Industrial User Inspections

RMWEA Industrial Wastewater PWO Seminar
April 25, 2019
PG Environmental
Introduction

- Inspection and Sampling frequency
- Types of Inspections
- Confidential Information
- Inspector responsibilities
- Inspectors field notebook
- Pre-inspection
- On-site activities
- Follow-up
Inspection and Sampling Frequency

- POTWs with an approved program are required to inspect and sample each Significant Industrial User at least once a year.

- Risk based

- Compliance based
Types of Inspections

- **Scheduled**
  - Announced
  - Unannounced

- **On Demand**
  - Complaint Investigation
  - Emergency Situations
  - Response to Noncompliance
Confidential Information

- What constitutes confidential information?
- Disclosure of confidential information.
- Repercussions of improper disclosure
- Section 308 of the Federal Clean Water Act
Responsibilities of the Inspector

- Examine the environmental activities of a single regulated facility.
- Be knowledgeable about the requirements that apply to the industrial user.
Proper Inspection Practices

- Legal Authority
  - Inspect within Legal Framework
  - Apply appropriate regulations
- On-site Procedures
- Evidence Collection
- Safety
- Professional/Ethical Conduct
- Quality Assurance Responsibilities
- Documentation of Findings
Inspector’s Field Notes

- Observations
- Documents and Photographs
- Unusual Conditions and Problems
- General Information
Pre-Inspection Activities

- Plan effectively
- Review background information
General Facility Information

1. Previous inspection report
2. Maps and schematics
3. Names, titles, and telephone numbers of responsible facility officials
4. Any special entry requirements
5. Nature of the IU processing operations and wastewater characteristics
6. General layout of the facility
7. Production levels
8. Changes in facility conditions since the last inspection or permit application
General Facility Information (cont’d)

9. Water use data
10. SIU slug control plan
11. Raw materials used in production processes
12. Location of storage sites for raw materials
13. Special permit conditions
14. Progress toward meeting any applicable compliance schedule
15. Sources, volumes, and characteristics of waste discharges
Facility Compliance and Enforcement History

1. Any correspondence between the facility and Local, State or Federal agencies
2. Documentation, past violations, permit requirements, compliance schedules
3. Self-monitoring data and reports
4. Post inspection reports
5. Past notices of violation
6. Laboratory capability and analytical methods used by the industrial user's lab
Wastewater Treatment Systems

1. Description and design specifications for the wastewater treatment process employed at the industrial user
2. Process description, specifications, and schematic diagram
3. Available bypasses for existing pretreatment systems
4. Type and amount of wastes discharged
5. Spill control and contingency plans
Requirements, Regulations, and Limitations

1. Copies of all applicable Federal, State and Local regulations and requirements, including any joint agreements or multi jurisdictional agreements.

2. Copy of the industrial user's permit and permit application.

3. Any applicable compliance schedule which the industry might be under.
Entry Procedures

• **Arrive during normal business hours** unless it is an emergency situation or if other arrangements have been made with the industry.

• **Enter the facility through the main gate** unless the facility has designated another point of entry.

• Locate the person in charge at the facility as soon as possible. **Consent to enter the facility must be given by the owner, operator, or designated representative.**

• Present credentials.

• Sign-in sheet/visitor log.
Entry to the Industrial Facility

- Proper, lawful entry onto an inspection site is crucial.

- Should have the ability to enter all areas of facility.
Refused Entry

- A. Present Credentials
- B. Tactfully Discuss the Reason for Denial
- C. Record Observations in the Field Notebook
- D. Privately call your Supervisor for Direction
- E. Leave and immediately collect samples
When Consent to Inspect is NOT Necessary

A. Emergency Situations

B. Open Fields and Plain View Situations
Before entering the facility...

- Examine the facility's perimeter
  - Detect leaky storage areas and other general housekeeping practices at the plant that might affect its discharge to the POTW.
- Evaluate the environmental conditions
  - Vegetation, odor problems, or direct discharges to streams.
Perimeter Inspection
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Use as a prompting and documentation tool, not as your inspection report.

Verify answers you receive with visual observations, and note discrepancies.
Operations/Sources of Discharge

Restroom/showers
Lab
Air pollution control devices
Maintenance shop
Noncontact cooling water
Backwash water
Cooling tower bleed off
Boilers
Off spec/out of date returned product or raw material

Cafeteria/breakroom
Contact cooling water
Pump sealant water
Equipment washdown
Remediated groundwater
Fleet maintenance
Storm water
In-product
Tank bottoms
Walkthrough

- Housekeeping
- Labels & containment
- Dilution sources
- Piping configurations
- Identify potential P2 opportunities
- Monitoring point location/ accessibility
- Condition of monitoring point and pretreatment equipment
- Visible permit/SUO non-compliance
What are you looking for?

- Floor Drains near chemical storage, Haz. Waste
- Chemical Storage with Secondary Containment
- Cleanliness/Housekeeping
- Proper Haz. Waste Accumulation, Storage, & Disposal
- Effluent pH
- Pretreatment System Functioning Properly
Evaluate Need for SDCP

40 CFR § 403.8(f)(2)(vi)

- IUs must be evaluated to determine if the IU needs to develop a plan or action to control slug discharges within one year of being classified as an SIU.
  - Document your evaluation of need for SDCP
  - Retain copy of SDCP if req’d and approved
  - In SIU permit, make enforceable!
Walkthroughs can be performed prior to asking questions
What are you looking for?
What are you looking for?
What are you looking for?
What are you looking for?
What are you looking for?
What are you looking for?
What are you looking for?
Identifying visible non-compliance - Biodiesel SIU Monitoring Point
Identifying visible non-compliance -

Four minutes later...
Identifying visible non-compliance -
Identifying visible non-compliance
Identifying visible non-compliance -
Identifying visible non-compliance -
Identifying visible non-compliance -
Follow-Up With IU Before Leaving

- Comment on housekeeping and/or compliance issues
- Allow IU to ask questions
Follow-Up Activities

- Once the inspection is completed:
  - Review your notes
  - Identify need for follow-up
  - Organize notes into a report format.

- Accuracy
- Relevancy
- Comprehensiveness
Questions??