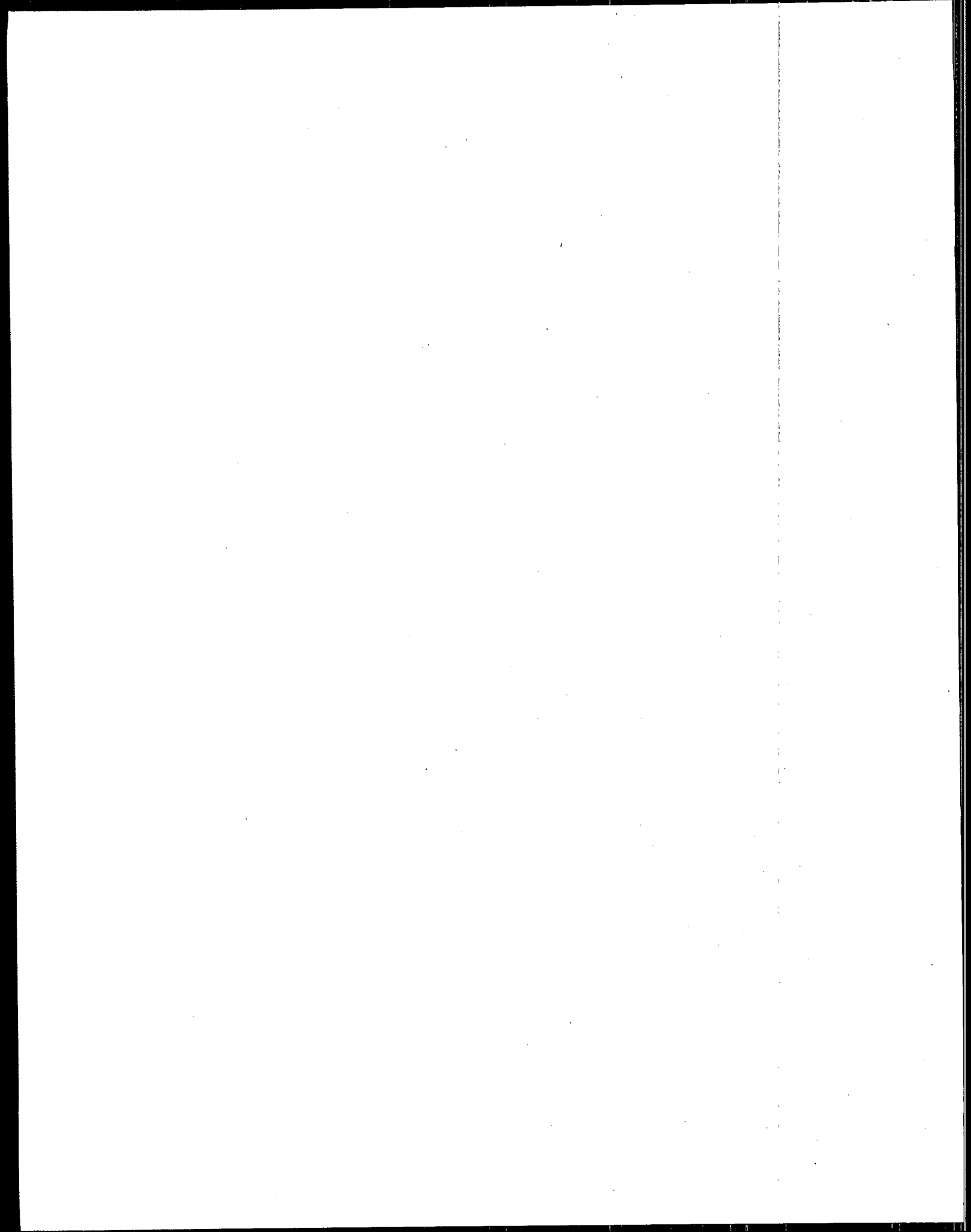


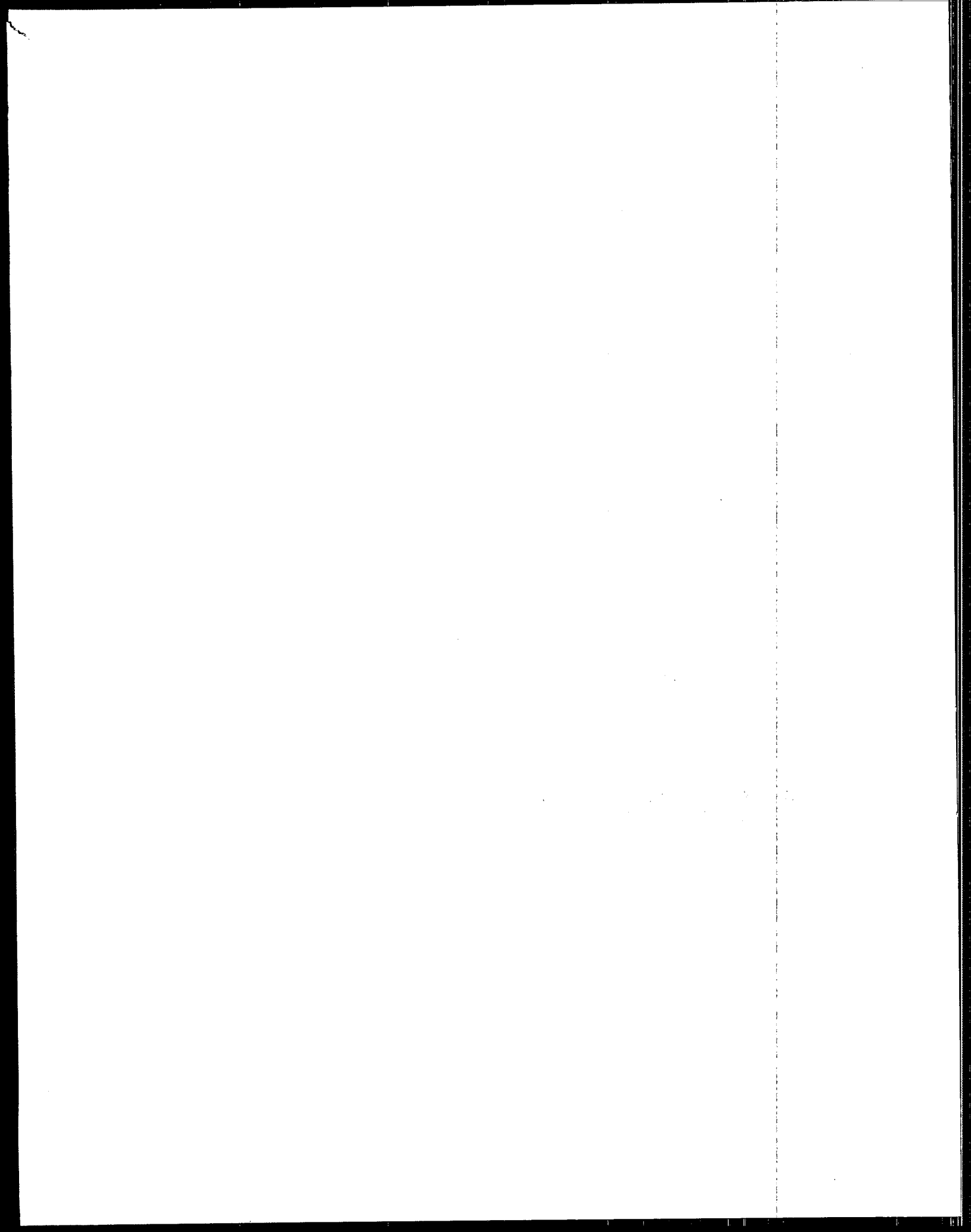


# Guidance For Conducting A Pretreatment Compliance Inspection





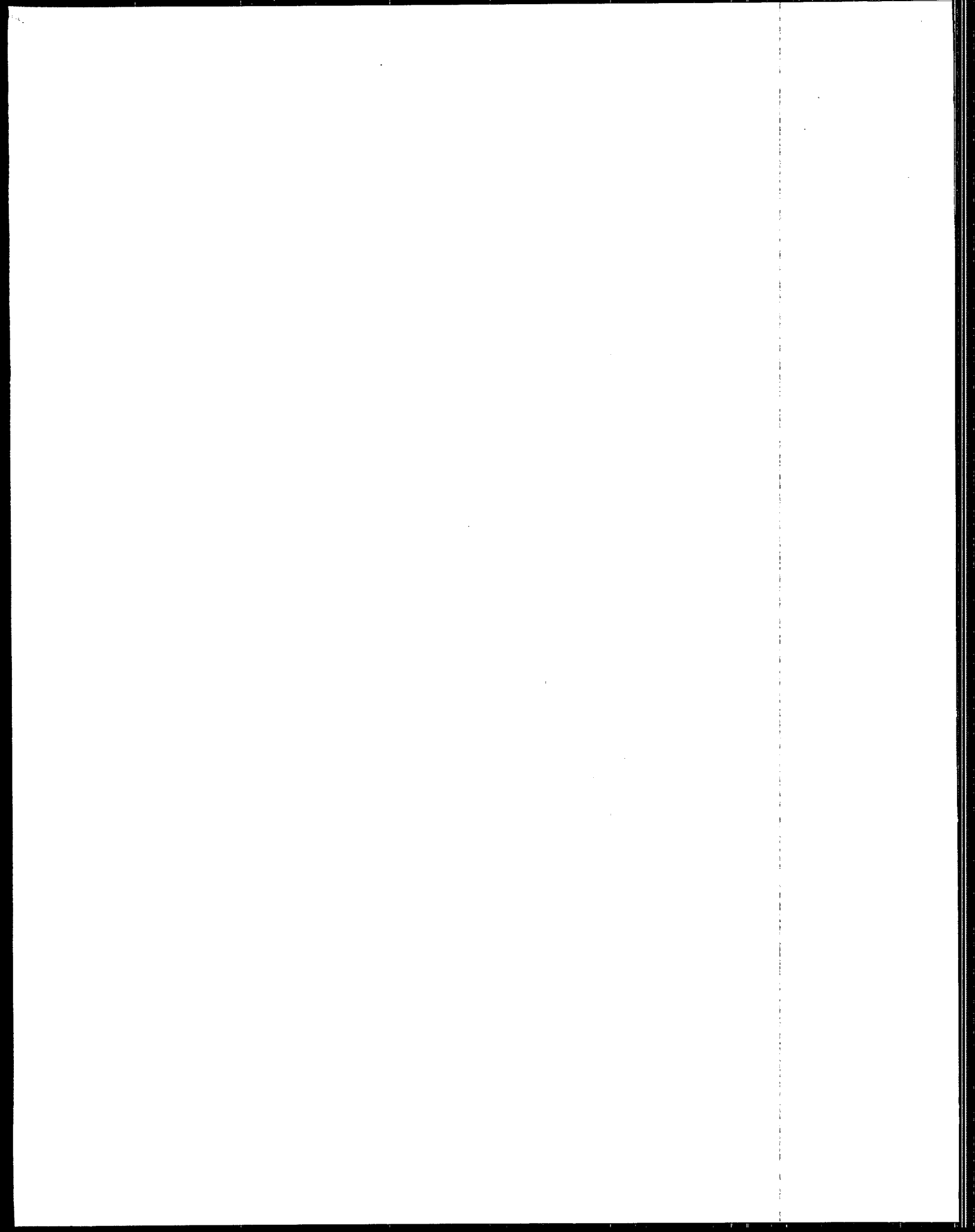
**GUIDANCE FOR CONDUCTING A  
PRETREATMENT COMPLIANCE INSPECTION**



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PRETREATMENT COMPLIANCE INSPECTION**

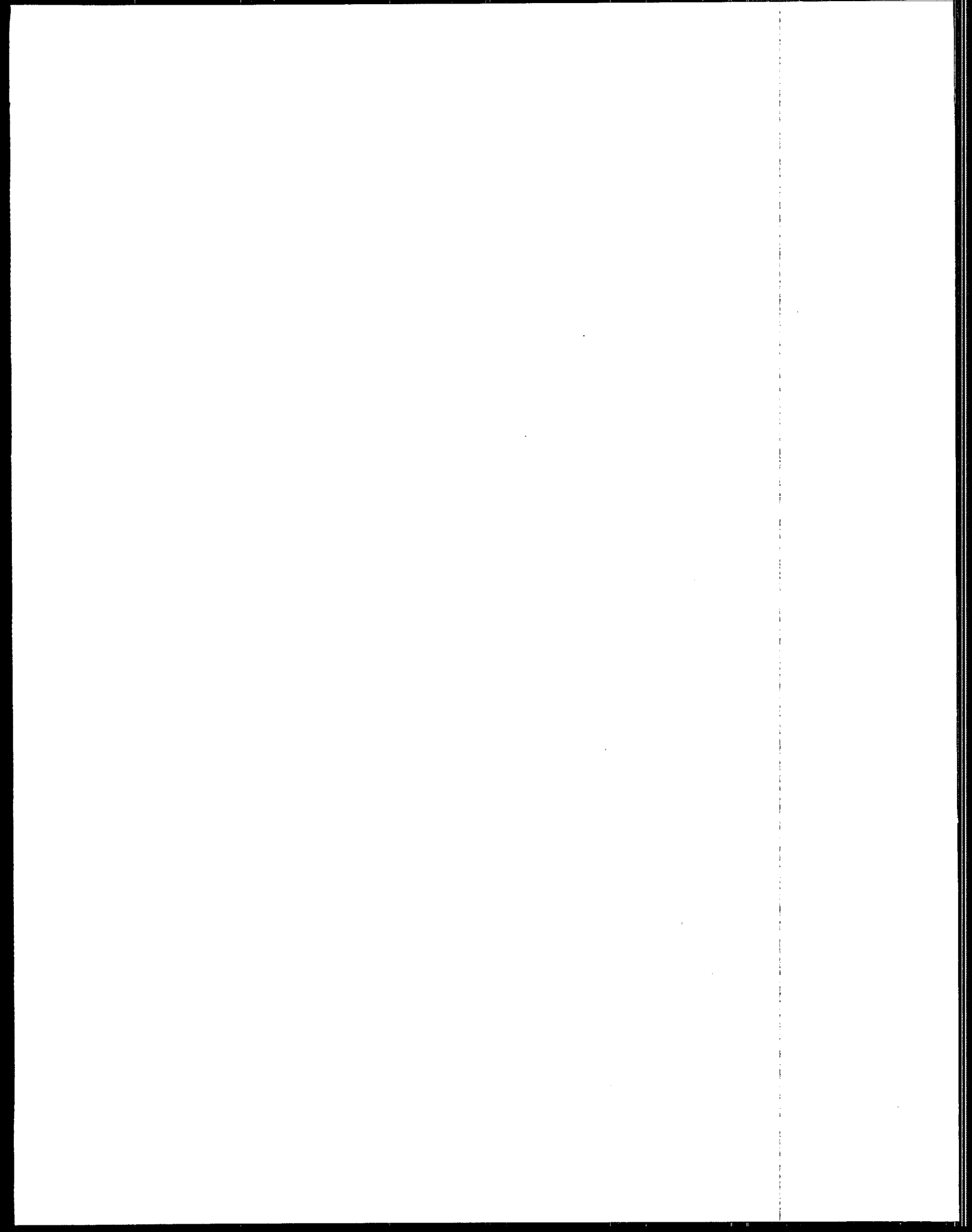
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**1.**

**PCI GENERAL INSTRUCTIONS**





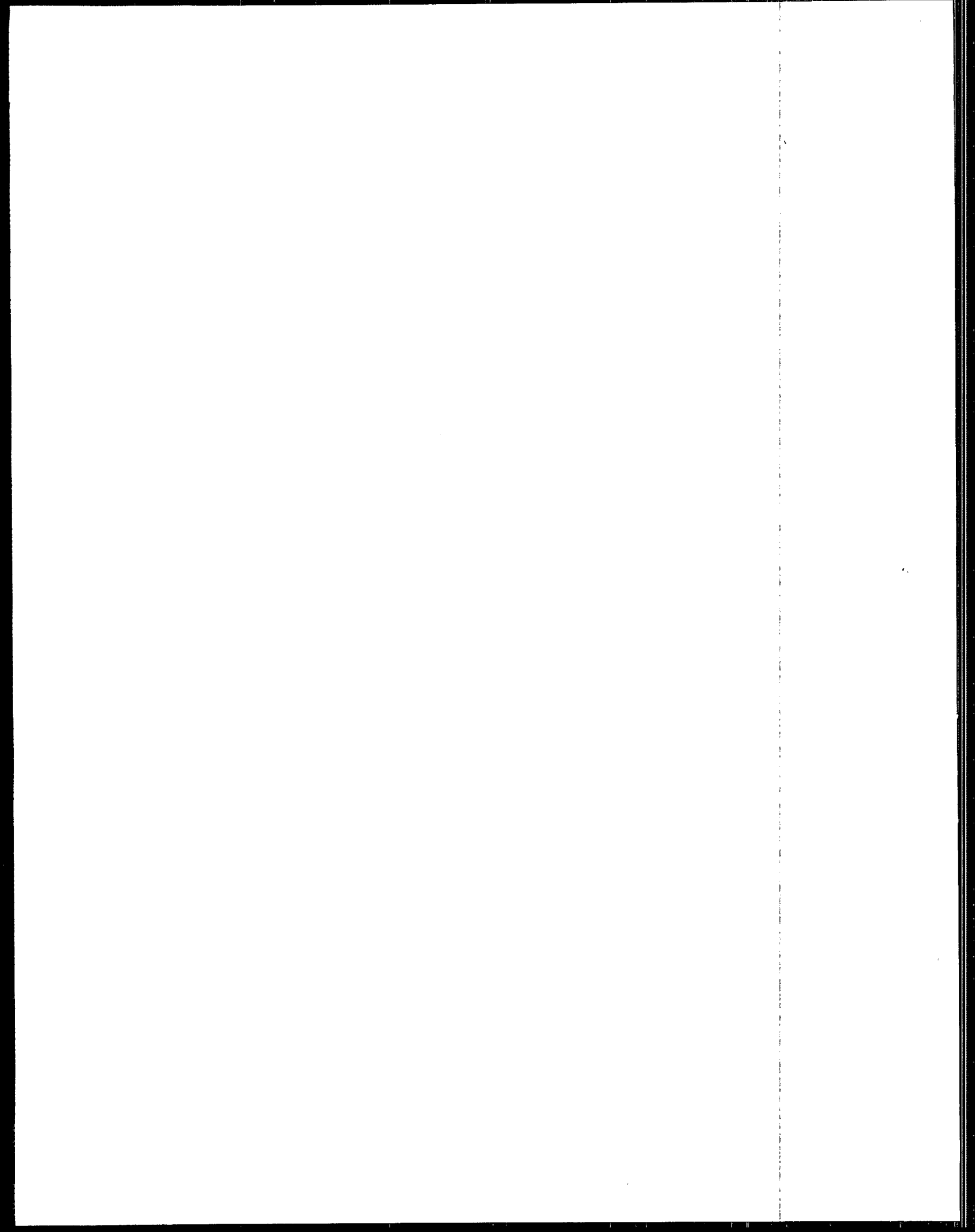
## PCI GENERAL INSTRUCTIONS

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# PRETREATMENT COMPLIANCE INSPECTION GENERAL INSTRUCTIONS

## OVERVIEW

The National Pretreatment Program regulates the discharges of pollutants from non-domestic sources into Publicly Owned Treatment Works (POTWs) that could pass through inadequately treated, interfere with the treatment works processes, threaten worker health and safety, or contaminate POTW sludges. The Pretreatment Compliance Inspection (PCI) is one of the oversight mechanisms used by Approval Authorities<sup>1</sup> to evaluate compliance by POTWs [i.e., Control Authorities (CAs)] with approved pretreatment programs. (Other oversight mechanisms include the pretreatment program audit and the pretreatment program performance report submitted at least annually by the CA.) This document provides guidance to the inspector on each step of conducting a PCI inspection, including preparation for the inspection, review of Industrial User (IU) files, visits to IUs, interview and closing conference with the CA, and follow-up reporting. In addition, this guidance provides instructions for using the POTW PCI Checklist, which was designed to facilitate the collection of data and ensure that all necessary information is reviewed and documented. This Checklist is intended to be used as a framework for organizing information that is reviewed or received during a PCI and serves as a reminder to assess the compliance status of the CA's pretreatment program implementation as required through its NPDES permit. A complete copy of the Checklist is included with this manual. The manual also includes reference materials: an in-depth explanation of all Checklist questions; a bibliography of materials applicable to development, implementation and oversight of POTW pretreatment programs; and, a list of development documents for categorical industries.

## THE PURPOSE OF THE PCI

The primary purpose of a PCI is to determine or verify the CA's compliance with and enforcement of its approved pretreatment program and NPDES permit pretreatment requirements. This and other specific objectives for the PCI are listed in Table 1.

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<sup>1</sup>Approval Authorities are U.S. Environmental Protection Agency (EPA) Regional Offices and States with approved National Pollution Discharge Elimination System (NPDES)/Pretreatment Programs.

**TABLE 1. SPECIFIC OBJECTIVES OF A PCI**

- Identification of deficiencies, problems, or noncompliance throughout the CA's service area (including contributing jurisdictions) in implementing the approved program or NPDES pretreatment requirements, focusing primarily on the issuance of control mechanisms and application of pretreatment standards and requirements, compliance monitoring, and enforcement activities
- Verification of information that the CA has supplied in its pretreatment program performance reports (e.g. annual reports)
- Determination of whether changes have been made to the CA's program since approval, or since the most recent PCI, audit, pretreatment program performance report, or previous program modification

### **EXPERIENCE NECESSARY TO CONDUCT A PCI**

Timely counseling on potential noncompliance or other issues that may be identified during the inspection is central to the ultimate goal of ensuring an effective pretreatment program. For this reason, the inspectors responsible for performing PCIs must be familiar enough with the goals of the program, the General Pretreatment Regulations, and EPA/State policy and guidance to conduct the inspection in a manner that will obtain information to detect noncompliance with pretreatment requirements.

At a minimum, the inspector must be knowledgeable of:

- Categorical Industries - Although the inspector does not need to be expert on each process associated with each type of categorical industry, he/she must be familiar with the categorical industries for which pretreatment standards exist and know enough about the processes to verify whether an industry has been properly categorized. The inspector can rely upon the applicability section of the categorical standard regulations for individual categories, development documents, and guidance documents developed for some specific categories.
- Application of Pretreatment Standards - The inspector must understand how to implement specific standards such as Total Toxic Organic (TTO), how to calculate production-based standards, when the Combined Wastestream Formula (CWF) and Flow-Weighted Averaging formula (FWA) need to be used, and be able to verify that the alternate standards have been calculated correctly. This understanding includes knowing which wastestreams are regulated, unregulated and dilute, and which pollutants are regulated for each process. The inspector must also be knowledgeable on how to apply local limits and to compare local limits to categorical pretreatment standards to determine the most stringent.

- Control Mechanisms - The inspector's role is not merely to verify that a control mechanism (e.g., permit) has been issued and is current but also to evaluate its content and to ensure that it meets the minimum requirements of 403.8(f)(1)(iii).
- Compliance Monitoring - The inspector should be familiar with EPA-approved sampling and analytical procedures, including specifications for sample location and type, and how to collect samples for use as evidence in court proceedings. Additionally, the inspector must be able to evaluate the basic inspection protocol and documentation efforts for industrial inspections.
- Evaluation of Spill Prevention and Hazardous Waste - While it is not critical that the inspector have extensive knowledge of regulatory requirements under the Resource Conservation and Recovery Act (RCRA), he/she must have some knowledge of hazardous wastes and prevention and control of spills of hazardous and nonhazardous materials to sewers.
- Enforcement - The inspector should be familiar with EPA policies and guidance on enforcement in order to evaluate the enforcement efforts of the POTW and the ability of the POTW to obtain IU compliance.

## PROCEDURES FOR CONDUCTING A PCI

A one-page summary of the steps involved in conducting a PCI is provided at the end of this section (Table 7 entitled SUMMARY OF PCI PROCEDURES). Briefly, the major steps involved in conducting a PCI include:

- Pre-site Visit Preparation
  - Notifying the CA, if appropriate,
  - Reviewing information on the CA's pretreatment program
- Onsite Visit
  - Entry (presenting credentials)
  - File review
  - Inspections of IUs
  - Interview
  - Closing conference
- Post-site Visit Follow-up
  - Report
  - Water Enforcement National Data Base (WENDB) data entry into Permit Compliance System (PCS)
  - Reportable Noncompliance/Significant Noncompliance (RNC/SNC) determination.

## Preparation For The Inspection

During a PCI, considerable information must be collected in a relatively short period of time. Therefore, planning is necessary in advance of the actual site visit to ensure that the inspection is properly focused and that the information necessary to determine compliance with program requirements is collected.

The inspector should include the following steps in planning for a specific PCI:

- Notify the CA of the scheduled inspection approximately a week in advance<sup>2</sup>
- Review CA data
  - Approved program requirements
  - Pretreatment requirements in POTW's NPDES permit
  - Previous PCI and audit reports, pretreatment program performance reports, and most recent Significant Industrial User (SIU) compliance data.

The CA should be notified of a pending inspection when it is necessary that appropriate CA personnel (and contributing jurisdiction personnel) and/or specific compiled data be available at the time of the inspection. This notification can prevent the inspector from traveling to the POTW only to find that the CA contact or specific information is not available.

Prior to the site visit, the inspector will need to obtain specific information on the current status of the CA's pretreatment program. This information should be used to update the Pretreatment Program Status Update (Attachment A of the PCI Checklist). A summary of the type of information to review is listed in Table 2.

The inspector should also obtain appropriate information in advance of the site visit to assist him/her in clearly understanding the specific requirements of the CA's approved program. An extensive list of background information for the program is contained in the

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<sup>2</sup>The inspector should follow Regional or State policy which may dictate whether the CA is notified in advance of the scheduled inspection.

Pretreatment Program Profile (Attachment B of the PCI Checklist.)<sup>3</sup> This allows the inspector to spend onsite time focusing on problems and current issues instead of collecting information that should already be a part of the Approval Authority's file. After completing the PCI, the inspector should make appropriate changes to the Status Update and the Profile.

**TABLE 2. PRETREATMENT PROGRAM INFORMATION TO REVIEW BEFORE A PCI**

- General information (Name of CA, contact)
- Number of treatment plants, NPDES permit discharge limits, sludge conditions, pretreatment conditions
- Influent, effluent, sludge, biomonitoring/toxicity test data
- Approved program and any approved modifications
  - Procedures/frequency for updating IU inventory
  - Procedures for notifying IUs of classification and applicable standards and requirements
  - Procedures for issuing control mechanisms
  - Procedures/frequency for sampling/inspecting IUs
  - Procedures for handling hauled wastes
  - Enforcement Response Plan (ERP)
- Findings of last PCI, audit, pretreatment program performance report

If the PCI is announced, the inspector should request that the CA compile certain information in advance that will be discussed during the onsite interview portion of the inspection, such as data required to support determinations of SNC, RNC, and WENDB data elements. Table 3 lists the types of information that the CA should have but may not be able to readily supply or summarize during the inspection unless compiled in advance. (This information may be contained in the CA's pretreatment program performance reports, but if it is not the inspector should request that the information be compiled for the PCI.) If possible, this information should be sent to the inspector before the site visit. If the CA does not provide this information prior to the site visit, the information should be made available when the inspector arrives onsite.

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<sup>3</sup>The Pretreatment Program Profile should be comprehensively completed (or updated) during a Pretreatment Audit. If it is not available in a completed form, the inspector may want to work with the EPA or State Pretreatment Coordinator to compile the information in preparation for the PCI.

**TABLE 3. INFORMATION POTW SHOULD COMPILE BEFORE A PCI\***

- Number/List of Categorical IUs (CIUs)
- Number/List of significant noncategorical IUs
- Number/List of regulated noncategorical IUs
- Number/List of SIUs with existing, unexpired control mechanisms
- Number of control mechanisms not issued within 180 days of the expiration date
- Number/List of SIUs evaluated for the need to develop slug discharge control plans
- Number/List of SIUs not sampled or inspected at least once
- Number/List of SIUs with effluent violations
- Number/List of industries affected by enforcement actions
- Number/List of SIUs in SNC
- Number/List of SIUs on compliance schedules
- Number/List of SIUs in SNC with self-monitoring and not inspected or sampled

\*Based on the last four full quarters<sup>4</sup>

### **Entry Interview**

Upon arriving onsite to conduct the PCI, the inspector should follow normal entry procedures according to EPA's 1988 NPDES Compliance Inspection Manual. A brief interview should follow, involving appropriate CA pretreatment staff, wherein the inspector introduces him/herself and explains the purpose and objectives of the inspection. He/she should also discuss procedures for conducting the inspection, and ask that any outstanding information that had been requested of the CA earlier be compiled and made available during the file review.

### **File Review**

The file review conducted during the PCI provides a means of assessing the CA's performance based on the records the CA maintains on its IUs. These records document that the CA has conducted the permitting, compliance monitoring, compliance assessment and

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<sup>4</sup>EPA's September 9, 1991, memorandum, Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users addresses the concept of quarters in terms of calculating SNC.



enforcement activities required by its approved program. If the CA does not maintain such documentation it has no proof of meeting the requirements of its program. ***Verbal accounts and assurances by CA personnel, although helpful in identifying potential problems, do not constitute sufficient documentation of CA program activities. The inspector should independently verify all such verbal information with file data.*** The inspector may need to request that CA personnel locate or organize file information. If relevant information is not found in the files, the inspector should note this as a problem or deficiency on the Checklist.

Thus, the file review serves two main purposes:

- To determine compliance with the approved pretreatment program requirements
- To verify information submitted by the CA in its pretreatment program performance reports (i.e., annual or more frequent reports) to the Approval Authority.

The file review gives the inspector the opportunity to determine and document deficiencies in the following major program components: issuance of control mechanisms, application of standards, compliance monitoring and enforcement. The PCI Checklist's Section I: IU File Evaluation follows this general outline of program components to be evaluated and lists frequently observed deficiencies in implementing these major program components.

The file review should be completed before conducting the interview portion (Section II: Supplemental Data Review/Interview) of the inspection. This procedure allows the inspector to identify issues or problems found in IU files which can then be discussed and resolved during the interview. In some cases it may be appropriate to conduct the interview first (i.e., where doing such would enable the inspector to better focus the file review), followed by the file review, and a closing interview to resolve issues or contradictions that arise as a result of the file review. For example, if the inspector was unable to obtain or review information as part of the preparation for the PCI, has no knowledge of the number or types of SIUs, or has never reviewed the files at the CA, the inspector may be able to obtain information in an initial interview that would assist him/her in selecting which files to review or in understanding how the files are organized (e.g., spill plans being kept in a separate file drawer or the chain-of-custody forms being kept in the laboratory's files).

The inspector should ensure that all deficiencies identified during the file review are adequately documented and should obtain copies of any relevant information. For example, if the CA has issued a control mechanism to an SIU which contains incorrect limits, the inspector should make a copy of the control mechanism to support documentation of the deficiency in the Checklist. Appropriate narrative comments should be recorded in the "Comments" section of the PCI Checklist under the industry name and address. Occasionally, it will be impractical to make copies of material which demonstrate problems or deficiencies at the time of the PCI (i.e., the material does not exist or a copy machine is not available). Where the material exists but cannot be copied onsite, the inspector should request that the CA duplicate and send these materials after completion of the onsite portion of the inspection. The inspector should keep a copy of the list of materials requested in order to verify receipt of all needed documents. If the materials cannot be obtained, this should be noted on the Checklist, along with specific information that will enable the inspector to obtain the material at a later time (e.g., the control mechanism number, to whom it was issued, and when).

***The inspector should review as many files as necessary to ensure a complete review.*** Although the PCI Checklist provides space for information on five files, the inspector should not limit his/her review to five files. Obviously, if the CA has 5 or fewer SIUs, the inspector should review all the SIU files. If the CA has greater than 5 SIUs, then the inspector should increase the number of files reviewed. Additional copies of Section I: IU File Evaluation should be made to accommodate all files reviewed.

Some CAs will have more SIUs (and therefore more files) than the inspector can review during the PCI. The files reviewed should be representative of the industries regulated by the CA, and therefore should include the various types of categorical and noncategorical SIUs. The inspector should select files that demonstrate the CA's implementation of all pretreatment requirements. Table 4 lists some of the criteria the inspector can use to select files to review. For example, the inspector could randomly select one SIU from each of the following: SIUs in SNC, SIUs in compliance, SIUs in noncompliance but not in SNC, SIUs on compliance schedules, CIUs subject to production-based standards, and CIUs using the CWF. Such a selection would enable the inspector to investigate the CA's implementation of categorical standards and local limits, identification of violations, determination of SNC, and adherence to its ERP. The inspector may want to select SIU files that were not reviewed in previous PCIs. The inspector should avoid reviewing only a specific group of SIUs (e.g., those in SNC) or the

same set of files PCI after PCI (unless this group or set represents all SIUs). By targeting only those SIUs where deficiencies or problems are known to exist, the inspector will not be able to identify other deficiencies or problems.

The inspector should also not be limited by the items listed in the file review portion of the PCI Checklist. The Checklist is intended to assist the inspector's organization of thought and documentation of deficiencies. If additional deficiencies are identified, they should be documented at the end of Section I: IU File Evaluation under G. Other.

**TABLE 4. CRITERIA TO USE IN SELECTING IU FILES TO REVIEW**

- CIU without pretreatment but reported as in compliance with categorical standards
- CIU subject to production-based categorical pretreatment standards
- One CIU from each of the different categories represented (e.g., 1 metal finisher, 1 aluminum former, 1 electrical and electronic components manufacturer)
- CIU where CWF was applied
- SIU reported in SNC in POTW's recent pretreatment program performance reports
- SIU that has caused pass through or interference
- SIU in occasional noncompliance (but not SNC)
- SIU that has received escalated enforcement action
- SIU that had slug load or accidental discharge
- CIU subject to TTO limitations
- SIU subject to local limits only
- Largest (in flow and/or loading) SIU
- SIU that (potentially) generates/stores hazardous waste

### **Industrial User Site Visits**

Another important component of the PCI are visits to selected SIUs. Site visits to SIUs can be used to:

- Verify file information or clarify/verify errors the CA has made in implementation (such as: miscategorization, misapplication of categorical standards, no evaluation of spill potential or hazardous waste handling)
- Observe and record any deficiencies in the CA personnel's inspection or sampling procedures.

The inspector should generate a brief site visit report focusing on any information that is new or inconsistent with the information in the CA's file.

In selecting which IUs to visit, the inspector should choose those IUs where the file data suggest possible errors, deficiencies, or IU noncompliance that needs further investigation (particularly in categorization, sampling location, or the need for and use of CWF or FWA). For example, the inspector should visit IUs where the file data:

- Are insufficient to determine categorization or indicates that the IU may be subject to a different categorical standard than the one the CA applied
- Suggest inappropriate sampling locations (locations that do not contain all regulated process wastestreams) or sampling locations with possible dilution wastestreams present
- Reveal very different monitoring results between the CA compliance monitoring data and the IU self-monitoring data.

Criteria for selecting which industries to visit are listed in Table 5. The number of SIUs to visit is dependent upon the results of the file review and is left to the discretion of the inspector (or Regional/State policy). The more files reviewed and site visits conducted, the more thorough the PCI will be in identifying deficiencies.

**TABLE 5. CRITERIA TO USE IN SELECTING IUs TO VISIT**

- Any SIU with incomplete or missing information in the file with regards to:
  - Categorization/classification
  - Dilute wastestreams introduced prior to sampling point
  - Self-monitoring/compliance information
  - POTW sampling/inspection procedures
- CIU without pretreatment but reported as in compliance with categorical standards
- SIU in SNC
- SIU that has caused pass through or interference
- SIU that had slug load or accidental discharge
- Other criteria used in selecting files to review

If an SIU is selected for a visit, its file should have been reviewed during the file review to determine whether the information contained in the file is consistent with observations made during the IU visit. The IU Site Visit Report Form, provided as part of Attachment C of the PCI Checklist, can prompt the inspector as to the information that should be reviewed or obtained during an IU site visit.

### **Supplemental Data Review/Interview With The CA**

The interview with CA personnel should occur after the inspector has had the opportunity to review the files. This will allow the inspector to focus on specific issues or problem areas that have been identified during the file review, to clarify items from the file review, and to evaluate compliance with program requirements that could not be determined from the file review. It is generally useful to interview various CA personnel responsible for the different pretreatment tasks (e.g., permitting, inspecting, sampling, compliance tracking and enforcement). Where the staff is large, the inspector may want to arrange for several interviews at different times with different personnel. Where appropriate, the inspector may want to interview contributing jurisdiction personnel to evaluate program implementation in the jurisdiction(s).

During the interview with the CA, verbal responses to the inspector's questions should be substantiated with documentation; information that had been specifically requested by the inspector should be provided at this time to serve as documentation. It is also very important that the inspector take accurate notes during the interview, and that he/she fully understands all responses before proceeding to the next question or issue. Oral or written statements obtained during an interview are generally admissible in court under exceptions to the "hearsay evidence" rules. For this reason, a written record should be made of statements made during the interview, either in the form of a verbatim record of questions and answers, unsworn statements, or informal notes.

### **Closing Conference**

The closing meeting is also an ideal time for final questions and details to be resolved. The inspector should be prepared to discuss general follow-up procedures, such as transmittal of findings, that will occur. The closing conference discussion should be guided by rules established by the Regional Administrator or State Director regarding permittee contacts in the

Region/State but may at least include presentation and discussion of preliminary findings. In general, certain precautions are essential:

- The inspector should not discuss any legal or enforcement consequences with the pretreatment program contact.
- The inspector must refrain from recommending a particular consultant or consulting firm, even if asked to do so. Inspectors should tell the CA representative to contact a professional society or other CAs for a listing or advice concerning this matter.

### Documentation

Any and all irregularities in the CA's pretreatment program or IU files should be documented. "Documentation" refers to all notes, Checklists or copies taken to provide evidence to support the program deficiencies identified during the inspection. Types of documentation include the completed PCI Checklist, field notes, analytical results from samples, recorded statements, photographs, videotapes, drawings and maps, printed matter and copies of permits and records. The inspector should obtain copies of any material in the CA's files that indicate an error, problem or deficiency. Types of material indicating problems include:

- Control mechanisms that contain incorrect limits
- Monitoring data that indicate noncompliance where the CA has not responded
- Enforcement actions believed to be inappropriate.

The basis of all documentation relating to the CA pretreatment program is the Checklist which, if used properly, provides accurate and inclusive documentation of all pretreatment activities. It will form the documentary basis for all determinations made by the inspector. The inspector should supplement the Checklist with clarifying notes. For example, if information on the number and types of enforcement actions were obtained from the CA's pretreatment program performance report, the inspector should note on the Checklist that this issue was not evaluated or not determined as part of the inspection and should include a reference to the CA's report. This type of clarification is needed so there is no erroneous assumption made that the information was obtained through the PCI. All PCI documentation should be maintained in the same manner as other NPDES inspections. For additional information on

proper documentation, inspectors should refer to EPA's 1988 NPDES Compliance Inspection Manual.

### Follow-up And Reporting

The Checklist and any report generated from the PCI provide the basis for all follow-up activities. It is important that the PCI Checklist and any accompanying reports be written in a clear and comprehensive manner. Section III: Evaluation and Summary of the Checklist provides space for identifying required actions (and recommendations, as per EPA/State policies) that the POTW should undertake to resolve any deficiencies in its program. All deficiencies identified during the PCI must be documented along with required corrective actions. The deficiencies must be factual and verifiable. All supporting documentation (e.g., photographs, descriptive statements, copies of records) must be clearly referenced so anyone reading the report will get a complete, clear overview of the situation. ***The required corrective actions must be clearly differentiated from any recommendations aimed at improving the implementation of the CA's program.***

The inspector should follow Regional/State policy on who completes the WENDB and RNC worksheets that are part of the PCI Checklist. They need not necessarily be completed during the site visit and should not be provided to the CA in the report unless Regional/State policy so dictates. The NPDES Compliance Inspection Report Form 3560-3 must also be completed after the inspection and incorporated into the final inspection report. This form contains a pretreatment code (P) to indicate that a PCI was performed. This form must be prepared to provide for data entry into PCS.

The inspector should also update the Profile and Status Update, where needed, based on information obtained during the PCI. If other personnel are responsible for updating the Profile and Status Update, the inspector should provide information from the PCI to assist in this process.

## HOW TO USE THE CHECKLIST

The PCI Checklist is a tool to help the inspector in documenting problems or deficiencies and ensuring all necessary program components have been covered in the inspection. The Checklist is organized into the following sections:

- Cover page
- Section I: IU File Evaluation
- Section II: Supplemental Data Review/Interview
- Section III: Evaluation and Summary
- Attachment A: Pretreatment Program Status Update
- Attachment B: Pretreatment Program Profile
- Attachment C: Worksheets
  - WENDB Data Entry Worksheet
  - RNC Worksheet
  - IU Site Visit Report Form
  - IU File Evaluation Worksheets.

The inspector should not limit him/herself only to the items listed in the Checklist but should expand on the Checklist where deficiencies/problems are uncovered. The format of the Checklist is designed to allow the inspector to add/customize via the preformatted page at the end of each Section. As always, the inspector should provide clear comments about specific deficiencies found.

Inspectors will realize that the PCI is not a comprehensive evaluation of all aspects of the CA's program or activities. In particular, the CA's resources, legal authority or the technical basis of the CA's local limits are not reviewed or evaluated. Since an intensive review of material in all files may not be possible during a PCI, it would not be appropriate to conclude that the CA's program, procedures, or implementation activities are adequate if no deficiencies were explicitly identified. When using the Checklist, the inspector should note where items, questions or program components were not evaluated or were not answerable due to a lack of information. Where the inspector finds a deficiency in a program element, it should be identified with a check and noted in the comment field. Only *program elements the inspector knows to be deficient are checked*. If no deficiencies



are identified, then portions of Sections I, II, and III of the Checklist may remain blank. It is essential that the inspector not provide what may be misleading information by indicating that a program element is adequate. Such information can undermine subsequent enforcement actions taken against the CA based on the inspection or upon other evaluations that can conflict with the inspection. The inspector should develop and use some type of coding system that will enable him/her to know what was reviewed, what was not reviewed, and what was found to be deficient. Table 6 illustrates an example of a documentation system an inspector could use.

**TABLE 6. EXAMPLE PCI CHECKLIST INFORMATION DOCUMENTATION SYSTEM**

- Place a (✓) in the appropriate places to indicate deficiencies; then describe the specific deficiencies in the places provided or on separate sheets to be attached to the PCI Checklist
- Write ND (Not Determined) beside the questions or items that were not reviewed or discussed during the PCI; at the end of the Checklist indicate the reason(s) why these were not addressed (e.g., lack of time, appropriate CA personnel was not available to answer, etc.)
- Use NA (Not Applicable) where appropriate.

### **Cover Page**

The cover page provides space for the name of the CA, its address, and the representative present during the inspection. It also provides space for the date(s) of the inspection and the inspectors' names, titles and phone numbers. At the top of the cover page the inspector can indicate the sections and attachments of the PCI Checklist that were used in the PCI.

### **Section I: IU File Evaluation**

The file review section is designed to allow the inspector to document any problems or deficiencies found during file review. The inspector should complete the IU information requested in the designated "Narrative Comments" field (e.g., industry name, address, etc.) in order to document the files reviewed. Many important components of the pretreatment program are listed in this section (yet, the inspector should realize that the list is not all inclusive). The inspector should indicate a deficiency by placing a (✓) by any of the listed

program components. Then, in the "Comments" field beneath each of the major program components in this section, he/she should write the specific deficiency found in the file. For example, if the IU was subject to the metal finishing pretreatment standards and the inspector found that the cadmium metal finishing limit had not been applied to the IU, then the inspector should place a (✓) in C.2.c. and in the "Comments" field state that the cadmium limit for the metal finishing category was not applied to the IU. If the identified deficiency is not listed in any of the subsections of Section I of the Checklist, then the inspector should list the deficiency under G. Other and again explain or describe the specific deficiency in the "Comments" field.

## **Section II: Supplemental Data Review/Interview**

Section II: Supplemental Data Review/Interview is designed to enable the inspector to determine compliance with other program requirements that may not be easily determined through review of individual files. While a determination of compliance for some of the items in this section is possible based on the file reviews alone, most will require additional information. For some of the program requirements listed in this section, the inspector may need to request that the CA compile some data in advance so that a review will enable him/her to determine compliance. Again, the inspector should not limit his/her review and evaluation to the questions/items in the Checklist and is encouraged to ask questions beyond those in the Checklist.

***The inspector should avoid asking leading or suggestive questions which imply the desired answer.*** These types of questions tend to influence the answers given by the interviewee. Examples of leading questions are:

- Did you sample all IUs in the past year?
- Have you permitted all SIUs?

Additionally, the inspector should phrase questions to require a narrative response rather than "yes" or "no" responses. For example, question II.F.2 is designed to enable the inspector to document any deficiencies in the CA's implementation of its approved ERP. Rather than soliciting a "yes/no" response from CA personnel, the inspector should record his/her evaluation based upon the CA's documentation of its enforcement actions. Before concluding the interview, the inspector should verify that all necessary information has been gathered and

that any outstanding problems are identified. If there is any conflicting information, the inspector should resolve the issue to his/her satisfaction.

### **Section III: Evaluation And Summary**

Section III: Evaluation and Summary may be completed at the end of the onsite visit or thereafter in the office. This section provides a means for the inspector to summarize the deficiencies identified during the inspection. The format allows the inspector to concisely describe any noncompliance with the listed regulatory requirements and to specify and describe the required and/or recommended corrective actions.<sup>5</sup> Space is provided for the inspector to add any additional recommendations or requirements. The inspector should follow Regional/State policy in providing recommendations.

### **Attachment A: Pretreatment Program Status Update**

Attachment A: Pretreatment Program Status Update provides a means of updating the program's status. The attachment should be updated prior to each PCI based on information obtained from the most recent inspection and/or audit and the last pretreatment program performance report (e.g. annual report). If the CA's pretreatment program performance report provides the number and list of SIUs in SNC (in the CA's pretreatment year), the inspector should record this data in the Status Update, Section B: Pretreatment Program Status, Item No. 4. If this information was not in the CA's pretreatment program performance report, then prior to the PCI the inspector should request the CA to compile the following information and send it to the inspector before the PCI or have it available during the PCI: the number (and percent) of SIUs that were in SNC during the four most recent full quarters. The information contained in the Status Update enables the inspector to become familiar with the known strengths and weaknesses of the CA's program. At the completion of the PCI, the inspector should revise the Status Update, as needed, based on information obtained during the PCI.

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<sup>5</sup>The CA's approved pretreatment program should be consistent with the regulatory requirements of the General Pretreatment Regulations; however, the CA's program or NPDES permit pretreatment requirements may not have been modified to include the latest revisions to the General Pretreatment Regulations. For those CA programs that have not been modified, the inspector needs to determine compliance with the approved program and NPDES requirements that are legally effective at the time of the PCI.

## **Attachment B: Pretreatment Program Profile**

The inspector should be familiar with the CA's approved pretreatment program, its NPDES permit conditions, and all applicable pretreatment regulations. The Pretreatment Program Profile (Attachment B to the PCI Checklist) was developed for this purpose. The Profile provides a summary of the CA's approved pretreatment program requirements and NPDES pretreatment conditions. The attachment should be initially completed based on information obtained from the approved pretreatment program submission, all modifications thereto, and the NPDES permit. If the Profile is available from a previous PCI or audit, the inspector should use it to prepare for the inspection. If the Profile has not been previously developed, it may be completed by the inspector and the State/EPA Pretreatment Coordinator. Once completed, the Profile need only be updated when the approved pretreatment program is modified and/or the NPDES permit requirements are revised. The inspector should review this permanent record of the CA's approved program requirements and NPDES conditions prior to a PCI, in order to determine the CA's compliance with all pretreatment requirements.

## **Attachment C: Worksheets**

### **WENDB Data Entry Worksheet**

The Pretreatment Permits and Enforcement Tracking System (PPETS) is a computerized management information system for tracking the permit compliance and enforcement status of approved pretreatment programs. The critical elements of the tracking system, referred to as WENDB data elements, provide EPA with summary pretreatment statistics to highlight problem areas in local oversight and enforcement of approved pretreatment programs. The PCI Checklist identifies the questions that correspond to the WENDB data elements. A WENDB Data Entry Worksheet is included in Attachment C of the Checklist to facilitate data entry.

### **RNC Worksheet**

Approval Authorities are required to report certain permit violations on the Quarterly Noncompliance Report (QNCR), including a CA's failure to adequately implement its approved pretreatment program. RNC criteria are used in determining when a CA is to be reported on the QNCR. In order to assess RNC, the inspector should become familiar with EPA's FY 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Requirements. The RNC Worksheet included in Attachment C of the PCI Checklist should be used by the

inspector (in accordance with Regional/State policy) to determine and document whether the CA should be reported on the QNCR based on the information obtained during the PCI.

### **IU Site Visit Report Form**

The inspector must document any IU site visits which occur. The IU Site Visit Report Form provided in Attachment C as a supplement to the Checklist may be used. This form is provided for the convenience of the inspector. It should not be considered as all inclusive and may be replaced with a more comprehensive form.

### **File Review Worksheets**

The optional File Review Worksheets in Attachment C of the Checklist are designed to assist the inspector in quantifying the CA's performance in applying standards, compliance monitoring, and enforcement activities. If these worksheets are used they need not be submitted as part of the report to the CA. However, they should be kept in the inspector's PCI file. The inspector is especially encouraged to use these worksheets if he/she has reason to believe that enforcement action will result or may be necessary. The worksheets are:

- File Review Worksheet
- IU Self-Monitoring Worksheet
- POTW Monitoring Reports Worksheet
- Violations Based on IU Self-Monitoring and POTW Monitoring Data Worksheet
- Enforcement Actions Against IU Worksheet
- CIUs Worksheet.

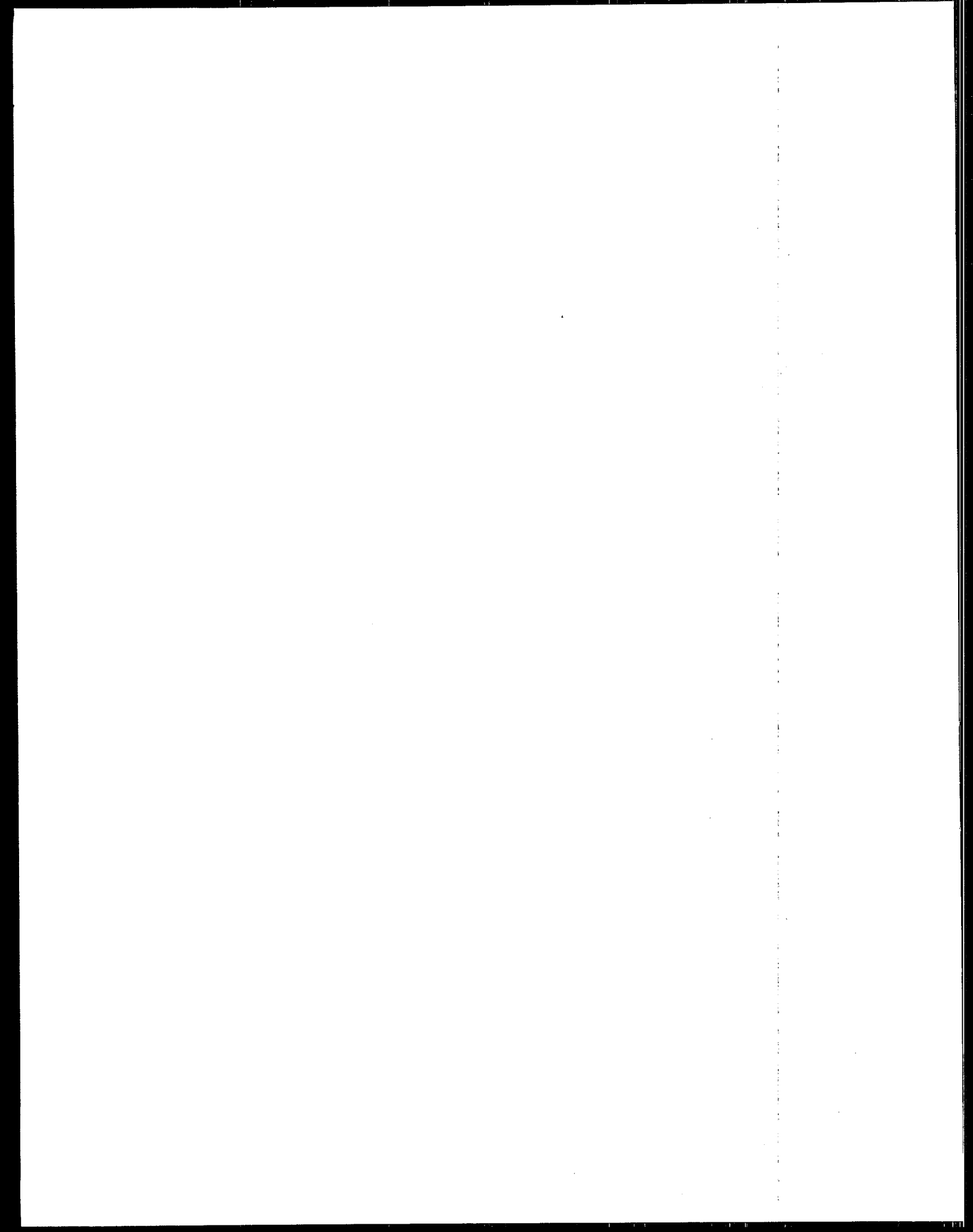
### **SUMMARY OF PCI PROCEDURES**

Table 7 provides a one-page summary of the steps involved in conducting a PCI. The inspector may find this summary useful to refer to during the preparation, onsite visit, and follow-up.

✓	TABLE 7. SUMMARY OF PCI PROCEDURES
	<b>PREPARATION TASKS</b>
	Determine specific objectives of PCI
	Provide advance notification to CA
	Review CA information
	<i>CA approved pretreatment program, its NPDES conditions and all applicable environmental regulations (NPDES limits, receiving stream water quality standards, sludge standards, air emissions) (Pretreatment Program Profile)</i>
	<i>Most recent compliance data and reports</i>
	<i>Any available environmental data to identify any problems</i>
	Obtain information from CA before site visit
	Complete Pretreatment Program Status Update
	<b>SITE VISIT TASKS</b>
	<u>Follow entry procedures</u>
	<u>Conduct file review</u>
	Select files to review
	<i>CIUs that the CA has reported are in compliance but do not have any pretreatment, SIUs that are in SNC or that have had a range of enforcement actions, CIUs using the CWF or FWA or are subject to production-based standards, etc.</i>
	Review file information
	<i>Classification</i>
	<i>Control mechanism</i>
	<i>Application of pretreatment standards</i>
	<i>Compliance monitoring (sampling and inspections)</i>
	<i>Enforcement</i>
	<i>Compliance status</i>
	<u>Conduct IU inspections</u>
	Select IUs to inspect
	Conduct inspections
	<i>Observe CA inspection/sampling procedures</i>
	<i>Verify file information or clarify/verify errors CA has made in implementation</i>
	<i>Obtain IU compliance/noncompliance information for possible enforcement action against IU</i>
	<i>Manufacturing/process areas, all wastestreams (regulated, unregulated, dilute), hazardous waste generation/handling, pretreatment facilities, IU sampling and analysis protocols (sampling point, procedures and methods), spill/slug potential and controls, records</i>
	<u>Interview</u>
	Obtain information
	<i>Information that was not obtained by file review</i>
	<i>Clarify deficiencies found in file review</i>
	Check notes and Checklist to ensure everything has been reviewed
	Clarify any discrepancies
	Obtain copies of CA records
	<i>Copies of any materials in the CA's files that indicate an error or deficiency (e.g., control mechanisms that do not contain correct limits, monitoring data that indicate noncompliance where CA has not responded, or enforcement actions believed to be inappropriate)</i>
	<b>FOLLOW-UP TASKS</b>
	Write the report
	Content of report
	<i>Deficiencies</i>
	<i>Required actions</i>
	<i>Recommendations</i>
	<i>Request for CA to respond</i>
	Complete WENDB and RNC portions of the Checklist and Program Profile and Status Update

**2.**

**POTW PCI CHECKLIST**





## POTW PCI CHECKLIST

When using this Checklist the inspector should develop a system of documentation that will indicate what was reviewed, what was not reviewed and what was found to be deficient. It is essential that the inspector not provide what may be misleading information by indicating that a program element is adequate. Such information can undermine subsequent enforcement actions. The following table provides an example documentation system that can be used.

EXAMPLE PCI CHECKLIST INFORMATION DOCUMENTATION SYSTEM
<ul style="list-style-type: none"><li>• Place a (✓) in the appropriate places to indicate deficiencies; then describe the specific deficiencies in the places provided or on separate sheets to be attached to the Pretreatment Compliance Inspection (PCI) Checklist</li><li>• Write ND (Not Determined) beside the questions or items that were not discussed or reviewed during the PCI; at the end of the Checklist indicate the reason(s) why these were not addressed (e.g., lack of time, appropriate Control Authority (CA) personnel was not available to answer)</li><li>• Use NA (Not Applicable) where appropriate.</li></ul>

*This Checklist assumes that the CA's program has been modified to include the latest revisions to the General Pretreatment Regulations [referred to as the Domestic Sewage Study (DSS) revisions]. For those CA programs that have not been modified, the inspector needs to determine compliance with the approved program and National Pollutant Discharge Elimination System requirements that are legally effective at the time of the PCI.*

The CA is responsible for regulating all SIUs in its service area, regardless of the jurisdiction in which they are located. *The PCI should encompass the CA's program implementation throughout its service area including contributing jurisdictions.* When reviewing each program component (i.e., IU inventory, issuance of control mechanism, compliance monitoring, and enforcement) the inspector should document any deficiency in implementation and enforcement in the contributing jurisdictions.

In principal, the PCI should cover the CA's pretreatment program through the last four fall quarters<sup>1</sup>. If the PCI occurs within three months after the end of the Ca's pretreatment year, then the inspector may choose to review data through the CA's pretreatment year in order to validate the information the CA submitted in its pretreatment program performance report.

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<sup>1</sup>EPA's September 9, 1991, memorandum, Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users addresses the concept of quarters in terms of calculating SNC. Briefly, at the end of each quarter, all data from the previous 6-month time period is to be used in the calculation of SNC. Under this system, each IU is evaluated for SNC four times during the year and the total evaluation period covers 15 months (i.e., beginning with the last quarter of the previous pretreatment year through the end of the current year).

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2.

POTW PCI CHECKLIST

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# POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

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  - RNC Worksheet
  - IU Site Visit Report Form (Optional)
  - File Review Worksheets (Optional)
- Attachment D        Supporting Documentation

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CA name and address:	Date(s) of PCI
	Period covered by PCI

PIRT/DSS incorporated in NPDES permit?	Yes	No
--	-----	----

INSPECTOR(S)		
Name	Title/Affiliation	Telephone Number

CA REPRESENTATIVE(S)		
Name	Title/Affiliation	Telephone Number
	*	

\*Identified program contact

**ACRONYM LIST****Acronym****Term**

BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FTE	Full-Time Equivalent
FWA	Flow-Weighted Averaging
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical Review Criteria
TTO	Total Toxic Organics
WENDB	Water Enforcement National Data Base

**SECTION I: IU FILE EVALUATION**

**INSTRUCTIONS:** Select a representative number of files to review. Provide relevant details on each file reviewed. Comment on problems identified. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

NARRATIVE COMMENTS			
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status	<input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing
Comments			

**SECTION I: IU FILE EVALUATION (Continued)**

<b>NARRATIVE COMMENTS</b>			
FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)	
		Type of industry (products manufactured)	
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			
FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)	
		Type of industry (products manufactured)	
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			



**SECTION I: IU FILE EVALUATION (Continued)**

<b>NARRATIVE COMMENTS</b>		
FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)
Type of industry (products manufactured)		
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing
Comments		
FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)
Type of industry (products manufactured)		
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing
Comments		

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**SECTION I: IU FILE EVALUATION (Continued)**

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>B. ISSUANCE OF IU CONTROL MECHANISM</b>	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					2. Control mechanism contents	403.8(f)(1)(iii)
					a. Statement of duration ( $\leq$ 5 years)	
					b. Statement of nontransferability	
					c. Applicable effluent limits (local limits, categorical standards)	
					d. Self-monitoring requirements	
					• Identification of pollutants to be monitored	
					• Sampling frequency	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements	
					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
					g. Notice of slug loading	
					h. Notification of spills, bypasses, upsets, etc.	
					i. Notification of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	
					k. Slug discharge control plan requirement	
Comments						



**SECTION I: IU FILE EVALUATION (Continued)**

<u>File</u>	<u>File</u>	<u>File</u>	<u>File</u>	<u>File</u>	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>D. CA COMPLIANCE MONITORING</b>	
					<b>Sampling</b>	
					1. Sampling (once a year)	403.8(f)(2)(v)
					2. Sampling at frequency specified in approved program	
					3. Documentation of sampling activities	403.8(f)(2)(vi)
					4. Analysis of results for all parameters	
					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					<b>Inspection</b>	
					6. Inspection (once a year)	403.8(f)(2)(v)
					7. Inspection at frequency specified in approved program	
					8. Documentation of inspection activities	403.8(f)(2)(vi)
					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(v)
<b>Comments</b>						

**SECTION I: IU FILE EVALUATION (Continued)**

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>E. CA ENFORCEMENT ACTIVITIES</b>	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vii)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vii)

Comments

**SECTION I: IU FILE EVALUATION (Continued)**

File	File	File	File	File	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>F. IU COMPLIANCE STATUS</b>	
					<b>Self-Monitoring and Reporting</b>	
					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
					2. Analysis of all required pollutants	403.12(g)(1)&(h)
					3. Submission of BMR/90-day report	403.12(b)&(d)
					4. Periodic self-monitoring reports	403.12(e)&(h)
					5. Reporting all required pollutants	403.12(g)(1)&(h)
					6. Signatory/certification of reports	403.12(l)
					7. Submission of compliance schedule reports by required dates	403.12(c)
					8. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					9. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					10. Notification of hazardous waste discharge	403.12(j)&(p)
					11. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					12. Notification of significant changes	403.12(j)
<b>INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.</b>						
					<b>Discharge</b>	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	[403.5(a)(1)]
					• Spill or slug load	[403.12(f)]
					d. Other discharge violations (specify)	
					<b>Reporting</b>	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)
<b>Comments</b>						





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**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW**

**INSTRUCTIONS:** Complete this section during the onsite visit based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

**A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]**

	Yes	No
<p>1. Did the CA make substantial changes to the pretreatment program that were not approved by the Approval Authority (e.g., definitions, limits)?</p> <p>If yes, describe.</p>		

	Yes	No
<p>2. Is the CA in the process of modifying any approved pretreatment program component (including legal authority, local limits, DSS requirements, etc.)?</p> <p>If yes, describe.</p>		

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)**

**B. IU CHARACTERIZATION** [403.8(f)(2)(i)&(ii)]

1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

2. How many IUs are currently identified by the CA in each of the following groups?

- |    |                      |  |
|----|----------------------|--|
| a. | <input type="text"/> | SIUs (as defined by the CA) [WENDB-SIUS]     |
|    | <input type="text"/> | CIUs [WENDB-CIUS]                            |
|    | <input type="text"/> | Noncategorical SIUs                          |
| b. | <input type="text"/> | Other regulated noncategorical IUs (specify) |
| c. | <input type="text"/> | TOTAL  |

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)**

**C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]**

1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism?

b. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENDB-NOCM] [RNC-II]

%

If any, explain.

2. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]

If any, explain.

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)**

**D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS**

1. a. How many SIUs were not evaluated for the need to develop slug discharge control plans in the last 2 years? [403.8(f)(2)(v)]

--

b. List the SIUs below or attach additional sheets as needed.

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW?

N/A	Yes	No

If yes, identify the industries.

If no, explain.

3. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

Yes	No

If yes, identify and explain.

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)**

<b>E. COMPLIANCE MONITORING</b>			
<b>1. Identify the following.</b>			
Program Aspect	Required Frequency	Actual Frequency	Explain Difference
<b>a. Inspection</b>			
• CIUs			
• Other SIUs			
<b>b. Sampling (by CA)</b>			
• CIUs			
• Other SIUs			
<b>c. Self-Monitoring</b>			
• CIUs			
• Other SIUs			
<b>d. Reporting</b>			
• CIUs			
• Other SIUs			
<b>2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(v)] [WENDB-NOIN] [RNC-II]</b>			
a. Not sampled or not inspected at least once [WENDB-NOIN]			%
b. Not sampled at least once			%
c. Not inspected at least once			%
If any, explain.			







**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)**

**F. ENFORCEMENT (Continued)**

7. a. How many SIUs are on compliance schedules?  

b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).

SIU	End Date

8. Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)]

If yes, identify and explain.

Yes	No

9. Did the SIUs return to compliance by any of the following? [RNC-I]

- a. Within 90 days
- b. Within the time specified in the ERP
- c. Through a compliance schedule

Yes	No

**G. ADDITIONAL EVALUATIONS**

**INSTRUCTIONS:** *Attach additional sheets as needed.*

SECTION II COMPLETED BY: <div style="text-align: center;">TITLE:</div>	DATE: TELEPHONE:
POTW REPRESENTATIVE PROVIDING RESPONSES:	DATE: TELEPHONE:

**SECTION III: EVALUATION AND SUMMARY**

**INSTRUCTIONS:** Identify program components that the CA is recommended (Rec.) or required (Req.) to implement in order to effectively implement the pretreatment program and/or to meet its regulatory requirements. Specify the corrective action the CA needs to take.

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>A. CA PRETREATMENT PROGRAM MODIFICATION</b>				
1. Notify of program modification	403.18	II.A		
<b>B. IU CHARACTERIZATION</b>				
1. Identify and locate all SIUs	403.8(f)(2)(i)	II.B		
2. Identify the character and volume of pollutants contributed to POTW by IUs	403.8(f)(2)(ii)	II.B.1; II.E.1		
<b>C. CONTROL MECHANISM EVALUATION</b>				
1. Issue individual control mechanisms to all SIUs	403.8(f)(1)(iii)	I.B.1; II.C.1&2		

**SECTION III: EVALUATION AND SUMMARY (Continued)**

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>C. CONTROL MECHANISM EVALUATION (Continued)</b>				
2. Ensure control mechanisms contents include: <ul style="list-style-type: none"> <li>a. A statement of duration</li> <li>b. A statement of nontransferability</li> <li>c. Effluent limits</li> <li>d. Self-monitoring requirements</li> <li>e. A statement of penalties</li> <li>f. Compliance schedules</li> <li>g. Notice of slug loading</li> <li>h. Notification of spills, bypasses, upsets, etc.</li> <li>i. Notification of significant change in discharge</li> <li>j. 24-hour notification of violation/resample requirement</li> </ul>	403.8(f)(1)(iii)	I.B.2.a-j		
<b>D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>				
1. Apply all applicable pretreatment standards	403.8(f)(1)(ii); 403.5	I.C.1-6; II.D.2		
2. Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(v)	I.D.9; II.D.1		
<b>E. COMPLIANCE MONITORING</b>				
1. Inspect and sample each SIU in accordance with approved program	Approved program	I.D.2&7; II.E.1		

**SECTION III: EVALUATION AND SUMMARY (Continued)**

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>E. COMPLIANCE MONITORING (Continued)</b>				
2. Inspect and sample each SIU once a year	403.8(f)(2)(v)	I.D.1&6; II.E.1&2		
3. Use proper sampling analysis (40 CFR Part 136) and inspection procedures	403.8(f)(2)(vi)	I.D.3,5&8		
4. Require, receive, and analyze reports from SIUs	403.8(f)(2)(iv)	I.B.2.d; I.F.1-12; II.E.1		
5. Monitor to demonstrate continued compliance and resampling after violation(s)	403.12(g)(1)&(2)	I.F.3,4&9		
6. Ensure CIUs report on all regulated pollutants at least once every 6 months	403.12(g)(1)	I.F.2&5		

**SECTION III: EVALUATION AND SUMMARY (Continued)**

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>E. COMPLIANCE MONITORING (Continued)</b>				
7. Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months	403.12(h)	I.F.2&5		
8. Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed	403.12(l); 403.6(a)(2)(ii)	I.F.6		
9. Receive notification of hazardous waste discharges	403.12(j)&(p)	I.F.10; II.D.3		
<b>F. ENFORCEMENT</b>				
1. Implement approved ERP	403.8(f)(5)	I.E.3; II.F.2		
2. Annually publish a list of IUs in SNC	403.8(f)(2)(vii)	I.E.5; II.F.4		

**SECTION III: EVALUATION AND SUMMARY (Continued)**

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>F. ENFORCEMENT (Continued)</b>				
3. Develop IU compliance schedules	403.8(f)(1)(iv)(A)	I.B.2.f; II.F.1,7&9		
4. Ensure IU compliance within 3 years of standards effective date (or less than 3 years where required by standard)	403.6(b)	II.F.8		
5. Ensure new sources report on compliance with appropriate standards within the first 90 days of discharge	403.12(d)	I.F.3		
<b>G. ADDITIONAL EVALUATIONS</b>				

SECTION III COMPLETED BY:	DATE:
TITLE:	TELEPHONE:

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## PRETREATMENT PROGRAM STATUS UPDATE

**INSTRUCTIONS:** This attachment is intended to serve as an update of program status. It should be updated prior to each PCI based on information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.

### A. CA INFORMATION

1. CA name			
2. a. Pretreatment contact		b. Mailing address	
c. Title		d. Telephone number	
3. Date of last CA report to Approval Authority			
4. Is the CA currently operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?			Yes
			No
5. Effluent and sludge quality			
a. List the NPDES effluent and sludge limits violated and the suspected cause(s).			
Parameters Violated		Cause(s)	
b. Has the treatment plant sludge violated these tests?			Yes
• EP toxicity			No
• TCLP			

### B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.			
	Last PCI Date:	Last Audit Date:	Program Report Date:
a. Program modification			
b. Legal authority			
c. Local limits			
d. IU characterization			
e. Control mechanism			
f. Application of pretreatment standards			
g. Compliance monitoring			
h. Enforcement program			
i. Data management			
j. Program resources			
k. Other (specify)			

**PRETREATMENT PROGRAM STATUS UPDATE (Continued)**

<b>B. PRETREATMENT PROGRAM STATUS (Continued)</b>																											
<p><b>2. Is the CA presently in RNC for any of these violations?</b></p> <p>a. Failure to enforce against pass through and/or interference [RNC-I][SNC]</p> <p>b. Failure to submit required reports within 30 days [RNC-I][SNC]</p> <p>c. Failure to meet compliance schedule milestones within 90 days [RNC-I][SNC]</p> <p>d. Failure to issue/reissue control mechanisms to 90 percent of SIUs within 6 months [RNC-II]</p> <p>e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC-II]</p> <p>f. Failure to enforce standards and reporting requirements [RNC-II]</p> <p>g. Other (specify) [RNC-II]</p>	<b>Data Source</b>	<b>Yes</b>	<b>No</b>																								
<p><b>3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit (whichever is most recent).</b></p> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr style="background-color: #cccccc;"> <th style="width: 35%;">Name of SIU in SNC</th> <th style="width: 35%;">Compliance Status</th> <th style="width: 30%;">Source</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>				Name of SIU in SNC	Compliance Status	Source																					
Name of SIU in SNC	Compliance Status	Source																									
<p><b>4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program performance report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the PCI.</b></p> <p align="right">SNC Evaluation Period <input style="width: 100px;" type="text"/></p> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 5px;"> <tr> <td style="width: 10%;"></td> <td style="width: 10%; text-align: center;">%</td> <td style="width: 60%;">Applicable pretreatment standards and reporting requirements</td> <td style="width: 20%;"></td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> </tr> <tr> <td></td> <td align="center">%</td> <td>Self-monitoring requirements</td> <td></td> <td align="center" colspan="2">*SNC defined by:</td> </tr> <tr> <td></td> <td align="center">%</td> <td>Pretreatment compliance schedules</td> <td></td> <td align="center">POTW</td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td align="center">EPA</td> <td></td> </tr> </table>					%	Applicable pretreatment standards and reporting requirements					%	Self-monitoring requirements		*SNC defined by:			%	Pretreatment compliance schedules		POTW						EPA	
	%	Applicable pretreatment standards and reporting requirements																									
	%	Self-monitoring requirements		*SNC defined by:																							
	%	Pretreatment compliance schedules		POTW																							
				EPA																							
<p><b>5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.</b></p> <div style="border: 1px solid black; height: 100px; margin-top: 5px;"></div>																											

<p><b>ATTACHMENT A COMPLETED BY:</b></p> <p align="center"><i>TITLE:</i></p>	<p align="center"><b>DATE:</b></p> <p align="center"><b>TELEPHONE:</b></p>
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## PRETREATMENT PROGRAM PROFILE

**INSTRUCTIONS:** This attachment is intended to serve as a summary of program information. This background information should be obtained from the original, approved pretreatment program submission and modifications and the NPDES permit. The profile should be updated, as appropriate, in response to approved modifications and revised NPDES permit requirements.

### A. CA INFORMATION

1. CA name
2. Original pretreatment program submission approval date
3. Required frequency of reporting to Approval Authority
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?

Yes	No

If yes, provide the following information.

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants

### B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM]
2. Identify any substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]

Date Approved	Nature of Modification	Date Incorporated in NPDES Permit

**PRETREATMENT PROGRAM PROFILE (Continued)**

<b>C. TREATMENT PLANT INFORMATION</b>										
<b>INSTRUCTIONS:</b> Complete this section for each treatment plant operated under an NPDES permit issued to the CA.										
1. Treatment plant name					2. Location address					
3. a. NPDES permit number			b. Expiration date		4. Treatment plant wastewater flows					
					Design <input style="width: 50px;" type="text"/>		MGD Actual <input style="width: 50px;" type="text"/>		MGD	
5. Sewer system		a. Separate <input style="width: 50px;" type="text"/> %			b. Combined <input style="width: 50px;" type="text"/> %			c. Number of CSOs		
6. a. Industrial contribution (MGD) <input style="width: 50px;" type="text"/>			b. Number of SIUs discharging to plant <input style="width: 50px;" type="text"/>			c. Percent industrial flow to plant <input style="width: 50px;" type="text"/>				
7. Level of treatment					Type of Process(es)					
a. Primary										
b. Secondary										
c. Tertiary										
8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.										
		Influent (Times/Year)		Effluent (Times/Year)		Sludge (Times/Year)		Receiving Stream (Times/Year)		
a. Metals										
b. Organics										
c. Toxicity testing										
d. EP toxicity										
e. TCLP										
9. Effluent Discharge										
a. Receiving water name			b. Receiving water classification				c. Receiving water use			
d. If effluent is discharged to any location other than the receiving water, indicate where.										
10. 301(h) waiver (ocean discharge)										
		Yes		No						
a. Applied for						c. Date of application				
b. Granted						d. Date approved or denied				
11. Did the CA submit results of whole effluent biological toxicity testing as part of its NPDES permit application(s)? [122.21(j)(1) and (2)]							N/A	Yes	No	
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]										
b. Has there been a pattern of toxicity demonstrated?										
12. Indicate methods of sludge disposal.										
		Quantity of Sludge				Quantity of Sludge				
a. Land application		<input style="width: 50px;" type="text"/>		dry tons/year		e. Public distribution		<input style="width: 50px;" type="text"/>		dry tons/year
b. Incineration		<input style="width: 50px;" type="text"/>		dry tons/year		f. Lagoon storage		<input style="width: 50px;" type="text"/>		dry tons/year
c. Monofill		<input style="width: 50px;" type="text"/>		dry tons/year		g. Other (specify)		<input style="width: 50px;" type="text"/>		dry tons/year
d. MSW landfill		<input style="width: 50px;" type="text"/>		dry tons/year						

**PRETREATMENT PROGRAM PROFILE (Continued)**

**D. LEGAL AUTHORITY**

1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority).

b. Date enacted/adopted c. Date of most recent revision

2. Does the CA's legal authority enable it to do the following: [403.8(f)(1)(i-vii)]

	Yes	No
a. Deny or condition pollutant discharges [403.8(f)(1)(i)]		
b. Require compliance with standards [403.8(f)(1)(ii)]		
c. Control discharges through permit or similar means [403.8(f)(1)(iii)]		
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)]		
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)]		
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)]		
g. Comply with confidentiality requirements? [403.8(f)(1)(vii)]		

3. a. How many contributing jurisdictions are there?   
 List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.

Jurisdiction Name	Number of CIUs	Number of Other SIUs

b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions? 

Yes	No

If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform.

a. IWS update		e. Notification of IUs	
b. Permit issuance		f. Receipt and review of IU reports	
c. Inspection and sampling		g. Analysis of samples	
d. Enforcement		h. Other (specify)	



**PRETREATMENT PROGRAM PROFILE (Continued)**

**G. APPLICATION OF STANDARDS**

1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)]		Yes	No				
2. If there is more than one treatment plant, were local limits established specifically for each plant?		N/A	Yes No				
3. Has the CA <u>technically evaluated</u> the need for local limits for all pollutants listed below? [WENDB-EVLL] [403.5(e)(1); 403.8(f)(4)]							
Partial Technical Evaluation (not all 10 pollutants evaluated)?							
	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)							
b. Cadmium (Cd)							
c. Chromium (Cr)							
d. Copper (Cu)							
e. Cyanide (CN)							
f. Lead (Pb)							
g. Mercury (Hg)							
h. Nickel (Ni)							
i. Silver (Ag)							
j. Zinc (Zn)							
k. Other (specify)							

**H. COMPLIANCE MONITORING**

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
<b>a. Inspections</b>				
• CIUs				1/year
• Other SIUs				1/year
<b>b. Sampling by POTW</b>				
• CIUs				1/year
• Other SIUs				1/year
<b>c. Self-monitoring</b>				
• CIUs				2/year
• Other SIUs				2/year
<b>d. Reporting by IU</b>				
• CIUs				2/year
• Other SIUs				2/year





**PRETREATMENT PROGRAM PROFILE (Continued)**

**K. RESOURCES (Continued)**

2. Identify the sources of funding for the pretreatment program. [403.8(f)(3)]

a. POTW general operating fund


b. IU permit fees

c. Industry surcharges

d. Monitoring charges

e. Other (specify)


**L. ADDITIONAL INFORMATION**

ATTACHMENT B COMPLETED BY:

TITLE:

DATE:

TELEPHONE:



## WENDB DATA ENTRY WORKSHEET

### I. WENDB DATA ENTRY WORKSHEET

**INSTRUCTIONS:** Enter the data provided by the specific checklist questions that are referenced.

CA name

NPDES number

Date of inspection

Date entered into PCS

	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.B.2.a	
• Number of CIUs	CIUS	II.B.2.a	
- Number of SIUs without control mechanism	NOCM	II.C.1.b	
- Number of SIUs not inspected or sampled	NOIN	II.E.2	
- Number of SIUs in SNC** with standards or reporting	PSNC	Att. A.B.4	
- Number of SIUs in SNC with self-monitoring	MSNC	Att. A.B.4	
- Number of SIUs in SNC with self-monitoring and not inspected or sampled	SNIN	II.F.5	

\*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."

\*\*As defined in EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.

WENDB DATA ENTRY WORKSHEET  
COMPLETED BY:

TITLE:

DATE:

TELEPHONE:

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## RNC WORKSHEET

### II. RNC WORKSHEET

**INSTRUCTIONS:** Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.

CA name

NPDES number

Date of inspection

Date entered into QNCR

	Level	Checklist Reference
<input type="checkbox"/> Failure to enforce against pass through and/or interference	I	II.F.6.b&9
<input type="checkbox"/> Failure to submit required reports within 30 days	I	Att. A.A.3
<input type="checkbox"/> Failure to meet compliance schedule milestone date within 90 days	I	Att. A.A.4
<input type="checkbox"/> Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
<input type="checkbox"/> Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
<input type="checkbox"/> Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
<input type="checkbox"/> Other (specify)	II	

### SNC

CA in SNC for violation of any Level I criterion

CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements.

RNC WORKSHEET COMPLETED BY:

TITLE:

DATE:

TELEPHONE:

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## IU SITE VISIT REPORT FORM

III. IU SITE VISIT REPORT FORM	
<b>INSTRUCTIONS:</b> Use this form to record observations made during the site visit and findings based on the site visit. Provide as much detail as possible.	
Name of industry and city	
Date of visit	Time of visit
Name(s) of inspector(s)	
Provide name(s) and title(s) of industry representative(s).	
Name	Title
1. What does this industry produce?	
2. How is the industry classified by the POTW? Is this classification correct?	
3. Have there been any significant changes in processes or flow?	
4. What raw materials are used?	

**IU SITE VISIT REPORT FORM (Continued)**

5. What processes are used to make the product(s)? (Attach a step-by-step diagram if possible.)

6. Where is water used and what is the source of the water (city, well, river, etc.)?

7. Describe the processes which discharge wastewater.



## IU SITE VISIT REPORT FORM (Continued)

8. Describe the sample location. Are the CA and industry using the same location?

9. Describe the treatment system which is in place.

**IU SITE VISIT REPORT FORM (Continued)**

10. What chemicals are maintained onsite? How are they stored? Is adequate spill prevention in place?

11. Are any hazardous wastes stored or discharged?

Additional comments

*IU SITE VISIT REPORT FORM  
COMPLETED BY:*

*TITLE:*

*DATE:*

*TELEPHONE:*

## FILE REVIEW WORKSHEET

### IV. FILE REVIEW WORKSHEET

IU name \_\_\_\_\_

**INSTRUCTIONS:** For each pollutant required to be regulated record the local limit and categorical standard (if applicable) that the CA should be applying and enforcing. Then record that actual discharge limits applied through the control mechanism (permit). Also record the sample type and frequency required by the control mechanism.

Permit issuance date \_\_\_\_\_

Permit expiration date \_\_\_\_\_

Parameter	Local Limit	Categorical Standards		Permit Discharge Limits		Required Sample Type	Required Sample Frequency
		Daily Average	Long-Term Average	Daily Average	Long-Term Average		

Comments \_\_\_\_\_

PERMIT LIMITS WORKSHEET COMPLETED BY:  TITLE:	DATE:  TELEPHONE:
--	-------------------------

**FILE REVIEW WORKSHEET (Continued)**

**V. IU SELF-MONITORING WORKSHEET**

IU name

**INSTRUCTIONS:** Review IU self-monitoring reports and data and record the information in the appropriate columns below.

**IU Self-Monitoring**

Date Sample Collected	Date Report Received	Date Report Due	Days Late	Pollutants Monitored	Sample Type	Pollutants Missing

	<b>Yes</b>	<b>No</b>
Do reports indicate 40 CFR Part 136 analytical methods were used?		
Were self-monitoring reports signed/certified?		
List any reports not signed/certified.		
If subject to TTO certification, were they submitted as required?		

<b>IU SELF-MONITORING WORKSHEET</b> COMPLETED BY: TITLE:	DATE:  TELEPHONE:
--	-------------------------



**FILE REVIEW WORKSHEET (Continued)**

**VII. VIOLATIONS BASED ON IU SELF-MONITORING AND POTW MONITORING DATA WORKSHEET**

IU name

**INSTRUCTIONS:** Review IU self-monitoring and POTW monitoring data; compare this information to the permit limits; and list all violations.

Date of Violation	Pollutant	Type (Daily or Long-Term Average)	Monitoring Result	POTW Monitoring or IU Self-Monitoring	Date IU Notified CA	Date Re-sampling Results Submitted	Days of Violation

IU SELF-MONITORING AND POTW MONITORING DATA WORKSHEET COMPLETED BY: TITLE:	DATE:  TELEPHONE:
---	-------------------------

FILE REVIEW WORKSHEET (Continued)

VIII. ENFORCEMENT ACTIONS AGAINST IU WORKSHEET

IU name

*INSTRUCTIONS: Record violations, (e.g. 3/15/91, zinc), the enforcement actions taken by the CA (e.g. telephone, 4/1/91) and the response of the IU (e.g. re-sampled, 4/15/91 - returned to compliance).*

Date of Violation	Nature of Violation	Action Taken	Action Date	IU Response	Response Date

Spills, slugs, and accidental discharges	Date of spill/slug	Time CA notified
Description of spill/slug		
CA response		

<b>ENFORCEMENT ACTIONS AGAINST IU WORKSHEET COMPLETED BY:</b>  TITLE:	DATE:  TELEPHONE:
---	-------------------------

**FILE REVIEW WORKSHEET (Continued)**

**IX. CIUs WORKSHEET**

IU name

**INSTRUCTIONS:** Record information from IU file, note any apparent misapplication of the applicable categorical pretreatment standards.

1. IU category (s)

2. List all applicable subcategories.

3. a. Does the sampling location contain nonregulated or dilution wastestreams?

- CA
- IU

b. If yes, is the CWF applied?

c. If yes, is FWA applied?

Yes	No

4. Is the facility subject to production-based standards?

a. If yes, provide the following information.

- Average production
- Average process flow


Yes	No

5. Provide the following information on TTO monitoring and reporting (if applicable).

- a. Date initial scan performed
- b. Date organic management plan submitted
- c. Date(s) certifications submitted (in the past 12 months)
- d. Date(s) monitoring performed (in the past 12 months)

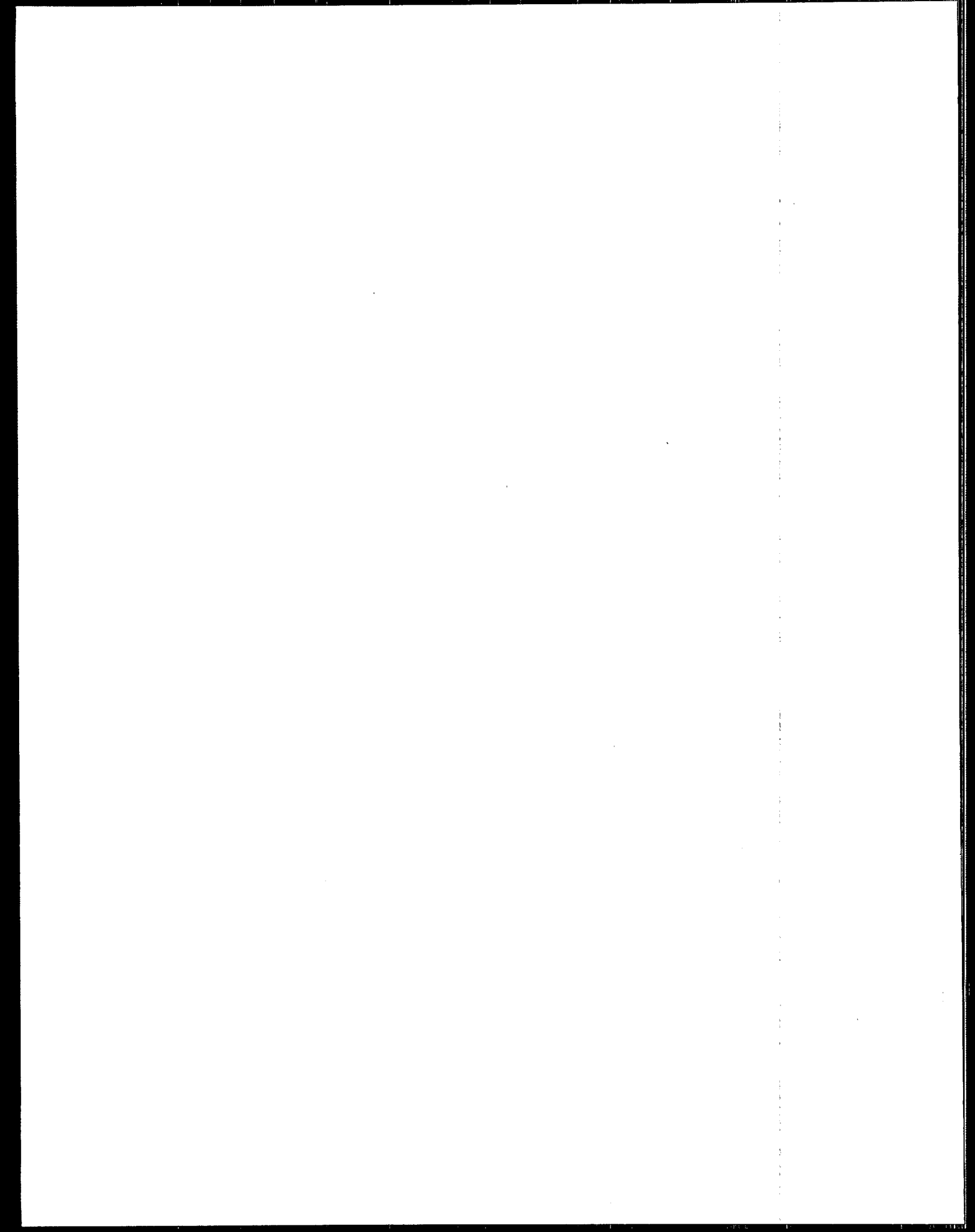

**CIUs WORKSHEET COMPLETED BY:**  
**TITLE:**

**DATE:**  
**TELEPHONE:**



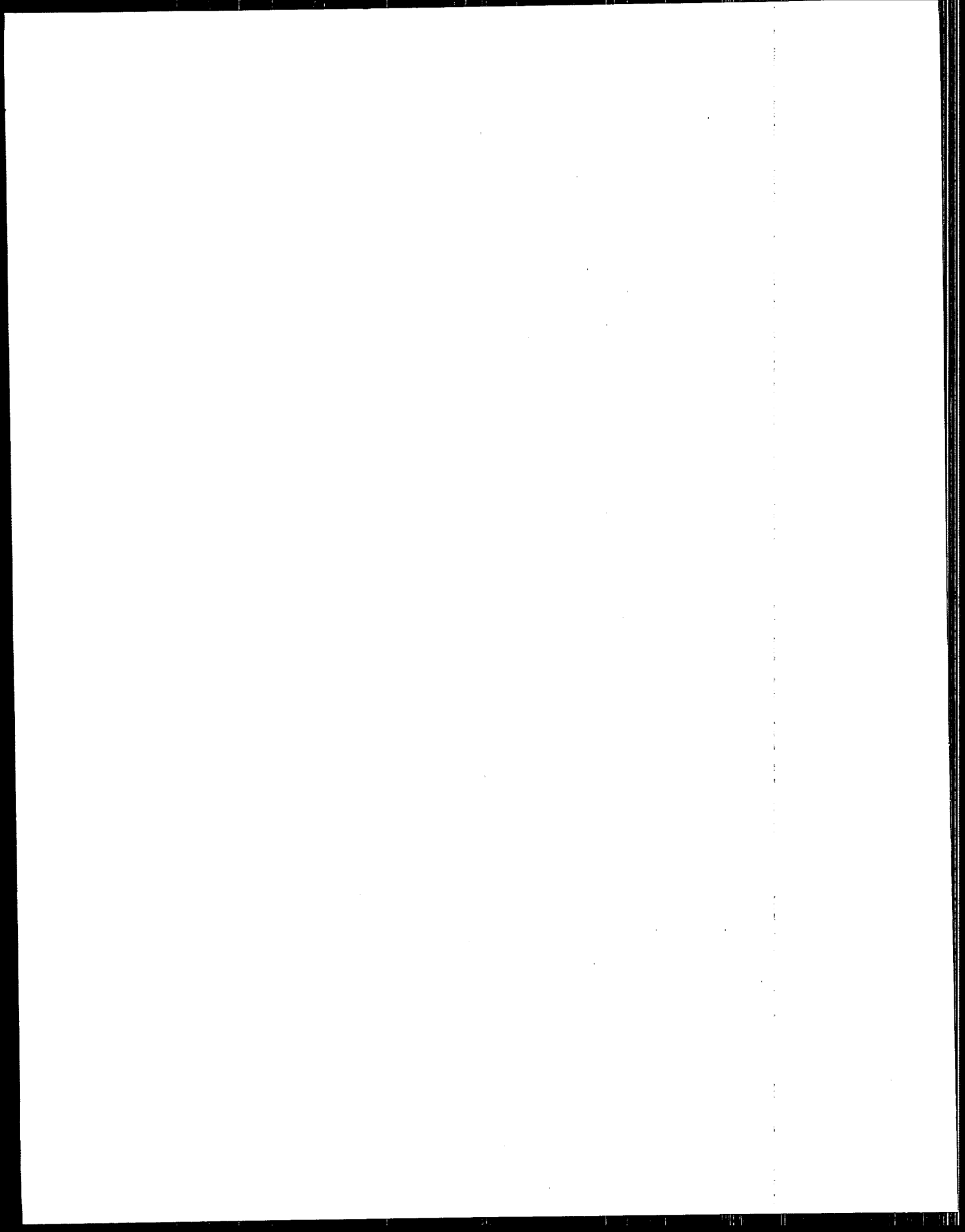
**3.**

**PCI REFERENCE MATERIAL**



**A**

**PCI CHECKLIST QUESTION REFERENCE**

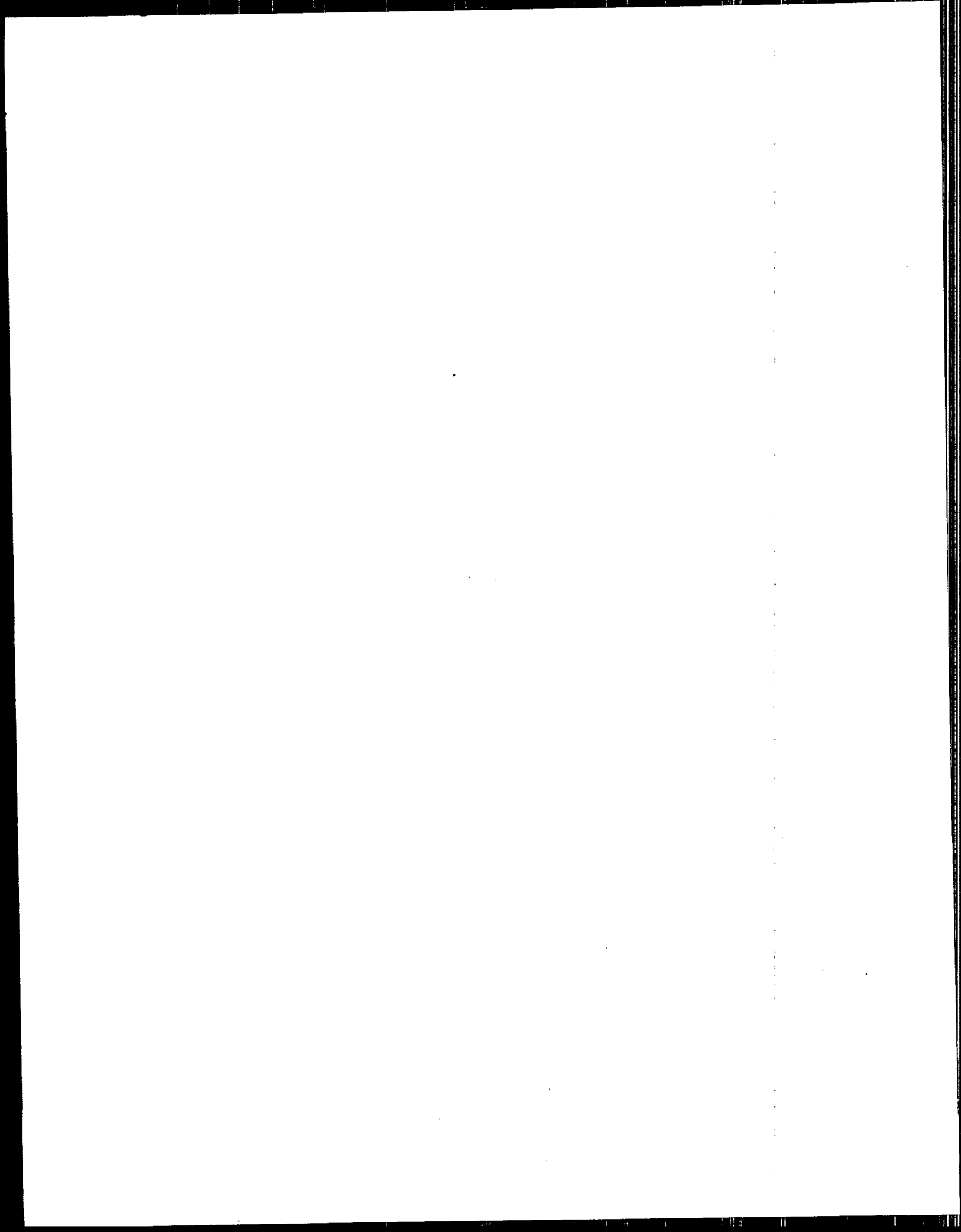


A

PCI CHECKLIST QUESTION REFERENCE

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## REFERENCE TO THE POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST QUESTIONS

The purpose of these instructions is to provide the inspector with guidance in conducting a Pretreatment Compliance Inspection (PCI) of a local pretreatment program implemented by a Publicly Owned Treatment Works (POTW) using the U.S. Environmental Protection Agency's (EPA's) "POTW Pretreatment Compliance Inspection Checklist." The Checklist is intended to serve as a guide to ensure the comprehensiveness of the PCI and as a tool for the documentation of PCI findings. As such, the intent of the PCI questions may not always be self-evident. Instead, the questions are meant to act as triggers to remind the inspector to delve into specific program areas and to evaluate compliance with implementation requirements in those areas. The same question may need to be asked in different ways to derive an answer. The inspector should use this reference to obtain a better understanding of the intent and scope of each Checklist question and as a guide to finding the answers required. He/she should not be limited by the Checklist, but should obtain as much information as is necessary to identify program implementation deficiencies.

***This Checklist reference guide assumes that the Control Authority's (CA's) program has been modified to include the latest revisions to the General Pretreatment Regulations [referred to as the Domestic Sewage Study (DSS) revisions]. For those CA programs that have not been modified, the inspector needs to determine compliance with approved program and National Pollutant Discharge Elimination System (NPDES) requirements that are legally effective at the time of the PCI.***

The CA is responsible for regulating all SIUs in its service area, regardless of the jurisdiction in which they are located. ***The PCI should encompass the CA's program implementation throughout its service area including contributing jurisdictions.*** When reviewing each program component (i.e., IU inventory, issuance of control mechanism, compliance monitoring, and enforcement) the inspector should document any deficiency in implementation and enforcement in the contributing jurisdictions.

In principal the PCI should cover the CA's pretreatment program through the last four full quarters<sup>1</sup>. If the PCI occurs within three months after the end of the CA's pretreatment year, then the inspector may choose to review data through the CA's pretreatment year in order to validate the information the CA submitted in its pretreatment program performance report.

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<sup>1</sup>EPA's September 9, 1991, memorandum, Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users addresses the concept of quarters in terms of calculating SNC. Briefly, at the end of each quarter, all data from the previous 6-month time period is to be used in the calculation of SNC violations. Under this system, each IU is evaluated for SNC four times during the year and the total evaluation period covers 15 months (i.e., beginning with the last quarter of the previous pretreatment year through the end of the current year).

## SECTION I

### SECTION I: IU FILE EVALUATION

Each of the major program components in Section I of the Checklist is listed below along with an explanation of the issue (generally an explanation of the regulatory requirement). Guidance is provided on how the inspector can evaluate the CA's (or IU's) compliance with the program requirement and on what constitutes a deficiency. The "Where to Look" guides the inspector to the most likely source or document that will contain the necessary data to evaluate.

#### Narrative Comments

What: These comments provide a brief profile of the IU. This information should summarize industrial categorization, discharge characterization, and compliance history.

Source: File information, interview comments, and site visit to the IU.

Comment Section: Some information is filled out at the start of the file review (e.g., name, address, etc.). Some information (e.g., category, flow, compliance status, etc.) will be obtained as the review proceeds. The inspector should enter additional information about the industry obtained from the interview with CA staff or site visit to the IU.

#### IU File Review

##### A. CA Notification of IU

##### A.1. Notification of classification or change in classification

ISSUE: The CA is required to notify all IUs subject to the pretreatment program of their classification as a Significant Industrial User (SIU).

WHERE TO LOOK: Control mechanism (e.g., permit), a written notice or letter, or documentation of a conversation between the IU and the CA.

HOW TO EVALUATE: Look for documentation pertaining to the CA's notification to the IU. If the inspector cannot locate documentation of such notification, a deficiency should be noted.



**A.2. Notification of applicable standards/requirements/RCRA**

**ISSUE:** The CA is required to notify all IUs subject to the pretreatment program of applicable standards and requirements (including limits for discharge of pollutants, sampling and reporting requirements, as well as the IU's responsibilities under the Resource Conservation and Recovery Act [RCRA]).

**WHERE TO LOOK:** Control mechanism, a written notice or letter, or documentation of a conversation between the IU and the CA.

**HOW TO EVALUATE:** Look for documentation pertaining to the CA's notification to the IU. If the inspector cannot locate documentation of such notification, a deficiency should be noted.

**B. Issuance of IU Control Mechanism****B.1. Issuance or reissuance of control mechanism**

**ISSUE:** The CA is required to control IU discharges to the POTW. All SIU discharges must be controlled under individual control mechanisms (i.e., permit, order, or similar means). A CA is in Reportable Noncompliance (RNC) if it has not reissued 90% of the control mechanisms within 180 days from the expiration of the existing control mechanisms.

**WHERE TO LOOK:** The control mechanism may be called "control mechanism," "order," "permit," etc. (e.g., "IU contract") and a complete copy of a current control mechanism should be in the file.

**HOW TO EVALUATE:** If the inspector cannot locate a control mechanism or if the control mechanism is not current or valid, a deficiency should be noted. If the control mechanism has to be signed by the CA and the control mechanism is not signed, it may not be valid.

The inspector should check an expired control mechanism to see if it has been or will be reissued within 180 days from the expiration of the last control mechanism. If the control mechanism is expired and not reissued, the CA may have the authority to administratively extend the control mechanism (similar to the Agency's authority under the NPDES). Check to see if there is a letter to the permittee that indicates the control mechanism has been extended. However, the inspector should be aware that an administrative extension may only be used in unusual situations; it may not be used in lieu of sufficient staff to write control mechanisms.

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### B.2. Control mechanism contents

**ISSUE:** Individual control mechanisms issued to SIUs must contain minimum conditions listed in 40 Code of Federal Regulations (CFR) 403.8(f)(1)(iii) (a-j on the Checklist).

**WHERE TO LOOK:** Control mechanism.

**HOW TO EVALUATE:** Examine the control mechanism for the inclusion of the following conditions. Carefully read the entire control mechanism. Many of the conditions will probably be found in the section "Standard Conditions," or a section similarly titled.

- a. Statement of duration - the control mechanism cannot have a duration of more than 5 years. If the permit does not contain such a statement or an expiration date or has an effective period of more than 5 years, a deficiency should be noted.
- b. Statement of nontransferability - the control mechanism cannot be transferred without, at a minimum, prior notification to the CA and provision of a copy of the existing control mechanism to the new owner or operator.
- c. Applicable effluent limits - the control mechanism must contain effluent limits based on applicable general pretreatment standards in 40 CFR 403.5, categorical pretreatment standards, local limits, and State and local law. Deficiencies should be noted if the pretreatment standards contained in the control mechanism are incorrect or if the CA has not applied all standards (including monthly average limits) for all regulated pollutants. If the inspector cannot determine whether the correct limits were applied (because the CA has not documented any calculations or information is missing), then a ND (not determined) should be recorded on the Checklist.
- d. Self-monitoring requirements - the control mechanism must contain sampling, reporting and record-keeping requirements including an identification of the pollutants to be monitored, sampling location, sampling frequency, and sample type. The CA may choose to conduct all compliance monitoring in lieu of IU self-monitoring. In this case, the control mechanism need not contain those self-monitoring requirements which the CA is performing on behalf of the IU.
- e. Statement of applicable civil and criminal penalties - the control mechanism must contain a statement of applicable civil and criminal penalties for violation of pretreatment standards and requirements.
- f. Compliance schedules - if the control mechanism contains a compliance schedule which extends the compliance date beyond applicable Federal deadlines a deficiency should be noted.

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- g. Notice of slug loading [40 CFR 403.12(f)] - if the control mechanism does not contain this notification requirement a deficiency should be noted.
- h. Notification of spills, bypasses, upsets, etc. [40 CFR 403.12(f)] - if the control mechanism does not contain this notification requirement a deficiency should be noted.
- i. Notification of significant change in discharge [40 CFR 403.12(j)] - if the control mechanism does not contain this notification requirement a deficiency should be noted.
- j. 24-hour notification of violation/resample requirement (40 CFR 403.12(g)) - if the control mechanism does not contain this notification requirement a deficiency should be noted.
- k. Slug discharge control plan requirement - if the CA has identified the IU as needing a slug discharge control plan, the control mechanism should contain a requirement to develop and implement such a plan. If the CA has determined that the IU does not need to develop and implement a plan, the inspector should record NA (not applicable) on the Checklist.

### C. CA Application of IU Pretreatment Standards

#### C.1. IU categorization

ISSUE: The CA is required to correctly determine whether the IU is subject to categorical pretreatment standards and, if so, which categorical standard(s) applies. The inspector should be aware that an IU may be subject to more than one categorical pretreatment standard since these standards apply to individual industrial processes.

WHERE TO LOOK: Control mechanism, fact sheet, control mechanism application form, Baseline Monitoring Report (BMR), process and flow diagrams, inspection reports, correspondence, and IU site visit.

HOW TO EVALUATE: The inspector should attempt to verify proper categorization by reviewing any applicable documentation. The inspector will need to be familiar with the industrial categories regulated by categorical pretreatment standards. The categorical pretreatment standards are found in EPA's regulations Title 40, Chapter I, Subchapter N, Effluent Guidelines and Standards, 40 CFR Parts 405-471. Numerous documents in the IU file may need to be reviewed to obtain process information helpful in categorizing the IU. If information to make these determinations is missing from the file, or if the standards in the control mechanism conflict with the inspector's own conclusions, a visit to the IU may be necessary to determine or verify the correct categorization. If a site visit is not made to verify proper categorization, a potential problem (e.g. possible miscategorization) should be recorded and explained in the inspector's notes.

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### C.2. Calculation and application of categorical standards

**ISSUE:** The CA is required to calculate and apply the applicable categorical pretreatment standards to those industries regulated by categorical standards. This includes: (a) correct classification by category and subcategory; (b) correct classification as existing or new source [see 40 CFR 403.3(k) for definition]; and (c) correct application of limits for all regulated pollutants.

**WHERE TO LOOK:** Control mechanism, fact sheet, control mechanism application form, BMR, process and flow diagrams, inspection reports, and sampling data.

**HOW TO EVALUATE:** The inspector should review the IU's control mechanism application, BMR, and process or flow diagrams to obtain information on its industrial processes for possible categorization. These documents should also provide information on any combined wastestreams. Inspection reports and sampling data may indicate that the IU has more going on than is described in other documents. The categorical pretreatment regulations [Pretreatment Standards for Existing Sources (PSES) and Pretreatment Standards for New Sources (PSNS)] will provide information on regulated processes and pollutants.

The information found in the file should be compared to the category specified by the CA in the IU's control mechanism as well as to the Federal categorical standard. The inspector should bear in mind that more than one categorical standard may apply to a given IU. If sampling data are not consistent with process descriptions or if process descriptions are inconsistent with those described in the most likely categorical standards, the inspector will probably need to schedule a site visit to the IU facility. The inspector should note any deficiencies in the CA's application of the correct categorical standards (this applies only to industries regulated by categorical standards, not all SIUs).

### C.3. Application of local limits

**ISSUE:** The CA is required to calculate and apply appropriate limits, including local limits and prohibited discharge standards, for all industries regulated by the local pretreatment program.

**WHERE TO LOOK:** CA's ordinance and control mechanism.

*Note: Local limits may apply at end-of-pipe or end-of-process, depending upon the CA's permitting practices. If they are applied at end-of-process, the ordinance should not refer to the local limits simply as discharge limits, but should make it clear that they limit pollutants discharged from individual processes. The inspector should review EPA's Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program for an explanation of different allocation methods for local limits.*

**HOW TO EVALUATE:** The inspector needs to review the control mechanism which should require compliance with the CA's ordinance, including its local limits

and prohibited discharge standards. The control mechanism may cite these standards or reiterate them in the standard conditions section. The inspector should be aware that the CA does not have the authority to waive (or give a variance to) these standards. If the CA has applied an IU-specific standard that is less stringent than the standard listed in the ordinance, the inspector should investigate this incident further to determine whether the CA has inappropriately granted a variance from the local limits. If the ordinance contains language that implies that the standards in the ordinance are end-of-pipe or end-of-process limits that all IUs must meet, the CA cannot waive or grant variances from these limits.

The CA may apply categorical standards at end-of-process and local limits at end-of-pipe. In this case, the control mechanism must clearly state where each apply.

If the ordinance contains numerical limits to be applied on an IU-specific basis, the inspector should look for language which indicates that they represent influent loadings which are not to be exceeded in the collection system. The ordinance should also require compliance with the limits specified in the control mechanism.

Further, the CA usually does not expect each IU to self-monitor for all the pollutants regulated by local limits, but only for those reasonably expected to be present. In this case, the control mechanism must specify which parameters are to be monitored by that IU. If the control mechanism required the IU to self-monitor for local limits and all parameters are not monitored, a deficiency should be noted.

#### **C.4. Calculation and application of production-based standards**

**ISSUE:** The CA is required to calculate and apply appropriate limits for industries regulated by production-based categorical standards.

**WHERE TO LOOK:** Control mechanism, fact sheet, control mechanism application form, BMR, process and flow diagrams, and correspondence.

*Note: The application of production-based standards requires production data (i.e., pounds/number/square footage of "widgets"), flow data, and concentration of pollutants. Separate calculations may be required for each production process, depending upon industry configuration (e.g., one process versus multiple processes). Some POTWs may be using alternate limits based on historical data (applying an alternate concentration or mass limit as opposed to calculating a production-based limit each day) [see 40 CFR 403.6(c)(2)]. Alternate limits should be based on a long-term measure of production. See Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula [September, 1985].*

**HOW TO EVALUATE:** The control mechanism should state what categorical standard the CA applied to the IU. The inspector should review the appropriate

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categorical regulations and know how these standards should be applied. The inspector also needs to be familiar with the guidance on how to derive alternate limits contained in EPA's Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula. Then the inspector should review the information in the IU's control mechanism application or BMR to determine whether the correct standard is being applied. These documents should also contain production data, although these data may also be found in correspondence submitted by the IU. If production data are not included in the file, a deficiency should be noted.

### C.5. Calculation and application of CWF or FWA

**ISSUE:** The CA is allowed to calculate and apply an alternate limit based on the Combined Wastestream Formula (CWF) or the Flow Weighted Average (FWA) formula.

**WHERE TO LOOK:** Control mechanism, fact sheet, control mechanism application form, process and flow diagrams, and IU site visit.

**Note:** *The CWF is used where a regulated process wastestream is mixed prior to treatment with wastestreams other than those generated by the regulated process [some combination of regulated, unregulated and/or dilute (e.g., sanitary)]. See Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula [September, 1985].*

*The FWA applies where one or more categorical wastestreams mix with a nonregulated or dilute wastestream after treatment but prior to sampling. Where the CA has used the CWF instead of the FWA and this provides a more stringent limit than the FWA would have, then the CA can continue to use the CWF. [See 51 Federal Register 21454.]*

**HOW TO EVALUATE:** Again, the inspector should be familiar with the guidance on how to use the CWF and FWA formula contained in EPA's Guidance Manual for the Use of Production-Based Standards and the Combined Wastestream Formula. If the user is subject to categorical standards, the inspector must consider whether the standards need to be adjusted using the CWF or FWA formula. This may be determined by reviewing the sample location described in the control mechanisms, sampling records, and any wastewater flow schematics or other information that identifies the types of wastestreams present at the sample location. A site visit to the IU may be required to determine whether use of the CWF or FWA is necessary.

Where use of the CWF or FWA results in an alternate limit that is below detection level, that limit may not be applied and adjustment of the standard is not appropriate. Instead the CA needs to require the IU to reduce, eliminate, or separate the dilute wastestreams introduced prior to the sampling point or identify another sampling point prior to the combined wastestreams.

The inspector should find the standards in the control mechanism. If there is a fact sheet, it should contain the calculations used to adjust the standard. A deficiency should be noted if the inspector identifies that the CWF or FWA should have been used and was not or if the CWF/FWA was incorrectly applied.

### C.6. Application of most stringent limit

**ISSUE:** The CA is required to compare all calculated limits (categorical, CWF, FWA, and local limits) and apply the most stringent for each regulated constituent.

**WHERE TO LOOK:** CA's ordinance, approved program's local limits, categorical regulations, and control mechanism.

**HOW TO EVALUATE:** The control mechanism should include all applicable effluent limitations. The CA's ordinance will usually contain the local limits. If the ordinance does not contain the limits, the approved program should contain the local limits or procedures for allocating the local limits. The appropriate categorical standards are found in EPA's regulations, Title 40, Chapter I, Subchapter N, Effluent Guidelines and Standards, 40 CFR Parts 405-471. The CA may have a copy of these volumes of the Code of Federal Regulations or may have a copy of the particular Federal Register containing the appropriate standards.

For Categorical Industrial Users (CIUs), the CA can apply all limits (any applicable categorical standards and local limits) or the most stringent limits. The procedure for determining which limit (the categorical or the local limit) is more stringent may not be a straightforward comparison of the two numerical values. Categorical standards are applied at the end of the regulated process(es), while local limits may have been developed to be applied to the total wastewater discharge from the IU. The presence of dilution wastestreams will also affect the numerical value of the categorical standard (an alternate standard has to be calculated). The CA may have forgotten to evaluate the monthly average categorical standards.

The inspector may be able to identify obvious errors in application of the most stringent limit. However, some errors may not be readily apparent. If the CA has not clearly documented how it arrived at its determination of the most stringent limit, the inspector may have to conduct independent calculations for one or two pollutants to ascertain that the correct limits have been applied.

Once the appropriate standards for the user have been identified, the inspector must review the control mechanism to verify that the correct standards have been applied. If the correct limits are not included in the control mechanism, a deficiency should be noted.

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### D. CA Compliance Monitoring

#### *Sampling*

##### D.1. Sampling (once a year)

**ISSUE:** The CA is required to sample each SIU discharge point at least once per year to verify compliance independent of self-monitoring data supplied by the IU.

**WHERE TO LOOK:** CA sampling records, laboratory (in-house or outside contract lab) analytical reports, and chain-of-custody forms.

**HOW TO EVALUATE:** The inspector should find documentation of CA sampling events on CA or contract lab analysis data forms, field sampling forms or log books, and chain-of-custody forms. In some cases, this information may be filed separately from other pretreatment data. Sampling records and chain-of-custody forms are frequently kept in the lab. All data should be available to the inspector. The CA may keep current data on a computer. The inspector should examine all CA compliance sampling data in the IU's file. If sampling data do not exist, a deficiency should be noted

##### D.2. Sampling at frequency specified in approved program

**ISSUE:** The CA is required to sample each IU discharge point to verify compliance independent of self-monitoring data supplied by the IU. The CA is required to conduct this sampling at the frequency specified in the approved program (or in any modification to the approved program).

**WHERE TO LOOK:** CA sampling records, laboratory (in-house or outside contract lab) analytical reports, chain-of-custody forms, interview, and approved program.

**HOW TO EVALUATE:** The inspector must be aware of the requirements in the approved program. Where the program establishes a sampling scheme with varying frequencies based on specific criteria, the inspector will need to determine where the IU fits in this scheme. To do so, he/she may need to discuss the IU with pretreatment staff to determine the required sampling frequency. He/she should then determine the actual number of times the CA sampled the IU. If the CA sampled less frequently than required in the approved program, this is a deficiency. Where the approved program does not specify sampling frequencies, the CA still must sample at least once a year pursuant to the regulatory requirement.

##### D.3. Documentation of sampling activities

**ISSUE:** The CA is required to conduct sampling activities with sufficient care to produce evidence admissible in enforcement proceedings. Appropriate sampling (grab vs. composite) should have been used and the sampling conducted at proper locations and times (during representative process/discharge). Since the



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SIU is required by 40 CFR 403.12(g) to conduct all monitoring in accordance with 40 CFR Part 136, the CA should perform analyses according to 40 CFR Part 136 procedures.

**WHERE TO LOOK:** CA analytical reports, field sampling forms or log books, chain-of-custody forms, and Quality Assurance/Quality Control (QA/QC) protocols.

**HOW TO EVALUATE:** The inspector should review analytical results and chain-of-custody forms for requisite documentation of the sampling event. The inspector should also look for documentation of QA/QC protocols. This may be kept in the CA's lab. If a contract lab is used, this information should be furnished to the CA. Documentation should at least include: sample date and time, location, sampling method/type, sampler's name, sample preservation techniques, sample characteristics, dates of analyses, name of analyst, analytical technique/method (40 CFR Part 136), and analytical results. Where production-based or mass limits have been applied, sampling will need to include wastewater flow data at time of sampling or the sampling equipment calibrated to collect a flow-proportional sample. All QC sample data should be reported along with the standard sampling results. Where documentation is incomplete or missing, a deficiency should be noted.

### D.4. Analysis of results for all parameters

**ISSUE:** The CA is required to obtain analytical results for all regulated parameters.

**WHERE TO LOOK:** Categorical regulations, control mechanism, CA analytical reports, and Toxic Organic Management Plan (TOMP).

**HOW TO EVALUATE:** Categorical standards (PSES, PSNS) specify regulated pollutants and discharge limits for each specific process. The control mechanism should require self-monitoring for all these parameters as well as those local limits potentially present in the IU's discharge and any other pollutants of concern for that IU. Categorical industries are subject to categorical standards even where the CA has failed to incorporate these into a control mechanism.

The CA's analytical data will show the pollutants analyzed. The analytical results must include data on all regulated parameters, even if such pollutants are not expected to be present in the wastestream. Example: A metal finisher doing phosphatizing of steel is still required to be sampled for silver, nickel, etc., even though silver, nickel, etc. are not used in the process. In this case, the analytical data record would indicate "not detected or below detectable" for each of the constituents not present in the discharge. The inspector should note any regulated pollutants that the CA has not sampled and analyzed and a deficiency should be noted.

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The inspector should determine whether the IU has an approved TOMP. (These are sometimes kept in another location for emergency purposes.) The inspector should look at the TOMP to verify its existence and approval. If the IU has an approved TOMP, the inspector should ask the CA how frequently verification sampling is done.

### D.5. Appropriate analytical methods (40 CFR Part 136)

**ISSUE:** The SIU is required to use the methods defined under 40 CFR Part 136 when collecting and analyzing all samples obtained to determine compliance with pretreatment standards. Since the CA's compliance monitoring serves to verify compliance with the same standards and to check the validity of self-monitoring data, the CA's monitoring should also be conducted in accordance with 40 CFR Part 136.

**WHERE TO LOOK:** CA and IU analytical reports, chain-of-custody forms, and QA/QC protocols.

**Note:** *The 40 CFR Part 136 methods are those test procedures approved by EPA for the analysis of pollutants under the Clean Water Act. There are other EPA test methods approved for other regulatory programs. For example, both the Office of Solid Waste and Office of Air have EPA approved test methods for analysis of pollutants under the RCRA and the Clean Air Act. In some cases, the CA may obtain permission to use an alternative analytical method if such method is approved by the EPA Administrator. Such approval would be found in a formal letter or report.*

**HOW TO EVALUATE:** The laboratory's sampling analysis reports should include the analytical methods used. QA/QC protocols and chain-of-custody forms may also identify analytical methods used. The CA's documentation of the methods used should list the specific methods and not just indicate "EPA approved methods." While specific test procedures included in "Standard Methods for the Examination of Water and Wastewater" are approved under 40 CFR Part 136 for many parameters, not all the test procedures in "Standard Methods" are approved. If a particular method(s) is identified, the inspector may have to review 40 CFR Part 136 to determine whether that method is approved. The inspector should look for documentation that the lab (whether POTW or contract lab) performs all pretreatment analyses according to methods listed in 40 CFR Part 136 or an alternate method approved by the EPA Administrator. If the appropriate methods were not used, a deficiency should be noted.

**Inspection****D.6. Inspection (once a year)**

**ISSUE:** The CA is required to inspect each IU at least once per year to verify compliance independent of data supplied by the IU.

**WHERE TO LOOK:** Inspection report or form, activity log, or letter of inspection findings.

**HOW TO EVALUATE:** The inspector should look for inspection reports, logs, and/or daily activity reports for documentation of inspection events. If the occurrence of the inspection is only noted in a log book (e.g., date, name of IU, and IU representative), the inspector should note the following deficiency "inspection occurred but data was not collected and documented with sufficient care to provide admissible evidence in an enforcement action". In some cases, inspection reports may be maintained in a file separate from other pretreatment activities. If the inspector is unable to locate any written documentation of an inspection, a deficiency should be noted.

**D.7. Inspection at frequency specified in approved program**

**ISSUE:** The CA is required to inspect each SIU at the frequency required by the approved program (or any modifications of the approved program) to verify compliance with pretreatment standards and requirements independent of data supplied by the IU.

**WHERE TO LOOK:** Inspection report or form, activity log, letter of inspection findings, and interview.

**HOW TO EVALUATE:** The inspector must be aware of the inspection requirements in the approved program. As with sampling events, the approved program may specify an inspection scheme with variable frequencies. If this is the case, the inspector will probably need to discuss the criteria applied to that IU to determine the required inspection frequency. If inspections during the past year occurred less frequently than required in the approved program, a deficiency should be noted.

**D.8. Documentation of inspection activities**

**ISSUE:** The CA is required to conduct each SIU inspection with sufficient care to produce evidence admissible in enforcement proceedings.

**WHERE TO LOOK:** Inspection report or form, activity log, or letter of inspection findings.

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**HOW TO EVALUATE:** Documentation should at least include: inspection date and time, inspector's name, IU representative(s) present at inspection, and all observations or information obtained during the inspection. Observations could include: description of manufacturing processes or services performed; identification of sources, flow and types of wastewater discharges (regulated, dilution flow, etc.); evaluation of pretreatment facilities (adequacy, capacity, etc.); evaluation of IU sampling protocols, sampling equipment, sampling point and analytical methods; evaluation of spill/slug potential and compliance with spill prevention plan; evaluation of hazardous waste generation, storage areas and handling procedures; evaluation of IU records, areas/processes inspected; and, representative production activity during the inspection. All findings, deficiencies, and any required actions relayed verbally or in writing to the IU should be documented in the CA's report. Depending on the frequency of inspections performed by the CA at each IU, not all inspection reports will be the same. Some may be more detailed than others so all of the components listed above may not be found in each report.

### D.9. Evaluation of need for slug discharge control plan

**ISSUE:** The CA is required to evaluate each IU's need for a slug discharge control plan at least once every two years.

**WHERE TO LOOK:** Inspection report or form, letter of inspection findings, activity log, enforcement order, compliance schedule, and control mechanism.

*Note: This may also be called an accidental discharge plan. However, to fulfill the regulatory requirement, the plan must also address any potential nonaccidental slug discharges.*

**HOW TO EVALUATE:** The inspector should find documentation of this evaluation in the CA's inspection reports or a letter to the IU of evaluation findings. The CA may have required the IU to develop a slug discharge control plan via the control mechanism, an enforcement order, a compliance schedule, a meeting or correspondence. Where a slug control plan was required, it should also be in the IU file. If the IU has an existing slug discharge control plan that was approved more than two years prior to the PCI, the inspector should find documentation of a reevaluation of the facility and the effectiveness of the existing plan.

A slug discharge control evaluation should at least include investigation of: production and/or service areas, chemical storage, material handling and transfer areas, loading and unloading operations, shut down/cleaning operations, plant site runoff areas, containment structures, TOMP's, and emergency response procedures. The inspector should look for evidence that the CA inspected all areas of the IU facility where there are floor drains, noting potential for spills from: open chemical drums, process tanks, chemical storage, pretreatment system hydraulic overload, sludge spillage, leakage from segregated lines (e.g., for the removal of toxic organics), nonroutine batch discharges, pretreatment system failure, and bypasses.

If no evidence exists that the IU was evaluated (or re-evaluated at least once every two years) a deficiency should be noted. If a plan was required and never developed, a deficiency should be noted.

**E. CA Enforcement Activities**

In the event of IU noncompliance, the CA must take action to bring an IU back into compliance within the shortest time frame possible. This portion of the file review evaluates whether the CA has reviewed all monitoring data to determine IU compliance, is aware of the compliance status of the industry, and is following its approved Enforcement Response Plan (ERP) procedures for responding to IU violations.

**E.1. Identification of violations**

- a. Discharge violations
- b. Monitoring/reporting violations
- c. Compliance schedule violations

**ISSUE:** The CA is required to investigate all instances of noncompliance with pretreatment standards and requirements.

**WHERE TO LOOK:** Control mechanism, CA and IU sampling data, enforcement orders, and compliance schedules.

**HOW TO EVALUATE:** The CA needs to identify noncompliance by comparing sampling data with applicable limits and investigate any violations. Investigation further involves requiring the IU to explain the violation. SIUs are required to report any noncompliance identified in self-monitoring data within 24 hours of becoming aware of the noncompliance.

The inspector should review the monitoring data for violations and then determine whether the CA followed up on each violation with some form of enforcement action. Look for documentation of the 24-hour notification and the repeat sampling results. The inspector should also review IU reports submitted and compare them to reports required under the control mechanism, any enforcement order and/or compliance schedule.

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### E.2. Calculation of SNC

**ISSUE:** The CA is required to calculate SNC in order to determine which industries to publish at least annually in the largest local daily newspaper. The CA must also report those IUs in SNC in its pretreatment program performance reports to the State or EPA. SNC should be determined on a rolling quarter basis.

**WHERE TO LOOK:** CA and IU analytical reports, CA enforcement file, correspondence, and pretreatment program performance report.

*Note: CAs should be evaluating SNC based on the procedures set forth in EPA's September 9, 1991, memorandum on the Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users. According to these procedures, the CAs should evaluate IU compliance status at the end of fixed quarters established by the CA to correspond to its "pretreatment year." At the end of each quarter, all data from the previous 6-month time period is to be used in the calculation of SNC violations. Under this system, each IU is evaluated for SNC four times during the year and the total evaluation period covers 15 months (i.e., beginning with the last quarter of the previous pretreatment year through the end of the current year).*

**HOW TO EVALUATE:** Evidence of SNC evaluation should be found in the CA's enforcement file, the pretreatment program performance report submitted to EPA or the State as well as in the CA and IU sampling reports. The inspector should look for any SNC violations (such as violations that meet the criteria for chronic or Technical Review Criteria [TRC], violations causing or contributing to interference or pass through; violations requiring the CA's emergency response, failure to meet compliance schedule deadlines by more than 90 days, failure to submit required reports within 30 days of due dates, or any other violations deemed SNC by the CA). If the inspector detects any SNC violations he/she should determine if the CA has identified these violations as SNC, taken appropriate enforcement, and published the IU in the newspaper. The inspector should note any deficiencies in the CA's SNC determination.

### E.3. Adherence to approved ERP

**ISSUE:** The CA is required to implement its approved Enforcement Response Plan (ERP).

**WHERE TO LOOK:** CA enforcement file, inspection reports, CA and IU sampling data, control mechanism, enforcement orders, compliance schedules, and correspondence.

**HOW TO EVALUATE:** The inspector needs to be familiar with the CA's ERP. He/she needs to review the IU file for enforcement actions [e.g., reports, Notices of Violation (NOVs), Administrative Orders (AOs), Consent Orders] taken by the CA. Documentation of enforcement actions may be contained in correspondence

or documentation of informal conversations between the CA and the user, or official enforcement actions such as NOV's or AOs.

Implementation of the approved ERP involves timely and appropriate enforcement and escalation of enforcement action where violations persist. The CA should have noted and responded to any instance of noncompliance with local limits and/or categorical pretreatment standards. At minimum, for minor violations the CA should have notified the IU of the violation through a phone call, meeting, or NOV.

The inspector should evaluate whether the enforcement actions taken were in accordance with the time frames and responses established in the CA's approved ERP. Where they were not, the inspector should document the occurrence and note a deficiency.

#### **E.4. Escalation of enforcement**

ISSUE: The CA is expected to escalate enforcement for persistent violations.

WHERE TO LOOK: CA enforcement file and enforcement orders (e.g., AOs, Consent Orders, judicial actions, etc.).

HOW TO EVALUATE: The inspector should look at all enforcement actions (e.g., reports, NOV's, AOs, Consent Orders, etc.) taken against an IU for each type of violation. The CA is expected to bring noncompliant users back into compliance by timely and appropriate enforcement. This requires escalation of enforcement activity for persistent violations per the CA's ERP. The inspector should look for patterns of increasingly severe enforcement actions (e.g., NOV's followed by AOs) where the past enforcement actions have not resulted in the IU achieving consistent compliance. The inspector should note dates of the enforcement actions and IU responses. He/she should evaluate where the past enforcement actions have not resulted in the IU achieving consistent compliance and whether escalation has proceeded in a timely manner. Even if the CA is following its ERP procedures, if the enforcement actions are not effective in achieving compliance, the inspector should make note of this problem. The CA's ERP procedures may need to be modified.

#### **E.5. Publication for SNC**

ISSUE: The CA is required to annually publish a list of IUs found to be in SNC in the largest local daily newspaper.

WHERE TO LOOK: Copy/clipping of notice and CA enforcement file.

HOW TO EVALUATE: The IU file or a central enforcement file should contain a copy or clipping of the notice placed in the local newspaper. The CA may keep this public notice in a separate file. If the IU has been in SNC at any time during the year to which the publication pertains, then the IU must be included in the

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published list. Even those IUs that returned to compliance and are in compliance at the time of publication must be included in the published list. IUs that are on compliance schedules (but have had or continue to have SNC violations of standards or requirements) must be published. The publication may take the form of a legal notice; however, it may be more effective in the form of an article or advertisement. Where the inspector identifies an IU in SNC that was not published, a deficiency should be noted.

### F. IU Compliance Status

The inspector should determine the compliance status of the IU based on his/her independent determination and check this determination against whatever information the CA has been reporting in its pretreatment program performance reports to EPA or the State.

#### *Self-monitoring and Reporting*

##### F.1. Sampling at frequency specified in control mechanism/regulation

ISSUE: The SIU is required to sample at the frequency specified in its individual control mechanism but not less than once per six months.

WHERE TO LOOK: Control mechanism, enforcement orders (e.g., AO, consent decree, etc.), CA's ordinance, or approved program.

HOW TO EVALUATE: The sampling frequency may be contained in the control mechanism, or in an enforcement document (such as an NOV, AO, consent decree, etc.) issued to the IU. The frequency may also be established in the CA's ordinance or approved program. The SIU must sample for all pollutants applied in its control mechanism, including all parameters regulated under an applicable categorical pretreatment standard, at least every six months. Sampling must be appropriate (grab vs. composite) and at proper locations and times (during representative process/discharge). The SIU must certify continuing compliance with an approved TOMP as part of the self-monitoring (if appropriate).

##### F.2. Analysis of all required pollutants

ISSUE: SIUs are required to obtain analytical results for all regulated parameters.

WHERE TO LOOK: Categorical regulations, control mechanism, IU analytical reports, and TOMP.

*Note: Unless the specific categorical pretreatment regulation specifies otherwise, CIUs must monitor for all regulated parameters. There is one exception: EPA established a policy that allowed IUs subject to 40 CFR Part 413 or 433 (electroplating or metal finishing) to demonstrate compliance with the total toxic*



*organics limit by sampling only for those organics reasonably expected to be present in the wastestream. However, the IUs must sample for all the other regulated parameters (cyanide, cadmium, etc.) even if these parameters are not expected to be in the wastestream.*

**HOW TO EVALUATE:** Categorical industries are subject to categorical standards even where the CA has failed to incorporate these in the control mechanisms. Therefore, analytical results must include data on all regulated parameters, even if such pollutants are not expected to be present in the wastestream. Example: A metal finisher doing only zinc plating is still required to be sampled for silver, nickel, etc., even though silver, nickel, etc. are not used in the process. In this case, the analytical data record would indicate "not detected or below detectable" for each of the constituents not present in the discharge.

### F.3. Submission of BMR/90-Day Report

**ISSUE:** CIUs must submit a BMR within 180 days of the effective date of the categorical regulation and 90-Day Compliance Reports within 90 days of the date for final compliance with the applicable pretreatment standards (established in the categorical regulations). In the case of new source CIUs, the BMRs must be submitted at least 90 days prior to discharge and the 90-Day Compliance Reports must be submitted within 90 days following commencement of discharge.

**WHERE TO LOOK:** BMR, control mechanism application form, 90-Day Compliance Report(s), and periodic IU compliance reports.

*Note: For most existing sources, the BMR and 90-Day Compliance Report deadline is passed. Each new source discharger must fulfill these requirements. Categorical dischargers that currently discharge directly to a receiving stream but plan to discharge to the POTW would be considered an existing source, but would still be required to submit BMR and 90-Day Compliance Reports.*

**HOW TO EVALUATE:** The inspector should verify that the reports were submitted on time and include results for all parameters required to be sampled and contain all the information required by 40 CFR 403.12. The control mechanism application may serve as the BMR if it contains all the elements listed in 40 CFR 403.12(b). In some cases, the dates for the submission of these reports may have passed prior to implementation of the local program and the reports may not be in the files. In this event, the inspector should verify that equivalent data is in the files of CIUs.

### F.4. Periodic self-monitoring reports

**ISSUE:** IUs are required to submit self-monitoring reports at a frequency specified in their individual control mechanism, but not less than once per six months.

**WHERE TO LOOK:** IU self-monitoring reports.

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**HOW TO EVALUATE:** The IU's self-monitoring report should contain sampling documentation. Documentation should at least include: sample date and time, location, sampling method/type, sampler's name, sample preservation techniques, dates of analyses, name of analyst, analytical technique/method (40 CFR 136), and analytical results. Self-monitoring reports should also include certification of the IU's compliance with any approved TOMP.

### F.5. Reporting all required pollutants

**ISSUE:** IUs are required to report analytical results for all regulated parameters.

**WHERE TO LOOK:** Control mechanism, CA's ordinance, categorical regulations, and IU analytical reports.

**HOW TO EVALUATE:** Categorical industries are subject to categorical standards even where the CA has failed to incorporate these into the IU's control mechanism. Therefore, analytical results must include data on all regulated parameters, even if such pollutants are not expected to be present in the wastestream. Where pollutants are not present, the analytical data record would indicate "not detected or below detectable" for each of these constituents.

### F.6. Signatory/certification of reports

**ISSUE:** SIUs are required to sign all self-monitoring reports and provide a certification statement [as found in 40 CFR 403.6(a)(2)(ii)] that the information is accurate and complete.

**WHERE TO LOOK:** IU self-monitoring reports, BMR, and 90-Day Compliance Reports.

**HOW TO EVALUATE:** The inspector should verify that these reports are signed and certified by the responsible corporate officer, general partner or proprietor [see 40 CFR 403.12(l)].

### F.7. Submission of compliance schedule progress reports by required dates

**ISSUE:** IUs on compliance schedules are required to submit compliance schedule progress reports on meeting milestone requirements by the reporting date(s) specified in the compliance schedule.

**WHERE TO LOOK:** Compliance schedule, control mechanism, and enforcement orders.

**HOW TO EVALUATE:** The compliance schedule may be contained in the control mechanism, an AO, or other enforcement document. A compliance schedule may also have been submitted by the IU in its BMR or 90-Day Compliance Report.

The inspector should verify that the reports were received by the CA on time and included all required information. If the reports are late or incomplete a deficiency should be noted.

#### **F.8. Notification within 24 hours of becoming aware of violations**

- **Discharge violation**
- **Slug load**
- **Accidental spill**

**ISSUE:** IUs are required to notify the CA of any discharge violation identified in self-monitoring within 24 hours of becoming aware of the violation. IUs are also required to provide immediate notice to the CA of any discharge with the potential to cause harm to the POTW (i.e., slug loads/accidental spills).

**WHERE TO LOOK:** IU self-monitoring reports, letter, or phone call documentation.

**HOW TO EVALUATE:** The inspector should verify that the CA was notified of discharge violations within 24 hours. In the case of slug loads/accidental spills, the inspector should verify that notice was given as soon as the IU could reasonably be expected to have been aware of the slug load or spill.

#### **F.9. Resampling/reporting within 30 days of knowledge of violation**

**ISSUE:** IUs are required to resample and report to the CA within 30 days of becoming aware of a discharge violation. If the repeat sampling performed indicates a violation the IU must repeat the sampling and analysis; this cycle continues until the sampling indicates compliance.

**WHERE TO LOOK:** IU analytical report.

**Note:** *The IU does not have to resample if the CA performs sampling at the IU at least once per month or has sampled the IU between the time of the initial sample and the IU's receipt of the sample results. The IU need only resample for the pollutant(s) found to be in violation. For example, if the IU was sampling for six different metals and had a copper violation, the IU would resample for copper, not all six metals.*

**HOW TO EVALUATE:** The inspector should verify that the IU resampled and reported the data within 30 days of becoming aware of the discharge violation.

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### F.10. Notification of hazardous waste discharge

ISSUE: All IUs are required to notify the CA in advance of any discharges of listed or characteristic hazardous waste to the POTW.

WHERE TO LOOK: Letter or report.

HOW TO EVALUATE: This requirement is tied to the 40 CFR 403.12(j) and (p) requirements that IUs submit to the CA, EPA, and the State information concerning wastes discharged to the POTW that, if disposed of differently, would be considered a listed or characteristic hazardous waste. The information submitted to the CA must include the name of the waste, the hazardous waste number and types of discharge (batch, continuous, or other). Note that this is a one time reporting requirement unless the IU's discharge changes. Also, this requirement does not apply to pollutants which are already reported under a self-monitoring requirement.

### F.11. Submission/implementation of slug discharge control plan

ISSUE: IUs required to submit and implement a slug discharge control plan must do so in accordance with CA specifications.

WHERE TO LOOK: Control mechanism, enforcement order (e.g., compliance schedule, AO, etc.), or letter.

HOW TO EVALUATE: The requirement to submit and implement such a plan may be contained in the IU's control mechanism or an AO or other enforcement document. The plan itself should be in the IU's file and may be variously titled: spill prevention plan or accidental discharge control plan. All IU plans must at least contain: description of actual and potential slug/batch discharges; description of all stored chemicals; procedures for notifying of all slugs; preventative measures, containment structures or equipment; clean-up procedures/equipment; and any special measures for controlling toxic organic slugs [40 CFR 403.8(f)(2)(v)].

### F.12. Notification of significant changes

ISSUE: IUs are required to promptly notify the CA in advance of any substantial changes in the volume or character of pollutants in their discharge. IUs with alternative categorical pretreatment standards (through use of the CWF or FWA) are required to immediately report any material or significant change in the flow values used in the calculations to derive the alternative limits. IUs operating under a control mechanism incorporating equivalent mass or concentration limits calculated from a production-based standard must notify the CA within 2 business days after the IU has a reasonable basis to know that the production level will significantly change within the next calendar month.

WHERE TO LOOK: CA and IU sampling data, IU self-monitoring report, letter, phone call documentation, and meeting notes.

HOW TO EVALUATE: These notifications are usually in the form of letters and may be in the correspondence file. In some cases, these notifications may be by telephone and should be documented by the CA in its telephone log or by memoranda to the file. Change in products, processes, raw/base materials, discharge points, discharge time (batch), treatment, etc. could affect the production flows, pollutants and pollutant concentrations or mass in the IU's discharge. The inspector should look for these types of changes as well and evaluate whether these changes had an affect upon production, flows, and the volume or character of pollutants. Changes are substantial, significant or material changes if the changes would result in the application or derivation of different numerical limits or additional regulated pollutants.

### ***Discharge***

#### **F.13. Noncompliance with discharge limits (but not SNC)**

ISSUE: IUs are required to comply with all applicable discharge limits.

WHERE TO LOOK: Control mechanism, CA's ordinance, categorical regulations, and analytical data.

HOW TO EVALUATE: The applicable limits would be found in the control mechanism, the CA's ordinance and applicable categorical pretreatment regulations (PSES, PSNS). The sampling data (both the CA's and IU's) should be found in the file or in separate sampling files. The inspector should compare the CA and IU sampling data against the applicable limits, identify all violations, and determine if the violations meet the SNC criteria. (This documentation should be made after the inspector has determined that the discharge limits are appropriate.) If these violations do not meet the SNC criteria, the inspector should note that the IU is or has been in noncompliance (but not in SNC).

#### **F.14. SNC**

- a. Chronic violations
- b. TRC
- c. Pass through or interference
  - Spill or slug load

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### d. Other discharge violations (specify)

ISSUE: IUs are in SNC with discharge standards if the discharge meets any of the conditions identified in a-d above.

WHERE TO LOOK: Control mechanism, CA's ordinance, categorical regulations, and analytical data.

HOW TO EVALUATE: SNC is calculated on a rolling quarter basis; at the end of each quarter, all data available from the previous six-month time period are used to calculate Chronic and TRC SNC. Any discharge that causes pass through or interference at the treatment works is SNC. An "other discharge violation" would include any that caused the CA to exercise its emergency powers or that the CA deemed as SNC. The inspector should compare CA and IU sampling data and note any SNC violations. He/she should indicate on the Checklist if the IU was in SNC at any time during the four most recent full quarters evaluated.

### *Reporting*

#### F.15. Noncompliance with reporting requirements (but not SNC)

ISSUE: IUs are required to comply with all applicable reporting requirements.

WHERE TO LOOK: Control mechanism and enforcement orders (e.g., NOVs, AOs, etc.).

HOW TO EVALUATE: In addition to reports required by the control mechanism, enforcement orders may also contain reporting requirements. Any report submitted after the due date is considered noncompliance. Any report submitted lacking required data is also considered noncompliance.

#### F.16. SNC with reporting requirements

ISSUE: IUs are in SNC with reporting requirements if reports are incomplete or not received by CA within 30 days of their due date.

WHERE TO LOOK: Control mechanism and enforcement orders (e.g., NOVs, AOs, etc.).

HOW TO EVALUATE: Control mechanisms and enforcement orders may contain reporting requirements. The inspector needs to verify that the reports were submitted on time. If reports were more than 30 days late or were lacking requisite data more than 30 days beyond the due date, the inspector should verify that the IU was published or will be published for SNC.

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW**

Each of the questions in Section II of the Checklist is listed below along with an explanation of the issue or intent of the question. Guidance is provided on how the inspector can evaluate the CA's compliance with implementation requirements and on what constitutes a deficiency. The suggestions made in the "Where to Look" are possible places where the inspector may find the documentation or data but the inspector need not look in all the suggested places to ascertain the information. The majority of the data or answers to the questions can be supplied by the CA through the interview process (but documentation should be provided for any verbal answers and verified by reviewing the data or information contained in the files or pretreatment program performance reports).

**A. CA Pretreatment Program Modification**

- A.1. Did the CA make substantial changes to the pretreatment program that were not approved by the Approval Authority (e.g., definitions, limits, etc.)?**
- A.2. Is the CA in the process of modifying any approved pretreatment program component (including legal authority, local limits, DSS requirements, etc.)?**

**ISSUE:** The CA is required to notify the Approval Authority of any substantial changes it intends to make in its pretreatment program. Substantial changes should not be made without approval by the Approval Authority.

**WHERE TO LOOK:** Pretreatment program performance report, CA's ordinance, interjurisdictional agreements, available resources, and IU files.

**HOW TO EVALUATE:** During the interview, the inspector should elicit information about any modifications to the pretreatment program. If the CA personnel cannot readily identify changes, the inspector may want to specifically inquire about the following:

- New service areas
- New/revised interjurisdictional agreements
- New SIUs
- SIUs dropped from program
- Changes to ordinances or regulations

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- Changes to the control mechanisms (e.g., permits) issued to SIUs including changes in content, format, or standard conditions
- Changes in inspection and sampling frequencies and/or priorities
- Changes to local limits (modifications of the numerical values or the addition or deletion of pollutants)
- Revisions to ERP.

If changes have occurred, the inspector should document what the changes are and the reasons for the modifications. Use Section II.A. Question 1 of the Checklist to record any modification that the CA has made that has not been approved and use Section II.A. Question 2 to record any proposed modifications the CA is considering. Obtain a copy of all completed program modifications that have not been submitted to the Approval Authority for approval.

### **B. IU Characterization**

#### **B.1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs?**

**ISSUE:** The CA is required by 40 CFR 403.12(i)(1) to provide EPA or the State with an updated list of IUs or a list of deletions or additions keyed to a previously submitted list. This list must be submitted to EPA or the State at least annually as part of the CA's pretreatment program performance report.

**WHERE TO LOOK:** Pretreatment program performance report, inspection reports, control mechanisms, correspondence, and current list of IUs.

**HOW TO EVALUATE:** The inspector should record any deficiencies with respect to the following issues:

- Is the CA updating its Industrial Waste Survey (IWS) in accordance with its approved pretreatment program?
- Is the CA identifying all new users?
- Are there IUs the CA has overlooked or miscategorized?
- Is the definition of SIU the same as stated in the CA's approved program?
- What types of facilities does the CA regulate but does not consider as SIUs?

Although the regulations require an annual update (and that is what most approved programs specify), most CAs have found that it is more efficient to update the IWS information on a continuing basis. While this may be the ideal approach, CAs tend to concentrate on updating their existing IUs and miss many



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new IUs discharging to the system. Information on existing IUs is generally updated through inspections, permit applications, and notices of proposed discharge changes.

The inspector should look for information regarding new IUs and document how the CA goes about identifying new IUs. Usual methods employed are: notification by other municipal departments and/or contributing municipalities; periodic review of phone books, Chamber of Commerce listings, etc.; and drive-bys through industrial parks or other industrialized areas. Drive-bys are particularly helpful since identification of new IUs in existing leased spaced can be especially difficult.

The inspector should review the phone book yellow pages and drive through industrial/commercial areas to identify any industries not on the CA's list. Inquiry should be made regarding these facilities and documentation obtained to indicate why they are not included in the program.

It is important for the inspector to identify what criteria the CA is using to determine whether an IU is significant. It is not unusual for the ordinance and/or program submission to have one definition of SIU and for the pretreatment staff to be using another definition. Any alternate definitions should be recorded by the inspector. The CA must regulate all SIUs [as defined in 40 CFR 403.3(t)].

Frequently, identification of new IUs or changes to existing IUs in contributing jurisdictions is weak. The inspector should review a map of the CA's service area and inquire how the CA identifies new IUs and changes in existing IUs that are located in contributing municipalities. The CA should have procedures for IWS update in these areas. They might include: authority to conduct its own IWS update in those areas via an interjurisdictional agreement; notification by the contributing municipality of new IUs and changes in existing IUs, joint inspections with the contributing municipality. The inspector should document any deficiencies.

- B.2. How many IUs are currently identified by the CA as: a. SIUs (as defined by the CA), including CIUs and noncategorical SIUs; b. other regulated noncategorical SIUs; and c. what is the total number for a. + b.?**

ISSUE: The CA is responsible for categorizing its IUs as to whether they are subject to categorical pretreatment standards and if not, whether they are considered an SIU.

WHERE TO LOOK: POTW pretreatment program performance report, inspection reports, control mechanisms, correspondence, and current list of IUs.

HOW TO EVALUATE: The inspector should examine the current list of IUs regulated under the program and ask if the list is correct. If so, a copy of the list can be attached and the numbers entered on the Checklist. The inspector should verify that the CA is correctly identifying SIUs and CIUs by discussing selected

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IUs with the pretreatment staff and verify any questionable information by reviewing the IU files.

### **C. Control Mechanism Evaluation**

- C.1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism?**
- b. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism?**

**ISSUE:** Under 40 CFR 403.8(f)(1)(iii), the CA is required to issue individual control mechanisms to all SIUs.

**WHERE TO LOOK:** CA permit tracking system, individual control mechanisms, lists of IUs, and pretreatment program performance report.

**HOW TO EVALUATE:** The inspector should inquire as to the number of control mechanisms issued to SIUs and compare this number to the number of SIUs to determine if control mechanisms have been issued to all SIUs. It should be noted that the Federal regulations require the issuance of individual control mechanisms (e.g., permit, order, etc.). It should also be noted that the responses to these questions are based on the CA definition of SIU, not the Federal definition.

- C.2. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanisms?**

**ISSUE:** A CA is considered to be in RNC if it fails to issue, reissue, or ratify control mechanisms for at least 90% of its SIUs within 180 days of the expiration date of the previous control mechanisms.

**WHERE TO LOOK:** CA permit tracking system, individual control mechanisms, lists of IUs, and pretreatment program performance report.

**HOW TO EVALUATE:** The inspector should inquire as to the CA's control mechanism reissuance procedures, including the amount of time that lapses between control mechanism expiration and reissuance. In some instances the expiration date on the control mechanism may have passed and a new control mechanism has not been reissued, but the CA has issued a letter to the SIU stating that the control mechanism is in force until a new control mechanism is issued. In other instances the control mechanism's expiration date may have been exceeded but the control mechanism contains a clause stating that the control mechanism will continue to be in force until a new control mechanism is issued. These instances would still be considered as deficiencies if the control mechanism was not reissued within 180 days. There may be instances where an administrative extension could be granted (e.g., awaiting approval of revised local limits) to extend this 180 days period. However, lack of adequate CA staff and

resources or simply a failure to issue/reissue permits in a timely manner are not acceptable instances for granting an extension. It should be noted that the CA must have the appropriate legal authority to extend a control mechanism.

**D. Application of Pretreatment Standards and Requirements**

**D.1. a. How many SIUs were not evaluated for the need to develop slug discharge control plans in the last 2 years?**

**b. List the SIUs below or attach additional sheets as needed.**

**ISSUE:** The CA is required to evaluate each SIU to determine the need for a slug discharge control plan for the facility once every 2 years. This evaluation should include an inspection of the IU facility to identify the potential for accidental spills and other slug discharges (e.g., nonroutine batch discharges) to the sewer.

**WHERE TO LOOK:** Inspection reports, control mechanisms, orders, correspondence, or phone call documentation.

**HOW TO EVALUATE:** If there is no evidence that the CA has conducted these evaluations, a deficiency should be noted. The inspector should obtain a list of those IUs that the CA has not evaluated.

**D.2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW?**

**ISSUE:** All industries whose wastes are discharged to a POTW, regardless of the manner in which it is discharged, are considered IUs and are subject to pretreatment standards and requirements. The CA is required to apply all applicable standards to hauled industrial wastes.

**WHERE TO LOOK:** Control mechanism, hauled waste manifest forms, and sampling data on hauled wastes.

**HOW TO EVALUATE:** The inspector should ask whether the POTW receives any hauled industrial wastes. If the answer is yes, the inspector should ask the CA to describe its mechanism for controlling such wastes. Any permits issued to the hauler or the IU should be evaluated for the correct application of pretreatment standards, as discussed under Section I.C above. If the CA has no mechanism for regulating this waste, it is a deficiency.

If the CA states that the POTW does not accept hauled industrial wastes, only sanitary (and, perhaps, grease trap) wastes, the inspector should ask how the CA ensures that no industrial wastes are discharged. The CA should have oversight procedures such as random sampling and analysis for toxics (e.g. chemical specific analyses or a some type of biological inhibition or toxicity test) of the hauled wastes. It should also employ a manifest system which it checks for

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validity at least on a random basis. Documentation from these procedures should also be reviewed.

### **D.3. Did any IUs notify the CA of a hazardous waste discharge?**

**ISSUE:** All IUs, whether or not they have been issued individual control mechanisms, are required to notify the CA, EPA, and the State of any wastes which would be considered hazardous (listed or characteristic) if discharged other than to the municipal sewer. All IUs are subject to this Federal requirement regardless of notification by the CA. However, the CA should notify IUs of this requirement.

**WHERE TO LOOK:** CA notification to IU, control mechanism, correspondence, or self-monitoring reports.

*Note: This notification must be in writing and be submitted within 180 days from the effective date of the rule which was August 23, 1990. IUs which commence discharging after the effective date of the rule must provide this notification no later than 180 days after the discharge of the listed or characteristic hazardous waste. This notification does not apply to pollutants already reported by the IU under the self-monitoring requirements of 40 CFR 403.12. However, notifications of changed discharges (including the listed or characteristic hazardous wastes) must be submitted under 40 CFR 403.12(j).*

**HOW TO EVALUATE:** The inspector should ask whether the CA has provided notice to IUs of this requirement and, if so, how. Documentation of this notice should be reviewed by the inspector. He/she should also ask which IUs have notified the CA of a hazardous waste discharge.

## **E. Compliance Monitoring**

### **E.1. Identify required and actual frequency of inspections, sampling (by CA), self-monitoring, and reporting of CIUs and other SIUs and explain any differences noted in the required and actual frequencies.**

**ISSUE:** Under 40 CFR 403.8(f)(2)(v), the CA is required to inspect and sample all SIUs at least once a year. According to 40 CFR 403.12(e), CIUs are required to self-monitor and submit reports twice per year and 40 CFR 403.12(h) requires the same self-monitoring and reporting from noncategorical SIUs. Additionally, the CA's approved pretreatment program or NPDES permit may specify required sampling, inspection, self-monitoring or reporting requirements.

**WHERE TO LOOK:** CA approved program, NPDES permit, 40 CFR 403.12, CA inspection and monitoring plan, CA inspection and monitoring documentation, and IU self-monitoring reports.

**HOW TO EVALUATE:** The inspector should review the CA's approved pretreatment program and NPDES permit to determine if either specifies CA inspection and sampling frequency or SIU self-monitoring and reporting requirements. These frequencies, if specified, should then be compared to the Federal regulations (CA inspection and sampling once per year and SIU self-monitoring and reporting twice per year), and the most stringent frequency be entered as the required frequency. The inspector should then inquire as to the CA's actual frequency of these activities. Documentation of the actual frequency should be sought (e.g. a schedule for the year). If the actual frequency is less than the required frequency, the inspector should inquire as to the reason for the difference and document the reason on the Checklist.

**E.2. In the past 12 months, how many, and what percentage of SIUs were not sampled or not inspected at least once.**

**ISSUE:** Under 40 CFR 403.8(f)(2)(v) CAs must inspect and sample each SIU at least once a year. The number and percentage of SIUs not inspected or not sampled at least once in 12 months is a Water Enforcement National Data Base data element.

**WHERE TO LOOK:** CA inspection and sampling tracking system, sampling and inspection records, and list of SIUs.

**HOW TO EVALUATE:** The inspector should inquire as to the number of SIUs not sampled at least once, not inspected at least once, or not sampled or not inspected at least once in the past 12 months. The inspector should then use this number and the number of SIUs discharging to the CA to determine the percentage of SIUs not inspected or sampled. If it is determined that some SIUs were not inspected or sampled at least once during the past 12 months, the inspector should inquire as to the reason for the deficiency and document the reason in the Checklist.

**F. Enforcement**

**F.1. As an enforcement action, did the CA use notice or letter of violation, AOs, administrative fines, show cause hearings, compliance schedules, permit revocation, civil suits, criminal suits, termination of service, other (specify)?**

**ISSUE:** The CA must investigate instances of noncompliance with local limits and/or categorical discharge standards and take appropriate enforcement actions to return the IU to compliance.

**WHERE TO LOOK:** Pretreatment program performance report, IU file review, and documentation provided by CA during interview.

**HOW TO EVALUATE:** This question is an information gathering prompt to the inspector to collect information on the types of enforcement actions the CA has

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used in response to IU violations. In order to identify any deficiencies in the CA's enforcement, the inspector should obtain more than just what types of enforcement actions the CA has used. The inspector should request a list of IUs that have been in noncompliance which also indicates for each IU:

- Violations (types and dates of occurrence)
- Enforcement actions taken [type of enforcement action(s) and date(s)]
- Current compliance/noncompliance status.

This catalogue of enforcement actions will enable the inspector not only to know the range of enforcement actions taken but how many enforcement actions were necessary and how long it took before compliance was achieved.

The inspector should request that the CA provide this information before or during the PCI. This information may have been reported in the CA's pretreatment reports; however, the inspector may want to request an update to this information. The inspector can use the file review to verify this enforcement information the CA has provided by comparing what is found in the IU's file with what the CA has reported.

### F.2. Did the CA comply with its approved ERP?

ISSUE: Once approved by the Approval Authority, the CA's Enforcement Response Plan (ERP) constitutes a modification of the approved program. As such, the CA is obligated to conduct its enforcement activities in a manner consistent with the procedures established in the ERP.

WHERE TO LOOK: ERP, enforcement orders (e.g., NOVs, AOs, Consent Orders, etc.), compliance schedules, correspondence.

HOW TO EVALUATE: Since the ERP modifies the approved pretreatment program, the procedures outlined therein supersede those described in the program submission. The CA's enforcement activities, as documented in the IU files and described by the pretreatment staff, should reflect the ERP procedures, including time frames. The inspector should bear in mind that this is not necessarily the case for enforcement activities conducted prior to ERP approval.

If the CA does not have an approved ERP, the inspector should determine whether the CA conducted its enforcement activities in accordance with the procedures described in the approved program. Where the approved program does not contain enforcement procedures, the inspector should identify any instance where the enforcement activities of the CA appear to be ineffective in obtaining compliance.

- F.3. Indicate the number and percent of SIUs that were identified as being in SNC with applicable pretreatment standards and reporting requirements, self-monitoring requirements, and pretreatment compliance schedules for the most recent full quarter.**

**ISSUE:** A low percent of SIUs in SNC may be indicative of effective enforcement. The CA should take an escalated enforcement action (at least an AO) against an SIU that has reached SNC status.

**WHERE TO LOOK:** Pretreatment program performance report, IU file review, and documentation provided by CA during interview.

**HOW TO EVALUATE:** If the CA's pretreatment program performance report provides the number and list of SIUs in SNC (in the CA's pretreatment year), the inspector should record this data in Attachment A: Pretreatment Program Status Update, Section B: Pretreatment Program Status, Item No. 4. If this information was not in the CA's pretreatment program performance report, then prior to the PCI the inspector should request the CA to compile the following information and send it to the inspector before the PCI or have it available during the PCI: the number (and percent) of SIUs that were in SNC during the four most recent full quarters. (There may be cases in which an SIU is in SNC for more than one quarter. An SIU is only counted once even if that SIU was in SNC for several quarters.) The inspector should record this information in Attachment A: Pretreatment Program Status Update, Section B, Item No. 4.

During the PCI, the inspector should obtain the number and percent of SIUs in SNC for the most recent full quarter. This SNC information should be recorded in Section II: F. Enforcement, Item No. 3. If the CA's definition of SNC differs from EPA's, the inspector should indicate if the recorded information is based on SNC as defined by the CA or by EPA. The inspector should note any deficiencies in the information provided by the CA.

- F.4. Did the CA publish all SIUs in SNC in largest daily newspaper in accordance with NPDES permit requirements?**

**ISSUE:** The CA is required to publish (on an annual basis) all SIUs that had been in SNC during the reporting year.

**WHERE TO LOOK:** Pretreatment program performance report.

**HOW TO EVALUATE:** The inspector should obtain a copy of the CA's publication of significant violators (if a copy is not in the CA's pretreatment report to EPA or the State). It may be necessary to determine whether the CA's definition of "significant noncompliance" is consistent with the Federal definition. If the inspector identifies any IUs determined to be in SNC during the file review that were not published and should have been published, a deficiency should be noted.

## SECTION II

### **F.5. How many SIUs were in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)?**

ISSUE: There are three ways the CA has to obtain information about the compliance status of its IUs; through IU self-monitoring, CA inspections, and CA sampling. If an IU has not complied with its self-monitoring requirements and the CA has not conducted any inspections or sampling of the IU, then the compliance status of the IU is unknown.

WHERE TO LOOK: The inspector can request two lists: a list of IUs not sampled or inspected and a list of IUs in SNC for self-monitoring.

HOW TO EVALUATE: The inspector can compare the two lists and find those SIUs appearing on both lists.

- F.6. a. Did the CA experience interference, pass through, fire or explosions (flashpoint, etc.), corrosive structural damage, flow obstructions, excessive flow rates, excessive pollutant concentrations, heat problems, interference due to O&G, toxic fumes, illicit dumping of hauled wastes, worker health and safety, or other (specify) caused by industrial discharges?**
- b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference?**

ISSUE: The CA must investigate and take enforcement actions against IUs causing or contributing to pass through or interference.

WHERE TO LOOK: POTW's Discharge Monitoring Reports (DMRs) and sludge analytical data, wastewater treatment plant's log book, pretreatment program performance report, and interview.

HOW TO EVALUATE: The inspector should interview CA personnel (including sampling technicians or service maintenance crews) to determine if the CA has experienced any interference, pass through, or collection system or treatment plant operational problems caused by IU discharges. He/she should also review NPDES DMR effluent and sludge data as well as the wastewater treatment plant's operation log book for violations. Additionally, the CA may have reported these incidents in its pretreatment program performance report or kept a separate file on these incidents.

The inspector should review available documentation and should inquire of the CA personnel if there have been any problems of this type. The inspector should pursue any indication of collection system or wastewater treatment plant problems (particularly those where pass through or interference has resulted) by gathering the following information: description of the problem, known or purported cause, and the names of the IUs known or suspected of causing or



contributing to the problem. If the CA could not determine the cause or the IUs responsible, the inspector should inquire as to why this was not possible. The inspector should review the files of the IUs causing or contributing to the problem to verify that an enforcement action was taken.

**F.7. a. How many SIUs are on compliance schedules?**

**b. List these SIUs by name and compliance schedule end dates.**

**ISSUE:** The CA should establish compliance schedules for SIUs in accordance with its approved ERP. These compliance schedules should identify specific actions the SIUs are to take and establish specific dates by which these actions are to be completed. The dates should represent the shortest possible time frames in which the SIUs can realistically achieve compliance.

**WHERE TO LOOK:** Pretreatment program performance report, IU file review, and documentation provided by CA during interview.

**HOW TO EVALUATE:** The inspector should review the enforcement files of all or several of the SIUs on compliance schedules. The inspector should determine whether the IU is meeting the compliance schedule milestone dates, whether the CA has requested periodic compliance schedule progress reports from the IUs, and whether the CA is escalating its enforcement actions when the IUs have not met the compliance schedules or not achieved consistent compliance at the end of the compliance schedule.

**F.8. Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance?**

**ISSUE:** The CA can not extend the compliance date established in the regulation pertaining to specific categorical pretreatment standards. Unless the standard specifies otherwise, CIUs are allowed 3 years from the effective date of the standards to achieve compliance. The CA should notify the CIUs of any promulgated categorical pretreatment standards and establish, in the control mechanism, a construction schedule for any CIU that is not consistently meeting the categorical pretreatment standards. Those schedules should be developed in a manner that will ensure that the CIU is consistently achieving compliance by the date established in the Federal regulation. For those CIUs that have not achieved consistent compliance by the established date, the CA should initiate an appropriate enforcement action. At a minimum, the CIUs should receive an AO or similar enforcement action established in the CA's ERP for violations of enforcement compliance schedules. The CA should consider imposing penalties based on recovering any economic benefit the CIU has derived by delay in achieving compliance.

**WHERE TO LOOK:** Pretreatment program performance report, IU file review, and documentation provided by CA during interview.

## SECTION II

**HOW TO EVALUATE:** The inspector should review the enforcement files of all or several of the CIUs that have not achieved consistent compliance by the date established by the Federal regulations. The inspector should determine whether the CA has taken an enforcement action (at least an AO or similar enforcement action required by the CA's ERP) and whether the CA has assessed a penalty. The inspector should review compliance schedules and determine if the specific actions and dates established represent an accelerated schedule to achieve compliance in the shortest possible time. The inspector should obtain the necessary information that will enable a determination of whether EPA or the State should take an enforcement action against the IU and/or an enforcement action against the CA.

**F.9. Did the SIUs return to compliance within 90 days, within the time specified in the ERP, through a compliance schedule?**

**ISSUE:** Generally, effective enforcement is defined as a return to compliance within 90 days. Some situations make this time frame impossible. If it is unlikely that compliance can be achieved within 90 days even with a good faith effort on the part of the IU, the IU should be put on a compliance schedule. All enforcement activity must be consistent with the CA's ERP.

**WHERE TO LOOK:** Pretreatment program performance report, IU file review, and documentation provided by CA during interview.

**HOW TO EVALUATE:** The inspector should identify, through file reviews and interview discussion, instances where the CA has not taken effective enforcement against IUs in noncompliance. When compliance was not achieved within 90 days, the CA should have escalated enforcement to a formal stage (e.g., a show cause hearing, an AO, etc.). Generally, penalties should have been assessed against the IU which were significant enough to negate the economic benefit gained by not complying with the standards.

Where compliance within 90 days was not achievable (e.g., due to the need for installation of complex and/or costly equipment), the IU should have been placed on a compliance schedule and progress toward compliance should have been monitored. All compliance schedules should have contained milestone dates and the CA should have taken additional enforcement actions for missed milestones.

**B**

**BIBLIOGRAPHY OF MATERIALS ON  
POTW PRETREATMENT PROGRAM DEVELOPMENT,  
IMPLEMENTATION, AND OVERSIGHT**

THE UNIVERSITY OF CHICAGO

PHILOSOPHY

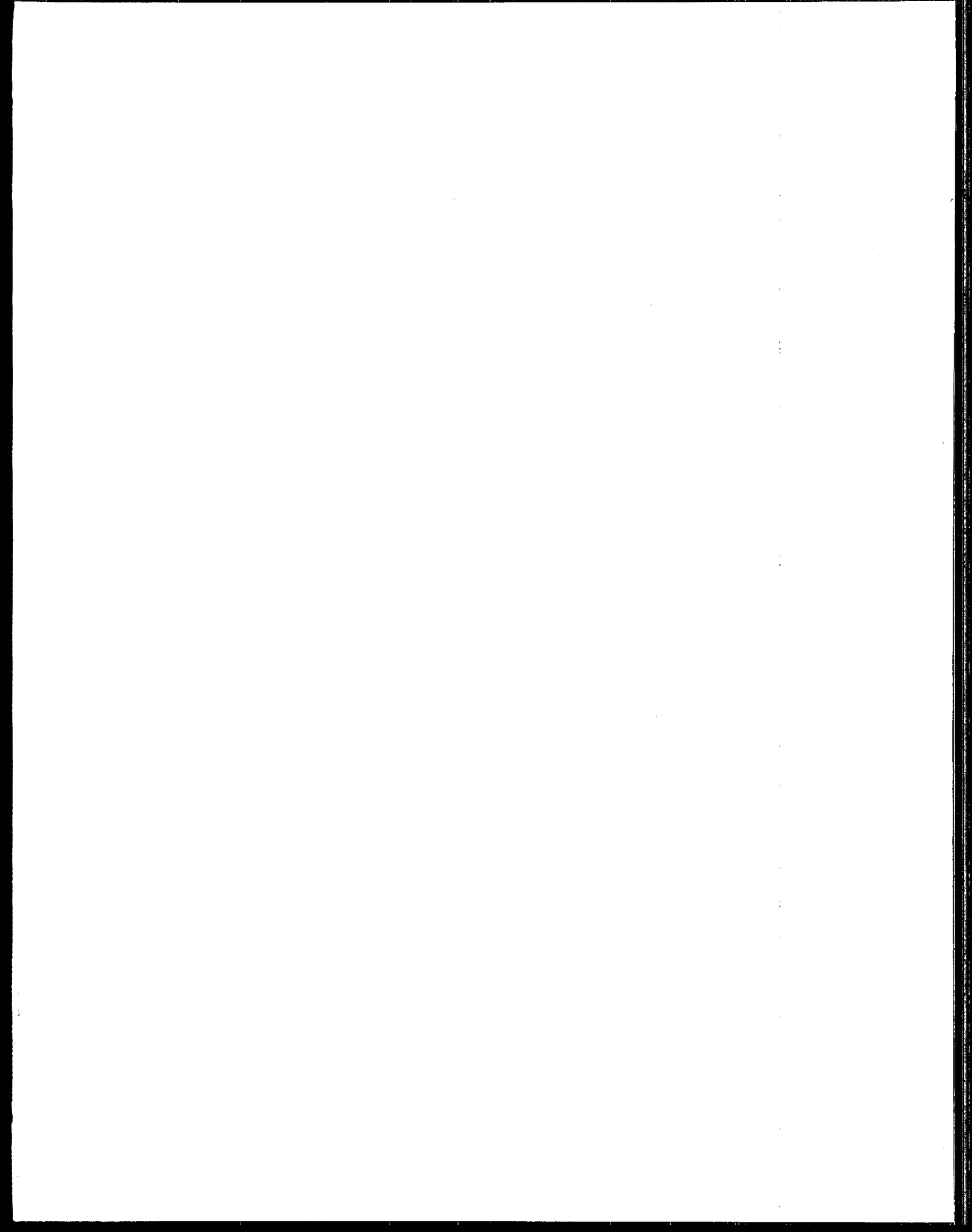
PHILOSOPHY

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## BIBLIOGRAPHY OF MATERIALS ON POTW PRETREATMENT PROGRAM DEVELOPMENT, IMPLEMENTATION, AND OVERSIGHT

The guidance manuals, memoranda, and reports identified in this list have been developed by the U.S. Environmental Protection Agency Office of Water. This list is not an order form. Many materials on this list are no longer available for distribution. Efforts are underway to provide essential documents to EPA Libraries Nationwide and to make materials available through the National Technical Information Service (NTIS - 5285 Port Royal Road, Springfield, VA 22161 [703/487-4600]). If you have any questions regarding these materials or would like to obtain a copy of any of the documents, please contact the EPA Regional or State Pretreatment Coordinator in your area.

### STATUTORY AND REGULATORY INFORMATION

Clean Water Act (incorporating the Water Quality Act of 1987)

EPA Administrated Permit Programs: The National Pollutant Discharge Elimination System (NPDES) (40 CFR Part 122)

Guidelines Establishing Test Procedures for the Analysis of Pollutants (40 CFR Part 136)

General Pretreatment Regulations (40 CFR Part 403)

Categorical Pretreatment Standard Regulations (40 CFR Parts 405 - 471)

- For regulatory information the following documents can be purchased:

- Code of Federal Regulations (CFR)
- Federal Register
- Federal Register Index
- Federal Register List of CFR Sections Affected.

- For information on these documents contact:

Superintendent of Documents  
U.S. Government Printing  
Washington, DC 20402  
(202) 783-3238

## **POTW PROGRAM OVERSIGHT**

Procedures Manual for Reviewing a POTW Pretreatment Program Submission (October 1983)

Pretreatment Implementation Review Task Force (January 30, 1985)

Pretreatment Compliance Inspection and Audit Manual for Approval Authorities (July 1986)

Guidance for Implementing RCRA Permit-by-Rule Requirements at POTWs (July 1987)

Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements (September 1987)

NPDES Compliance Inspection Manual (May 1988)

Basic Inspector Training Course Fundamentals of Environmental Compliance Inspections (February 1989)

NPDES Compliance Monitoring Inspector Training

- Laboratory Analysis (April 1990)
- Legal Issues (May 1990)
- Biomonitoring (June 1990)
- Overview (August 1990)
- Sampling (October 1990)

## **GENERAL PROGRAM DEVELOPMENT AND IMPLEMENTATION**

Guidance Manual for POTW Pretreatment Program Development (October 1983)

RCRA Information on Hazardous Wastes for POTWs (September 1985)

Environmental Regulations and Technology - The National Pretreatment Program (July 1986)

Pretreatment Compliance Monitoring and Enforcement Guidance (July 1986)

Guidance Manual for the Identification of Hazardous Wastes Delivered to Publicly Owned Treatment Works by Truck, Rail, or Dedicated Pipe (June 1987)

Guidance Manual for Preventing Interference at POTWs (September 1987)

Guidance Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program (December 1987)

Guidance Manual for Control of Slug Discharges to POTWs (February 1989)

Industrial User Permitting Guidance Manual (September 1989)



Guidance for Developing Control Authority Enforcement Response Plans (September 1989)

Guidance Manual for POTWs to Calculate the Economic Benefit of Noncompliance (September 1990)

Supplemental Manual on the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program: Residential and Commercial Toxic Pollutant Loadings and POTW Removal Efficiency Estimates (May 1991)

#### Pretreatment Bulletins

No. 1 (September 1985)

No. 2 (March 1987)

No. 3 (November 1987)

No. 4 (July 1988)

No. 5 (January 1989)

No. 6 (June 1989)

No. 7 (January 1990)

No. 8 (September 1990)

No. 9 (January 1991)

### **PRETREATMENT PROGRAM IMPLEMENTATION COMPUTER MODELS/PROGRAMS**

PRELIM 3.0 Users Manual and Diskette (January 1987)

Pretreatment Compliance Monitoring and Enforcement Software (June 1988)

PRELIM 4.0 Users Manual and Diskette (May 1991)

### **APPLICATION OF CATEGORICAL PRETREATMENT STANDARDS**

Guidance Manual for Electroplating and Metal Finishing Pretreatment Standards (February 1984)

Guidance Manual for Pulp, Paper, and Paperboard and Builder's Paper and Board Mills Pretreatment Standards (July 1984)

Guidance Manual for the Preparation and Review of Removal Credit Applications (July 1985)

Environmental Regulations and Technology - The Electroplating Industry (September 1985)

Guidance Manual for Iron and Steel Manufacturing Pretreatment Standards (September 1985)

Guidance Manual for the Use of Production-based Pretreatment Standards and the Combined Wastestream Formula (September 1985)

Guidance Manual for Implementing Total Toxic Organic (TTO) Pretreatment Standards (September 1985)

Guidance Manual for Leather Tanning and Finishing Pretreatment Standards (September 1986)

Guidance Manual for Battery Manufacturing Pretreatment Standards (August 1987)

Non-Consent Decree Categorical Pretreatment Standards (August 1988)

Guidance Manual for Aluminum, Copper, and Nonferrous Metals Forming and Metal Powders Pretreatment Standards (February 1989)

## **MEMORANDUM**

Pretreatment Compliance Strategy (October 28, 1983)

Guidance to POTWs for Enforcement of Categorical Standards (November 5, 1984)

Local Limits Requirements for POTW Pretreatment Programs (August 5, 1985) (In Local Limits Guidance Manual)

NPDES and Pretreatment Inspection Reporting for FY 1986 Office of Water Accountability System (August 6, 1985)

Audits of POTWs with Approved Pretreatment Programs (August 30, 1985)

Discharge of Wastewater from CERCLA Sites into POTWs (April 15, 1986)

Pretreatment Audit Reporting Requirements (December 16, 1985)

Non-Consent Decree Categorical Pretreatment Standards (August 24, 1988)

Guidance on Penalty Calculation for POTW Failure to Implement an Approved Pretreatment Program (December 22, 1988)

Conventional Pollutants Regulated by Categorical Pretreatment Standards (February 16, 1989)

Application and Use of the Regulatory Definition of Significant Noncompliance for Industrial Users (September 9, 1991)

## **NATIONAL PRETREATMENT PROGRAM REVIEW AND EVALUATION**

Assessment of the Impacts of Industrial Discharges of Publicly Owned Treatment Works (December 1981)

The Pretreatment Regulatory Impact Analysis (1983)

Assessment of Industrial Waste Control Programs in Three Municipalities (1983)

Fate of Priority Pollutants in Publicly Owned Treatment Works (September 1982)

Report to Congress on the Discharge of hazardous Wastes to Publicly Owned Treatment Works (February 1986)

GAO Report- Improved and Enforcement Needed for Toxic Pollutants Entering Sewers (April 1989)

Report to Congress on the National Pretreatment Program (July 1991)

## **OTHER**

Best Management Practices Guidance Document (June 1981)

NPDES Compliance Flow Measurement Manual (September 1981)

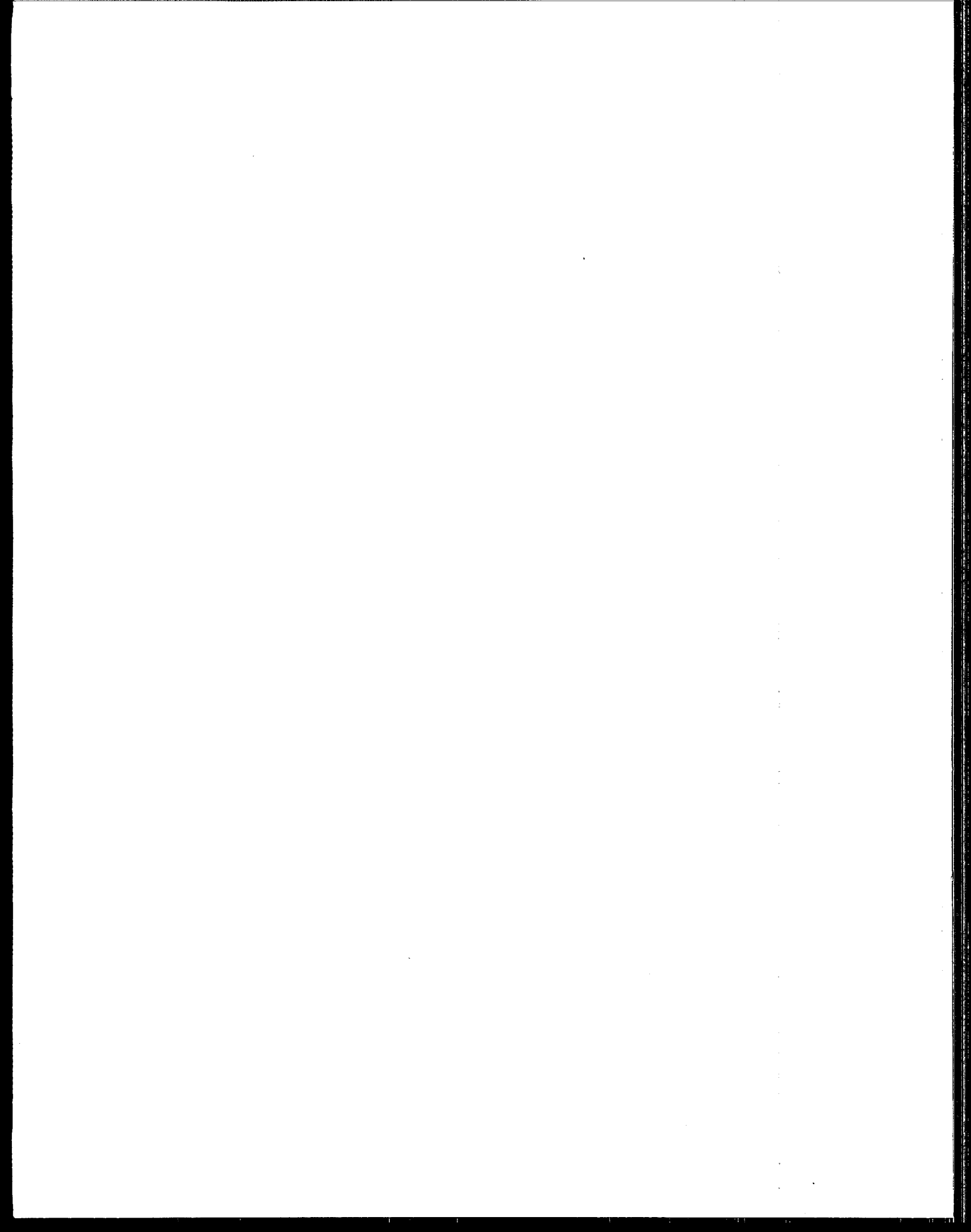
Handbook for Sampling and Sample Preservation of Water and Wastewater (September 1982) (NTIS number PB83-124503)

Fate of Priority Pollutants in Publicly Owned Treatment Works (September 1982)

Technical Support Document for Water Quality-Based Toxics Control (September 1985)

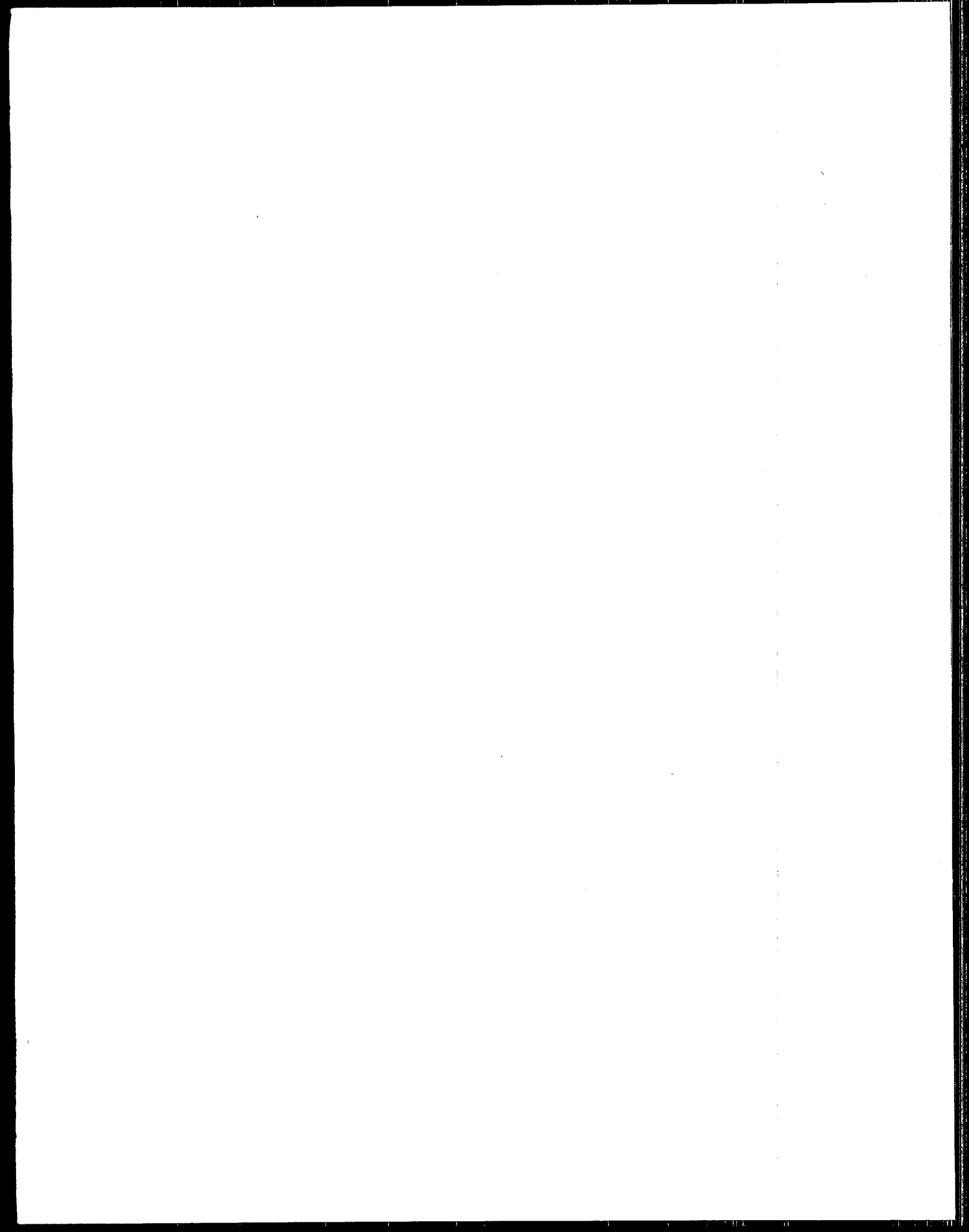
Summaries of 40 CFR Part 136 and 40 CFR Parts 405-471 (October 1988)

CERCLA Site Discharges to POTWs Guidance Manual (August 1990)



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**LIST OF DEVELOPMENT DOCUMENTS AND  
ADDITIONAL U.S. EPA INDUSTRIAL TECHNOLOGY DIVISION PUBLICATIONS**



LIST OF DEVELOPMENT DOCUMENTS AND ADDITIONAL U.S. EPA INDUSTRIAL TECHNOLOGY DIVISION PUBLICATIONS

SOURCES OF AVAILABILITY

<u>INDUSTRIAL POINT SOURCE CATEGORY</u>	<u>CFR PART NUMBER</u>	<u>SUBCATEGORY</u>	<u>EPA PUBLICATION DOCUMENT NUMBER</u>	<u>NTIS ACCESSION NUMBER</u>	<u>GPO STOCK NUMBER</u>
ALUMINUM FORMING	467	• Aluminum Forming (Final)	EPA 440/1-84/073	PB84244425	----
			Volume I	PB84244433	----
ASBESTOS MANUFACTURING	427	• Building, Construction and Paper (Final)	EPA 440/1-74/017-a	PB238320/AS	5501-00827
			Volume II		
AUTO AND OTHER LAUNDRIES	444	• Textile, Friction Materials & Sealing Devices (Final)	EPA 440/1-74/035-a	PB240860/AS	----
			Volume I		
BATTERY MANUFACTURING	461	• Auto and Other Laundries (Guidance)	----	----	----
			• Battery Manufacturing (Proposed)	EPA 440/1-82/067-b	PB83197921
BATTERY MANUFACTURING	461	• Battery Manufacturing (Final)	EPA 440/1-84/067	PB85121507	----
			Volume I	PB85121515	----
BATTERY MANUFACTURING	461	• Battery Manufacturing Pretreatment Standards (Guidance)	----	----	----
			Volume II		

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BUILDERS PAPER & BOARD MILLS	431	• Builders Paper & Roofing Felt Segment	EPA 440/1-74/026-a	PB238076	5501-00909
		• Board & Builders' Paper & Board Mills (Proposed)	EPA 440/1-80/025-b	PB81201535	----
		• Pulp, Paper & Paper-Board and Builders' Paper & Board Mills (Final)	EPA 440/1-82/025	PB83163949	----
CANNED & PRESERVED FRUITS & VEGETABLES	407	• Apple, Citrus & Potato Processing	EPA 440/1-74/027-a	PB238649	5501-00790
		• Fruits, Vegetables & Specialties (Interim Final)	EPA 440/1-75/046	----	----
CANNED & PRESERVED SEAFOOD PROCESSING	408	• Catfish, Crab, Shrimp & Tuna (Final)	EPA 440/1-74/020-a	PB238614	5501-00920
		• Fishmeal, Salmon, Bottom Fish, Sardine, Herring, Clam, Oyster, Scallop, & Abalone (Final)	EPA 440/1-75/041-a	PB256840	----



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<u>INDUSTRIAL POINT SOURCE CATEGORY</u>	<u>CFR PART NUMBER</u>	<u>SUBCATEGORY</u>	<u>EPA PUBLICATION DOCUMENT NUMBER</u>	<u>NTIS ACCESSION NUMBER</u>	<u>GPO STOCK NUMBER</u>
CANNED & PRESERVED SEAFOOD PROCESSING (Continued)	408	<ul style="list-style-type: none"> <li>Report to Congress, Section 74 Seafood Processing Executive Summary</li> </ul>	EPA 440/1-80/020-a	PB81182362	----
			Volume I	PB81182370	----
			Volume II	PB81182388	----
CARBON BLACK	458	<ul style="list-style-type: none"> <li>Carbon Black Manufacturing (Interim Final)</li> </ul>	EPA 440/1-76/060h	----	----
CEMENT MANUFACTURING	411	<ul style="list-style-type: none"> <li>Cement Manufacturing (Final)</li> </ul>	EPA 440/1-74/005-a	PB238610/AS	5501-00866
COAL MINING	434	<ul style="list-style-type: none"> <li>Coal Mining (Proposed)</li> <li>Coal Mining (Final)</li> </ul>	EPA 440/1-81/057-b	PB81229296	----
			EPA 440/1-82/057	PB83180422	----
COIL COATING	465	<ul style="list-style-type: none"> <li>Coil Coating, Phase I (Final)</li> <li>Coil Coating, Phase II- Canmaking (Proposal)</li> <li>Coil Coating, Phase II- Canmaking (Final)</li> </ul>	EPA 440/1-82/071	PB83205542	----
			EPA 440/1-83/071-b	PB83198598	----
CONCRETE PRODUCTS	452	<ul style="list-style-type: none"> <li>Concrete Products (Guidance)</li> </ul>	EPA 440/1-78/090		

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COOLING WATER INTAKE STRUCTURES	402	<ul style="list-style-type: none"> <li>• Best Technology Available for the Location Design Construction &amp; Capacity of Cooling Water Intake Structures for Minimizing Adverse Environmental Impact (Final)</li> </ul>	EPA 440/1-76/015-a	PB253573/AS	----
COPPER FORMING	468	<ul style="list-style-type: none"> <li>• Copper (Final)</li> </ul>	EPA 440/1-84/074	PB84192459	----
DAIRY PRODUCTS PROCESSING	405	<ul style="list-style-type: none"> <li>• Dairy Products Processing (Final)</li> </ul>	EPA 440/1-74/021-a	PB238835/AS	5501-00898
DOMESTIC SEWAGE STUDY - Hazardous Wastes	----	<ul style="list-style-type: none"> <li>• Report to Congress on the Discharge of Hazardous Wastes to Publicly Owned Treatment Works (Report)</li> </ul>	EPA 530-SW-86-004	PB86184017/AS	----
DRUM RECONDITIONING INDUSTRY	----	<ul style="list-style-type: none"> <li>• Drum Reconditioning</li> </ul>	EPA 440/1-89/101	PB90126491	----
ELECTRICAL & ELECTRONIC COMPONENTS	469	<ul style="list-style-type: none"> <li>• Electrical &amp; Electronic Components Phase I (Final)</li> <li>• Electrical &amp; Electronic Components Phase II (Final)</li> </ul>	EPA 440/1-83/075-b	----	----
			EPA 440/1-84/075-b	PB83199208	----

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			EPA PUBLICATION DOCUMENT NUMBER	NTIS ACCESSION NUMBER	GPO STOCK NUMBER	
ELECTROPLATING & METAL FINISHING	413 & 433	• Copper, Nickel, Chrome & Zinc (Final)	EPA 440/1-74/003-a	PB238834/AS	5501-00816	
		• Electroplating - Pretreatment (Final)	EPA 440/1-79/003	PB80196488	----	
		• Metal Finishing (Proposed)	EPA 440/1-82/091-b	PB83102004	----	
		• Metal Finishing (Final)	EPA 440/1-83/091	PB84115989	----	
		• Electroplating and Metal Finishing Pretreatment (Guidance)	EPA 440/1-84/091-g	----	----	
ETHANOL FOR FUEL (SYNFUELS)	472	• Multimedia Technical Support Document for Ethanol for Fuel Industry (Guidance)	EPA 440/1-86/093	PB86177557/AS	----	
		• Low BTU Gasifier Wastewater (1986) (Guidance)	----	PB86245438/AS	----	
		• Low BTU Coal Gasification (Guidance)	----	----	----	

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				<u>NTIS ACCESSION NUMBER</u>	<u>GPO STOCK NUMBER</u>
EXPLOSIVES	457	• Explosives Manufacturing (Interim Final)	EPA 440/1-76/060-j	----	----
FEEDLOTS	412	• Feedlots (Final)	EPA 440/1-74/004-a	PB238651/AS	5501-00842
FERROALLOY MANUFACTURING	424	• Smelting & Slag	EPA 440/1-74/008-a	PB238650/AS	5501-00780
		• Calcium Carbide (Interim Final)	EPA 440/1-75/038	----	----
		• Electrolytic Ferroalloys (Interim Final)	EPA 440/1-75/038-a	----	----
FERTILIZER MANUFACTURING	418	• Basic Fertilizer Chemicals (Final)	EPA 440/1-74/011-a	PB238652/AS	5501-00969
		• Formulated Fertilizer (Final)	EPA 440/1-75/042-a	PB240863/AS	5501-01006
		• Summary Report - Phosphate Fertilizer Subcategory of Fertilizer Point Source (40 CFR 418)	----	----	----

**LIST OF DEVELOPMENT DOCUMENTS AND ADDITIONAL U.S. EPA INDUSTRIAL TECHNOLOGY DIVISION PUBLICATIONS**  
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			<u>EPA PUBLICATION DOCUMENT NUMBER</u>	<u>NTIS ACCESSION NUMBER</u>	<u>GPO STOCK NUMBER</u>
GLASS MANUFACTURING	426	• Pressed & Blown Glass (Interim Final)	EPA 440/1-75/034-a	PB256854/AS	5501-01036
		• Insulation Fiberglass (Final)	EPA 440/1-74/001-b	PB238078/AS	5501-00781
		• Flat Glass (Final)	EPA 440/1-74/001-c	PB238907	5501-00814
GRAIN MILLS	406	• Grain Processing (Final)	EPA 440/1-74/028-a	PB238316/AS	5501-00844
		• Animal Feed, Breakfast Cereal & Wheat Starch (Final)	EPA 440/1-74/039-a	PB240861/AS	5501-01007
GUM & WOOD CHEMICALS MANUFACTURING	454	• Corn Wet Milling	EPA 440/1-75/028-b	----	----
		• Gum and Wood Chemicals (Interim Final)	EPA 440/1-76/060-b	----	----
HAZARDOUS WASTE TREATMENT INDUSTRY	----	• Hazardous Waste Treatment	EPA 440/1-89/100	PB90126517	----
HOSPITALS	460	• Hospitals (Interim Final)	EPA 440/1-76/060-N	PB87192670	----

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INDUSTRIAL LAUNDRIES	----	• Industrial Laundries	EPA 440/1-89/103	PB90126541	----
INK FORMULATING	447	• Oil Base Solvent Wash Subcategories (Interim Final)	EPA 440/1-75/049	----	----
		• Ink Formulating (Proposal)	EPA 440/1-79/090-b	PB81178188	----
INORGANIC CHEMICALS MANUFACTURING	415	• Major Inorganic Chemical Products (Final)	EPA 440/1-74/007-a	PB238611	5502-00121
		• Inorganic Chemicals Manufacturing Phase II (Proposed)	EPA 440/1-80/007-b	PB81122632	----
		• Inorganic Chemicals (Treatability Study)	EPA 440/1-80/103	----	----
		• Inorganic Chemicals Phase I (Final)	EPA 440/1-82/007	PB82265612	----
		• Inorganic Chemicals Phase II (Final)	EPA 440/1-84/007	PB85156446/XAB	----

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IRON & STEEL MANUFACTURING	420	• Steel Making	EPA 440/1-74/024-a	PB238837	5501-00906	
		• Iron & Steel (Proposed)	EPA 440/1-80/024-b		----	
			Volume I	PB81184392		
			Volume II	PB81184400		
			Volume III	PB81184418		
			Volume IV	PB81184426		
			Volume V	PB81184434		
			Volume VI	PB81184442		
			(*Set of Volumes I thru VI)	PB81184384*		
			• Iron & Steel (Final)	EPA 440/1-82/024		----
		Volume I	PB82240425			
		Volume II	PB82240433			
		Volume III	PB82240441			
		Volume IV	PB82240458			
		Volume V	PB82240466			
		Volume VI	PB82240474			
		(*Set of Volumes i-Vi)	PB82240417*			
		• Pretreatment Steel Manufacturing Point Source		----	----	

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			<u>EPA PUBLICATION DOCUMENT NUMBER</u>	<u>NTIS ACCESSION NUMBER</u>	<u>GPO STOCK NUMBER</u>
LEATHER TANNING	425	• Leather Tanning & Finishing (Final)	EPA 440/1-74/016-a	PB238079	5501-00818
		• Leather Tanning (Final)	EPA 440/1-82/016	PB83172593	----
		• Leather Tanning and Finishing (Supplemental Final)	EPA 440/1-88/016-s	PB88213541	----
		• Leather Tanning and Finishing (Guidance)	----	----	----
MACHINERY MANUFACTURING AND REBUILDING INDUSTRY	----	• Machinery Manufacturing	EPA 440/1-89/106	PB90126525	----
		• Red Meat Processing (Final)	EPA 440/1-74/012-a	PB238836/AS	5501-00843
		• Renderer (Final)	EPA 440/1-74/031-d	PB253572	----
MEAT PRODUCTS AND RENDERING	432	• Renderer (Supplement/ Reprint Final)	EPA 440/1-78/031-e	----	----
		• Renderer (Supplement)	EPA 440/1-77/031-e	----	----
METAL FINISHING	433	SEE ELECTROPLATING FOR LISTING			



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METAL MOLDING & CASTING (FOUNDRIES)	464	• Metal Molding & Casting (Proposed)	EPA 440/1-82/070-b Volumes I & II	----	----
		• Metal Molding & Casting (Final)	EPA 440/1-85/070	PB86161452/XAB	----
MINERAL MINING & PROCESSING	436	• Minerals for the Construction Industry	EPA 440/1-75/059	PB274593/3	----
		• Mineral Mining and Processing (Final)	EPA 440/1-76/059b	PB80110299	----
		• Report to Congress: The Effects of Discharges from Limestone Quarries on Water Quality and Aquatic Biota (Final)	EPA 440/1-82/059	PB82242207	----
		• Nonferrous Metals Forming (Final)	EPA 440/1-86/019 Volume I Volume II Volume III (* Set of Volumes I-III)	----- PB87121760 PB87121778 PB87121786 PB87121752*	-----

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NONFERROUS METALS MANUFACTURING	421	• Bauxite Refining- Aluminum Segment (Final)	EPA 440/1-74/019-c	PB238463	5501-00116
		• Primary Aluminum Smelting - Aluminum Segment (Final)	EPA 440/1-74/019-d	PB240859	5501-00817
		• Secondary Aluminum Smelting - Aluminum Segment (Final)	EPA 440/1-74/019-e	PB238464	5501-00819
OIL & GAS EXTRACTION	435	• Oil & Gas Extraction (Interim Final)	EPA 440/1-76/055-a	----	----
		• Oil & Gas Extraction - Offshore (Interim Final)	EPA 440/1-75/055	----	----
		• Oil & Gas Extraction - Offshore (Proposed)	EPA 440/1-85/055	PB86114949/XAB	----
OIL RECLAMATION	----	• Assessment of Environmental Fate & Effects of Discharge from Offshore Oil and Gas Operations	EPA 440/4-85/002	PB86114964/AS	----
		• Oil Reclamation	EPA 440/1-89/014	PB90126509	----

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ORE MINING AND DRESSING	440	• Ore Mining and Dressing Volume I (Proposed)	EPA 440/1-78/061-d	PB286520/AS	----
		• Ore Mining and Dressing Volume II (Proposed)	EPA 440/1-78/061-e	PB286521/AS	----
		• Ore Mining & Dressing (Proposed)	EPA 440/1-82/061-b	PB82250952	----
		• Ore Mining & Dressing (Final)	EPA 440/1-82/061	----	----
		• Gold Placer Mining Subcategory (Proposed)	EPA 440/1-85/061-b	----	----
		• Placer Mining and Dressing - Gold Placer Mining (Final)	EPA 440/1-88/061	PB89117790	----

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ORGANIC CHEMICALS, PLASTICS, AND SYNTHETIC FIBERS MANUFACTURING	414 & 416	• Major Organic Products (Final)	EPA 440/1-74/009-a	PB241905	5001-008812
		• Organic Chemicals & Plastics & Synthetic Fibers (Proposed)	EPA 440/1-83/009-b Volume I Volume II Volume III (*Set of Volumes I thru III)	PB83205633 PB83205641 PB83205658 PB83205625*	----
		• Synthetic Resins	EPA 440/1-74/010	PB239241	5501-00815
		• Synthetic Polymers	EPA 440/1-74/036	PB240862	5501-01012
		• Selected Summary of Information in Support of Organic Chemicals, Plastic & Synthetic Fibers, July 1985	----	----	----
		• Organic Chemicals & Plastics & Synthetic Fibers (Final)	EPA 440/1-87/009 Volumes I & II Volume II	PB88171335	----
PAINT FORMULATING	446	• Paint Formulating	EPA 440/1-89/050	PB90126475	----
		• Oil Base Solvent Wash Subcategories (Interim Final)	EPA 440/1-75/049	----	----
		• Paint and Ink Formulating (Interim Final)	EPA 440/1-75/050	----	----

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PAVING AND ROOFING (TARS & ASPHALT)	443	• Tars and Asphalt (Final)	EPA 440/1-75/050	----	----	
PESTICIDES	455	• Pesticides (Final)	EPA 440/1-78/060	PB285480	----	
			• Pesticides (Proposed)	EPA 440/1-89/060-e	PB90126426	
				----	PB83176636	----
				• Test Methods for Non-Conventional Pesticides Chemical Analysis of Industrial & Municipal Wastewater		
PETROLEUM REFINING	419	• Pesticides Chemicals Manufacturing (Interim Final)	EPA 440/1-75/060-d	----	----	
			• Pesticides (Final)	EPA 440/1-85/079	PB86150042/XAB	----
				NOTE: FINAL REGULATION WAS WITHDRAWN 1986 -- a restudy has been initiated by the Agency		
PETROLEUM REFINING	419	• Petroleum Refining (Final)	EPA 440/1-74/014-a	PB238612	5501-00912	
			• Petroleum Refining (Proposed)	EPA 440/1-79/014-b	PB81228413	----
				• Petroleum Refining (Final)	EPA 440/1-82/014	PB83172569

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PHARMACEUTICALS MANUFACTURING	439	• Pharmaceutical (Final)	EPA 440/1-83/084	PB84180066	----
		• Pharmaceutical - BCT (Final)	EPA 440/1-86/084	PB87172268	----
PHOSPHATE MANUFACTURING	422	• Phosphorus Derived Chemicals (Final)	EPA 440/1-74/006-a	PB241018/AS	5503-00078
		• Other Non-Fertilizer Phosphate Chemicals (Final)	EPA 440/1-75/043-a	----	----
		• Summary Report - Phosphate Fertilizer Subcategory of Fertilizer Point Source Category (40 CFR 418)	----	Contract # 68-1-4975	----
PHOTOGRAPHIC PROCESSING	459	• Guidance Document for the Control of Water Pollution in the Photographic Processing Industry	EPA 440/1-81/082-g	PB82177643	----
		• Photographic Processing (Interim Final)	EPA 440/1-76/060-I	----	----

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PLASTICS MOLDING AND FORMING	463	• Plastics Molding and Forming (Final)	EPA 440/1-84/069-b	PB85186823	----
		• Porcelain Enameling (Proposed)	EPA 440/1-81/072-b	PB81201527	----
PORCELAIN ENAMELING	466	• Porcelain Enameling (Final)	EPA 440/1-82/072	----	----
		• Summary of Available Information on the Levels of Controls of Toxic Pollutants Dischargers in the Printing and Publishing Point Source Category	EPA 440/1-78/090	----	----
PRINTING AND PUBLISHING	448				
PUBLICLY OWNED TREATMENT WORKS	----	• Fate of Priority Pollutants in Publicly Owned Treatment Works Volume I	EPA 440/1-82/303		
		Volume II		PB83122788	----
		- 30-Day Study	EPA 440/1-82/302	PB83122796	----
		- Pilot Study	EPA 440/1-79/300	PB82263880	----

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PULP, PAPER AND PAPERBOARD	430	<ul style="list-style-type: none"> <li>• Unbleached Kraft and Semi-chemical Pulp (Final)</li> <li>• Pulp, Paper &amp; Paper-board and Builders' Paper &amp; Board Mills (Proposed)</li> <li>• Pulp, Paper &amp; Paper-board and Builders' Paper &amp; Board Mills (Final)</li> <li>• Development Document for Best Conventional Pollutant Control Technology Pulp, Paper, and Paperboard</li> <li>• Pulp, Paper and Paperboard &amp; Builder's Paper and Board Mills (Guidance)</li> <li>• Control of Polychlorinated Biphenyls in the Deink Subcategory (Guidance)</li> </ul>	EPA 440/1-74/025-a	PB238833/AS	----
			EPA 440/1-80/025-b	PB81201535	----
			EPA 440/1-82/025	PB83163949	----
			EPA 440/1-86/025	PB87172250/AS	----



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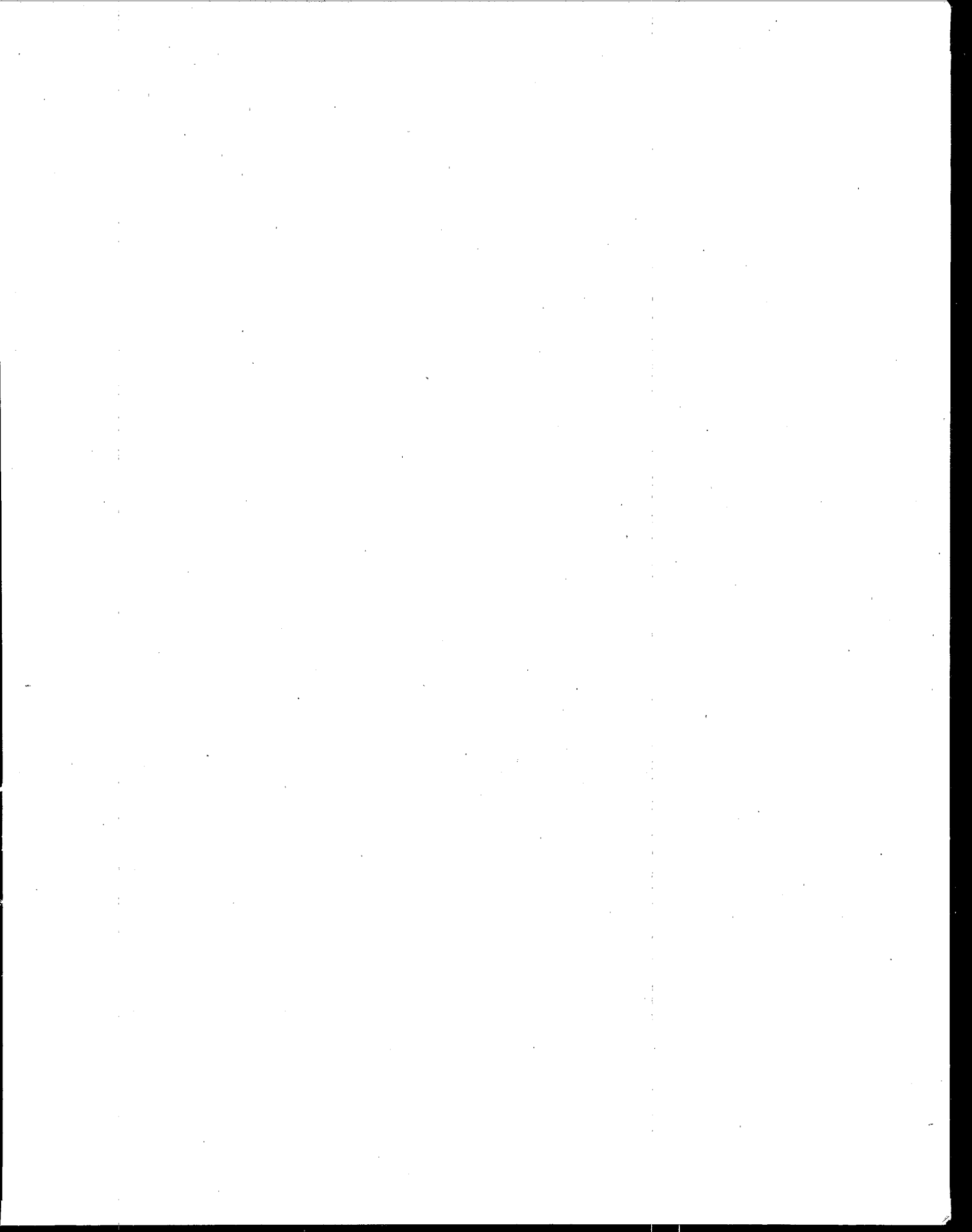
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			EPA PUBLICATION DOCUMENT NUMBER	NTIS ACCESSION NUMBER	GPO STOCK NUMBER
RUBBER PROCESSING	428	• Tire & Synthetic (Final)	EPA 440/1-74/013-a	PB238609/AS	5501-00885
		• Fabricated & Reclaimed Rubber (Final)	EPA 440/1-74/030-a	PB241916/AS	5501-01016
		• Soaps & Detergents (Final)	EPA 440/1-74/018-a	PB238613/AS	5501-00867
SOLVENT RECYCLING INDUSTRY	----	• Solvent Recycling	EPA 440/1-89/102	PB90126467	----
STEAM ELECTRIC POWER PLANTS	423	• Steam Electric Power Generating (Final)	EPA 440/1-74/029-a	PB240853	5501-01001
		• Steam Electric (Proposed)	EPA 440/1-80/029-b	PB81119075	----
		• Steam Electric (Final)	EPA 440/1-82/029	----	----
SUGAR PROCESSING	409	• Beet Sugar (Final)	EPA 440/1-74/002-b	PB238462/AS	5501-00117
		• Cane Sugar Refining (Final)	EPA 440/1-74/002-c	PB238147/AS	5501-00826
		• Raw Cane Sugar Processing (Interim Final)	EPA 440/1-75/044	----	----

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TEXTILE MILLS MANUFACTURING	410	• Textile Mills (Final)	EPA 440/1-74/022-a	PB238832/AS	5501-00903
		• Textile Mills (Final)	EPA 440/1-82/022	PB83116871	----
TIMBER PRODUCTS PROCESSING	429	• Wood Furniture and Fixtures (Final)	EPA 440/1-74/033-a	----	----
		• Timber Products Processing (Proposed)	EPA 440/1-79/023-b	----	----
		• Timber Products Processing (Final)	EPA 440/1-81/023	PB81227282	----
TRANSPORTATION EQUIPMENT CLEANING INDUSTRY	----	• Transportation Equipment Cleaning	EPA 440/1-89/104	PB90126483	----

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