



Industrial Inspections 101

The Purpose and Benefits Provided by Inspecting your industries

- **Knowledge of the various Industrial facilities**
- **Compliance with Federal & State regulations**
- **Understand the IU's waste impact to the POTW**
 - **Response to emergencies**

Inspection Frequency

40 CFR 403.8 (f) (2) (v)

Significant Industrial User (SIU)s must be inspected at least once a year.

- Exception: “Middle Tier” SIU (inspect once every 2 years)
- Exception: Non-Significant Categorical Industrial Users (no inspection required)
- Exception: Significant changes (inspection ASAP)
- Exception: Investigation for violations (inspection ASAP)

Types of Pretreatment Inspections

Screening or Certificate of
Occupancy (CO) Inspection

New SIU/Pre-Permit Inspection

Routine Annual Inspection

Compliance [Demand] Inspection


SIU Closure Inspection



Types of Pretreatment Inspections

Formal “announced” Inspection

- Proper inspection notification
- More overall and in-depth inspection
- SCDHEC inspection report

The background image shows two men in a workshop or office environment. The man on the left is smiling and looking towards the right. The man on the right has a serious expression and is looking towards the camera. They are both wearing jackets. The text is overlaid on this image.

Types of Pretreatment Inspections

Informal “unannounced” Inspection

- Site specific inspection
- Investigational inspection
- POTW inspection report
- Sample grab parameters (pH, VOC's, ext.)

Inspection Preparation

Review Your Files Before inspection

- Permit/Applications
- Inspection notes
- Site & process flow diagrams
- Compliance schedules
- Plans
- Analytical data
- Water use/billing records
- POTW sewer maps
- Categorical regulations
- Enforcement actions taken
- POTW problems
- Compliance status
- Check list of information required



Entry Procedures

- Signing IU entry waiver (READ BEFORE SIGNING)
- Delays (within reasonable time frame)
- Safety issues

Site specific and universal safety (PPE, dangerous areas)

Inspection Questionnaire

General facility information

- POTW representatives
- Facility changes
- Federal Category
- Date of previous inspection
- Hazardous waste management
- SNC or Compliance schedules
- Process change, POTW notified
- Pretreatment system
- Upgrades to Pretreatment system
- Operator of proper grade

**INDUSTRIAL USER
PRETREATMENT INSPECTION FORM**

INDUSTRY NAME _____ POTW _____

ADDRESS _____
(incl. city) _____
(location) _____ POTW _____

POTW REPRESENTATIVE(S) _____ TITLE _____

INDUSTRY REPRESENTATIVE(S) _____ TITLE _____

FEDERAL CATEGORY (IF APPLICABLE) _____
OR PRIMARY MFG. PRODUCT: _____

DATE OF PREVIOUS INSPECTION ____/____/____ RATING: SAC | UNSAT

COMMENTS: _____

SECTION I

	Y	N	N/A
1. Is the IU in significant noncompliance.			
2. Is the IU currently under any compliance schedules or administrative orders.			
3. Is the IU adhering to all conditions of compliance schedules or orders.			
4. Any process changes since the last inspection. If yes, briefly describe _____			
5. Was the POTW notified of any process changes.			
6. Does the IU have a pretreatment facility.			
7. Any pending upgrades to the treatment facility.			
8. Does the IU have an operator of proper grade.			

COMMENTS: _____

Inspection Questionnaire

General facility information (Cont.)

- Wastewater generation
- Pretreatment
- Hazardous waste management
- Chemical/waste storage area
- Facility plans
- Sampling procedures

Inspection Questionnaire

Facility Housekeeping

- Treatment system operational
- Specific or unusual hazards
- Production and storage condition

SECTION II--FILE REVIEW

1. Are all pretreatment files readily accessible.
 2. Do files contain all records pertinent to program.
 3. Are records maintained for at least 3 years.
 4. Is the current IU permit available for review.
 5. Are all sampling results available for review.
 6. Does an outside lab perform any sampling/analysis for the IU.
- if yes, indicate lab _____
7. Have all parameters been sampled at the frequency specified in the permit.
 8. Has the chain-of-custody been maintained.

Y	N	N/A

COMMENTS: _____

SECTION III--FACILITY TOUR

A. Overview

1. Is the general housekeeping satisfactory.
2. Are all treatment components operational.
3. Any specific or unusual hazards noted on site.
4. Are production and storage areas in satisfactory condition.

Y	N	N/A

COMMENTS: _____

Inspection Questionnaire

IU Pretreatment files

- Past 3 years
- IU PERMIT (MUST HAVE)
- Sampling / Lab info
- All parameters sampled
- Chain-of-custody documentation

SECTION II--FILE REVIEW

	Y	N	N/A
1. Are all pretreatment files readily accessible.			
2. Do files contain all records pertinent to program.			
3. Are records maintained for at least 3 years.			
4. Is the current IU permit available for review.			
5. Are all sampling results available for review.			
6. Does an outside lab perform any sampling/analysis for the IU.			
if yes, indicate lab _____			
7. Have all parameters been sampled at the frequency specified in the permit.			
8. Has the chain-of-custody been maintained.			
COMMENTS: _____			

SECTION III--FACILITY TOUR

A. Overview

	Y	N	N/A
1. Is the general housekeeping satisfactory.			
2. Are all treatment components operational.			
3. Any specific or unusual hazards noted on site.			
4. Are production and storage areas in satisfactory condition.			
COMMENTS: _____			

Inspection Questionnaire

Slug Discharge Evaluation

- Floor drains
- Continuous flow or Batch
- Containment description
- Batch flow equalization
- Spill control equipment
- Bypass lines
- HAZARDOUS WASTE
- Notification statement
- Slug control plan
- Toxic Organic Management Plan
- TOMP in compliance

B. Slug Discharge Potential Evaluation

- | | Y | N | N/A |
|--|---|---|-----|
| 1. Any floor drains in any mfg. or storage areas.
if so, where do they discharge _____ | | | |
| 2. Facility releases Continuous__ or Batch__ discharge
if Batch, how many discharges per week _____ | | | |
| 3. Are there appropriate containment devices in mfg.
and chemical storage areas to prevent slug loads.
if so, briefly describe _____ | | | |
| 4. Are all batch discharges subject to flow
equalization prior to discharge to the POTW. | | | |
| 5. Are all containment structures in good operating
condition. | | | |
| 6. Does the IU have on-site spill containment equip.
if yes, briefly describe _____ | | | |
| 7. Does industry practice a spill containment program
if yes, frequency of drills _____ | | | |
| 8. Any bypass lines around the IU treatment facility. | | | |
| 9. Any hazardous waste on site.
If yes, are all containers properly labeled. | | | |
| 10. Is the IU aware of its responsibility to notify the
POTW, DHEC and EPA of any hazardous waste discharge | | | |
| 11. Does the IU have a slug discharge control plan. | | | |
| 12. Does the IU have a toxic organic management plan. | | | |
| 13. Are preventative measures sufficient in order to
maintain compliance with the approved TOMP. | | | |

COMMENTS: _____

Slug Control Plan—40 CFR 403.8 (f) (2) (vi)

Evaluate need for a slug discharge control plan

- For existing SIUs at least once per year
- Adopted streamlining rule one time evaluation or re-evaluate if conditions change
- New SIUs must be evaluated within one year of designation as SIU

Inspection Questionnaire

Sampling information/Flow Measurement

- Sample point same as permit
- Sample point condition accessible
- Flow meter type & operational
- Flow meter CAIBRATION date
- Flow check & frequency
- Flow records
- IU deficiencies
- Need a SLUG control plan
- Previous deficiencies
- COMMENTS
- Signatures & date

C. Sampling Location/Flow Measurement Inspection

	Y	N	N/A
1. Is sampling performed at location in permit.			
2. Is sampling location accessible and in good condition.			
3. Is flow measuring equipment operational. Type of flow meter _____			
4. Is flow meter calibrated annually by certified tech Date of last calibration _____			
5. Is flow meter accuracy checked regularly. if yes, indicate frequency _____			
6. Are flow records properly maintained.			

SECTION IV--CLOSING CONFERENCE/COMMENTS

	Y	N	N/A
1. Has IU representative been notified of deficiencies			
2. If a slug discharge control plan is not in place, should one be implemented by the IU.			
3. Have noted deficiencies from previous inspection been corrected by the IU.			

COMMENTS: _____

 INDUSTRY REPRESENTATIVE DATE INDUSTRY REPRESENTATIVE

 POTW REPRESENTATIVE DATE POTW REPRESENTATIVE

Walkthrough

Walkthroughs can be preformed prior to asking questions

- Housekeeping
- Labels & containment
- Dilution sources
- Piping configurations
- Monitoring point location/accessibility and safe
- Condition of monitoring point and pretreatment equipment



Friendly Reminders

- Make sure all records are for inspection time frame
January 01, 2018 to December 31, 2018
- Follow-Up With IU Before Leaving
- Comment on housekeeping and/or compliance issues
- Identify potential improvement areas
- Allow IU to ask questions
- Show a positive, ethical and controlled demeanor
- Make sure report is signed and dated
- Take good notes
- Include staff & other team members
- CLARIFY ALL INFORMATION & QUESTIONS (Before departure)
- Ask about facility updates, production increase or decrease, is the IU's facility expanding or downsizing?

ASK QUESTIONS !

Areas to Improve

- EPA or State basic inspector training courses
- Purchase Pretreatment inspection material
- Ask more questions, learn more about the facility your inspecting.
- Volunteer for joint agencies inspection

