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Office of Water
Enforcement and Permits
Washington, DC 20460

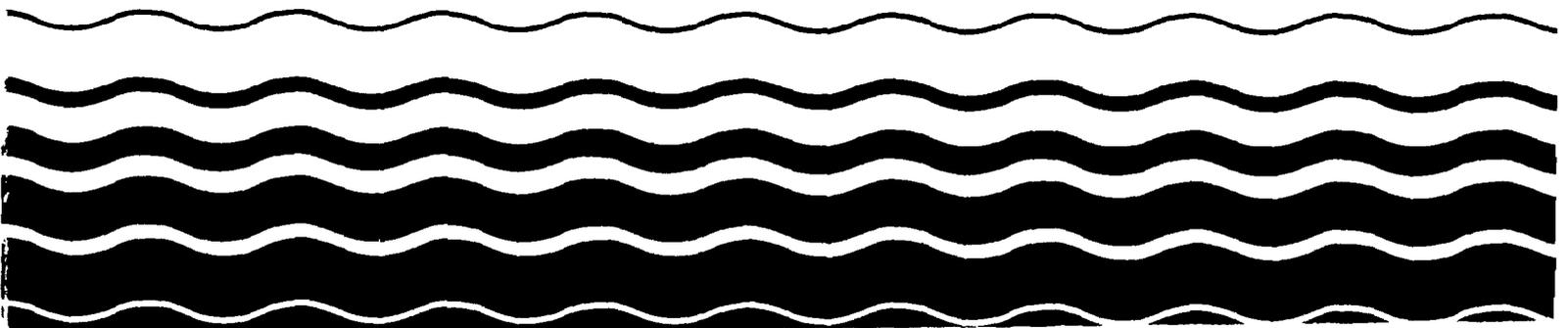
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Water

Pretreatment Compliance Inspection and Audit Manual for Approval Authorities





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 15 1986

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Pretreatment Compliance Inspections and Audits

FROM: *James R. Elder*
James R. Elder, Director
Office of Water Enforcement and Permits (EN-335)

TO: Users of the Pretreatment Compliance Inspection (PCI)
and Audit Manual for Approval Authorities

This manual provides Approval Authorities with information and material on audits and inspections of approved local POTW pretreatment programs. The manual should assist Approval Authorities in providing effective oversight of approved pretreatment programs under their jurisdiction.

The PCI and audit procedures are consolidated in this manual because the preparation and follow-up steps for the two activities are similar. Separate checklists for conducting PCIs and audits are included in the manual. The audit checklist addresses all materials contained in the PCI checklist, although some audit questions seek more detailed information.

Audits and PCIs are complementary means of achieving effective pretreatment program oversight. Audits, which are more comprehensive and resource-intensive than PCIs, are most useful when conducted approximately one year after program approval and again during the POTW's five-year permit term, preferably close to the time of permit reissuance for the approved POTW. Initial audits allow for identification of any problems the POTW may have in implementing its program. Where appropriate, follow-up guidance or assistance (including contractor assistance in some cases) may be provided by the Approval Authority to the POTW. In cases where the POTW has failed to implement important aspects of its program, the audit may also provide an opportunity to determine whether enforcement action against the POTW is needed. Audits performed just prior to permit reissuance provide the Approval Authority with a good opportunity to determine whether any modifications need to be made to the pretreatment conditions in the POTW's NPDES permit to address any deficiencies in the local program (e.g., to provide greater detail on performance expectations for local permit issuance or compliance inspections for IUs, to prescribe methodologies for developing or assessing the need for local limits, etc.)

PCIs are less resource-intensive than audits. The PCI focuses on the POTW's compliance monitoring and enforcement activities. Optimally, PCIs should be performed annually during the interim years between audits as part of routine NPDES municipal inspections. PCIs should be included in the compliance inspection plans developed between Regions and States.

I hope that you will find this manual to be a useful tool for ensuring that your approved local pretreatment programs are being implemented in accordance with the requirements of the General Pretreatment Regulations (40 CFR Part 403).

PRETREATMENT COMPLIANCE INSPECTION AND AUDIT
MANUAL FOR APPROVAL AUTHORITIES

Office of Water Enforcement and Permits

July 1986

U.S. Environmental Protection Agency
401 M. St. S.W.
Washington, D. C. 20460

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1. INTRODUCTION

The pretreatment compliance inspection (PCI) and the pretreatment program audit have been established to allow on-site review of pretreatment programs in approved publicly owned treatment works (POTWs). The intent of this manual is to provide guidance to EPA Regions and State personnel who are responsible for conducting PCIs and audits.

1.1 PRETREATMENT COMPLIANCE INSPECTION (PCI)

The PCI will expand the scope of existing municipal NPDES inspections to include an evaluation of the approved POTW pretreatment program. The PCI is designed to verify the compliance status of the POTW and focuses primarily on the compliance monitoring and enforcement activities of the POTW. It also attempts to ascertain whether there have been changes to the approved program which have not been reviewed by the Approval Authority. The PCI should normally be conducted as an adjunct to other NPDES inspections to conserve travel costs and staff time. Additionally, consolidation allows the inspector to more easily integrate information about all areas of the POTW's operations. PCIs are compatible with the following NPDES inspections:

- Compliance Evaluation Inspections (CEI)
- Compliance Sampling Inspections (CSI)
- Performance Audit Inspections (PAI)
- Diagnostic Inspections, and
- Other nonroutine types of inspections such as toxics sampling and biomonitoring inspections.

While not included in the PCI checklist, the EPA Region or State may include additional activities with the PCI. These activities may include but are not limited to the following:

- Industrial User Inspection Overview - The inspector may overview the POTW's industrial inspection and/or sampling procedures.
- Sampling Inspections - The inspector may actually sample industrial users within the POTW directly to determine compliance with pretreatment standards.
- QA/QC Procedure Inspections - The inspector can review either the POTW or industrial user (IU) or both to assess the adequacy of quality assurance and quality control analytical procedures at the laboratory.

This Manual, along with a PCI Workshop (offered by EPA to Regions and States), provides basic guidance to conduct a PCI.

1.2 AUDIT

POTW pretreatment program audits are also performed as a means of evaluating pretreatment program implementation. The audit is a comprehensive review of all elements of an approved POTW pretreatment program. The audit addresses all materials contained in the basic PCI although audit questions are in some instances worded differently, and seek more detailed information. The audit includes a review of the following elements of the POTW's program:

- Changes to the pretreatment program since approval
- Legal authority and control mechanism
- Application of pretreatment standards (categorical pretreatment standards and local limits)
- Compliance monitoring and enforcement efforts
- Data management and public participation
- Program resources.

In most instances, the audit is an independent activity which will not be conducted with an NPDES inspection. Also, the audit is generally performed by program office personnel rather than an inspector. While the results of the PCI or audit may be the basis for enforcement activity, the audit is also designed to provide guidance and technical assistance to the Control Authority and to assess the need for modifications to the approved pretreatment program. Consequently, the audit is designed to answer the following questions:

- Is the POTW complying with existing requirements in its permit, approved program, and the General Pretreatment Regulations?
- Are any changes that the POTW is proposing to make in its program appropriate and should such changes be officially incorporated via program/permit modification?
- Are elements of the previously approved program proving to be deficient through experiences in implementation, and should changes in the approved program be required via the NPDES permit?
- Can the POTW benefit from specific and available resources which the Approval Authority can provide such as guidance documents, computer programs, etc.?
- What follow-up actions on the part of the POTW are recommended to improve the effectiveness of the existing program?

1.3 ORGANIZATION OF THE GUIDANCE MANUAL

This Manual is organized into five chapters:

- Chapter One: Introduction provides a definition of the PCI and the audit; describes the organization of the Manual and addresses the issues of scheduling, resource requirements and Strategic Planning and Management System (SPMS) commitments.
- Chapter Two: Overview describes the National Pretreatment Program and provides general information relating to the principal responsibilities of POTWs, otherwise known as Control Authorities.
- Chapter Three: PCI and Audit Procedures discusses those elements of the PCI and audit that differ from other NPDES inspection procedures— including specific aspects of preinspection preparation, entry, opening conference, documentation, closing conference, inspection report, and follow-up responses to the Control Authority.

- ° Chapter Four: PCI Checklist provides narrative guidance to the user of the checklist. An explanation of the questions in the checklist appears on the left-hand page (even-numbered) with the checklist itself on the right-hand page (odd-numbered).
- ° Chapter Five: Audit Checklist provides an overview of the audit checklist and contains the checklist itself.

1.4 PCI AND AUDIT SCHEDULING AND COORDINATION

The PCI will generally be scheduled as an adjunct to a planned NPDES inspection. This will usually avoid the need for scheduling separate visits to the same POTW facility. Types of inspections that can be coordinated with a PCI include the Compliance Evaluation Inspection (CEI), the Compliance Sampling Inspection (CSI), the Performance Audit Inspection (PAI), Diagnostic Inspections and other nonroutine municipal inspections. These inspections are performed by EPA or States in accordance with a Compliance Inspection Plan arrived at between EPA Regions and States.

Audits should be performed initially within one year of POTW pretreatment program approval and at the time of NPDES permit reissuance (once every five years). The more concise PCI would be performed during intervening years. These are the minimum scheduling requirements for PCIs and audits. Each may be conducted more frequently if circumstances so require.

1.5 RESOURCE REQUIREMENTS

The average audit is estimated to require between six and ten person-days. Normally, two people will spend two days on-site, although more personnel may be needed to cover all elements of an audit for a large POTW. The average PCI is estimated to require two person-days with approximately one-half day on site. The balance of the time required includes pre-inspection preparation time and follow-up report preparation. Travel costs should normally be considered incidental to the NPDES municipal inspection.

1.6 STRATEGIC PLANNING AND MANAGEMENT SYSTEM (SPMS) COMMITMENTS

The Agency has established SPMS commitments for Regions and States to conduct PCIs and audits. Although an audit generally covers everything in the PCI checklist, the activity should not be counted as both a PCI and an audit. EPA Headquarters will track commitments for Regions and States based on retrievals from the Permit Compliance System (PCS). Instructions on PCI and audit entry codes and other procedures were outlined in the August 5, 1985 memorandum from J. William Jordan, and the August 30 and December 16, 1985 memorandum from Martha G. Prothro (See Appendix A.)

Training workshops will be provided to assist EPA Regions and States with PCIs and audits. Regions should accompany State personnel on initial inspections and audits and provide only periodic review after the Regions are satisfied with State performance.

1.7 SOURCES OF ADDITIONAL INFORMATION

This document assumes that the reader has some knowledge of the National Pretreatment Program or has attended a PCI or audit training workshop. Additional sources of pretreatment program information and inspection guidance can be found in the following documents:

- "Guidance Manual for POTW Pretreatment Program Development," Office of Water Enforcement and Permits, U.S. Environmental Protection Agency. October 1983.
- "Procedures Manual for Reviewing a POTW Pretreatment Program Submission", Office of Water Enforcement and Permits, U.S. Environmental Protection Agency. October 1983.
- "NPDES Compliance Inspection Manual", Office of Water Enforcement and Permits (EN-338), U.S. Environmental Protection Agency. June 1984.

2. OVERVIEW AND BACKGROUND

2.1 PRETREATMENT PROGRAM AUTHORITY

The Clean Water Act requires EPA to restore and maintain the chemical, physical, and biological integrity of the Nation's waters. The principal regulatory tool for reducing pollutant discharges is the National Pollutant Discharge Elimination System (NPDES). The requirements of the National Pretreatment Program are administered through the NPDES program. The NPDES permit places requirements and standards on Control Authorities, including the requirement for developing and implementing a local pretreatment program.

The goal of EPA's National Pretreatment Program is to protect POTWs and the environment from adverse impacts that may occur when hazardous or toxic wastes are discharged into a sewage treatment system. This protection is achieved mainly through the regulation of nondomestic users of POTWs that discharge toxic wastes or unusually high concentrations of conventional wastes.

EPA has promulgated the General Pretreatment Regulations in 40 CFR Part 403. These regulations use the terms "Approval Authority" and "Control Authority" in reference to the different agencies that have responsibility for pretreatment programs.

Approval Authorities are EPA Regional Offices or States to whom EPA has delegated pretreatment approval authority responsibilities. Approval Authorities must (1) oversee local pretreatment programs to determine whether Control Authorities are properly implementing and enforcing their pretreatment program requirements; (2) ensure that Control Authorities and industrial users comply with applicable local pretreatment standards and requirements; (3) evaluate the progress of pretreatment programs and identify any aspects of pretreatment programs that need improvements, and (4) serve as Control Authorities where no approved POTW programs exist.

Control Authorities are the agencies that must develop local pretreatment programs; directly apply and enforce Federal, State, and local pretreatment standards for industrial users; and comply with Federal, State, and local standards and requirements. When a pretreatment program is approved, the POTW becomes the Control Authority. If the POTW does not have an approved program or is not required to develop one, the Approval Authority (either the approved State or EPA Region) acts as Control Authority. Approximately 1,400 POTWs are currently required to develop and implement a local pretreatment program.

2.2 FEDERAL REQUIREMENTS

The General Pretreatment Regulations (40 CFR Part 403) specify the basic requirements for the development and implementation of the Federal program. The regulations address the various legal, procedural, technical, and administrative requirements and responsibilities for participating Federal, State, and local governments. The sections that follow will discuss the more specific aspects of the regulations.

2.2.1 Federal Categorical Pretreatment Standards

Federal Categorical Pretreatment Standards have been or are being established for specific categories of industries. Any industrial user falling within one or more of these industrial categories must meet, at a minimum, numerical limits for certain pollutants that are typically present in the waste discharges from those industries. Categorical pretreatment standards are technology based standards and may be expressed as maximum concentrations or production based, depending on the industrial category. They may be superceded only by more stringent State or local limitations where additional protection is necessary to comply with other limitations or site-specific factors (i.e., water quality standards or sludge disposal requirements). The current status of the various Categorical Pretreatment Standards is shown in Table 2.1.

Categorical Pretreatment Standards may be modified for a particular industrial discharger for any of the following reasons if proper documentation is prepared and the request for modification is approved by the Approval Authority (EPA or approved State):

- Net/Gross Adjustment - Upon request of the industrial user and if certain conditions are met, the applicable standard can be adjusted to reflect allowance for a pollutant(s) in the industrial user's intake water.
- Removal Credit - A Control Authority may apply for authorization to revise pollutant discharge limits in categorical pretreatment standards to reflect removal of such pollutants by the POTW treatment plant. However, EPA's removal credit regulation has been invalidated by an April 1986 court ruling. Thus, until further court or regulatory action restores the Agency's ability to provide removal credits, no such credits are available.
- Fundamentally Different Factors (FDF) Variance - An FDF variance may be requested by an industrial user, a Control Authority, or other interested person. The FDF variance is designed to compensate for those situations where factors relating to an individual facility are fundamentally different from factors as they were considered by EPA in establishing a categorical standard. A standard may be subsequently raised or lowered given the nature of the variance request.

2.2.2 Prohibited Discharge Standards and Local Limits

Section 403.5 of the General Pretreatment Regulations contains the requirements for both Prohibited Discharge Standards and locally developed limits. These limits apply to both categorical and noncategorical industries and are in addition to the Federal Categorical Pretreatment Standards already discussed. (EPA has authority to enforce Prohibited Discharge Standards and locally developed limits, if necessary.)

TABLE 2-1

INDUSTRIES SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS

FINAL REGULATIONS

<u>Industry Category</u>	<u>Date Issued In Federal Register</u>	<u>Effective Date</u>	<u>PSES¹ Compliance Date</u>
Timber Products Processing	1-26-81	3-30-81	1-26-84
Electroplating ²	1-28-81	3-30-81	4-27-84
			(Nonintegrated)
			6-30-84
			(Integrated)
	7-15-83	8-29-83	7-15-86 (TTO)
Iron & Steel	5-27-82	7-10-82	7-10-85
Inorganic Chemicals ³			
Certain Subparts	7-20-77		7-20-80
Phase I	6-29-82	8-12-82	6-29-85
Phase II	8-22-84	10-5-84	8-22-87
Petroleum Refining	10-18-82	12-01-82	12-01-85
Pulp & Paper Mills	11-18-82	1-03-83	7-01-84
Builders' Paper & Board Mills	11-18-82	1-03-83	7-01-84
Steam Electric Power Generating	11-19-82	1-02-83	7-01-84
Leather Tanning & Finishing	11-23-82	1-06-83	11-25-85
Porcelain Enameling	11-24-82	1-07-83	11-25-85
Coil Coating (Phase I)	12-01-82	1-17-83	12-01-85
-Steel Basis Material			
- Galvanized Basis Material			
- Aluminum Basis Material			
Electrical & Electronic	4-08-83	5-19-83	7-01-84
Components (Phase I)			11-08-85(As)
-Semiconductors			
-Electronic Crystals			
Metal Finishing	7-15-83	8-29-83	6-30-84 (Part 443 TTO)
			7-10-85 (Part 420 TTO)
			2-15-86 (Final)
Copper Forming	8-15-83	9-26-83	8-15-86
Pharmaceuticals	10-27-83	12-12-83	10-27-86
Coil Coating (Phase II)	11-17-83	1-02-84	11-17-86
(Cannmaking)			
Electrical & Electronic	12-14-83	1-27-84	7-14-87
Components (Phase II)			
-Cathode Ray Tube			
-Luminescent Materials			
Nonferrous Metals Manufacturing			
Phase I	3-08-84	4-23-84	3-09-87 (Subparts A-M)
Phase II	9-20-85	11-04-85	9-20-88 (Subparts N-AE)
Battery Manufacturing	3-09-84	4-23-84	3-09-87
Nonferrous Metals Forming	8-23-85	10-7-85	8-23-88
and Metal Powders			
Pesticide Chemicals	10-4-85	11-18-85	11-18-88
Metal Molding and Casting	10-30-85	12-13-85	10-31-88

TABLE 2.1 (Continued)

INDUSTRIES SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS
PROPOSED REGULATIONS

<u>Industry Category</u>	<u>Date Issued In Federal Register</u>	<u>Scheduled Promulgation Date</u>
Organic Chemicals and Plastics and Synthetic Fibers	3-21-83	3-86
Plastics Molding and Forming (Phthalates)	(4-86)	(7-87)

¹PSES - Pretreatment Standards for Existing Sources.

²Existing job shop electroplaters and independent printed circuit board manufacturers must comply with only the electroplating regulations. All other electroplating subcategories are now covered by both the electroplating and metal finishing standards.

³Final compliance date for Subparts A,B,L,AL,AR,BA, and BC is July 20, 1980. The compliance date for Subparts AJ,AU,BL,BM,BN, and BO, except for discharges from copper sulfate or nickel sulfate manufacturing operations, is August 22, 1987. The compliance date for discharges from copper sulfate and nickel sulfate manufacturing operations and for all Subparts in Part 415 not previously specified is June 29, 1985.

Prohibited Discharge Standards

Prohibited Discharge Standards apply to all nondomestic sources introducing pollutants into a POTW whether or not the source is subject to other Federal, State, or local pretreatment standards or requirements.

Prohibited Discharge Standards include general prohibitions and specific prohibitions, as described below:

- ° General Prohibitions - Section 403.5(a) generally states that pollutants introduced into a POTW by a nondomestic source shall not pass through the POTW or interfere with operation or performance of the works. This requirement is generic in nature but becomes very important in relation to locally developed limits, described later in this section. In short, local limits are developed by Control Authorities to ensure that the general prohibitions are met by industrial users.
- ° Specific Prohibitions - Section 403.5(b) states that the following pollutants shall not be introduced into any POTW:
 - Pollutants that create a fire or explosion hazard in the POTW
 - Pollutants that will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the system is specifically designed to accommodate such discharges
 - Solid or viscous pollutants in amounts that will cause obstruction to the flow in the POTW, resulting in interference
 - Any pollutant, including oxygen-demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration that will cause interference with the POTW
 - Heat in amounts that will inhibit biological activity in the POTW resulting in interference, but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40°C (104°F), unless the Approval Authority, upon request of the POTW, approves alternative temperature limits.

Again, some of the items above are generic in nature and are more clearly defined by technically based local limits.

Local Limits

Local limits are the mechanism by which general and prohibited discharge standards are applied in a technically based, defensible manner for individual non-domestic users of the POTW system. Generally, these standards consist of

numerical limits on the discharge of toxic metals, cyanide, BOD₅, phenols, oil and grease, and toxic organics. They are normally expressed as maximum limitations and usually apply at the point where the industry discharges to the POTW collection system. Some Control Authorities, however, have both average and maximum values and apply them at the end of industrial processes. The basic philosophy behind locally derived limits is to prevent discharges that contain pollutants which interfere with treatment plant unit processes, which pass through the treatment plant and adversely affect NPDES permit compliance and receiving water quality, and which contaminate sludge to levels that minimize disposal options.

In some cases, locally derived numeric limits will be more stringent than Categorical Pretreatment Standards, because the limits, based on local, site-specific conditions, are necessary to protect the POTW from interference and pass through. The Control Authority is required to enforce the most stringent pretreatment standard against an industrial user. In order for a single maximum local limit to replace a maximum daily and a monthly average (or 4-day) categorical standard, the local limit must be more stringent than both values. If the single maximum local limit is more stringent than the daily maximum contained in a categorical standard but less stringent than the applicable long-term average (4-day or monthly average), then the POTW must enforce the local limit and the long-term average (4-day or monthly). It is also important to realize that local limits are normally applicable at end of pipe while categorical standards apply to the end of a specific (regulated) industrial process. Therefore, it may be necessary to enforce both limits using different monitoring points. Alternatively, the categorical standard may be adjusted to apply at the end of pipe by performing a mass balance which accounts for dilution flows.

2.2.3 Overview of State Regulations

In certain instances, States have enacted State-wide or POTW-specific regulations that can directly or indirectly affect the pretreatment requirements with which an industry must comply. Examples of these situations are discussed below:

- Sludge Disposal Regulations - Many States have sludge disposal regulations that may affect an industrial user in one or two ways:
 - Restrictions on POTW Sludge - If State regulations limit the type and quantity of certain pollutants that may be present in a POTW's sludge for the disposal option practiced by the municipality, local limits for the industry may be necessary in order to maintain an acceptable sludge quality.
 - Restrictions on Industrial Sludge - An industry may generate a sludge as a byproduct of their pretreatment system. State (and Federal) regulations may then apply to the allowable storage, transport, and disposal options available to the industry.

- Water Quality Limitations - Some States are issuing NPDES permits to POTWs that contain limitations for toxic pollutants (especially toxic metals). These NPDES limits for toxic pollutants are usually based on achievement or maintenance of water quality standards that have been calculated for the water body into which the POTW discharges. As with the sludge disposal regulations, the Control Authority may develop local limits for industries to control the industrial input of those pollutants and thereby comply with its NPDES limitations.

2.3 CONTROL AUTHORITY REQUIREMENTS AND RESPONSIBILITIES

A POTW that receives pretreatment program approval becomes the Control Authority and is responsible for:

- Applying pretreatment standards and other requirements to industrial users
- Performing routine industrial user monitoring
- Taking appropriate compliance and enforcement action in cases of noncompliance
- Ensuring industrial user compliance.

The major components of a Control Authority's pretreatment program are discussed below.

2.3.1 Industrial Waste Survey

The industrial community must be accurately identified by the Control Authority. The Industrial Waste Survey (IWS) is generally used to identify and characterize industrial discharges to the POTW treatment plant. The IWS is typically conducted during program development. The four activities that generally comprise the IWS include:

- Compiling a master list of potential industrial users (IUs) located in the POTW service area.
- Surveying each of these industries, usually by means of a questionnaire, to collect the necessary information (i.e., the type of industry and the quality and quantity of the wastewater discharge).
- Conducting on-site industrial inspections to obtain complete and accurate information.
- Summarizing the data for use in developing the pretreatment program. This information includes: the number of industrial users to be regulated, types of industries, pollutants discharged, and volume of waste discharged to the POTW system.

An important component of effective pretreatment program implementation is the periodic updating of the IWS information by the Control Authority to identify new industrial discharges or changes in existing industrial discharges.

2.3.2 Industrial User Monitoring and Enforcement

Compliance monitoring by the Control Authority is essential for the implementation of the pretreatment program. Information collected during industrial monitoring activities provides the basis for compliance and enforcement activities taken by the Control Authority against industrial users who are found to be in violation of pretreatment standards and requirements.

Control Authority compliance activities include monitoring discharges, receiving and reviewing industrial self-monitoring reports, and conducting on-site inspections of industrial facilities. The goals of the Control Authority compliance activities are the following:

- ° Ensure industrial compliance with Federal categorical pretreatment standards
- ° Ensure industrial compliance with local discharge limitations, local ordinances, and industrial user permit provisions
- ° Ensure that required Federal and local self-monitoring and reporting requirements are being met
- ° Maintain accurate knowledge of industrial processes and their potential impact on the POTW.

Control Authority compliance monitoring falls into two general categories:

- ° Monitoring IUs and Their Wastewaters - This is achieved by inspections, sampling, and flow measurement. Sample collection and flow measurement must be performed with proper procedures if the results of the monitoring program are to be valid or useful for purposes of compliance and enforcement activities. Industrial user monitoring is generally performed by the Control Authority and the industry (self-monitoring).
- ° Monitoring the POTW Treatment Plant - The Control Authority determines impacts of industrial discharges on the POTW including assessment of potential pass through or interference with treatment plant operations or sludge disposal. This evaluation is supported by the results obtained from POTW influent, effluent, and sludge sampling and analysis. This data is critical to the development and continual re-evaluation of the local limits and their ability to protect the POTW treatment plant.

The Control Authority has primary responsibility for taking appropriate enforcement action against industrial users who fail to comply with pretreatment standards and requirements. General types of enforcement mechanisms fall into two categories:

- Informal Actions
 - Informal notice to industrial user (e.g., telephone call or meeting)
 - Written notice of violation
 - Establishment of a compliance schedule
- Formal Actions
 - Fines
 - Civil suits
 - Criminal suits
 - Revocation of permit
 - Termination of Service.

2.3.3 Recordkeeping and Reporting Requirements

The Control Authority and industrial users have several recordkeeping and reporting responsibilities. The major requirements for each are described in this section.

Notification to IU

The Control Authority must notify its industrial users of their obligation to comply with federal and local pretreatment standards. The notification should include:

- A list of the applicable pretreatment standards and requirements.
- A requirement for industrial users to sample their discharge(s) and analyze for those pollutants known or suspected to be in waste streams that are limited by a standard. These results must be reported to the Control Authority.
- A statement that requires industrial users to submit compliance schedules if they are not currently in compliance.
- A specific deadline date for the submission of all information.

These requirements are usually set forth in an appropriate control mechanism such as a permit or other form of legally binding agreement between the Control Authority and industrial user. The Control Authority should also notify the IUs through written communications when various reports are due. These reports include compliance schedule progress reports, final compliance reports, self-monitoring reports, or other required submissions.

Control Authority Reports to Approval Authority

The Control Authority may be required to submit an annual report to the Approval Authority which may contain the following information.

- Status of IU compliance
- Identification of enforcement actions taken against significant violators
- Status of general pretreatment program management.

These types of reporting requirements and the information to be included in each report will typically be specified in the NPDES permit where the POTW has a local program. These reports (normally required at least annually) will usually provide important background information to the inspector performing the PCI.

Industrial User Reporting Requirements

The Federal regulations require industrial users subject to categorical pretreatment standards to submit various reports to the Control Authority. The Control Authority is responsible for reviewing, evaluating, and responding to these reports. These reports include:

- Baseline Monitoring Reports (BMRs)
- Compliance Schedule Progress Reports
- Final 90-Day Compliance Reports
- Periodic Compliance Reports
- Notices of Slug Loading.

Baseline Monitoring Reports (BMRs). As a first step in applying pretreatment standards, the Control Authority must have basic data about its industrial dischargers that are subject to the standards. This includes information describing the industry's operation, discharge flow, pollutant type and concentration, whether the IU is in compliance with applicable regulations and, if not, what the IU plans to do to come into compliance within the required time period. The General Pretreatment Regulations, in 40 CFR Part 403.12(b), require every industrial user subject to a Categorical Pretreatment Standard to submit this information in a report within 180 days after the effective date of the applicable standard; this report is commonly referred to as the baseline monitoring report (BMR). The BMR must contain the following information:

- Name and address of the facility, and names of the operator and owners
- List of environmental control permits held by the industrial user
- Description of operations, including the average rate of production, SIC codes, and a schematic process diagram indicating discharge points
- Flow and pollutant measurements
- Certification by an authorized representative of the industry of whether applicable pretreatment standards are being met, and if not, a description of the additional operation and maintenance (O&M) or pretreatment facilities that are needed to comply with the standards
- A schedule by which the industrial user will provide the additional O&M or pretreatment needed to comply with the applicable pretreatment standards.

If an industrial user has already submitted this information during IWS activities or in a permit application and this information is still current, it need not be resubmitted in the BMR. The Control Authority may also require noncategorical IUs (which must meet local standards instead of categorical standards) to submit a similar report, as the information would be useful to the Control Authority.

Compliance Schedule Progress Reports. An IU that is not in compliance with discharge standards and other limitations as indicated in its BMR must develop and submit a compliance schedule of actions enabling it to meet the applicable discharge limitations. Section 403.12(c) of the General Pretreatment Regulations describes the conditions for industrial users required to submit compliance schedules.

90-Day Compliance Reports. This report specifies whether or not the IU has achieved compliance with the applicable Categorical Pretreatment Standard. As specified in Section 403.12(d) of the General Pretreatment Regulations, this report is required from the industry within ninety days following the compliance date of the standard and must include:

- Sampling data for all regulated pollutants
- Flow measurements for regulated wastewaters
- Statement of compliance
- Where necessary, a statement as to whether additional changes or equipment is needed to obtain compliance.

Semi-Annual Compliance Reports. Section 403.12(e) of the General Pretreatment Regulations requires industrial users subject to categorical standards to report the results of self-monitoring of their regulated waste discharges to the Control Authority at least semi-annually, usually during the months of June and December unless otherwise specified by the Control Authority. The reports must indicate the type and concentration of pollutants and include a record of estimated or measured average daily flows.

Notices of Slug Loading. Industrial users are required [40 CFR 403.12(f)] to notify the POTW immediately of any slug loading (e.g., spill, pretreatment system malfunction, etc.) from the user to the POTW. Immediate notification is usually by telephone, and a written follow-up report is usually required within five calendar days.

3. PCI AND AUDIT PROCEDURES

3.1 INTRODUCTION

This Chapter provides guidance for those responsible for conducting pretreatment audits and PCIs. In particular, the purpose of this chapter is to highlight for the auditor or inspector those general procedures that will result in a well-organized and thorough review. The basic procedural elements are similar for an audit and a PCI, consisting of:

- Preparation
- Conducting the audit/PCI
- Documentation and report preparation
- Follow-up response to Control Authority
- Data entry into PCS.

Each of these elements is discussed below in relation to both the audit and the PCI. Although a PCI is usually performed in conjunction with an NPDES inspection, the PCI includes some additional components and procedures which are not covered in other NPDES guidance. These are highlighted in the discussion below.

3.2 PREPARATION

Preplanning is necessary to ensure that the audit or inspection is properly focused and is conducted smoothly and efficiently. This planning should include the following:

- Review of the Control Authority's program status and background information,
- Development of an audit/inspection plan,
- Notification to the Control Authority (optional, but recommended),
- Equipment preparation, and
- Coordination with Region and State.

3.2.1 Review of the Control Authority's Program Status

Collection and analysis of readily available background information on the Control Authority will aid in the effective planning and overall success of the PCI or audit. Materials obtained from Approval Authority files such as the original pretreatment program application, POTW compliance history, annual reports, pretreatment program fact sheet, previous audit or PCI results, etc., will enable the reviewer to become familiar with the Control Authority's program. Reviewing the pretreatment program status and background information will allow Approval Authority personnel to identify any key issues before the site visit and to utilize the time spent during the site visit efficiently by requesting only updates or verification of previously-submitted information.

Appendix C contains a fact sheet which can be used to summarize background information that should be available to the auditor or inspector prior to conducting the site visit. This information may be located throughout Approval Authority files or may already be summarized in a similar format as the result of a previous audit or PCI. Completion of a fact sheet in preparation for an audit is strongly recommended. A fact sheet has been incorporated in the audit checklist as Section II. The fact sheet should be updated each time that an audit is performed. For a PCI, on the other hand, the inspector should limit preparation to review of an already-completed fact sheet, if possible. The use of a fact sheet facilitates a comparison of the

POTW's approved program requirements with the POTW's operating practices. The fact sheet summarizes the commitments made by the POTW in its approved program submission and any pretreatment requirements in the POTW's permit or other enforceable documents. Thus, the fact sheet provides a basis for determining whether the POTW is implementing its pretreatment program as approved.

3.2.2 Development of an Audit or Inspection Plan

This manual sets forth recommended procedures and checklists for conducting the PCI or audit. Should it be necessary for the auditor or inspector to deviate from the suggested approach, development of a written plan is recommended. The plan should define the objectives of the activity, the tasks required to fulfill the objectives, and the schedule. For example, sampling of the POTW treatment plant or selected IUs will not be a regular part of an audit or PCI, but may be necessary in some cases to verify such things as POTW compliance with sludge disposal regulations or IU compliance with applicable discharge limitations. An audit/inspection plan generally addresses the following items:

- ° Objectives
 - What is the purpose of the audit or inspection (i.e., investigative, enforcement action support, or problem identification or correction)?
 - What is to be accomplished (e.g., area of the Control Authority's program to be evaluated or specific concerns to be addressed)?
- ° Tasks
 - What information must be collected to fulfill the objectives?
 - What tasks are to be completed?
- ° Procedures
 - What procedures are to be used?
 - Will the audit/PCI require special procedures?
- ° Resources
 - What will be the time requirements and order of activities?
 - What will be the milestones?
- ° Coordination
 - What coordination with laboratories or other regulatory agencies is required?

These issues are addressed by this guidance for the suggested approach.

3.2.3 Notification to the Control Authority

Notification is recommended so Control Authority personnel are available at the time of the audit or inspection. However, Approval Authorities may find prior notification less advantageous for PCIs than for audits. Notification, if provided, should be written. The inspector/auditor should request that the infor-

mation necessary for the evaluation be compiled or developed prior to the site visit. Information that may be requested includes a list of all significant industrial users (SIUs) that are currently in noncompliance, the duration of noncompliance and description of the action(s) the POTW has taken against each IU to secure compliance.

In addition, the notification should request information regarding on-site safety requirements in the event a facility inspection or sampling is performed during the visit, especially when an IU will be sampled.

3.2.4 Equipment Preparation

Some safety equipment may be required at certain industries. In general, only safety glasses will be needed, but in some instances hard hats and/or safety shoes may also be necessary. The Control Authority inspection personnel should know what equipment will be required and either the POTW or the industry may have equipment available for the use of the inspection team.

In most cases, safety and sampling equipment will not be required unless the review of the program status or background information indicates a need for sampling of the POTW or selected IUs. In the event sampling is necessary, the appropriate equipment should be prepared according to the particular sampling needs. Consult the standard procedures in the EPA NPDES Compliance Inspection Manual for more specific information.

3.2.5 Coordination with Region and State

Regardless of whether the State or EPA is the Approval Authority, both parties may wish to be present at the audit/PCI. Adequate time and notification should always be given to encourage both State and EPA staff participation. When the State is the Approval Authority, the State should play the lead role in conducting the audit/PCI. Regions should accompany State personnel on initial audits/PCIs and provide only periodic review after the Regions are satisfied with the States' performance.

3.3 ENTRY PROCEDURES

3.3.1 Arrival

Arrival at the facility should be during normal working hours unless circumstances require otherwise. The pretreatment program contact should be located immediately upon arrival. If the review team is at the Control Authority to perform other NPDES inspections, each program contact or official should be informed of the team's arrival.

3.3.2 Presentation of Credentials

When the pretreatment program contact has been located, the review team members should be introduced and present their credentials. In the case of a PCI, the credentials must be presented to the pretreatment program contact, even if the inspector has already done so in the context of another NPDES inspection conducted at the Control Authority that same day.

3.3.3 Consent

For a PCI, specific consent to conduct the PCI should be obtained from the pretreatment program contact in order to avoid possible confusion between the various inspections conducted at the Control Authority.

3.3.4 Problems with Entry or Consent

The auditor/inspector should respond to problems with entry or consent in the manner detailed in NPDES inspection guidance.

3.4 OPENING CONFERENCE

Once credentials have been presented and legal entry has been established, the review team can proceed to outline the audit/inspection plans with the pre-treatment program contact. The opening conference should include discussion of the purpose of the visit, the authorities under which the audit/inspection is being conducted, and the procedures that will be followed. In addition to the information that is normally discussed with facility officials during the opening conference of an NPDES inspection, the PCI inspector should discuss any considerations unique to a PCI. This conference should include at least an overview of the checklist, the reviewer's intent to review files of specific IUs, and any other elements necessary to make the determinations required by the checklist and the audit/PCI plan.

3.5 DOCUMENTATION

Documentation is a general term referring to all print and mechanical media produced, copied, or taken to provide evidence of suspected violations or to support the conclusions of the audit/inspection. Types of documentation include the completed audit or PCI checklist, field notebook, statements, photographs, drawings and maps, printed matter, mechanical recordings, and copies of permits and records. All PCI documentation should be obtained in the same manner as other NPDES inspections.

The auditor/inspector should provide strong documentary support of discrepancies uncovered during an audit/inspection. Documentation serves to "freeze" the actual conditions existing at the time of the audit or inspection so that evidence may be examined objectively at a later date by permits and compliance personnel.

The basis of all documentation relating to the POTW's pretreatment program is the checklist which provides accurate and inclusive documentation of all pretreatment activities. It will form the documentary basis for all determinations made by the reviewer. The reviewer should document the source(s) of the response to each question in the checklist.

3.6 TOUR OF THE POTW (Optional)

Since an audit (or, in some cases, a PCI) may be conducted independently of an NPDES inspection, the review team may wish to tour the treatment plant to observe plant operations and identify any visible effects of industrial discharges on unit processes. During the tour, the team should:

- Evaluate laboratory capabilities
- Note any unusual wastewater characteristics or plant operations which could be the result of industrial discharges, such as:
 - Unusual odor
 - Unusual discoloration
 - Excessive/unusual corrosion of equipment, structures
 - Excessive oil and grease
 - Biological upsets (excessive foaming, sludge bulking, excessive trickling filter sloughing, low gas production in digesters)

- By-passing of slug loads/accidental discharges of toxic or high strength wastes
- ° Note any processes/equipment not on-line, and causes
- ° Note sampling points.

If unusual conditions are noted which are not representative of normal, well-run operations, the team should:

- ° Photograph the unusual conditions (if possible)
- ° Discuss observations with POTW staff
- ° Determine the history and cause of the unusual condition(s)
- ° If industrial discharges are the suspected cause, attempt to identify the specific industry(ies)
 - Determine if industry is in compliance with discharge limits and requirements
- ° Discuss corrective measures, if needed
- ° Note recommendations for follow-up (possibly schedule an NPDES inspection).

3.7 VISITS TO LOCAL INDUSTRIES (Optional)

Accompanying POTW staff on a visit to a local industry is a valuable source of information about the POTW's inspection procedures and its knowledge of its IUs. It is important to converse with POTW staff actually involved in IU inspections, rather than the pretreatment program director. If an IU is selected for a visit, it is recommended that the IU's file be reviewed during the PCI/audit in order to determine whether the information contained in the files is consistent with the observations made during the IU visit. The industry visits may be used to:

- ° Evaluate POTW procedures for:
 - Site inspection
 - Sampling of industrial process wastestreams
 - Gaining access to an industrial site
 - Documenting a sampling event
- ° Evaluate POTW inspectors'
 - Knowledge of categorical standards, the location of regulated process lines, and industrial compliance status
 - Relationship with industry officials
 - Safety precautions

- ° Provide support to the POTW's requests for submission of industrial reports and compliance with discharge standards
- ° Inform industries of EPA's or the State's continued oversight role in the pretreatment program.

The procedures for industry visits are flexible. They may be conducted in a very structured manner, and directed toward specific problems, or the Approval Authority may wish to simply set ground rules and then follow the POTW inspector's lead. They may also simply evaluate the communication between the POTW and the industry. The approach must be determined on a case-by-case basis. The approach should be discussed with the POTW personnel prior to the IU visit.

3.8 CLOSING CONFERENCE

Control Authority personnel are usually anxious to discuss the findings of the audit/inspection prior to the review team's departure. A closing meeting or conference should be held for the presentation and discussion of preliminary findings. This closing meeting is also an ideal time for final questions and details to be resolved. The inspector/auditor should be prepared to discuss general follow-up procedures (transmittal of findings to Approval Authority personnel, etc.) that will occur. The final meeting should be used as an opportunity to request the compilation of data or information that was not available at the time of the visit. Closing conference discussion should be guided by rules established by the Regional Administrator or State Director regarding permittee contacts in the Region/State.

3.9 REPORT PREPARATION

The adequacy of follow-up to correct problems or deficiencies noted during a PCI or audit depends in large part on the report package prepared by the inspector. The material must be organized and arranged in a manner that will allow compliance and permits personnel to make maximum use of the information.

The objective of the report is to organize and coordinate all relevant information and evidence in a comprehensive, usable manner. To meet this objective, information in an audit or inspection report must be:

- ° Accurate. All information must be factual and based on sound inspection practices. Observations should be the verifiable result of firsthand knowledge.
- ° Relevant. Information should be pertinent to the subject of the report.
- ° Comprehensive. Suspected violations should be substantiated by as much factual, relevant information as is feasible to gather.
- ° Coordinated. All information pertinent to the subject should be organized into a complete package. Documentary support (e.g., photographs, statements, sample documentation, etc.) accompanying the report should be clearly referenced to the checklist so that anyone reading the report will get a complete, clear overview of the situation.

Although specific information requirements for an audit or inspection report will vary, most reports will contain the same basic elements:

- Completed Form 3560-3 (or equivalent)
- Copy of completed checklist
- Supplementary narrative information
- Documentary support.

Form 3560-3. The NPDES Compliance Inspection Report Form 3560-3 (see Appendix D) is a standard cover sheet that is completed after an NPDES inspection and incorporated into the final inspection report. This form accommodates a pre-treatment code to indicate that an audit or PCI was performed. This form or its equivalent must be prepared to provide for data entry into PCS. Instructions for completing this form are contained in memoranda from J. William Jordan and Martha G. Prothro which are found in Appendix A.

PCI and Audit Checklists. The checklists are provided in Chapters 4 and 5. Each checklist gives a detailed item-by-item discussion of the information that must be considered when planning and conducting a PCI or audit. The checklist will aid the reviewer in performing the PCI or audit and will serve as the basic documentation of results.

Supplementary Narrative Information. Supplementary narrative information will generally be included on the checklist. When a narrative report is necessary to describe results more fully, the contents of the supplemental report should focus on supporting or explaining the findings in the checklist and may include recommendations for follow-up actions.

Documentary Support. All documentation that is produced or collected to provide evidence of suspected violations should be included as a part of the checklist. Types of documentation include statements, photographs, drawings and maps, printed matter, mechanical recordings, and copies of permits and records. A specific example of important documentation might be a series of repeated violations as documented in an industrial user's file, yet a complete lack of any compliance action by the POTW. Copies of the monitoring results will document that the repeated violations existed and the absence of any documented follow-up action by the POTW will indicate the Control Authority's neglect.

3.9.1 Schedule for Report Submission

The report containing the results of the PCI or audit should be submitted to the appropriate permits and compliance personnel. A complete report should be submitted within 30 days if sampling was not performed during the site visit. Where sampling was included as part of either the audit/PCI or the NPDES portion of the inspection, a complete report should be submitted within 45 days.

3.10 DATA ENTRY INTO PCS

As indicated previously, the PCI or audit report must include Form 3560-3 and the information must be entered into PCS to receive credit in the Strategic Planning and Management System (SPMS). If the State enters data into PCS directly, a form equivalent to Form 3560-3 may be used if it at least contains the same data elements as Form 3560-3. In either case, data entry of information related to the PCI/audit should be completed within 90 days of the date of the event.

3.11 FOLLOW-UP RESPONSE TO THE CONTROL AUTHORITY

3.11.1 PCI

After the compliance evaluation or enforcement office receives the complete PCI report from the inspector, that office should review the PCI report to determine: 1) whether the PCI identified violations of applicable pretreatment regulations and pretreatment-related NPDES permit requirements, and 2) whether other deficiencies exist which are not in violation of pretreatment regulations or NPDES permit requirements but render the Control Authority's pretreatment program less effective.

Unless violations or deficiencies are noted during the PCI which are considered to be of such significance that formal enforcement action should be undertaken against the Control Authority, compliance personnel should forward to the Control Authority a copy of Section IV (Summary Evaluation Section) of the completed PCI checklist and a letter listing the Control Authority's violations or deficiencies (if any) noted during the PCI. The compliance person and the inspector should jointly review Section IV of the completed PCI checklist and the follow-up letter prior to mailing.

The follow-up letter should clearly distinguish between violations of regulatory and/or permit requirements as compared to deficiencies which should be remedied to improve pretreatment program implementation. This follow-up letter should request that the Control Authority submit a written description of proposed corrective actions within 15 days of receipt of the letter. Appendix B presents a sample of such a follow-up letter.

However, if the PCI does reveal significant violations which warrant formal enforcement action against the Control Authority, it is strongly recommended that neither the follow-up letter as described above nor the summary evaluation be sent to the Control Authority. Instead, a formal enforcement approach (e.g., Administrative Order, warning letter, Consent Agreement, etc.) should be followed.

Upon review of the information contained in the PCI report, compliance personnel may identify a need to obtain additional information from the Control Authority by such means as 308 letters, audits, additional NPDES inspections, etc., before making a decision regarding the need for enforcement action. In such instances, a follow-up response to the Control Authority beyond requests for additional information may be withheld at the discretion of compliance personnel, pending the receipt of such additional information.

3.11.2 Audit

As with the PCI, a letter transmitting the findings and recommendations of the audit should be sent to the Control Authority. It should be sent to the POTW manager (e.g., Director of Public Works), mayor or city manager with a copy sent to the local pretreatment contact. The letter should clearly distinguish between violations of regulatory and/or permit requirements as compared to deficiencies which should be remedied to render the Control Authority's pretreatment program more effective. The sample follow-up letter in Appendix B is equally applicable to a PCI or an audit.

When it is sent to the POTW, the transmittal letter may be accompanied by a completed copy of the audit checklist and/or a narrative report. The narrative report would critically evaluate each element of the program as it was assessed in the checklist, based on both the program as it was approved and the effectiveness of the element as it has been implemented. The Approval Authority has flexibility

in deciding whether to send the entire checklist, just the summary and evaluation portion of the checklist, or a narrative report to the POTW. In many cases, a letter to the POTW containing the audit findings and recommendations may be sufficient.

Depending on the findings and observations, other follow-up activities may be necessary, such as:

- Issue an administrative order requiring the POTW to respond to the audit findings within a definite time period
- Modify the NPDES permit to include a compliance schedule containing specific conditions and requirements
- Modify the approved program
- Schedule future audits or pretreatment compliance inspections to determine if audit findings have been implemented
- Initiate enforcement action against the POTW and/or industrial users.

There is a need for close coordination between pretreatment auditors and pretreatment compliance inspectors to avoid duplication of efforts. Because of the subjectivity inherent in any review, auditors and inspectors should work very closely together and discuss their findings before an official report is forwarded to the POTW, particularly when separate visits are planned by each in the same year. Every attempt should be made to avoid the possibility of conflicting reports being filed which would be misleading to the POTW as well as potentially adversely affecting any enforcement action.

4. PRETREATMENT COMPLIANCE INSPECTION (PCI) CHECKLIST

The PCI checklist was developed primarily to assist NPDES inspectors in performing the inspection, but will also serve as the documentation for PCI findings. The checklist is organized into four sections:

- Control Authority Background Information
- Evaluation of Compliance Monitoring and Enforcement - Control Authority Personnel Response
- Evaluation of Compliance Monitoring and Enforcement - IU File Review
- Summary Evaluation.

Overall, the checklist questions are designed to be self-explanatory, which is particularly helpful to NPDES inspectors who are just being introduced to the PCI. The first Section represents a summary of background information. The second Section of the checklist relies upon Control Authority personnel responses which would be given to the NPDES inspector during an informal interview. The third Section of the checklist is completed based on an intensive review of selected industrial user files. The focus of Section II is to evaluate a Control Authority's efforts to determine and ensure industrial user compliance with pretreatment standards and requirements and to ascertain the level of information which management has about the pretreatment program. The file review found in Section III provides the opportunity to verify information provided during the interview and to assess the effectiveness of the procedures used to manage the pretreatment program. The file review covers:

- Industrial user inspection frequency
- Control Authority sampling of industrial user effluents
- Status of IU permits or other control mechanisms
- Industrial user self-monitoring and reporting frequency
- Nature and frequency of violations
- Type and effectiveness of Control Authority compliance actions
- Overall adequacy of Control Authority files and documentation.

The fourth Section of the PCI checklist represents a summary evaluation which the inspector will complete in conjunction with EPA Regional or State pretreatment program staff. It includes needed follow-up actions which are identified as either required or recommended.

The inspector should have a basic knowledge of the Control Authority's approved program and NPDES permit requirements relating to pretreatment prior to conducting the PCI. Additionally, the inspector should be aware of the Control Authority's treatment facilities and compliance history. The sources of this background information will include EPA and State files, the Control Authority's pretreatment program submission, annual reports, previous audits or PCIs, etc. In most cases, important background information should have been extracted from these various sources and summarized on a "Fact Sheet", particularly in those cases where a pretreatment program audit has been previously performed. The "Fact Sheet" has been recommended for completion prior to the first pretreatment program audit and should be updated on

subsequent audits. It can also be updated as a result of a PCI at the discretion of the Region or State. If the "Fact Sheet" has not been completed previously, the inspector may wish to complete it prior to conducting the PCI. Appendix C of this guidance contains the "Fact Sheet" which can be used to record specific information about the Control Authority.

In the following pages, the discussion of the intent and use of the PCI checklist appears on the left hand pages (even numbered) with the corresponding portion of the checklist appearing on the right hand pages (odd numbered).

4.1 CONTROL AUTHORITY BACKGROUND INFORMATION

Section I of the PCI checklist summarizes key information about the Control Authority and its pretreatment program. Section I should be completed before the inspection using information from the POTW program file and/or the Fact Sheet which may have been prepared previously. The information should then be confirmed during the conference. Additionally, the inspector should consult pretreatment program personnel to determine if the scope or focus of the PCI should be modified to address specific compliance questions.

4.1.1 GENERAL CONTROL AUTHORITY INFORMATION

Part A summarizes background information about the Control Authority, including NPDES permit information, previous audits or PCIs and the Control Authority's pretreatment program contact. Where applicable, the NPDES permit language and Approval Authority enforcement documents (administrative order, consent decree, etc.) would be attached to the completed PCI checklist.

CONTROL AUTHORITY PRETREATMENT COMPLIANCE INSPECTION (PCI) CHECKLIST

Date(s) of PCI: _____

Inspector(s) Name(s): _____

Control Authority Representatives: _____

SECTION I: CONTROL AUTHORITY BACKGROUND INFORMATION

A. General Control Authority Information

1. Control Authority Name: _____

2. Mailing Address: _____

3. Is the Control Authority currently operating under any consent decree, administrative order or other enforcement action that specifies pretreatment requirements or affects the Control Authority's pretreatment program? Yes _____ No _____
If yes, attach a copy.

4. Date of last PCI/Audit: _____ Circle Type: PCI Audit

5. Date of last Control Authority Report to Approval Authority: _____

6. Pretreatment Contact Name: _____

Title: _____

Telephone: _____

Section I Completed By: _____ Date: _____

4.2 COMPLIANCE MONITORING AND ENFORCEMENT PROCEDURES--CONTROL AUTHORITY PERSONNEL RESPONSE

Sections II and III of the PCI checklist primarily deal with the Control Authority's application of pretreatment standards and evaluation of the Control Authority's compliance and enforcement activities. Section II is completed from direct responses by Control Authority personnel, while Section III will entail a detailed review of selected industrial user files to evaluate the effectiveness and appropriateness of the Control Authority's:

- Control mechanisms
- Inspection and monitoring procedures
- Compliance and enforcement procedures.

4.2.1 Control Authority Pretreatment Program Overview

The inspector will obtain background information about the Control Authority's pretreatment program in Part A, prior to discussion about the Control Authority's compliance monitoring and enforcement program. If the Approval Authority desires more detailed information about the Control Authority's program, the "Fact Sheet" in Appendix C may be used and verified during this preliminary discussion.

4.2.2 Control Authority Pretreatment Program Modifications

Part B requires the inspector to inquire about any significant changes made to the Control Authority's pretreatment program since approval (or the last PCI or audit, whichever occurred last). The inspector should briefly describe these changes on a separate sheet and indicate on the checklist if the proposed changes were submitted to the Approval Authority for approval. Please note that the inspector should advise the Control Authority that all program modifications must be submitted to the Approval Authority for approval. Listed below are some examples of changes which a Control Authority might make to its approved program:

- Legal Authority
 - modified sewer use ordinance
 - incorporation of new jurisdictions/interjurisdictional agreements
- Control Mechanism Modification
 - modified provisions of IU permits
- Local Limits
 - revision of existing local limits
- Resources
 - change in personnel commitments
 - budget reallocations.

SECTION II. COMPLIANCE MONITORING AND ENFORCEMENT--CONTROL AUTHORITY
PERSONNEL RESPONSE

A. Control Authority Pretreatment Program Overview

1. How many industrial users (IUs) are currently identified by the Control Authority in each of the following groups?

_____ industries subject to categorical pretreatment standards
 _____ significant* noncategorical industrial users
 _____ other noncategorical industrial users
 _____ TOTAL

2. The Control Authority has defined "significant" industrial user to mean: _____

3. Approximately what percent of the total wastewater flow to the POTW treatment plant(s) is from the industrial users? _____ %

4. During the past year, has the Control Authority experienced any sludge contamination or problems in the collection system or at the treatment plant created by discharges from nondomestic sources?

Yes _____ No _____

If yes, describe: _____

B. Control Authority Pretreatment Program Modifications

1. Has the Control Authority made any changes to its pretreatment program from that stated in its approved pretreatment program submission, since the last PCI or audit? (Check below those program elements that have changed and briefly describe each on a separate sheet.)

<u>Program Element Changed</u>	<u>Submitted for Approval</u>	
	<u>Yes</u>	<u>No</u>
_____ Legal Authority	_____	_____
_____ Control Mechanism Implementation	_____	_____
_____ Local Limits	_____	_____
_____ Inspection and Monitoring Program	_____	_____
_____ Enforcement Program	_____	_____
_____ Resources	_____	_____

4.2.3 Control Authority Inspection and Sampling of Industrial Users (IUs)

The General Pretreatment Regulations [40 CFR Part 403.8(f)(2)(v)] require Control Authorities to carry out inspection and sampling procedures to determine whether IUs are in compliance or noncompliance with applicable pretreatment standards and requirements. Control Authority inspections and sampling serve specific, individual purposes. Sampling, and flow measurement if necessary, are used to determine if an industry is in compliance with pollutant limitations at a given time. A properly conducted industrial inspection should include a review of records and the treatment facility and provides a different assessment for the Control Authority such as:

- Determination of industrial process changes that may impact pollutant load
- Review of IU monitoring records
- Operational status of pretreatment equipment
- Evaluation of the potential for spills
- Development of a working rapport with the IU.

This portion of the checklist evaluates whether the Control Authority has performed inspection and sampling at each Significant Industrial User (SIU) consistent with its approved program and/or NPDES permit and whether it has inspected and sampled at least once a year. (EPA recommends that each SIU be inspected and sampled at least once a year.) Industries whose discharge is likely to interfere with treatment plant operations or ones with a poor compliance history should be on more frequent inspection and sampling schedules than those SIUs that discharge compatible wastes or demonstrate continued compliance.

C. Control Authority Inspection and Monitoring of Industrial Users

1. Was each categorical and noncategorical significant industrial user inspected by the Control Authority:

- a) At least once in the past year? Yes No
b) In accordance with the frequency required in the NPDES permit or approved program?
 Yes No

2. Was each categorical and noncategorical significant industrial user sampled by the Control Authority:

- a) At least once in the past year? Yes No
b) In accordance with the frequency required in the NPDES permit or approved program?
 Yes No

3. What percentage of SIUs were not sampled or inspected at least once in the past year?

Total Number of SIUs Sampled Inspected

[At the discretion of the Approval Authority and the NPDES inspector, the names of significant industrial users that have not been sampled and inspected within the last year can be attached to this PCI.]

4. Does the Control Authority's basic inspection of an industrial user consist of:

- | | | | | |
|--|--------------------------|-----|--------------------------|----|
| ° Inspection of the manufacturing facilities? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| ° Inspection of the pretreatment facilities? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| ° Inspection of chemical storage areas? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| ° Inspection of chemical spill prevention areas? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| ° Inspection of hazardous waste storage areas? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| ° Inspection of the sampling procedures? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| ° Inspection of laboratory procedures? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |
| ° Inspection of the monitoring records? | <input type="checkbox"/> | Yes | <input type="checkbox"/> | No |

5. Are categorical IUs required to perform sampling and submit self-monitoring reports as follows:

- a) At least twice per year? Yes No
b) In accordance with the frequency in the approved program or NPDES permit?
 Yes No

6. Are significant noncategorical IUs required to perform sampling and submit self-monitoring reports? Yes No

What is the range of sampling frequencies?

4.2.4 Control Mechanism Evaluation

Section 403.8(f)(2)(iii) of the General Pretreatment Regulations requires Control Authorities to have the legal authority to control each IU's discharge through some type of "control mechanism." The most commonly used type of control mechanism is the industrial user permit, although the Control Authority may choose to use some other mechanism such as a contract or an ordinance. Like the NPDES permit, the IU permit is tailored to each industrial user and specifies pretreatment standards and requirements with which the IU must comply. This portion of the checklist examines whether all significant industrial users (SIUs) are covered by a control mechanism and whether the Control Authority has incorporated Categorical Pretreatment Standards as they are promulgated. In Section III, the file review, the inspector will actually examine the control mechanism to see whether it covers the essential elements.

D. Control Mechanism Evaluation

1. Is each significant industrial user covered by an existing, unexpired permit, contract, or other control mechanism?

_____ Yes _____ No

2. If not, what percent of the SIUs are not covered by a control mechanism? _____

Briefly explain why all SIUs are not covered by a control mechanism: _____

3. Are SIU permits modified to reflect changes to the Categorical Pretreatment Standards and the General Pretreatment Regulations within three months of the change?

_____ Yes _____ No

4.2.5 Enforcement Procedures

In the event of IU noncompliance, the Control Authority must take necessary action to bring an IU back into compliance within the shortest possible time frame. Generally, this portion evaluates whether the Control Authority does the following:

- Has reviewed IU self-monitoring reports to determine compliance status
- Has a current knowledge of the compliance status of all IUs
- Has taken effective enforcement action, and
- Has established an enforcement response guide.

The Control Authority must have procedures to review all data that relates to the compliance of its IUs. This review must compare information from self-monitoring, inspection, and compliance schedule progress reports to the appropriate requirements. The Control Authority must know when reports are due, what monitoring is required, and what results are acceptable. The inspector does not need to know all of these details, but he does need to determine whether the appropriate Control Authority personnel know and understand these requirements.

The Control Authority should have procedures for responding to IU violations. The "Pretreatment Compliance Monitoring and Enforcement Guidance" recommends that the Control Authority develop an enforcement response guide which identifies the possible enforcement responses for a particular violation. While all Control Authorities may not yet have developed such a document, the Control Authority should have developed an approach to determining appropriate enforcement response which provides for escalation when compliance is not achieved.

This checklist uses the definition of "significant noncompliance" identified in the "Pretreatment Compliance Monitoring and Enforcement Guidance" as the basis for measuring performance. That definition has not yet been finally adopted, but a final definition will be in place by the beginning of FY 1987. Where the Region/State currently uses a different definition for identifying that noncompliance which is considered to be significant, the NPDES inspector may apply the Regional/State definition.

4.2.6 Compliance Tracking

Part F of Section II is intended to determine if the Control Authority has mechanisms in place to regularly track and document the compliance status of its industrial users.

F. Compliance Tracking

1. Does the Control Authority maintain an individual record or file on each significant industrial user which includes compliance information (i.e., monitoring data, IU reports, notices of violation, etc.)?
_____ Yes _____ No

2. Does the Control Authority maintain a management system (manual or computerized) to track IU compliance status?
_____ Yes _____ No

Section II Completed By: _____ Date: _____

4.3 COMPLIANCE MONITORING AND ENFORCEMENT - IU FILE EVALUATION

This Section of the PCI checklist will help the inspector to evaluate the validity of the data developed thus far in the inspection by verifying whether or not the prescribed procedures have been followed in the case of a particular industrial user. The inspector will select a random but representative number of significant industrial user files to perform this evaluation. The inspector should review at least five SIU files or 10 percent of the total number of SIU files. At least two of the files reviewed should be for categorical IUs and at least 2 should be SIUs identified as being in significant noncompliance. In the case of large Control Authorities, review of 10 SIU files will probably be adequate instead of 10 percent. Conversely, for small Control Authorities there may be less than five SIUs; in this case, it is suggested that all the SIU files be reviewed.

Complete and current industrial user files should at least contain copies of the following information:

- IU permit application
- Fully executed and current IU discharge permit or other appropriate control document
- IU reports (i.e., baseline monitoring report)
- On-site inspection reports
- Monitoring results (both Control Authority and IU self-monitoring)
- Compliance schedule, if applicable
- Telephone log
- All correspondence between the Control Authority and IU, including notices of violations, enforcement actions, etc.

From this information, the inspector can assess the adequacy of the Control Authority's monitoring program, assess the compliance of selected industrial users and determine if the Control Authority's pretreatment program is being effective in identifying noncompliance and achieving IU compliance. This file review will allow the inspector to:

- Evaluate the Control Authority's control mechanism
- Determine if pretreatment standards are being properly applied to IUs
- Assess the Control Authority's monitoring and inspection program (i.e., frequency, completeness, documentation)
- Determine whether the Control Authority is responding to noncompliance on a timely basis.
- Assess the compliance of specific IUs with applicable pretreatment standards
- Evaluate the Control Authority's overall recordkeeping system, and
- Collect documentation on IU noncompliance or situations where the Control Authority is not exercising adequate compliance/enforcement response.

The checklist provides the inspector with specific questions to determine the adequacy of the Control Authority's activities as demonstrated by the industrial user files. If the SIU files do not document a Control Authority's monitoring and inspection activities, it is possible that the Control Authority's efforts might be misrepresented by the files. This will not normally be the case, but may be an area for discussion in the close-out interview. This Section allows the inspector to record his findings on 5 IU files. Additional copies of this Section of the checklist may be used where more than five files will be reviewed. Appropriate narrative comments should be recorded on the supplemental comment sheet with the industry name and address.

4.3.1 File Contents

The Control Authority must maintain complete and accurate files on each SIU to effectively track and document compliance history. At all times Control Authority personnel must have ready access to well-organized information. For each selected SIU file, the NPDES inspector should find each of the items shown on the checklist in Part A.

4.3.2 Control Mechanism Evaluation

Each SIU permit or other control mechanism should contain requirements that are tailored to the SIU. The NPDES inspector will evaluate the control mechanism and determine whether it contains most of the essential elements of an effective control mechanism.

SECTION III: COMPLIANCE MONITORING AND ENFORCEMENT - IU FILE EVALUATION

The inspector should select a representative number of significant industrial user files to perform the file evaluation. The inspector should review at least five SIU files or 10 percent of the total number of significant industrial users. At least 2 of the files reviewed should be for categorical IUs and at least 2 should be SIUs identified as being in significant noncompliance. In the case of large Control Authorities, review of 10 SIU files will probably be adequate instead of 10 percent. Evaluate the contents to determine if the appropriate response to each of the following questions is yes (mark with an "X") or none or no (mark with an "O"). Numerical responses are also required in some cases. Appropriate narrative comments should be recorded in Section F.

FILE EVALUATION CRITERIA	<u>File 1</u>	<u>File 2</u>	<u>File 3</u>	<u>File 4</u>	<u>File 5</u>
A. <u>File Contents</u>					
1. Does the IU file contain:					
a) Completed IWS questionnaire?	_____	_____	_____	_____	_____
b) IU permit application?	_____	_____	_____	_____	_____
c) IU reports (BMR, 90 day report, etc.)?	_____	_____	_____	_____	_____
d) Discharge permit?	_____	_____	_____	_____	_____
e) Sampling results?	_____	_____	_____	_____	_____
f) Chain of custody forms?	_____	_____	_____	_____	_____
g) IU self-monitoring results?	_____	_____	_____	_____	_____
h) Correspondence?	_____	_____	_____	_____	_____
i) Telephone log?	_____	_____	_____	_____	_____
j) Inspection Report(s)?	_____	_____	_____	_____	_____
k) Is the IU in Compliance?	_____	_____	_____	_____	_____
B. <u>Control Mechanism Evaluation</u>					
1. Is the IU discharge permit, contract, etc. current (unexpired)?	_____	_____	_____	_____	_____
2. Does it contain applicable discharge limitations?	_____	_____	_____	_____	_____
3. Are types of samples (grab or composite) for self-monitoring specified?	_____	_____	_____	_____	_____

4.3.3 IU Compliance Evaluation

The review of an IU file will allow the inspector to evaluate the frequency of the Control Authority's inspection and sampling efforts over the past year. The inspector will also determine if all the pollutant parameters specified in the control mechanism were evaluated during the Control Authority's sampling events and whether the type of samples used (i.e., grab, composite) are appropriate and will reflect the discharge characteristics. The inspector will also evaluate whether there is adequate documentation in the inspection and sampling reports to support enforcement actions. The purpose of these questions is to determine if the Control Authority is undertaking the necessary activities to determine IU compliance.

4.3.4 IU Self-Monitoring Evaluation

Part D of this section of the checklist requires the inspector to determine if monitoring reports were submitted to the Control Authority by the industrial user and to determine if the proper parameters were evaluated. Unless specifically required by the IU permit or other control mechanism, only categorical industrial users are required by the General Pretreatment Regulations to submit semiannual periodic compliance reports. The control mechanism should be reviewed by the inspector, specifically for IU self-monitoring and reporting requirements, to determine if all the required reports have been submitted during the past year.

4.3.5 Control Authority Enforcement Initiatives

The NPDES inspector must review the monitoring records to identify violations of pretreatment standards. Where such violations exist, the inspector should note how quickly the Control Authority took action. The Control Authority should always notify an IU of a violation of a pretreatment standard or requirement. This notice should preferably be in writing but may be verbal as long as an adequate record of the notification exists. The inspector also should determine if the enforcement response was escalated by the Control Authority if noncompliance continued or recurred until compliance was achieved.

4.3.6 Narrative Comments

The last page of Section III allows the inspector to identify the actual files that were reviewed and record any appropriate comments that arise during the file evaluation.

FILE EVALUATION CRITERIA

File 1 File 2 File 3 File 4 File 5

B. Control Mechanism Evaluation (Cont.)

- 4. Is sample location(s) identified? _____
- 5. Are applicable IU self-monitoring and reporting requirements specified? _____

C. IU Compliance Evaluation

- 1. Within the last twelve months:
 - a) How many inspections of this IU were performed by the Control Authority? _____
 - b) How many Control Authority sampling visits were performed? _____
- 2. Were all the parameters specified in the control mechanism evaluated? _____
- 3. Will the type of samples used accurately reflect discharge characteristics? _____
- 4. Does the IU inspection report have adequate documentation to support potential enforcement actions? Did it include the following:
 - a) Date and time of inspection? _____
 - b) Name of company official contacted? _____
 - c) Verification of production and flow rates, if needed? _____
 - d) Problems with pretreatment facilities? _____
 - e) Problems with monitoring equipment and techniques? _____
 - f) Identification of sources and types of wastewater (regulated, unregulated, dilution flow, etc.)? _____

5. Did the sampling report for the IU include:

- a) Sampling methods used? _____
- b) Wastewater flow at time of sampling? _____
- c) Sample custody procedures? _____
- d) Determination of results for all parameters? _____

D. IU Self-Monitoring Evaluation

- 1. Did the IU report on all required parameters in the control mechanism? _____
- 2. Did the IU comply with the reporting frequency required in the control mechanism? _____
sampling frequency? _____

E. Control Authority Enforcement Initiatives

- 1. Did the Control Authority identify all IU violations:
 - a) in Control Authority monitoring results? _____
 - b) in IU self-monitoring results? _____
- 2. Was the IU notified of all violations? _____
- 3. Was follow-up compliance/enforcement action taken by the Control Authority? _____
- 4. Did the Control Authority's action result in the IU achieving compliance within three months? _____

F. Narrative Comments

FILE 1

Industry Name _____ File/ID No. _____

Industry Address _____

Type of Industry _____ IU Flow: _____ SIC: _____

Comments: _____

FILE 2

Industry Name _____ File/ID No. _____

Industry Address _____

Type of Industry _____ IU Flow: _____ SIC: _____

Comments: _____

FILE 3

Industry Name _____ File/ID No. _____

Industry Address _____

Type of Industry _____ IU Flow: _____ SIC: _____

Comments: _____

FILE 4

Industry Name _____ File/ID No. _____

Industry Address _____

Type of Industry _____ IU Flow: _____ SIC: _____

Comments: _____

FILE 5

Industry Name _____ File/ID No. _____

Industry Address _____

Type of Industry _____ IU Flow: _____ SIC: _____

Comments: _____

Section III Completed By: _____ Date: _____

4.4 SUMMARY EVALUATION OF CONTROL AUTHORITY PRETREATMENT PROGRAM

The summary evaluation checklist is provided as a mechanism for the inspector to record and evaluate his/her observations as well as a convenient means for transmitting information back to the Control Authority. The format allows the inspector to evaluate the facts collected and to make judgments about the adequacy of the Control Authority's pretreatment program. Since the NPDES inspector is normally a fact finder and may not have a complete understanding of the pretreatment program, the summary evaluation should be reviewed by program personnel and concurred in before it is sent to the Control Authority. There may be some situations in which the Approval Authority may choose not to transmit this summary evaluation to the Control Authority. In particular, this might be the case where an enforcement action is contemplated and transmission of this information might hinder the case.

4.5 SUPPORTING DOCUMENTATION

During the course of the PCI, the Inspector is asked to collect information which will be attached to the completed PCI checklist. As a reminder to the Inspector, an Attachment Cover Sheet is included that can be checked-off as information is collected during the PCI. If the Control Authority is notified of the inspection in advance, the inspector may wish to request this documentation at that time.

SECTION IV: SUMMARY EVALUATION OF CONTROL AUTHORITY PRETREATMENT PROGRAM

A. Control Authority Monitoring and Inspection

Is the Control Authority's monitoring program adequate to accurately identify SIU noncompliance consistently?

_____ Yes _____ No

Explain: _____

B. IU Self-Monitoring

Does the Control Authority receive regular (at least semiannual) self-monitoring reports from its categorical industrial users?

_____ Yes _____ No

Explain: _____

C. Control Mechanisms

Has the Control Authority administered pretreatment standards and requirements through an effective permit system or other control mechanism? _____ Yes _____ No

Explain: _____

D. Control Authority Enforcement

When violations occur, does the Control Authority routinely notify the SIU of the violation and escalate the enforcement response if violations continue?

_____ Yes _____ No

Explain: _____

Do the Control Authority's enforcement actions usually result in SIU compliance within three months? _____ Yes _____ No

Explain: _____

Does the Control Authority have a good understanding of the compliance status of all its SIUs at any given point in time? _____ Yes _____ No

Explain: _____

E. Follow Up Actions:

Record any recommendations for follow-up activity with the Control Authority below. Distinguish between those actions by the Control Authority which are required to comply with pretreatment requirements and those which are recommended to improve the effectiveness of the pretreatment program.

F. Other Findings

Do the findings of the PCI support the statements made in the Control Authority's last annual report to the Approval Authority?
_____ Yes _____ No

Explain: _____

Record any other pertinent findings from the PCI below:

Note: The inspector should attach necessary documentation to this completed checklist as requested throughout the PCI checklist.

Inspector Signature(s)

Date of Report

DOCUMENTATION
FOR
PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

- _____ Example of any enforcement action (i.e., administrative order) containing pretreatment findings or requirements (I.A.)

- _____ Description of significant changes to the Control Authority's pretreatment program (II.B.)

- _____ Names of IUs that have not been sampled or inspected within the last year (II.C.) - OPTIONAL

- _____ List of SIUs not in compliance, duration of noncompliance, and type of action taken by the Control Authority (II.E.)

- _____ Control Authority procedures that define appropriate enforcement response for IU violations (II.E.)

- _____ Annual list of significant violators (II.E.)

- _____ Other documentation (i.e., copies of Control Authority file information to support Inspector findings. List the additional supporting documentation below).

5. PRETREATMENT PROGRAM AUDIT CHECKLIST

5.1 INTRODUCTION

A checklist has been prepared to assist with the performance of pretreatment audits. The recommended checklist is both detailed and comprehensive since audits represent a relatively new activity, and the Agency wants to ensure that:

- o Audits are complete.
- o Audits accomplish the desired objectives.

The audit checklist is contained in section 5.3 of this chapter. It contains ten sections, each of which is discussed below.

5.2 OVERVIEW OF THE AUDIT CHECKLIST

5.2.1 Checklist Cover Page

The cover page is used to record the date of the on-site inspection, the audit participants, and the name of a principal reviewer. The principal reviewer would be the primary person whose judgement is involved in completion of the checklist. This person must necessarily be a representative of the Approval Authority.

5.2.2 Section I: Control Authority Background Information

This section of the checklist summarizes general information about the POTW, its wastewater treatment facilities, and the results of the last audit or PCI. The section is purposefully brief because detailed information about the Control Authority is often already on file and available to the auditor. Because the auditor must know the general characteristics of the POTW treatment plant(s), particularly when evaluating local limits, a section requiring information on each treatment plant is included. Once Section I has been completed as part of the first audit, it will always be available for future audits and PCIs and will require only minor updating.

5.2.3 Section II: POTW Pretreatment Program Fact Sheet

The fact sheet summarizes the POTW's approved pretreatment program requirements. It should be completed prior to the on-site audit. The approved program requirements may be contained in several documents, including the NPDES permit, the original pretreatment program submission, enforcement orders, and letters sent by the Approval Authority to the POTW officially acknowledging or approving program modifications. Part A of the fact sheet is an inventory of all such documents comprising the approved pretreatment program. The rest of the fact sheet provides a description of the approved program and is completed based on the documents listed in Part A. The fact sheet will help the auditor to determine whether the POTW is implementing its pretreatment program as approved. The fact sheet should be updated before each audit or PCI if there have been any changes in the approved program requirements.

5.2.4 Section III: Legal Authority and Control Mechanism

This section of the checklist evaluates the POTW's basic legal authority and mechanisms to effectively control users within and outside its primary jurisdiction. Regardless of the fact that the POTW's legal authority was reviewed during program approval, the POTW's sewer use ordinance, regulations, etc., may need to be reevaluated, as approved control mechanisms when implemented sometimes prove to be ineffective. This reevaluation is particularly important during the first audit.

5.2.5 Section IV: Application of Pretreatment Standards

This portion of the checklist solicits an in-depth evaluation of:

- o The POTW's efforts to identify, characterize, and notify industrial users
- o The POTW's application of categorical pretreatment standards and local limits to its industrial users
- o The technical basis for the POTW's local limits
- o The effectiveness of the pretreatment standards to prevent interference, pass through, and sludge contamination.

The auditor should determine whether the POTW has sound procedures for notifying users, updating the industrial waste survey, and administering the control mechanism. Deficiencies in these areas may indicate that the POTW should develop formal, written procedures. In addition, it is important that a detailed review of IU permits (or other control mechanisms) be carried out to ensure they are correctly written. If limits are not correctly applied in the permits, the POTW may be falsely reporting IU compliance. Permit application forms and other relevant forms should also be examined.

5.2.6 Section V: Compliance Monitoring

Section V of the checklist summarizes the results of discussions with POTW personnel about their compliance monitoring activities, such as POTW monitoring and inspection frequencies, inspection procedures, sampling protocol, and IU self-monitoring requirements. Since Section V relies primarily on extemporaneous POTW personnel responses, this section also gives a good evaluation of the POTW's depth of understanding of its industrial community.

5.2.7 Section VI: Enforcement

This portion of the checklist summarizes the results of discussions with POTW personnel about their enforcement procedures. It evaluates the POTW's compliance tracking system and enforcement management strategy. The section generally asks for the POTW's response to instances of IU noncompliance, the names of significant users that the POTW has determined are not in compliance, and the types of enforcement actions used by the POTW.

5.2.8 Section VII: Data Management and Public Participation

Section VII evaluates the POTW's efforts to effectively manage data and involve the public, where appropriate.

5.2.9 Section VIII: Program Resources

This section assists the reviewer in determining if the POTW has adequate personnel, equipment, and funding to operate the pretreatment program. Differences between the current resource and funding levels and those levels that are required by the approved program are noted. The reviewer is also asked to make judgements about the adequacy of the current resources.

5.2.10 Section IX: POTW File Review

The file review portion of the checklist will evaluate many of the same pretreatment program elements discussed in Sections V and VI, except it will rely on a different source of information. Industrial user files will be reviewed to determine the extent to which the POTW is conducting compliance monitoring and taking enforcement actions.

This file review will allow the reviewer to:

- o Evaluate the POTW's control mechanism
- o Determine if categorical pretreatment standards are being applied properly
- o Assess the POTW's monitoring and inspection program (i.e., frequency, completeness, documentation)
- o Predict the overall compliance rate of IUs with pretreatment standards
- o Evaluate the POTW's overall recordkeeping system.

The checklist contains specific questions to determine the adequacy of the POTW's activities as demonstrated by the industrial user files. This section of the checklist allows the reviewer to record findings on five IU files. Additional copies of this section of the checklist may be used where it is necessary to review more than five IU files. Appropriate narrative comments may be recorded on the supplemental comment sheet with the industry name and address.

5.2.11 Section X: Evaluation and Summary

Section X contains several questions which prompt the auditor to evaluate the information collected in the checklist Sections III through IX on each POTW pretreatment program element. Several items require the auditor to provide a yes/no answer about the adequacy of these elements. The auditor should use his/her best professional judgement for these items, basing this judgement on the effectiveness of the program as it has been implemented. This section of the checklist also contains several questions designed to address the POTW's compliance with the requirements of the General Pretreatment Regulations. Citations to specific regulatory provisions are provided and the auditor can indicate whether or not the POTW meets each basic provision.

Finally, Section X enables the auditor to summarize the key findings of the audit and to recommend follow-up actions on the part of the POTW. It is important that the audit summary distinguish between those actions the POTW is

required to take based on the General Pretreatment Regulations, the terms of its NPDES permit, or its approved program and those actions which are recommended to the POTW as good practices to improve its program. Accordingly, space is provided for the auditor to identify areas in which the POTW's pretreatment program does not fully comply with either regulatory, NPDES permit, or approved program requirements and to suggest necessary corrective actions. An example would be, "POTW is not enforcing T10 standards for metal finishers. Required Action: Immediately notify IUs of noncompliance and notify Approval Authority of plans and schedule for appropriate enforcement response." Space is also provided to address needs for improvements in the pretreatment program's adequacy and effectiveness. Each program area which is not adequately implemented and the recommended POTW actions to correct the deficiencies may be noted by the auditor. An example is, "The POTW's enforcement procedures and policies vary on a case-by-case basis and are not based on a documented enforcement management strategy. Suggested Action: Develop a formal, written enforcement response strategy to use as a consistent guide for enforcement activities and submit to Approval Authority for review."

Section X of the checklist is useful in preparing the audit findings and recommendations which are sent to the POTW. It aids the auditor to distinguish between regulatory or permit requirements and program effectiveness issues. This distinction between findings of POTW noncompliance and other recommendations for program improvements should be followed in the letter that is sent to the POTW containing the audit conclusions.

5.5.12 Supporting Documentation for Audit Checklist

During the course of the audit, the auditor is asked to collect information which will be attached to the completed checklist. As a reminder to the auditor, an attachment cover sheet is included that can be checked off as information is collected during the audit. If the Control Authority is notified of the audit in advance, the auditor may wish to request this documentation ahead of time.

5.3 AUDIT CHECKLIST

The complete checklist for performing POTW pretreatment program audits follows.

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

CHECKLIST CONTENTS:

- ___ Section I: Control Authority Background Information
- ___ Section II: POTW Pretreatment Program Fact Sheet
- ___ Section III: Legal Authority and Control Mechanism
- ___ Section IV: Application of Pretreatment Standards
- ___ Section V: Compliance Monitoring
- ___ Section VI: Enforcement
- ___ Section VII: Data Management and Public Participation
- ___ Section VIII: Program Resources
- ___ Section IX: POTW File Review
- ___ Section X: Evaluation and Summary
- ___ Attachments: Supporting Documentation for Audit Checklist

POTW NAME: _____

DATE(S) OF ONSITE REVIEW: _____

Participants:

	<u>Name</u>	<u>Title</u>	<u>Organization</u>	<u>Phone Number</u>
1)	_____			
	(Principal Reviewer)			
2)	_____			
3)	_____			
4)	_____			
5)	_____			
6)	_____			

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION I: CONTROL AUTHORITY BACKGROUND INFORMATION

INSTRUCTIONS: Complete background information prior to on-site audit.

A. General Information:

1) Name of Permittee: _____

2) Mailing Address: _____

3) Pretreatment Contact Name: _____

Title: _____

Telephone: _____

4) Frequency of POTW pretreatment program reporting to Approval Authority (e.g., annually, quarterly): _____

5) Date of last POTW pretreatment program report: _____

6) Date of last PCI/Audit: _____ Circle type: PCI Audit

7) Comments on results of last PCI/Audit and last pretreatment program report:

8) Number of treatment plants: _____

NPDES permit number(s)

Plant name(s)

SECTION I: CONTROL AUTHORITY BACKGROUND INFORMATION (Continued)

B: POTW Treatment Plant Information

(Complete this section for each treatment plant operated under NPDES permit by the POTW)

1) Name of Treatment Plant: _____

2) Location Address: _____

3) NPDES Permit Number: _____ Expiration Date: _____

4) POTW Treatment Plant Wastewater Flow

Design Daily Average (Dry Weather): _____ mgd

Actual Daily Average (Dry Weather): _____ mgd

Design Peak: _____ mgd

5) Sewer System: _____ % Separate _____ % Combined

6) Percent Industrial Flow: _____ %

7) Level of Treatment:

8) Type of Process(es):

Primary _____

Secondary _____

Tertiary _____

9) Method of Sludge Disposal:

10) Quantity of Sludge:

_____ Land Application _____ dry tons/yr.

_____ Incineration _____ dry tons/yr.

_____ Landfill _____ dry tons/yr.

_____ Public Distribution _____ dry tons/yr.

_____ Other (specify) _____ dry tons/yr.

11) Receiving Stream Name: _____

12) Stream Classification: _____

13) 301(h) Waiver Applied for: ___ Yes ___ No, Granted: ___ Yes ___ No

Date of Application: _____

Date Approved or Denied: _____

14) If the treatment plant is not in regular compliance with its NPDES permit, list the parameters commonly violated and the suspected cause(s):

Parameters Violated	Cause(s)
_____	_____
_____	_____
_____	_____

Section I Completed By: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET

INSTRUCTIONS: Complete entire Fact Sheet prior to on-site audit. Parts B thru H should be completed based on the approved program documents identified in Part A.

A. Inventory of Documents Comprising the Approved Pretreatment Program

1) Original Pretreatment Program Submission Approval Date: _____

2) Does NPDES permit contain pretreatment requirements or conditions?
_____ Yes _____ No

If yes, attach a copy of NPDES pretreatment conditions (e.g., reporting requirements, implementation requirements, etc.).

3) List in chronological order all program modification requests. Indicate whether request was contained in a letter, annual report, or other, and whether request was approved, denied, or not yet acted upon.

Date of Request	Where Contained	Brief Description of Nature of Request	Approval Authority Response and Date
_____	_____	_____	_____
_____	_____	_____	_____

4) Is the POTW currently operating under any consent decree, administrative order or other document which contains pretreatment program requirements?
_____ Yes _____ No

If yes, attach copy.

B. Legal Authority and Control Mechanism

1) POTW authority to implement and enforce pretreatment standards and requirements is contained in (cite legal authority):

Date Enacted/Adopted _____

2) Are all Industrial Users (IUs) located within the jurisdictional boundaries of the POTW? _____ Yes _____ No

If no, what type of legal agreement provides the authority to enforce pretreatment standards in outlying jurisdictions?

_____ interjurisdictional agreement
_____ contracts with IUs
_____ other (describe): _____

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

- 3) If a multijurisdictional situation exists, do the approved program documents specify who should have lead responsibility for carrying out each aspect of the pretreatment program in the outlying jurisdiction?
____ Yes ____ No ____ N/A

If yes, identify who undertakes the following (POTW or outlying jurisdiction):

establishing local limits _____
issuing IU control documents _____
receiving reports (BMRs, etc.) _____
sampling and analysis _____
inspections of IUs _____
compliance tracking _____
enforcement _____
pretreatment program administration _____

- 4) What IU control mechanisms are intended to be used by the POTW?

_____ permits
_____ contracts
_____ orders
_____ sewer use ordinance (SUO) only
_____ other (describe): _____

- 5) According to the approved program documents, approximately how many IU permits or other control documents were intended to be issued by the POTW? _____

- 6) How often are the control documents intended to be reissued? _____

C. Industrial User Characterization

- 1) How many IUs were identified in each of the following groups?

_____ categorical IUs
_____ significant* noncategorical IUs
_____ other regulated** noncategorical IUs
_____ other nondomestic users
_____ TOTAL

*The POTW has defined "significant" IU to mean: _____

** By "other regulated" IUs is meant IUs that the POTW surcharges, inspects, controls through a permit, or otherwise regulates, but which are not considered significant for purposes of the pretreatment program.

The POTW's "other regulated" IUs include: _____

- 2) Does the POTW intend to update its industrial waste survey (IWS)? ____ Yes ____ No How often? _____

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

D. Local Limits

- 1) Does the program submission indicate historical problems caused by IU discharges?
 - _____ inhibition/upset (describe) _____
 - _____ pass through (describe) _____
 - _____ sludge (describe) _____
 - _____ other (describe) _____

- 2) Attach a copy of the local limits contained in the approved program submission _____ attached
 _____ no local limits exist

- 3) How were the local limits derived?
 - _____ technical basis (describe) _____
 - _____ preexisting in ordinance, basis unknown
 - _____ other (describe) _____

- 4) Does the POTW's NPDES permit(s) contain limits or monitoring requirements for any toxic/priority pollutants? _____ Yes _____ No
 If yes, list pollutants: _____

If yes, how many analyses per year for:

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>
metals	_____	_____	_____
organics	_____	_____	_____
bicmonitoring		_____	
EP toxicity			_____

E. Standards and Requirements for Industrial Users

- 1) Do the approved program documents indicate that the POTW has IUs subject to any of the following requirements (indicate approximate number, if known):

	<u>Yes</u>	<u>No</u>	<u>Approximate Number</u>
a. combined wastestream formula	_____	_____	_____
b. production-based categorical standards	_____	_____	_____
c. total toxic organic (TTO) limits	_____	_____	_____
d. solvent management plans	_____	_____	_____

- 2) Does the POTW have approval to grant removal credits to categorical IUs? _____ Yes _____ No If yes, list parameters: _____

- 3) Does the POTW have a spill prevention and control plan to address toxic discharges from IUs? _____ Yes _____ No

- 4) Does the program include procedures for accepting hazardous wastes by truck, rail, or dedicated pipeline? _____ Yes _____ No _____ N/A

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

- 5) Does the program include procedures for notifying IUs of Resource Conservation and Recovery Act (RCRA) obligations? Yes No

F. Compliance Monitoring

- 1) Does the program submission establish a proposed frequency for conducting:

	<u>Minimum Frequency (times/yr/IU)</u>	
	<u>Categorical</u>	<u>Significant Noncategorical</u>
<u> </u> onsite IU inspections	<u> </u>	<u> </u>
<u> </u> POTW monitoring of IUs	<u> </u>	<u> </u>
<u> </u> self-monitoring by IUs	<u> </u>	<u> </u>
<u> </u> reporting by IUs	<u> </u>	<u> </u>

G. Enforcement

- 1) Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance:

- notice or letter of violation
 establishment of IU compliance schedule
 revocation of permit
 injunctive relief
 fines; maximum amount: \$ /day/violation
 criminal penalties
 termination of service

- 2) Does the program submission highlight any particular IUs as being problem dischargers?

<u>IU Name</u>	<u>Reason</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

H. POTW Resources

- 1) How many full-time equivalents (FTEs) will be committed to the POTW's pretreatment program? FTEs
 (An FTE is sometimes referred to as a man-year. For example, two persons working half-time all year are equivalent to one FTE.)

- 2) Which of the following equipment is to be available for pretreatment program implementation? Indicate the number of units where possible.

	<u>Number</u>
<u> </u> vehicle(s)	<u> </u>
<u> </u> automatic sampler(s)	<u> </u>
<u> </u> flow meter(s)	<u> </u>
<u> </u> portable pH meter(s)	<u> </u>
<u> </u> gas detector(s)	<u> </u>
<u> </u> self contained breathing unit(s)	<u> </u>
<u> </u> other safety equipment (describe) <u> </u>	<u> </u>

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

3) How does the POTW intend to fund the pretreatment program?

	Percent of Total Funding
____ POTW general operating fund	_____
____ IU permit fees	_____
____ monitoring charges	_____
____ industry surcharges	_____
____ other (describe) _____	_____
<u>Total</u>	<u>100%</u>

4) What is the total estimated level of annual funding required to implement the POTW pretreatment program?

\$ _____ /year

Other Supporting Comments:

SECTION II Completed By: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION III. LEGAL AUTHORITY AND CONTROL MECHANISM

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Legal Authority

- 1) Is the POTW's current legal authority (i.e., sewer use ordinance) the same as that in the approved program? Yes No

If no, provide reasons for any changes: _____

If no, highlight the changes (deletions, additions and changes) on a copy of the ordinance, rules, regulations, etc. and attach them to the checklist.

- 2) Has the POTW experienced any practical difficulty implementing and enforcing the provisions of its Sewer Use Ordinance (SUO) or other legal authorities? Yes No

If yes, briefly explain: _____

B. POTW Jurisdiction

- 1) Is the current jurisdictional situation the same as that documented in the approved program? Yes No

If no, briefly describe any changes: _____

- 2) If all contracts or agreements necessary to regulate IUs in outlying jurisdictions were not officially enacted at the time the program was approved, have they since been enacted? Yes No N/A

- 3) Have procedures been implemented in outlying jurisdictions which adequately address the following:

<input type="checkbox"/> Updating industrial waste survey	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Notification of IUs	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Permit issuance	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Receipt and review of IU reports	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Inspection and sampling	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Analysis of samples	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Enforcement	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Briefly describe any deficiencies: _____

SECTION III: LEGAL AUTHORITY AND CONTROL MECHANISM (Continued)

C. Control Mechanism

- 1) Is the POTW implementing the approved control mechanism (i.e., IU discharge permit system, contracts, etc)? Yes No

If no, explain: _____

- 2) Do all of the required IUs have current (unexpired) control documents?
 Yes No

If no, explain: _____

Give number control documents issued/number required: _____ / _____

Give number currently expired: _____

- 3) If the control mechanism is an ordinance only, how are IUs notified of what specific standards and requirements they must meet?

- 4) Does the POTW have a control mechanism for regulating IUs whose wastes are trucked to the POTW? Yes No
 N/A

Describe the control mechanism: _____

Other Supporting Comments:

Section III Completed by: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Industrial User Characterization

- 1) How often has the POTW updated its Industrial Waste Survey (IWS) to identify new IUs or changes in wastewater discharges? _____

Method used to update survey:

- _____ review of newspaper/phone book
_____ review of plumbing/building permits
_____ permit reapplication requirements
_____ onsite inspections
_____ review of water billing records
_____ other (describe) _____

- 2) Give the current number of IUs of each of the following types:

- _____ # categorical IUs
_____ # significant noncategorical industries
_____ # other regulated noncategorical IUs
_____ # other nondomestic users
_____ TOTAL

- 3) Is the POTW's definition of "significant" IU the same as in the approved program? ____ Yes ____ No

If no, explain: _____

- 4) How are categorical IUs identified and categorized? _____

- 5) Have any new IUs been added since the original IWS which are capable of causing interference or pass through or contribute significantly to the treatment plant's toxic loading? ____ Yes ____ No

If yes, specify: _____

- 6) Have any new IUs been added since the original IWS which are located in outlying jurisdictions where the POTW has no interjurisdictional agreements or IU contracts? ____ Yes ____ No

If yes, specify: _____

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS (Continued)

B. Local Limits

- 1) Has the POTW made (or proposed) any changes to its local limits which have not been approved? Yes No

(Note that any changes to local limits should be submitted and approved before adoption.)

Describe any unapproved changes (attach copy): _____

- 2) What was the principal reason for changing or proposing to change limits? _____

- 3) Did the POTW technically evaluate the need for local limits for at least the following six pollutants (See EPA Memorandum, "Local Limits Requirements for POTW Pretreatment Programs," August 5, 1985):

	<u>Headworks Analysis Completed?</u>	<u>Local Limits Adopted?</u>	
		<u>Yes</u>	<u>No</u>
<input type="checkbox"/> Cadmium	_____	_____	_____
<input type="checkbox"/> Chromium	_____	_____	_____
<input type="checkbox"/> Copper	_____	_____	_____
<input type="checkbox"/> Lead	_____	_____	_____
<input type="checkbox"/> Nickel	_____	_____	_____
<input type="checkbox"/> Zinc	_____	_____	_____

- 4) Was site-specific monitoring data used in the calculations? Yes No N/A

If yes, indicate types of site-specific data used:

sampling data: influent effluent sludge
 ambient receiving water monitoring data
 biomonitoring data
 priority pollutant analyses
 other (specify) _____

- 5) How did the POTW identify pollutants of concern other than the basic six metals and evaluate the need for local limits for them? _____

- 6) If there is more than one treatment plant, were the local limits established specifically for each plant? Yes No N/A

- 7) Have there been instances of treatment plant inhibition/upsets during the past year? Yes No

If yes, briefly describe: _____

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS (Continued)

8) Does the POTW attempt to determine if such inhibition/upsets are related to industrial wastes and to trace the problem to the IU?
 Yes No N/A

9) Have there been instances of pass through the past year?
 Yes No

If yes, briefly describe: _____

10) If any NPDES permit violations have been caused by discharges of high-strength conventional wastes, what measures are being taken to correct the problem?

11) Have POTW workers experienced industrial waste related injuries or illnesses? Yes No

If yes, explain: _____

12) How many times were the following monitored for toxics during the past year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>
metals	_____	_____	_____
organics	_____	_____	_____
biomonitoring	_____	_____	_____
EP toxicity	_____	_____	_____

13) Has monitoring at the treatment plant shown a noticeable change in whole effluent toxicity or in the quantity of metals or toxic organics in influent, effluent or sludge? Yes No

If yes, provide details: _____

C. Standards and Requirements for Industrial Users

1) Has the POTW notified its industrial users of the pretreatment standards and requirements they must meet? Yes No

2) Does the POTW compare local limits against federal categorical standards and apply the most stringent standards to categorical IUs?
 Yes No N/A

3) Is the method of remaining abreast of categorical regulations adequate to ensure that the POTW is prepared to properly implement categorical standards? Yes No N/A

4) For industries with combined wastestreams, is the combined wastestream formula being correctly applied? Yes No N/A

SECTION IV: APPLICATION OF PRETREATMENT STANDARDS (Continued)

- 5) For IUs subject to production-based standards, do limitations in control documents incorporate them properly?
_____ Yes _____ No _____ N/A
- 6) Are all applicable local, State, and federal standards included in control documents issued to IUs? _____ Yes _____ No
- 7) Are TTO standards or alternatives (solvent management plans or oil & grease monitoring) being implemented for IUs subject to TTO limitations?
_____ Yes _____ No _____ N/A
- 8) If the POTW has removal credits authority, is it correctly granting removal credits to IUs? _____ Yes _____ No _____ N/A
- 9) If applicable, is the POTW maintaining its approved removal credits efficiency? _____ Yes _____ No _____ N/A
- 10) Has the POTW notified IUs of RCRA obligations?
_____ Yes _____ No
- 11) Are all applicable categorical standards and local limits applied to IUs whose wastes are trucked in to the POTW?
_____ Yes _____ No _____ N/A
- 12) If any of the answers to questions 1-12 are "no", briefly explain:

- 13) List below any available EPA guidance materials which the POTW does not have, but should have: _____

Other Supporting Comments:

Section IV Completed by: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION V: COMPLIANCE MONITORING

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Inspection and Monitoring

1) What is the current frequency (attach schedule, if available) for:

	#times/year/IU	
	Categorical	Significant Noncategorical
1. POTW sampling of IUs	_____	_____
2. POTW inspections of IUs	_____	_____
3. IU self-monitoring	_____	_____
4. IU reporting	_____	_____

2) Are the monitoring and reporting frequencies the same as those described in the approved program?

	Frequency			Reason for change
	same	less	greater	
1. POTW sampling of IU	___	___	___	_____
2. POTW inspections of IUs	___	___	___	_____
3. IU self-monitoring	___	___	___	_____
4. IU reporting	___	___	___	_____

3) The following question is optional, at the discretion of the Approval Authority. If any significant or categorical IUs were either not sampled or not inspected within the last year, then list the IUs and provide a reason. (attach additional pages if necessary)

Name of IU	Reason	Date Inspection/ Sampling is Planned
_____	_____	_____
_____	_____	_____
_____	_____	_____

4) Are composite samples used to evaluate compliance with categorical standards when appropriate? ___ Yes ___ No ___ N/A

5) Does the POTW sample for all regulated pollutants? ___ Yes ___ No

6) Are samples split with industrial personnel:
 o if requested? ___ Yes ___ No
 o if necessary to verify IU self-monitoring results? ___ Yes ___ No

7) Are chain-of-custody procedures employed (attach copy of chain of custody form, if available)? ___ Yes ___ No

8) Do all sampling and analytical procedures conform to EPA methodologies (including 40 CFR Part 136)? ___ Yes ___ No

SECTION V: COMPLIANCE MONITORING (Continued)

- 9) Indicate where the following pollutant analyses are performed (i.e., inhouse laboratory, contract laboratory, etc.) and method used (AC, GC, GC/MS, wet chemistry, etc.):

metals _____
cyanide _____
organics _____

- 10) Is a QA/QC program implemented for sampling? _____ Yes _____ No
for analysis? _____ Yes _____ No
- 11) How much time normally elapses between sample collection and obtaining analytical results? _____
- 12) Is the Control Authority prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. readily available)?
_____ Yes _____ No

Briefly describe any deficiencies in demand monitoring capabilities.

- 13) Are sampling location, techniques, preservatives, etc., clearly detailed for sampling personnel before they take a sample? _____ Yes _____ No

Briefly describe any deficiencies in the ability to perform routine compliance monitoring.

- 14) Do the POTW's inspections of IUs consist of:

- | | | |
|---|-----------|----------|
| <input type="checkbox"/> Inspection of manufacturing facility? | _____ Yes | _____ No |
| <input type="checkbox"/> Inspection of chemical storage areas? | _____ Yes | _____ No |
| <input type="checkbox"/> Evaluation of hazardous waste generation? | _____ Yes | _____ No |
| <input type="checkbox"/> Inspection of spill prevention and control procedures? | _____ Yes | _____ No |
| <input type="checkbox"/> Inspection of pretreatment facilities? | _____ Yes | _____ No |
| <input type="checkbox"/> Inspection of IU sampling procedures? | _____ Yes | _____ No |
| <input type="checkbox"/> Inspection of lab procedures? | _____ Yes | _____ No |
| <input type="checkbox"/> Inspection of monitoring records? | _____ Yes | _____ No |

B. IU Self-Monitoring and Reporting

- 1) Are categorical IUs required to sample for all pollutants regulated in the categorical standards? _____ Yes _____ No _____ N/A
- 2) Does the POTW routinely review the periodic IU self-monitoring reports and compare the results to the applicable pretreatment standards?
_____ Yes _____ No _____ N/A

SECTION V: COMPLIANCE MONITORING (Continued)

- 3) Have the following reports been received from all categorical IUs for which the due date has passed?

	<u>Number Received</u>	<u>Number Required</u>
Baseline Monitoring Reports (BMRs)	_____	_____
Compliance Schedule Milestone Reports	_____	_____
90-Day Final Compliance Reports	_____	_____
Periodic Self-Monitoring Reports	_____	_____

Is the information contained in these reports analyzed and verified by the POTW? _____ Yes _____ No _____ N/A

- 4) Are IUs required to report spills, slug discharges, etc., to the POTW? _____ Yes _____ No

- 5) If the answer to any of questions (1)-(4) is no, briefly explain:

Other Supporting Comments:

Section V Completed by: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION VI: ENFORCEMENT

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

- 1) Estimate the number of IUs that are currently in significant noncompliance with pretreatment standards and whether noncompliance results from lack of pretreatment facilities or O&M problems.

	Number of IUs In Non-Compliance		
	Total	Lack of Treatment	O&M
a) Noncompliance with Categorical Standards	_____	_____	_____
b) Noncompliance with Local Limits	_____	_____	_____

- 2) Estimate the number of IUs that are currently in significant non-compliance with:

	Number of IUs in Noncompliance
a) Self-Monitoring Requirements	_____
b) Reporting Requirements	_____

- 3) Approximately how many (or what percent) of all the IUs were subject to any kind of enforcement action during the last 12 months? _____

- 4) Indicate whether the following types of compliance/enforcement actions have been used by the POTW during the past 12 months:

	Yes	No
Verbal warning	_____	_____
Written notice or letter of violation	_____	_____
Issue compliance schedule	_____	_____
Revoke permit	_____	_____
Consent decree	_____	_____
Civil penalties (fines)	_____	_____
Criminal penalties	_____	_____
Termination of service	_____	_____
Injunction relief	_____	_____
Other (Specify) _____	_____	_____

- 5) Has the Control Authority used any unusual enforcement techniques that are effective which other POTWs could benefit by knowing about?
 Yes No

If yes, briefly describe: _____

- 6) Has the POTW published an annual notice of significant violators (40 CFR 403.8(f)(2)(vii))? Yes No

- 7) Does the POTW require the development of compliance schedules when installation of pretreatment facilities or additional O&M is necessary for an IU to achieve compliance with applicable pretreatment standards?
 Yes No

SECTION VI: ENFORCEMENT (Continued)

8) How many IUs are currently on compliance schedules? _____

Have any of these IUs been allowed more than 3 years from the effective date of a categorical standard or local limit to achieve compliance?

_____ Yes _____ No

If yes, provide details: _____

9) Have all New Source Categorical IUs been compliant from the first day of discharge? _____ Yes _____ No _____ N/A

10) Does the control authority have procedures that define the appropriate enforcement response and time frames to initiate the response for different types and patterns of IU violations? _____ Yes _____ No (if yes, attach a copy).

11) Provide the following information for all significant industrial users (SIUs) currently in significant noncompliance (Attach additional pages if necessary.):

<u>Name of SIU</u>	<u>Date of 1st Violation</u>	<u>Enforcement Action Taken to Date</u>	<u>Date of Action</u>
--------------------	------------------------------	---	-----------------------

The POTW's annual report may include this information. The appropriate sections of the report may be updated and substituted for the listing described above.

Other Supporting Comments:

Section VI Completed by: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION VII: DATA MANAGEMENT AND PUBLIC PARTICIPATION

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Data Management

- 1) Are files/records? computerized hard copy both
- 2) Does POTW have an ample source of technical documents for implementing its pretreatment program? Yes No
- 3) Does the POTW keep apprised of current regulations? Yes No
If yes, describe how: _____
- 4) Are data on permit issuance and compliance status readily available? Yes No
- 5) Are inspection and sampling records well organized and readily retrievable? Yes No
- 6) Can IU monitoring data be retrieved by:
 - Industry name Yes No
 - Pollutant type Yes No
 - Industrial category or type Yes No
 - SIC code Yes No
 - IU discharge volume Yes No
 - Geographic location Yes No
 - Receiving treatment plant (i.e., if there is more than one plant in the system) Yes No
 - Other (specify) _____
- 7) Are all records maintained for at least 3 years? Yes No

B. Public Participation

- 1) Are program records available to the public? Yes No
- 2) Have IUs requested that data be held confidential? Yes No
- 3) Does the POTW have provisions to address confidentiality? Yes No
- 4) Has public comment been solicited during revisions to the SUO and/or local limits [403.5(c)(3)]? Yes No N/A
- 5) Are there significant public or community issues impacting the POTW's pretreatment program? Yes No
If yes, please explain: _____

Section VII Completed by: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION VIII: PROGRAM RESOURCES

INSTRUCTIONS: Complete during on-site audit based on POTW interview.

A. Personnel and Equipment

- 1) Does the POTW have the same or greater resources (full time equivalents and equipment) than was stated in the submission?
_____ Yes _____ No

If no, describe the nature of the reduced resources: _____

- 2) Are an adequate number of personnel available for the following program areas:

- | | | | | |
|--|-------|-----|-------|----|
| o IU sampling | _____ | Yes | _____ | No |
| o IU sample analyses | _____ | Yes | _____ | No |
| o IU inspections | _____ | Yes | _____ | No |
| o Administration (including recordkeeping/
data management) | _____ | Yes | _____ | No |
| o Legal | _____ | Yes | _____ | No |
| o Data analysis, review and response | _____ | Yes | _____ | No |

- 3) Do available personnel have appropriate training? _____ Yes _____ No

- 4) Is the available sampling equipment adequate? _____ Yes _____ No

- 5) Is the available safety equipment adequate? _____ Yes _____ No

- 6) Is the number of vehicles available adequate? _____ Yes _____ No

- 7) Does the POTW have access to adequate analytical equipment? _____ Yes _____ No

- | | | | | |
|--|-------|-----|-------|----|
| o Conventional pollutant analysis equipment (i.e.,
lab oven, precision balance, pH meter) | _____ | Yes | _____ | No |
| o Atomic adsorption spectrophotometer | _____ | Yes | _____ | No |
| o Gas chromatograph | _____ | Yes | _____ | No |
| o Gas chromatograph/mass spectrometer | _____ | Yes | _____ | No |

B. Funding

- 1) Is the POTW's annual budget for program implementation the same or greater than that projected in the POTW submission?
_____ Yes _____ No

If no, describe the reason(s) it is less: _____

SECTION VIII: PROGRAM RESOURCES (Continued)

- 2) Have any problems in program implementation been observed which appear to be related to inadequate funding? _____ Yes _____ No

If yes, describe: _____

- 3) Is funding expected to continue near the current level? _____ Yes
_____ No (Increase _____ Decrease _____)

Other Supporting Comments:

Section VIII Completed by: _____ Date: _____
Title: _____ Telephone: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION IX: POTW FILE REVIEW

INSTRUCTIONS: Review the POTW's files on a representative sample of SIUs (at least 5 files), attempting to include at least two significant noncomplying IUs and two categorical IUs. If the question is correct or should be answered yes, mark with an "X." If the appropriate response is none or no, then mark an "0." Numerical responses may also be required. Narrative comments should be recorded in part G.

	<u>IU #1</u>	<u>IU #2</u>	<u>IU #3</u>	<u>IU #4</u>	<u>IU #5</u>
A. <u>File Contents</u>					
1) Does the IU file contain:					
a) Industrial waste survey information?	_____	_____	_____	_____	_____
b) Description of wastewater flows and pollutants?	_____	_____	_____	_____	_____
c) Discharge permit application?	_____	_____	_____	_____	_____
d) Control document?	_____	_____	_____	_____	_____
e) POTW sampling results?	_____	_____	_____	_____	_____
f) POTW inspection report(s)?	_____	_____	_____	_____	_____
g) IU reports (BMR, 90-day, etc.)?	_____	_____	_____	_____	_____
h) IU self-monitoring results?	_____	_____	_____	_____	_____
i) Correspondence?	_____	_____	_____	_____	_____
j) Telephone log?	_____	_____	_____	_____	_____
k) Meeting notes?	_____	_____	_____	_____	_____
l) Determination of IU compliance status?	_____	_____	_____	_____	_____

	<u>IU #1</u>	<u>IU #2</u>	<u>IU #3</u>	<u>IU #4</u>	<u>IU #5</u>
B. <u>Control Mechanism Evaluation</u>					
1) Is the IU discharge permit, contract, etc. current (i.e., unexpired)?	_____	_____	_____	_____	_____
2) Does it cite the POTW's legal authority?	_____	_____	_____	_____	_____
3) Does it contain correct discharge limitations?	_____	_____	_____	_____	_____
4) Are types of samples for self-monitoring specified?	_____	_____	_____	_____	_____
5) Is sample location(s) identified?	_____	_____	_____	_____	_____
6) Are applicable IU reporting requirements specified?	_____	_____	_____	_____	_____
7) Are standard conditions included for:					
o Right of entry?	_____	_____	_____	_____	_____
o Records retention?	_____	_____	_____	_____	_____
o Penalty provisions?	_____	_____	_____	_____	_____
o Revocation of permit?	_____	_____	_____	_____	_____
o Nontransferability?	_____	_____	_____	_____	_____
o Notice of slug loading?	_____	_____	_____	_____	_____
o Permit expiration date?	_____	_____	_____	_____	_____

SECTION IX: POTW FILE REVIEW (Continued)

C. <u>POTW Compliance Monitoring Evaluation</u>	<u>IU #1</u>	<u>IU #2</u>	<u>IU #3</u>	<u>IU #4</u>	<u>IU #5</u>
Within the last twelve months:					
1) How many times was the IU inspected?	_____	_____	_____	_____	_____
2) Approximately how many sampling visits were made to the IU?	_____	_____	_____	_____	_____
3) Were all the parameters specified in the control mechanism evaluated?	_____	_____	_____	_____	_____
4) Indicate TTO monitoring status*	_____	_____	_____	_____	_____
5) Are monitoring results well documented?	_____	_____	_____	_____	_____
o Date sample taken	_____	_____	_____	_____	_____
o Type of sample	_____	_____	_____	_____	_____
o Sampler name	_____	_____	_____	_____	_____
o Condition of sample, preservatives added, etc	_____	_____	_____	_____	_____
o Chain of custody form	_____	_____	_____	_____	_____
o Analytical procedures used	_____	_____	_____	_____	_____
6) Did the IU inspection report have adequate documentation to support potential enforcement actions?	_____	_____	_____	_____	_____
Did it include:					
o Date and time of inspection?	_____	_____	_____	_____	_____
o Name of company official contacted?	_____	_____	_____	_____	_____
o Verification of production and flow rates, if needed?	_____	_____	_____	_____	_____
o Identification of sources and types of wastewater (regulated, unregulated, dilution flow, etc.)?	_____	_____	_____	_____	_____
o Problems with pretreatment facilities?	_____	_____	_____	_____	_____
o Evaluation of IU self-monitoring equipment and methods?	_____	_____	_____	_____	_____
o Other (describe) _____	_____	_____	_____	_____	_____
<hr/>					
D. <u>IU Self-Monitoring Evaluation</u>	<u>IU #1</u>	<u>IU #2</u>	<u>IU #3</u>	<u>IU #4</u>	<u>IU #5</u>
1) Have periodic IU self-monitoring reports been submitted?	_____	_____	_____	_____	_____
2) Were the required parameters evaluated?	_____	_____	_____	_____	_____
3) Did the IU comply with the reporting requirements in the control mechanism?	_____	_____	_____	_____	_____

*(N) not regulated, (M) monitoring data submitted, (S) solvent management plan submitted, (U) monitoring data/SMP required but not included in file.

SECTION IX: - POTW FILE REVIEW (Continued)

<u>E. POTW Enforcement Initiatives</u>	<u>IU #1</u>	<u>IU #2</u>	<u>IU #3</u>	<u>IU #4</u>	<u>IU #5</u>
1) Did the POTW identify all IU violations:					
o In POTW monitoring results?	_____	_____	_____	_____	_____
o In IU self-monitoring results?	_____	_____	_____	_____	_____
2) Was the IU notified of all violations?	_____	_____	_____	_____	_____
3) Was compliance/enforcement action taken by the POTW?	_____	_____	_____	_____	_____
4) Did the POTW's action result in the IU achieving compliance within 3 months?	_____	_____	_____	_____	_____

<u>F. Spills/Slug Loading</u>	<u>IU #1</u>	<u>IU #2</u>	<u>IU #3</u>	<u>IU #4</u>	<u>IU #5</u>
1) Has the industry been responsible for spills or slug loads discharged to the POTW?	_____	_____	_____	_____	_____
2) If yes, does the file contain documentation regarding:					
a) Notification by the IU of the spill or slug?	_____	_____	_____	_____	_____
b) POTW response to notification?	_____	_____	_____	_____	_____
c) POTW response to the discharge?	_____	_____	_____	_____	_____
d) the effect of the spill on the POTW?	_____	_____	_____	_____	_____

Notes:

SECTION IX: POTW FILE REVIEW (Continued)

G. Narrative Comments From POTW File Review

FILE 1

Industry Name _____ File/ID No. _____
Industry Address _____
Type of Industry _____ Flow(gpd): _____ SIC: _____
Comments: _____

FILE 2

Industry Name _____ File/ID No. _____
Industry Address _____
Type of Industry _____ Flow(gpd): _____ SIC: _____
Comments: _____

FILE 3

Industry Name _____ File/ID No. _____
Industry Address _____
Type of Industry _____ Flow(gpd): _____ SIC: _____
Comments: _____

FILE 4

Industry Name _____ File/ID No. _____
Industry Address _____
Type of Industry _____ Flow(gpd): _____ SIC: _____
Comments: _____

FILE 5

Industry Name _____ File/ID No. _____
Industry Address _____
Type of Industry _____ Flow(gpd): _____ SIC: _____
Comments: _____

POTW PRETREATMENT PROGRAM AUDIT CHECKLIST

SECTION X: EVALUATION AND SUMMARY

INSTRUCTIONS: Complete during or after on-site audit based on reviewer's analysis of program documentation and implementation. Distinguish between required POTW actions necessary to achieve compliance with the POTW permit, approved program, or General Pretreatment Regulations and recommended actions to improve or refine the existing program.

A. Legal Authority and Control Mechanism (Section III)

1) Does the POTW have adequate legal authorities to implement and enforce pretreatment standards and requirements upon all nondomestic/industrial users (i.e., mobile sources, IUs in outside jurisdictions)?
 _____ Yes _____ No

2) If the POTW's legal authority has been changed since program approval, does it still have the requisite authorities per 40 CFR 403.8(f)(1) to:

	<u>Yes</u>	<u>No</u>
◦ Deny or condition new or increased contributions (i)	_____	_____
◦ Apply and enforce pretreatment standards (ii)	_____	_____
◦ Control each IU through permit, contract, etc. (iii)	_____	_____
◦ Require development of IU compliance schedules (iv)(A)	_____	_____
◦ Require submission of IU reports (iv)(B)	_____	_____
◦ Conduct IU inspections and sampling (v)	_____	_____
◦ Obtain remedies for noncompliance (vi)(A)	_____	_____
◦ Halt or prevent discharges (vi)(B)	_____	_____
◦ Comply with confidentiality requirements (vii)	_____	_____

3) Have effective procedures been established to implement interjurisdictional agreements? _____ Yes _____ No _____ N/A

4) Has the POTW implemented an adequate control mechanism to regulate:

	<u>Yes</u>	<u>No</u>
◦ Categorical industrial users?	_____	_____
◦ Significant noncategorical industrial users?	_____	_____
◦ Waste haulers?	_____	_____

5) Has the POTW issued all of the necessary control documents?
 _____ Yes _____ No

6) Describe required POTW actions necessary to achieve compliance with legal authority requirements:

7) Describe recommended POTW actions to improve the existing legal authority and interjurisdictional agreements.

SECTION X: EVALUATION AND SUMMARY (Continued)

B. Application of Pretreatment Standards (Section IV)

- 1) Has the POTW developed technically based local limits that will sufficiently protect the POTW treatment plant from interference, pass through, and sludge contamination and protect worker safety [403.5(c) and (d)]? _____ Yes _____ No
- 2) Are pretreatment standards (local limits and categorical standards) being properly applied to all industrial users, including:

	<u>Yes</u>	<u>No</u>
° Correct categorization of industries	_____	_____
° Application of more stringent standard (local limits vs. categorical standards)	_____	_____
° Designation of proper sampling location(s)	_____	_____
° Application of production-based standards	_____	_____
° Use of the combined wastestream formula	_____	_____
° Sample type and frequency	_____	_____
° Use of an effective control mechanism (403.8(f)(1)(iii))	_____	_____
° Other _____	_____	_____

- 3) Is the POTW implementing adequate procedures per 40 CFR 403.8(f)(2) to:

	<u>Yes</u>	<u>No</u>
° Identify and locate all IUs (i)	_____	_____
° Notify IUs of all applicable standards and requirements including RCRA (iii)	_____	_____

- 4) Describe required POTW actions necessary to adequately apply pretreatment standards:

- 5) Describe recommended POTW actions to improve the POTWs application of pretreatment standards:

SECTION X: EVALUATION AND SUMMARY (continued)

C. Compliance Monitoring (Section V)

- 1) Does the POTW perform (in combination with IU self-monitoring) adequate inspections and sampling of its IUs, consistent with 40 CFR 403.8 (f)(2), to:

	<u>Yes</u>	<u>No</u>
• Identify the character and volume of pollutants from all IUs (ii)	_____	_____
• Receive and review industrial user reports (iv)	_____	_____
• Assess industrial user compliance (v)	_____	_____
• Investigate instances of noncompliance (vi)	_____	_____
• Produce admissible evidence in an enforcement action (vi)	_____	_____

- 2) Does the POTW implement the categorical IU reporting requirements as specified in 40 CFR Part 403.12? _____yes _____No

- 3) Describe required POTW actions necessary to comply with all compliance monitoring requirements:

- 4) Describe recommended POTW actions to improve the POTW's compliance monitoring program:

D. Enforcement (Section VI)

- 1) In the event of IU noncompliance, does the POTW take appropriate and necessary enforcement action to bring IUs back into compliance in a timely manner? _____ Yes _____ No

SECTION X: EVALUATION AND SUMMARY (Continued)

2) Describe required POTW actions necessary for proper enforcement of all pretreatment standards and requirements:

3) Describe recommended POTW actions to improve enforcement of pretreatment standards and requirements:

E. Data Management and Public Participation (Section VII and IX)

1) Does implementation of the POTW's pretreatment program include:

	<u>Yes</u>	<u>No</u>
• Annual publication of significant violators [403.8(f)(2)(vii)]	_____	_____
• Notice to interested parties when local limits are developed [403.5(c)(3)]	_____	_____
• Adequate procedures for handling confidential information [403.14(a)]	_____	_____
• Unrestricted access to effluent data provided to the public [403.14(b)]	_____	_____
• Maintenance of records for at least three years [403.12(n)(2)]	_____	_____
• Well-documented activities in IU files	_____	_____

2) Describe required POTW actions necessary for compliance with data management and public participation requirements:

SECTION X: EVALUATION AND SUMMARY (Continued)

- 3) Describe recommended POTW actions to improve data management and public participation:

F. Program Resources

- 1) Does the POTW have adequate personnel, equipment, supplies, and funding and technical guidance documents to effectively implement all elements of its pretreatment program [40 CFR 403.8(f)(3)]?

_____ Yes _____ No

- 2) Describe the required POTW actions necessary to comply with all resource requirements:

- 3) Describe recommended POTW actions to improve its ability to implement its pretreatment program:

Section X Completed by: _____ Date: _____
Title: _____ Telephone: _____

SUPPORTING DOCUMENTATION
FOR
AUDIT CHECKLIST

- _____ NPDES permit conditions for pretreatment program development or implementation (II.A)
- _____ Copy of administrative order, consent decree or other document containing pretreatment program requirements (II.A)
- _____ Copy of local limits from the approved program (II.D)
- _____ Copy of POTW SUO if changed since program approval (III.A)
(Highlight the changes that have been incorporated.)
- _____ Copy of local limits if changed since program approval (IV.B)
- _____ POTW sampling and inspection schedule for regulated IUs (V.A)
- _____ List of IUs not sampled or not inspected in the past year (V.A)
(Optional)
- _____ Copy of POTW chain-of-custody form (V.A)
- _____ List of all noncompliant industries and history of enforcement actions taken (VI)

APPENDIX A

EPA MEMORANDA
FROM J. WILLIAM JORDAN AND MARTHA PROTHRO

INSTRUCTIONS FOR COMPLETING
FORM 3560-3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 6 1985

OFFICE OF
WATER

MEMORANDUM

SUBJECT: NPDES and Pretreatment Inspection Reporting for
FY 1986 Office of Water Accountability System

FROM: *James Deaton*
J. William Jordan, Director
Enforcement Division (EN-338)

TO: Water Management Division Directors, Regions I-X
Environmental Service Division Directors, Regions I-X

In FY 1986, the Office of Water Accountability System will require EPA and State commitments for POTW pretreatment inspections, industrial user pretreatment inspections, NPDES inspections, and a commitment to inspect each major facility during the year (EPA and State inspections combined). For this measure, the list of major facilities will be those designated as major in PCS as of July 31, 1985. The inspection strategy encourages Regions to use resources efficiently. This can be accomplished by combining the pretreatment inspection for the POTW and/or the industrial user with an NPDES inspection. The purpose of this memorandum is to provide guidance for reporting NPDES and pretreatment inspections in PCS and to confirm that all inspections, including pretreatment inspections, will be tracked on a one quarter "lag" basis.

We will not allow the entry of multiple inspections at a single facility on a single day, but it will be acceptable to enter the code for the POTW pretreatment inspection or industrial user pretreatment inspection on the day(s) following the other NPDES compliance inspection. This method should only be used for pretreatment inspections and static biomonitoring inspections that are coupled with other NPDES compliance inspections. Any other multiple inspections at a single facility within a five day period must have reasonable justification.

If the inspection involves an industrial user(s), a separate entry should be made with the inspection type "I" and the POTW permit number. You must also indicate the number of IUs covered during the inspection under comments in Columns 21 through 23.

Please "right justify" the number in these three columns (e.g., "003" for 3 IU's that have been inspected). This approach will allow us to track pretreatment inspections of industrial users and POTWs separately. We can also separate IUs in approved POTWs from those in unapproved POTWs based on their approval status data. A 'Y' in the Pretreatment Program Required Indicator (PRET) indicates an approved POTW in PCS.

Although we are not presently requiring detailed lists of the name and SIC code for each industrial user inspected, this information should be maintained by the Regions. We may request this information later to help develop an inspection strategy for industrial users. If you have any questions concerning this issue, please call either Gary Polvi at (FTS 475-8313) or Ed Bender at (FTS 475-8331).

cc: PCS User Group



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 30 1985

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Audits of POTWs with Approved Pretreatment Programs

FROM: Martha G. Prothro, Director *Martha Prothro*
Permits Division (EN-336)

TO: Water Management Division Directors
Regions I-X

The purpose of this memorandum is to provide final draft procedures for conducting a POTW pretreatment audit and to describe Headquarters tracking of audits in FY 86. We solicit your comments of the final draft audit procedures by September 16, 1985.

In FY 85, EPA Regions conducted 59 audits of POTWs with approved pretreatment programs and States performed additional audits. The local pretreatment program audit is a detailed on-site review of an approved program to determine its adequacy. The audit report identifies needed modifications to the approved local program and/or the POTW's NPDES permit to address any problems. The audit includes a review of the substantive requirements of the program, including local limits, to ensure protection against pass through and interference with the treatment works and the methods of sludge disposal. The auditor reviews the procedures used by the POTW to ensure effective implementation and reviews the quality of local permits and determinations (such as implementation of the combined wastestream formula). In addition, the audit includes all the elements of a pretreatment compliance inspection (PCI).

The draft PCI was distributed to the Regions by Bill Jordan of the Enforcement Division, OWEP, for review and comment on August 5. Regions and States will need a capability to conduct both audits and inspections. We recommend that audits be performed first at (1) POTWs which have been approved for one year or longer and have not previously been audited, and at (2) POTWs which are within one year of permit reissuance. As a minimum, roughly 20% of all POTW pretreatment programs must be audited in each fiscal year to assure adequate oversight of local programs during each five year permit term. All Regions have

informally committed to FY 86 SPMS outputs for audits consistent with this approach. (All POTWs that are not audited in a given year should have a PCI as part of the routine NPDES inspection at that facility.)

The POTW audit checklist contains 10 sections (I thru X) as shown in the checklist table of contents (Appendix A). The PCI generally consists of six of these sections (I, II, III, VI, VII and X). Although an audit includes all the elements of a PCI, the activity should not be counted as both an audit and a PCI. If the on-site POTW review does not include all the aspects of an audit (checklist Sections I thru X), it may still be counted as a PCI (assuming all elements of a PCI are addressed), but it may not be counted as an audit.

Our current plan (subject to OW and OMSE agreement) is that for purposes of reporting, audits will be tracked at Headquarters based on retrievals from the Permit Compliance System (PCS) on a "lag" basis similar to that traditionally used for NPDES compliance monitoring inspections. Further instructions on entry codes, audits with industrial user inspections, and other procedures will be provided early in FY 86. The audit will not be counted as completed and entered into PCS until the audit checklist has been completed, the auditor's reviewer or supervisor has signed the completed 3560-3 form and the audit has been officially sent to the POTW. Tracking from PCS in FY 86 will be conducted according to the following schedule:

<u>AUDITS</u>	<u>RETRIEVAL DATE</u>
July 1, 1985 through September 30, 1985	NO REPORT
Oct. 1, 1985 through December 31, 1985	April 2, 1986
Oct. 1, 1985 through March 31, 1986	July 2, 1986
Oct. 1, 1985 through June 30, 1986	October 1, 1986
July 1, 1986 through September 30, 1986	To be credited in FY 87 first quarter report

An OWEPP strategy for conducting local pretreatment program audits and inspections is being prepared. The strategy will describe FY 86-87 implementation activities, plans for additional guidance, training, workshops and assistance, and clarification of EPA and State roles and responsibilities. Rebecca Hanmer will discuss this strategy at the September Water Management Division Directors meeting.

Please let me know if you have any comments on the attached audit checklist or our reporting requirements or if you have any suggestions on how to make it work more effectively. You may contact me at 755-2545 or ask your staff to submit comments to Jim Gallup (755-0750) by September 6, 1985.

Attachment

cc: Rebecca Hanmer
Jim Elder
Bill Jordan
Regional and State Pretreatment
Coordinators



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 16 1985

OFFICE OF
WATER

MEMORANDUM

SUBJECT Pretreatment Audit Reporting Requirements

FROM: Martha G. Prothro, Director
Permits Division (EN-336)

A handwritten signature in black ink that reads "Martha Prothro".

TO: Water Management Division Directors
Regions I-X

My August 30, 1985 memorandum to you provided final draft procedures for conducting a POTW pretreatment audit and described Headquarters tracking of audits in FY 1986 (see attachment). The purpose of this memorandum is to provide further instructions on audit tracking and Region/State PCS data entry requirements. A final pretreatment audit/inspection procedures guidance document should be issued by Rebecca Hanmer in the very near future.

As stated in the aforementioned memorandum, for purposes of reporting, audits will be tracked at Headquarters based upon retrievals from PCS on a one quarter "lag" basis. The schedule in the August 30 memorandum for audit and PCS retrieval dates is still valid. Audits are not counted as complete and should not be entered into PCS until the audit has addressed all the subjects contained in the checklist, form 3560-3 has been completed and signed, and a letter containing the audit findings and recommendations has been officially sent to the POTW. Once the audit is complete, the Region/State should enter the appropriate information from form 3560-3 into PCS. Particular attention must be paid to data entered from two fields: Inspection Type (Column 18) and Inspection Date (Columns 12-17). We have established the code "G" to describe pretreatment audits. This code should be entered in Column 18. Enter the date the POTW site visit was conducted in Columns 12-17. See Example 1, form 3560-3 (attached). Section D should be completed by either providing a short summary of the audit results or attaching the letter transmitting the checklist and audit findings and recommendations to the POTW.

The Office of Water Accountability System will track industrial user (IU) pretreatment inspections in FY 1986. For those IU inspections performed as part of a POTW pretreatment audit, data entry requirements are basically the same as those for IU inspections performed in conjunction with POTW pretreatment inspections.

Those requirements are discussed in the August 6, 1985 memorandum from Bill Jordan to the Regions (copy attached). Because multiple entries for a single facility on a single day are not permitted in PCS, a separate entry should be made with the Inspection Type code "U" in Column 18 (rather than "I" used for IU inspections performed in conjunction with pretreatment inspections), the receiving POTW's permit number in Columns 3-11, and the date following the pretreatment audit site visit date in Columns 12-17. Regions/States should also indicate the number of IU's inspected in conjunction with an audit using Columns 21-23 of the comments section of form 3560-3. This number should be "right justified" in these columns (e.g., "003" for three IU's inspected). See Example 2, form 3560-3 (attached). Guidance on industrial user inspections will be provided by the Enforcement Division in OWEPP.

Please contact me or have your staff call Jim Gallup of my staff (FTS: 755-0750) if you have any questions or comments on these reporting requirements.

Attachments

cc: Rebecca Hanmer
Bill Jordan
Ed Bender
Larry Reed
Dela Ng
Regional and State Pretreatment Coordinators

United States Environmental Protection Agency Washington, D. C. 20460		<h2 style="margin: 0;">NPDES Compliance Inspection Report</h2>		Form Approved OMB No. 2040-0003 Approval Expires 7-31-85	
Section A: National Data System Coding					
Transaction Code		NPDES		yr/mo/day	
1 N	2 5	3 X	4 X	5 0	6 0
7 0	8 0	9 0	10 0	11 0	12 0
13 8		14 5		15 1	
16 0		17 2		18 4	
19 E		20 R		21 I	
Remarks					
21					
Reserved		Facility Evaluation Rating		Reserved	
67	69	70 4	71 F	72 Q	80
Section B: Facility Data					
Name and Location of Facility Inspected			Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM		Permit Effective Date
All American WWTWP			8:00		6/1/83
1 USA Drive			Exit Time/Date		Permit Expiration Date
Everywhere, New York 99999			5:00/ 10/24/85		5/31/88
Name(s) of On-Site Representative(s)			Title(s)		Phone No(s)
John Smith			WWTWP Superintendent		(999) 999-9999
Name, Address of Responsible Official			Title		
Same as above					
Phone No.			Contacted		
			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
Permit		Flow Measurement		S	
Records/Reports		Laboratory			
Facility Site Review		Effluent/Receiving Waters			
				Pretreatment	
				Compliance Schedules	
				Self-Monitoring Program	
				Operations & Maintenance	
				Sludge Disposal	
				Other:	
Section D: Summary of Findings/ Comments (Attach additional sheets if necessary)					
See attached copy of checklist and POTW transmittal letter containing findings and recommendations.					
Name(s) and Signature(s) of Inspector(s)		Agency/Office/Telephone			Date
John Jones <i>John Jones</i>		U.S. EPA Region 99 Water Management Division (999) 999-9999			11/25/85
Signature of Reviewer		Agency/Office			Date
<i>Jane Supervisor</i>		U.S. EPA Region 99 Water Management Division			11/27/85
Regulatory Office Use Only					
Action Taken				Date	Compliance Status
					<input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance



United States Environmental Protection Agency
Washington, D. C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code 1N 25	NPDES 3X10101000011	yr/mo/day 1285/10/25	Inspection Type 1BU	Inspector 19R	Fac Type 2d2
Remarks 0103					
Reserved 67	Facility Evaluation Rating 70	BI 71	QA 72	Reserved 73 74 75 80	

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Permit Effective Date
	Exit Time, Date	Permit Expiration Date
Name(s) of On-Site Representative(s)	Title(s)	Phone No(s)
Name, Address of Responsible Official	Title	
	Phone No.	Contacted <input type="checkbox"/> Yes <input type="checkbox"/> No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

Permit	Flow Measurement	Pretreatment	Operations & Maintenance
Records/Reports	Laboratory	Compliance Schedules	Sludge Disposal
Facility Site Review	Effluent/Receiving Waters	Self-Monitoring Program	Other

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Guidance on industrial user inspections will be provided by the Enforcement Division.

Name(s) and Signature(s) of Inspector(s)	Agency/ Office/ Telephone	Date
Signature of Reviewer	Agency/ Office	Date

Regulatory Office Use Only

Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance
--------------	------	--

APPENDIX B

SAMPLE FOLLOW-UP LETTER
TO THE CONTROL AUTHORITY

(Name of Control Authority Manager)
(Address of Control Authority)

Dear _____:

As you are aware, a (Pretreatment Compliance Inspection/Pretreatment Program Audit) was conducted at your facility (NPDES #) on (date of event). This (inspection/audit) indicated that your facility exhibited the following deficiencies in its pretreatment program when compared to applicable pretreatment regulations, your facility's NPDES permit, and/or your facility's approved pretreatment program submission:

- ° (List such deficiencies)

- °

- °

- °

In addition, we suggest that your facility remedy the following deficiencies to improve the effective implementation of your facility's pretreatment program:

- ° (List such deficiencies)

- °

We request that within 15 days of receipt of this letter you inform us by written response of the proposed corrective actions which will be undertaken at your facility to address the deficiencies listed here.

Attached is a summary describing in general terms the results of the (Pretreatment Compliance Inspection/audit) at your facility. Note that the absence on the summary report of any of the deficiencies listed in this letter does not excuse you from the above request to perform coorrective actions to remedy deficiencies.

If you have any questions regarding this matter, please contact (name of Approval Authority representative) at (telephone number of Approval Authority representative) as soon as possible.

Yours truly,

(Name and signature of
Approval Authority representative)

Attachment

APPENDIX C

POTW PRETREATMENT PROGRAM FACT SHEET

POTW PRETREATMENT PROGRAM FACT SHEET

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET

INSTRUCTIONS: Complete entire Fact Sheet prior to on-site audit. Parts B thru F should be completed based on the approved program documents identified in Part A.

A. Inventory of Documents Comprising the Approved Pretreatment Program

1) Original Pretreatment Program Submission Approval Date: _____

2) Does NPDES permit contain pretreatment requirements or conditions?
_____ Yes _____ No

If yes, attach a copy of NPDES pretreatment conditions (e.g., reporting requirements, implementation requirements, etc.).

3) List in chronological order all program modification requests. Indicate whether request was contained in a letter, annual report, or other, and whether request was approved, denied, or not yet acted upon.

Date of Request	Where Contained	Brief Description of Nature of Request	Approval Authority Response and Date
_____	_____	_____	_____
_____	_____	_____	_____

4) Is the POTW currently operating under any consent decree, administrative order or other document which contains pretreatment program requirements?
_____ Yes _____ No

If yes, attach copy.

B. Legal Authority and Control Mechanism

1) POTW authority to implement and enforce pretreatment standards and requirements is contained in (cite legal authority):

Date Enacted/Adopted _____

2) Are all Industrial Users (IUs) located within the jurisdictional boundaries of the POTW? _____ Yes _____ No

If no, what type of legal agreement provides the authority to enforce pretreatment standards in outlying jurisdictions?

_____ interjurisdictional agreement
_____ contracts with IUs
_____ other (describe): _____

SECTION II: POTW PRETREATMENT FACT SHEET (Continued)

- 3) If a multijurisdictional situation exists, do the approved program documents specify who should have lead responsibility for carrying out each aspect of the pretreatment program in the outlying jurisdiction?
____ Yes ____ No ____ N/A

If yes, identify who undertakes the following (POTW or outlying jurisdiction):

establishing local limits _____
issuing IU control documents _____
receiving reports (BMRs, etc.) _____
sampling and analysis _____
inspections of IUs _____
compliance tracking _____
enforcement _____
pretreatment program administration _____

- 4) What IU control mechanisms are intended to be used by the POTW?
_____ permits
_____ contracts
_____ orders
_____ sewer use ordinance (SUO) only
_____ other (describe): _____
- 5) According to the approved program documents, approximately how many IU permits or other control documents are intended to be issued the POTW? _____
- 6) How often are the control documents intended to be reissued? _____

C. Industrial User Characterization

- 1) How many IUs were identified in each of the following groups:

_____ categorical IUs
_____ significant* noncategorical IUs
_____ other regulated** noncategorical IUs
_____ other nondomestic users
_____ TOTAL

*The POTW has defined "significant" IU to mean: _____

** By "other regulated" IUs is meant IUs that the POTW surcharges, inspects, controls through a permit, or otherwise regulates, but which are not considered significant for purposes of the pretreatment program.

The POTW's "other regulated" IUs include: _____

- 2) Does the POTW intend to update its industrial waste survey (IWS)? ____ Yes ____ No How often? _____

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

D. Local Limits

- 1) Does the program submission indicate historical problems caused by IU discharges?
 - _____ inhibition/upset (describe) _____
 - _____ pass through (describe) _____
 - _____ sludge (describe) _____
 - _____ other (describe) _____

- 2) Attach a copy of the local limits contained in the program submission _____ attached
 _____ no local limits exist

- 3) How were the local limits derived?
 - _____ technical basis (describe) _____
 - _____ preexisting in ordinance, basis unknown
 - _____ other (describe) _____

- 4) Does the POTW's NPDES permit(s) contain limits or monitoring requirements for any toxic/priority pollutants? _____ Yes _____ No
 If yes, list pollutants: _____

If yes, how many analyses per year for:

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>
metals	_____	_____	_____
organics	_____	_____	_____
biomonitoring		_____	
EP toxicity			_____

E. Standards and Requirements for Industrial Users

- 1) Do the approved program documents indicate that the POTW has IUs subject to any of the following requirements (indicate approximate number, if known):

	<u>Yes</u>	<u>No</u>	<u>Approximate Number</u>
a. combined wastestream formula	_____	_____	_____
b. production-based categorical standards	_____	_____	_____
c. total toxic organic (TTO) limits	_____	_____	_____
d. solvent management plans	_____	_____	_____

- 2) Does the POTW have approval to grant removal credits to categorical IUs? _____ Yes _____ No If yes, list parameters: _____

- 3) Does the POTW have a spill prevention and control plan to address toxic discharges from IUs? _____ Yes _____ No

- 4) Does the program include procedures for accepting hazardous wastes by truck, rail, or dedicated pipeline? _____ Yes _____ No _____ N/A

SECTION II: POTW PRETREATMENT PROGRAM FACT SHEET (Continued)

3) How does the POTW intend to fund the pretreatment program?

	Percent of Total Funding
____ POTW general operating fund	_____
____ IU permit fees	_____
____ monitoring charges	_____
____ industry surcharges	_____
____ other (describe) _____	_____
	<u>Total</u> <u>100%</u>

4) What is the total estimated level of annual funding required to implement the POTW pretreatment program?
\$ _____ /year

Other Supporting Comments:

SECTION II Completed By: _____ Date: _____
Title: _____ Telephone: _____

APPENDIX D

NPDES COMPLIANCE INSPECTION REPORT
FORM 3560-3



United States Environmental Protection Agency
Washington, D. C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code 1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3	NPDES	yr./mo./day 11 <input type="checkbox"/> 12 <input type="checkbox"/> 17	Inspection Type 18 <input type="checkbox"/>	Inspector 19 <input type="checkbox"/>	Fac Type 20 <input type="checkbox"/>
Remarks					
21	Reserved 67 <input type="checkbox"/> 69	Facility Evaluation Rating 70 <input type="checkbox"/>	SI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 80

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time <input type="checkbox"/> AM <input type="checkbox"/> PM	Permit Effective Date
	Exit Time/Date	Permit Expiration Date
Name(s) of On-Site Representative(s)	Title(s)	Phone No(s)
Name, Address of Responsible Official	Title	
	Phone No.	Contacted <input type="checkbox"/> Yes <input type="checkbox"/> No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Operations & Maintenance
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Sludge Disposal
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Signature of Reviewer	Agency/Office	Date

Regulatory Office Use Only

Action Taken	Date	Compliance Status <input type="checkbox"/> Noncompliance <input type="checkbox"/> Compliance
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INSTRUCTIONS

Section A: National Data System Coding (*i.e.*, PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. (*Use the Remarks columns to record the State permit number, if necessary.*)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 82/06/30 = June 30, 1982).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

- | | | |
|---------------------------|-------------------------------|-------------------------|
| A — Performance Audit | E — Corps of Engrs Inspection | S — Compliance Sampling |
| B — Biomonitoring | L — Enforcement Case Support | X — Toxic Sampling |
| C — Compliance Evaluation | P — Pretreatment | |
| D — Diagnostic | R — Reconnaissance Inspection | |

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

- | | |
|--|---|
| C — Contractor or Other Inspectors (<i>Specify in Remarks columns</i>) | N — NEIC Inspectors |
| E — Corps of Engineers | R — EPA Regional Inspector |
| J — Joint EPA/State Inspectors—EPA lead | S — State Inspector |
| | T — Joint State/EPA Inspectors—State lead |

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1972 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1972 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory.

Section C: Areas Evaluated During Inspection

Indicate findings (S, M, U, or N) in the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Other" may include activities such as SPCC, BMP's, and multimedia concerns.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.