NPDES Pretreatment Program Permit Quality Review (PQR) Checklist

Program Status Determination

Please indicate the following and complete the checklist accordingly:

- The State is approved to administer the Pretreatment Program and delegates program administration responsibility to the POTWs. Please complete sections I, III, IV (when applicable) and V of the checklist below. (Scenario A)
- 40 CFR 403.10(e) States where the State is approved to administer the Pretreatment Program and implements the Pretreatment Program directly. Please complete sections II, III.A, IV, and V of the checklist below. (Scenario B)
- The State is not approved to administer the Pretreatment Program. Please complete sections I (item numbers 1-10), III, IV (when applicable) and V of the checklist below. (Scenario C)

Background Information

1. Is the State reporting to ICIS? [Yes] [No] [Not Entered]
   a. If not, does the Region enter this data? [Yes] [No]

2. Do you have a copy of the approved State program for this review? [Yes] [No]

3. Do you have a copy of the approved State MOA for this review? [Yes] [No]

For more information on required legal authorities (or procedures, etc.) for Approved Pretreatment Program States, refer to 40 CFR 403.10(f)(1)-(3).

I. Program and Compliance Information – Approved and Not Approved States (Scenarios A and C)

1. Number of Approved POTW Pretreatment Programs
   a. Number of Approved POTW Pretreatment Programs for POTWs with capacity greater than 5 million gallons per day [40 CFR 403.10(f)(2)(i)-(iii)]

2. Number of SIUs in POTWs with approved programs

3. Number of SIUs in POTWs without an Approved POTW Pretreatment Program (Note: If this number is greater than zero, also fill out Section IV for SIUs that discharge to POTWs without an approved program)

4. Number (and percentage) of noncategorical SIUs with expired permits in Approved POTW Pretreatment Programs

5. Number of CIUs in Approved POTW Pretreatment Programs

6. Number (and percentage) of CIUs with expired permits in Approved POTW Pretreatment Programs
   Comments:

7. Number of CIUs in POTWs without an Approved POTW Pretreatment Program (NOTE: If this number is greater than zero, also fill out Section IV for CIUs that discharge to POTWs without an approved program)
   Comments:

8. Number of PCIs conducted in the last full year [40 CFR 403.10(f)(1)(iii)]

9. Number of PCAs conducted in the last full year [40 CFR 403.10(f)(1)(iii)]

10. Number and percentage of SIUs inspected in the last full year (when States or EPA are the Control Authority)

11. Were compliance monitoring strategy (CMS) goals of 2 PCIs and 1 PCA per five-year NPDES permit cycle reached by the State and/or Region (Approval Authority) for POTWs with an approved pretreatment program?
   a. Percentage of POTWs for which the Approval Authority has met the CMS goal for this State:
   [N/A] [Yes] [No]
b. Comments:  

12. When was the last audit of the State program conducted?  
Date:  

13. Has the State updated its State Pretreatment Regulations to come into compliance with federal regulations to date, including revisions that went into effect November 14, 2005 (the “streamlining rule” [SR])?  
☐ Yes  ☐ No  
Date of State’s streamlining rule provision adoption:  

a. If so, has the State adopted all mandated streamlining rule provisions?  
☐ Yes  ☐ No  
Date:  

b. If so, indicate which of the following optional provisions the State has adopted?  
☐ Yes  ☐ No  
Date:  

Sampling Pollutants Not Present ☐ Equivalent concentration ☐  
Issuance of General Permits ☐ SNC late reports (to 45 days) ☐  
Use of Best Management Practices ☐ NSCIU ☐  
Slug control plan evaluation frequency ☐ Middle Tier ☐  
Equivalent mass ☐  

c. Is the Attorney General statement included [40 CFR 403.10(g)(1)]?  
☐ Yes  ☐ No  

14. Describe how the State is ensuring that POTWs update their local regulations to comply with the required streamlining revisions?  

15. Are discharge monitoring reports and required reports received and reviewed by State or EPA where State or EPA is the Approval Authority?  
☐ Yes  ☐ No  

16. Is comprehensive compliance evaluation performed during the receipt of discharge monitoring reports?  
☐ Yes  ☐ No  

II. Program and Compliance Information – 40 CFR 403.10(e) States (Scenario B)  

1. Number of SIUs  
a. Number of CIUs  

2. Number of SIUs that have been inspected in the last full year  
a. In accordance with 40 CFR 403.8(f)(2)(v), were 100 percent of the SIUs inspected in the last full year?  
☐ Yes  ☐ No  

3. Number of SIUs for which monitoring events were conducted in the last full year  
a. In accordance with 40 CFR 403.8(f)(2)(v), were 100 percent of the SIUs monitored in the last full year?  
☐ Yes  ☐ No  

4. Number of SIUs with expired permits  
a. Discuss expired permits/backlog percentage:  

5. Number of permits never issued to SIUs that require permits.  

________________________________________
6. Did the State submit an annual pretreatment report for the last full year? □ Yes □ No
   a. If so, does the report include the content required in 40 CFR 403.12(i)? □ Yes □ No
7. Did the State identify SIUs in SNC as defined by 40 CFR 403.8(f)(2)(viii) in the last full year? □ Yes □ No
8. Did the State publish all SIUs in SNC in the newspaper in accordance with 40 CFR 403.10(f)(2)(i)? □ Yes □ No
   a. Comment: ________________________________________________
9. When was the last audit of the State program conducted?
   Date: _______________________________________________________
10. Has the State updated its State Pretreatment Regulations to come into compliance with federal regulations to date, including revisions that went into effect November 14, 2005 (i.e., the SR)? □ Yes □ No
    Date of streamlining rule provision adoption: ____________________________
   a. If so, has the State adopted all mandated streamlining rule provisions? □ Yes □ No
      Date: _______________________________________________________
   b. If so, has the state adopted any of the following optional provisions? □ Yes □ No
      Date: _______________________________________________________
      Sampling Pollutants Not Present □ Equivalent concentration □
      Issuance of General Permits □ SNC late reports (to 45 days) □
      Use of Best Management Practices □ NSCIU □
      Slug control plan evaluation frequency □ Middle Tier □
      Equivalent mass □
11. Describe how the State is ensuring that POTWs update their local regulations to comply with the required Streamlining Rule revisions?
    _______________________________________________________________
### 4. Does the NPDES Permit contain requirements at 40 CFR 122.44(j)(1) to identify SIUs (i.e., industrial waste survey)?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>a.</td>
<td></td>
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<tr>
<td>b.</td>
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</tbody>
</table>

#### a. If so, does it designate who must be notified?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### b. Who?

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### 5. Does the permit have an accompanying fact sheet?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
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<tbody>
<tr>
<td>a.</td>
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#### a. If so, does the fact sheet designate whether a Pretreatment Program is required or not?

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<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</table>

#### b. If so, does the fact sheet describe why a Pretreatment Program is required?

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<thead>
<tr>
<th></th>
<th>N/A</th>
<th>Yes</th>
<th>No</th>
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#### c. If so, does the fact sheet describe when the Pretreatment Program was approved (dates) and any subsequent modifications to the program?

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
<th>Yes</th>
<th>No</th>
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</table>

#### d. If so, does the fact sheet describe types of industrial users?

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
<th>Yes</th>
<th>No</th>
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</table>

#### e. If so, does the fact sheet evaluate pollutants from these industry sectors for reasonable potential analysis for water quality-based limits?

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<thead>
<tr>
<th></th>
<th>N/A</th>
<th>Yes</th>
<th>No</th>
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### 6. Does the NPDES Permit contain requirements at 40 CFR 122.44(j)(2)(ii) to provide a technical evaluation of the need to calculate or reevaluate local limits following permit issuance or reissuance?

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<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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<tbody>
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<td>a.</td>
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<td>b.</td>
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<tr>
<td>c.</td>
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<tr>
<td>d.</td>
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</tbody>
</table>

#### a. If so, does it designate who must be notified?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

#### b. Who?

<p>| | |</p>
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#### c. If so, does it specify a date or a time frame for submission?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### d. If so, what date or frequency of submittal is required?

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### III.B. For POTWs with Pretreatment Programs (Scenarios A and C)

#### 1. Does the POTW NPDES Permit identify that the POTW has an approved Pretreatment Program?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</table>

#### a. Does the fact sheet identify that the POTW has an approved Pretreatment Program?

<table>
<thead>
<tr>
<th></th>
<th>N/A</th>
<th>Yes</th>
<th>No</th>
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#### 2. Does the NPDES Permit incorporate 40 CFR Part 403 by reference?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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**If not, does the NPDES Permit contain the following POTW pretreatment requirements?**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### a. Identify and locate all possible industrial users [40 CFR 403.8(f)(2)(i)]

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</table>

#### b. Identify character and volume of pollutants from industrial users [40 CFR 403.8(f)(2)(ii)]

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</table>

#### c. Notify industrial users of applicable pretreatment standards and requirements [40 CFR 403.8(f)(2)(iii)]

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### d. Receive and analyze reports from industrial users [40 CFR 403.8(f)(2)(iv)]

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<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### e. Randomly sample and inspect industrial users at least once a year [40 CFR 403.8(f)(2)(v)]

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</table>

#### f. Evaluate each significant industrial user for the need for a slug discharge control plan [40 CFR 403.8(f)(2)(vi)]

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<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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</table>

#### g. Investigate instances of noncompliance by industrial users with pretreatment standards and requirements [40 CFR 403.8(f)(2)(vii)]

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### h. Annual publication of significant noncompliance notices [40 CFR 403.8(f)(2)(viii)]

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### 3. Does the NPDES Permit identify contents and a submittal date (at least annually) for an annual pretreatment report [40 CFR 403.12(i)]?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
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#### a. If so, does it designate who must be notified?

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
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#### b. Who? ________________________________

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#### c. If so, does it specify a date for submission?

<table>
<thead>
<tr>
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<th>Yes</th>
<th>No</th>
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</table>

#### d. If so, what date and or frequency of submittal is required? ________________________________

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### 4. Does the NPDES Permit require notification if the POTW modifies its Pretreatment Program as required at 40 CFR 403.18?
- If so, does it designate who must be notified?
  - Who?

- [ ] Yes  
- [ ] No

**III.C. For POTWs without Pretreatment Programs (Scenarios A and C)**

1. Does the NPDES Permit contain requirements at 40 CFR 122.44(j)(2)(i) to develop and submit a local program?
   - If so, does it designate who must be notified?
   - Who?

- [ ] Yes  
- [ ] No

2. Does the NPDES Permit contain a reopener clause that the permit can be reopened to require development of a local pretreatment program if determined necessary?

- [ ] Yes  
- [ ] No

### IV. Industrial User Permit Reviews

1. Statement of duration (≤ 5 years) [40 CFR 403.8(f)(1)(iii)(B)(1)]

- [ ] Yes  
- [ ] No


- [ ] Yes  
- [ ] No

3. All general and specific prohibitions included [40 CFR 403.5]

- [ ] Yes  
- [ ] No

4. Dilution prohibition [40 CFR 403.6(d)]

- [ ] Yes  
- [ ] No

5. Applicable effluent limits correctly applied to wastestreams required to be regulated (local limits, categorical standards, best management practices) [40 CFR 403.8(f)(1)(iii)(B)(3)]

- [ ] Yes  
- [ ] No

6. Identification of pollutants to be monitored [40 CFR 403.8(f)(1)(iii)(B)(4)]

- [ ] Yes  
- [ ] No

7. Is use of Part 136 methods required [40 CFR 403.12(g)(3)]

- [ ] Yes  
- [ ] No

8. Does the permit grant a waiver for pollutants not present [40 CFR 403.8(f)(1)(iii)(B)(4)]
   - If so, does the POTW have the authority to grant the waiver
   - If so, did the POTW document its process for granting the waiver

- [ ] Yes  
- [ ] No


- [ ] Yes  
- [ ] No

10. Sampling locations/discharge points [40 CFR 403.8(f)(1)(iii)(B)(4)]

- [ ] Yes  
- [ ] No

11. Sample types (grab or composite) [40 CFR 403.8(f)(1)(iii)(B)(4) and 40 CFR 403.12(g)(3)]

- [ ] Yes  
- [ ] No

12. Representative sampling [40 CFR 403.12(g)(3)]

- [ ] Yes  
- [ ] No

13. Recordkeeping of sampling and analysis requirements [40 CFR Part 136 and 40 CFR 403.12(o)(1) and 40 CFR 403.12(g)(3)]
   - Sample date
   - Sample time
   - Name of samplers
   - Sample preservation
   - Analysis dates
   - Name(s) of analyst(s)
   - Analytical methods

- [ ] Yes  
- [ ] No

14. Signatory requirement [40 CFR 403.12(m)]

- [ ] Yes  
- [ ] No

15. Certification statement [40 CFR 403.6(a)(2)(ii) and 40 CFR 403.12(l)]

- [ ] Yes  
- [ ] No

16. Reporting requirements to report sampling results twice per year [at 40 CFR 403.12(e)&(h)]

- [ ] Yes  
- [ ] No
NPDES PQR Pretreatment Checklist

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<tr>
<td>17. Requirements to report all monitoring results [40 CFR 403.12(g)(6)]</td>
<td>□ Yes □ No</td>
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<td>18. Record-keeping requirements [40 CFR 403.12(o)(2)]</td>
<td>□ Yes □ No</td>
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<td>19. Statement of applicable civil and criminal penalties [40 CFR 403.8(f)(1)(i)(iii)(B)(5)]</td>
<td>□ Yes □ No</td>
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<td>20. Compliance schedules [40 CFR 403.8(f)(1)(iv)]</td>
<td>□ N/A □ Yes □ No</td>
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<tr>
<td>21. Slug discharge control plan, if determined by the POTW to be necessary [40 CR 403.8(f)(1)(i)(iii)(B)(6)]</td>
<td>□ N/A □ Yes □ No</td>
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<td>22. Notice of slug loading [40 CFR 403.12(f)]</td>
<td>□ Yes □ No</td>
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<td>23. Notification of facility change affecting slug discharge potential [40 CFR 403.8(f)(2)(vi)]</td>
<td>□ Yes □ No</td>
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<tr>
<td>24. Hazardous waste notification [40 CFR 403.12(p)(1)]</td>
<td>□ Yes □ No</td>
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<tr>
<td>25. Notification of spills, bypasses, upsets, etc. [40 CFR 403.8(f)(1)(iii)(B)(4) and 40 CFR 403.17]</td>
<td>□ Yes □ No</td>
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<td>26. Notification of significant change in discharge [40 CFR 403.12(j)]</td>
<td>□ Yes □ No</td>
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<tr>
<td>27. 24-hour notification of violation/resample requirement [40 CFR 403.12(g)(2)]</td>
<td>□ Yes □ No</td>
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<td>28. Right of entry authorization [40 CFR 403.8(f)(1)(vi)(B)]</td>
<td>□ Yes □ No</td>
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V. Summarize Findings

The outline for the Pretreatment Program PQR summary is provided below. The Instructions Manual provides information about the required content of each of the sections. Additional information for preparation of the PQR Report is provided in the guidance documents entitled NPDES Permit Quality Review (PQR) Standard Operating Procedures and Region [XX] NPDES Permit Quality Review [Insert State], which is provided as a template for the PQR report. Use this space to summarize findings while you are completing the checklist.

PQR Report Outline for Pretreatment Program Review:

- Kudos
- Program and Compliance Information
- Findings
- PQR Action Items