Pretreatment Program Audits

Common Problems and How to Avoid Them

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Objectives

- Selection Criteria
- Local Limits
- Industrial user characterization
- Sewer Use Ordinance
- Control Mechanism Issues
- Compliance Monitoring Problems
- Control of Hauled Wastes
- Enforcement Response Plans
Selection Criteria

- National performance measure
- ENPPA or state work plan agreement
- New effluent guidelines
- Regional initiative
- Year before permit expiration
- Required enforcement action (on QNCR)
- Worthy of national recognition
Local Limits

- Permit re-issuance
- Local limits that have not been reevaluated to determine if they are protective
- Monthly limits borrowed from categorical – not technically based
Local Limits

- Problems due to pollutant loadings
- Local Limit evaluations should include conventional pollutants
- Consideration of conventional pollutants
- No upper limit for surcharge pollutants
Specific Local Limits and Concerns

- Oil and Grease
- Mercury
- BOD
- CBOD
- Nutrients - Phosphorous - Ammonia
- Phenols
Industrial User Characterization

△ Industrial User surveys not done on a regular basis or they do not have a procedure in place for yearly evaluations

△ Look beyond known IUs

△ Look at discharges and potential discharges
Sewer Use Ordinances

- Operating personnel or titles no longer present or used
- Undefined adjectives are used
  - Major/Minor contributor
  - Major/Minor violation
  - Significant increase or change
  - Infrequent or gross violations
Control Mechanisms

- Permits do not reflect the current operations
- Sampling locations do not allow for compliance determination with the regulations
- Not properly identifying and sampling the permitted outfalls/compliance points.
- Sample time frame does not match SUO or the permit
- Best management plans or practices
Control Mechanisms

- Not all pollutants are being regulated or accounted for.
- Permits need to be signed, dated and the effective period identified.
- Modifications of permit and extending the expiration date.
- Missing required elements.
Control Mechanisms

- Basis for limits and conditions
- When permit limits are mass based (lbs/day) programs not measuring flow during compliance sampling
- Permit limits that are unenforceable
- Permit limits for parameters that are not established in the Local Limits and were not public noticed
Control Mechanisms

- Correct signatures of IU authorized officials on all required documents. Files not containing documentation regarding delegation of authority within the IU structure.
- Incomplete chain of custody (COC) forms and/or not maintaining COC with IU monitoring records (preservation, part 136 method, date collected, etc.)
Control Mechanisms

Defining term 'significant' in permits. Needs to be defensible in court.

Limit units missing (e.g., mg/l, lbs/day)

Limit type missing (e.g., instantaneous maximum, daily maximum, 4-day average, monthly average)
Compliance Monitoring

- Monitoring for all regulated pollutants
- Flow monitoring where mass limits set
- Sampling that reflects IU operations
- Slug control requirements
- Re-sampling where POTW conducts all sampling
- Only accepting reports from authorized representatives
Specific Monitoring Concerns

- Oil and Grease
- pH
- Cyanide
- TTO and VOCs
- Flows, locations, signatures
Application of Pretreatment Standards

- Categorization
- Existing/new source
- Incorporation of recent categorical standards
- Incorporation of local limit
- Narrative standards
- Changing monthly categorical standards
Control of Hauled Wastes

- Understanding of wastes accepted
- Procedures to accept it
- Physical controls
- Accounted for in local limits evaluation
**Enforcement**

- Authority for responses in ordinance
- Workable range of responses
- Is POTW following approved ERP?
- Are responses being taken by those in specified positions?
- Is POTW’s enforcement effective?
Questions?