

HOW TO PREPARE FOR PRETREATMENT AUDITS

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Phoebe Low

(614) 644-2134

Phoebe.Low@epa.ohio.gov

OVERVIEW

- **Basic and Generalized Summary of Ohio EPA's Pretreatment Inspections**
- **Types of Pretreatment Inspections**
- **Components of a Pretreatment Audit Inspection (PAI)**
- **How to prepare for a PAI**
- **Common mistakes (“red flags”)**

TWO TYPES OF INSPECTIONS

PRETREATMENT COMPLIANCE INSPECTION (PCI)

- Twice per NPDES permit cycle (2 every 5 years)
- Usually takes 1 day
 - Interview Questions
 - File Reviews

PRETREATMENT AUDIT INSPECTION (PAI)

- At least once per NPDES permit cycle (every 5 years)
- Usually takes multiple days
 - Interview Questions
 - File Reviews
 - Sewer Use Ordinance Review
 - Industrial User Inspection

ACRONYMS

- **CFR** – Code of Federal Regulations
- **CIU** – Categorical Industrial User
- **ERP** – Enforcement Response Plan
- **IU** – Industrial User
- **OAC** – Ohio Administrative Code
- **PAI** – Pretreatment Audit Inspection
- **PCI** – Pretreatment Compliance Inspection
- **POTW** – Publicly Owned Treatment Works
- **SIU** – Significant Industrial User
- **SUO** – Sewer Use Ordinance

BASIC COMPONENTS OF THE PAI



Interview
Questions



File Reviews



Sewer Use
Ordinance Review



Industrial User
Inspection

US EPA PAI FORM

- Online - https://www3.epa.gov/npdes/pubs/final_pca_checklist_and_instructions_%20feb2010.pdf
- “Control Authority Pretreatment Audit Checklist and Instructions” (US EPA, 2010).
833-B-10-001

US EPA PAI FORM

Component	# of Pages
Interview Questions	~20
File Reviews	~15
Sewer Use Ordinance Review	~12
Industrial User Inspection	3



INTERVIEW QUESTIONS

Interview
Questions

File
Reviews

SUO
Review

Industrial
User
Inspection



WHAT IS OHIO EPA LOOKING FOR?

- General overview of how the pretreatment program is run
- Is the POTW aware of any issues?
- Is the POTW keeping up with the pretreatment requirements?
- Are there any IUs causing problems?



HOW TO PREPARE?

- Main Pretreatment Contact – set aside all plans for that day
- Make sure all pretreatment personnel are available
 - Includes monitoring & lab personnel
 - If some personnel are only available for limited hours, notify Ohio EPA inspector at the beginning of the inspection (prioritize inspection procedures)



COMPONENTS OF THE INTERVIEW

- Pretreatment Program Modifications
 - Legal Authority
 - IU Classification
 - Control Mechanism Evaluation
 - Application of Pretreatment Standards & Requirements
 - Compliance Monitoring
 - Enforcement
 - Data Management / Public Participation
 - Resources
 - Environmental Effectiveness / Pollution Prevention
- Does the POTW's Sewer Use Ordinance and Pretreatment Program allow it to do everything it needs to do?
- Are the IUs' permits correctly written and managed?
- Does the POTW make sure the IU is in compliance or works towards compliance?
- Does the POTW have all the resources it needs to run an effective pretreatment program?



QUESTIONS ABOUT INTERVIEWS?

Another opportunity for questions at the end of the presentation.



FILE REVIEWS

Interview
Questions

File
Reviews

SUO
Review

Industrial
User
Inspection




WHAT IS OHIO EPA LOOKING FOR?

- 1. Control Mechanisms (permits)
- 2. Compliance Monitoring (inspections & monitoring)
- 3. Enforcement Activities (violations, IU significant non-compliance)
- 4. IU Compliance Status (IUs' reports & sampling)
- 5. Recordkeeping Requirements (≥ 3 Years)



I. CONTROL MECHANISMS (PERMITS)

- Every SIU should have a permit that:
 - Is not expired
 - Contains all the required info 
 - Uses the right pretreatment standards



I. PERMIT CONTENTS

- Duration of permit (≤ 5 years)
- Applicable limits (local limits, categorical standards, BMPs)
- Self-Monitoring Requirements
- Recordkeeping Requirements
- Notification Requirements
- Statements (transferability, civil and criminal penalties)





2. COMPLIANCE MONITORING

- **Inspection & Sampling**
 - Once per year (or more) - SILUs
 - Frequency is consistent with approved pretreatment program
 - Documentation of POTW's activities



3. ENFORCEMENT ACTIVITIES

- Identification of violations (limits, monitoring/reporting, compliance schedule)
- Determination of Significant Non-Compliance (SNC)
 - Defined in OAC 3745-3-03(C)(2)(h)
- POTW & IU response to violation
- Publication of SNC in local newspaper [40 CFR 403.8(f)(2)(viii)]



4. IU COMPLIANCE STATUS (SELF-MONITORING AND REPORTING)

- Self-monitoring as required in permit
- Reports (see next slide)
- Notifications
 - Discharge Violations / Slug Load / Accidental Spill → 24 hour notification
 - Hazardous waste discharge
 - Notifications of significant changes



4. IU COMPLIANCE STATUS REPORTS FROM INDUSTRIAL USERS

Report Type	New Categorical Industrial Users	Other Significant Industrial Users
Baseline Monitoring Report (aka Application)	✓	Not required by rule but highly recommended
Initial Compliance Report (aka 90-day Compliance Report)	✓	
Periodic Compliance Report	✓	✓
Notification of Violation	✓	✓
Resampling (after violation)	✓	✓

Common Report to Forget



4. IU COMPLIANCE STATUS REPORTS REQUIRED FOR VIOLATIONS

- OAC 3745-3-06(G)(5); 40 CFR 403.12(g)(2)

If Industrial User's sampling detects a violation...





5. RECORDS RETENTION

- Are you keeping things for at least three (3) years?
 - Sampling & monitoring data
 - IUs' reports submitted to the POTW
 - The POTW's reports submitted to the Ohio EPA
 - Industrial User inspection documents
 - Any other communications / correspondences relevant to the pretreatment program

OAC 3745-3-03(C)(8-10)
40 CFR 403.12(o)(2)



HOW TO PREPARE? (RECOMMENDED ORGANIZATION)

- Organize all pretreatment files by Industrial User
- Each IU's file should have separate folders for:
 - Permit
 - IU's Reports, Correspondences, & Notification
 - POTW Independent Sampling & Inspections
- Most likely to focus on past three (3) years, but might request older documents, if available.

Organize by year
(or at least in
chronological order)



QUESTIONS ABOUT FILE REVIEWS?

Another opportunity for questions at the end of the presentation.



SUO & ERP REVIEW

SUO = Sewer Use Ordinance

ERP = Enforcement Response Plan





WHAT DOES THIS REQUIRE?

- Comb through the SUO & ERP
- Make sure *actual* pretreatment program is consistent with SUO & ERP
- Everything has to be as strict as (or stricter than) the federal pretreatment requirements

WHAT ARE SUO & ERP?

- SUO – Sewer Use Ordinance
Pretreatment regulations codified into the local ordinance
- ERP – Enforcement Response Plan
Serves as internal document
 - Standard Operating Procedures explaining what to do when an IU is in violation
- Crucial documents & manuals in case of turnover

WHY DOES THIS NEED TO BE CHECKED?

“Why does this need to be checked when the Ohio EPA approved my SUO and ERP back in 20XX?”

- Possibility of overlooking a detail
- Inconsistency between approved program & actual program
 - Inconsistency Example
 - Approved program indicates that the POTW will run independent monitoring 2/year but the POTW has fallen back to the federal minimum of 1/year

WHY DOES THIS NEED TO BE CHECKED? (CONTINUED)

“Why does this need to be checked when the Ohio EPA approved my SUO and ERP back in 20XX?”

19XX – Initial
SUO/ERP Approved

20XX – POTW
Updates SUO/ERP
to meet Streamlining
Rule Requirements

2005 – US EPA
Streamlining Rule

2012 – Clarification
of Requirements via
US EPA Audit Form

Capable of more
comprehensive
review with US EPA's
clarification

HOW TO PREPARE?

- Locate current (or proposed, if approval pending) SUO & ERP
- Send Ohio EPA a Word Doc of SUO & ERP beforehand
- Review SUO & ERP for discrepancies with current pretreatment activities

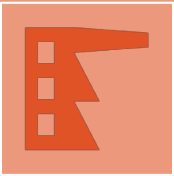
QUESTIONS ABOUT SUO/ERP REVIEWS?

**Another opportunity for questions at the
end of the presentation.**



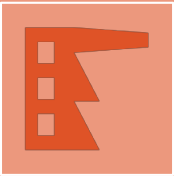
INDUSTRIAL USER INSPECTION





WHAT IS OHIO EPA LOOKING FOR?

- Does POTW's IU Inspection Form include relevant & recommended info?
- Is the POTW running inspections correctly?
 - Is info from previous inspection still accurate?
 - Self-monitoring done according to permit (location, collection method, etc.)?
 - Pretreatment system is operated and maintained?
 - pH and flow meters properly calibrated?
- Records retention (≥ 3 years)



HOW TO PREPARE?

- Schedule an IU Inspection ahead of time with the industry (Ohio EPA inspector should determine SIUs of interest)
- Have a blank IU Inspection Form for Ohio EPA and for inspection



QUESTIONS ABOUT IU INSPECTIONS?

QUESTIONS?

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