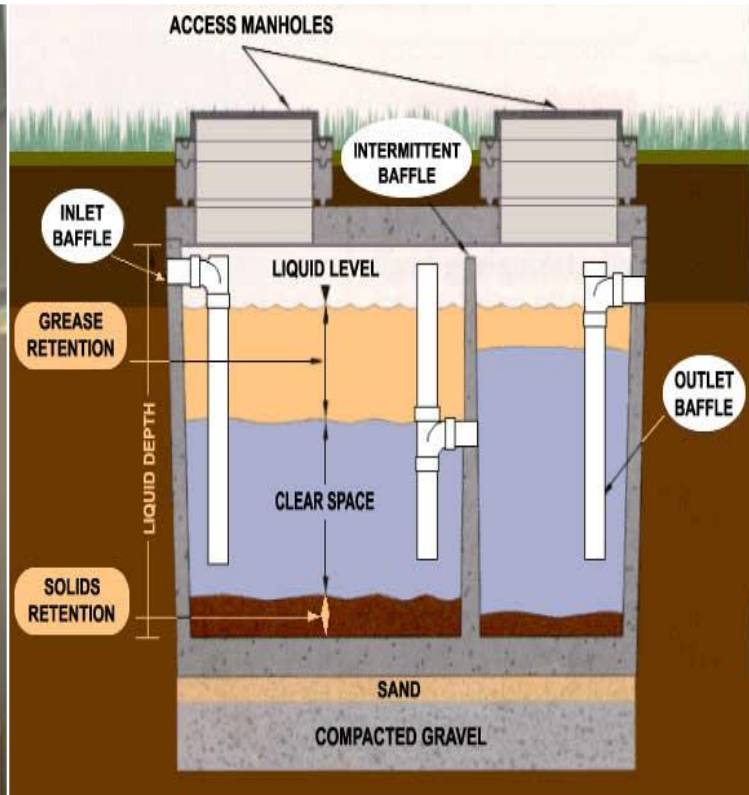
Chemical Storage



So what to look for in Chemical Storage?

1. Any materials not described in the Production Area or Raw Material Storage
2. Storage of liquids and proximity to drains
3. Secondary Containment or other containment practices
4. Possible discharge locations

Treatment System



So what to look for in Treatment System?

1. What is the system designed to remove?
Such as:
 - A. Grease Interceptors remove grease, oils, and solids
2. The condition of the equipment
 - A. Is the power working
 - B. Is the system being maintained
3. Are any dilution wastewaters added

Offices



Verify that these spaces are only used for offices.

Maintenance Area



So what to look for in the Maintenance Area?

1. Chemical Storage
2. The processes they are performing
3. Possible discharge locations

Facility Property



So what to look for around the Facility Property?

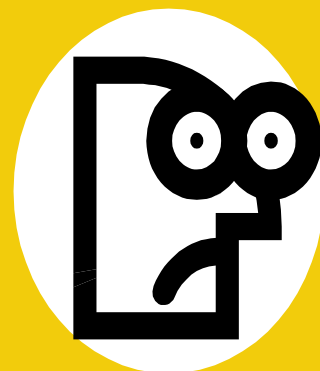
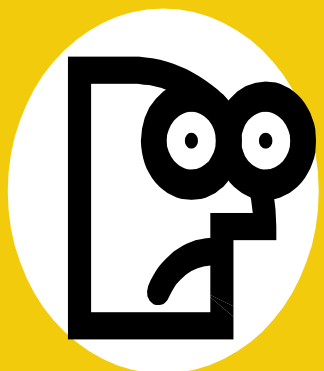
1. Additional buildings
2. Possible discharge locations
3. Chemical Storage
4. Waste production

Post-Inspection Meeting

1. Identify to the Industrial User any deficiencies that Industrial User must correct
2. Identify any violations with the Permit
3. Inform the Industrial User the expected corrective actions to be taken.
4. Also inform the Industrial User of the expected dates for compliance or correction of deficiencies

Post-Inspection Follow Up

1. Any Enforcement on Industrial User incurred during Inspection should be follow up with written communication of the violations or deficiencies by the Industrial User
2. Any agreed to requested information from the POTW by the Industrial User should be provide in a timely manner



It's QUESTION TIME !!