Inspections and POTW Monitoring
SIUs must be inspected at least once a year.
Review Your Files Before Going Out Into the Field...

- Permit/Applications
- Inspection notes
- Site & process flow diagrams
- Compliance schedules
- Plans
- Analytical data
Examine/Determine Before Going Out Into the Field...

- Water use/billing records
- POTW sewer maps
- Categorical regulations
- Enforcement actions taken
- POTW problems
- Compliance status
Inspections

Unannounced versus Announced
Entry Procedures

- Signing IU entry waivers
- Delays
- Safety issues
Inspection Questionnaire

- General facility information
- Process areas
- Facility changes
- Wastewater generation
- Pretreatment
Inspection Questionnaire, cont.

- Hazardous waste management
- Chemical/waste storage areas
- Facility plans
- Sampling procedures
- Records review
Evaluate need for a slug discharge control plan at least every two years
<table>
<thead>
<tr>
<th>Operations/Sources of Discharge</th>
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<tbody>
<tr>
<td>Restrooms/showers</td>
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<tr>
<td>Air pollution control devices</td>
</tr>
<tr>
<td>Backwash water</td>
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<tr>
<td>Boilers</td>
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<tr>
<td>Cafeteria/Breakroom</td>
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<tr>
<td>Contact Cooling Water</td>
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<tr>
<td>Equipment Washdown</td>
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<tr>
<td>Fleet Maintenance</td>
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<tr>
<td>In-product</td>
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<tr>
<td>Lab</td>
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<tr>
<td>Maintenance Shop</td>
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<tr>
<td>Noncontact Cooling Water</td>
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<tr>
<td>Cooling Tower Bleed Off</td>
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<tr>
<td>Off Spec/out of date/returned product or raw materials</td>
</tr>
<tr>
<td>Pump sealant water</td>
</tr>
<tr>
<td>Remediated groundwater</td>
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<tr>
<td>Storm water</td>
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<tr>
<td>Tank Bottoms</td>
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</tbody>
</table>
Walkthrough

- Housekeeping
- Labels & containment
- Dilution sources
- Piping configurations
- Monitoring point location/ accessibility
- Condition of monitoring point and pretreatment equipment
Walkthroughs can be performed prior to asking questions.
Follow-Up With IU Before Leaving

- Comment on housekeeping and/or compliance issues
- Identify potential P2 opportunities
- Allow IU to ask questions
Prepare inspection report and follow-up with facility promptly
POTW Monitoring

[40 CFR § 403.8(f)(2)(v)]

Annually
(at a minimum)
Purpose of POTW Monitoring

- Verify compliance status
- Maintain up-to-date information
- Support enforcement activities
- Verify correction of problem
- Identify source of problem discharge
- Provide user charge data
Types of POTW Monitoring

- Scheduled
- Unscheduled
- Demand
40 CFR Part 136

Specifies acceptable:

- Collection containers
- Preservatives
- Holding times
- Preferred sample type
- Approved methods
Unique Circumstances

- Batch dischargers
- Split and side by side sampling
- Flow proportional versus time compositing samples
- Multiple outfalls
- Tampering with sampling equipment
- Meter out of calibration