Data Management and Compliance Evaluations
Key Concepts

- Thorough documentation is essential
- Retain all documents and data (at least three years)
- Document all activities
- Maintain general and facility-specific files
General Documentation

- Regulations
- Legal authority
- Industrial user classification
- Local limits development
- Other documentation
Facility-Specific Documentation

- Permitting
- Application of standards
- Industrial user reporting
- Monitoring/Inspections
- Compliance evaluations
- Enforcement
Industrial User Files

- General facility information
- Discharge permits
- Monitoring data
- Inspection reports
- Compliance evaluation conclusions
- Enforcement actions
- Correspondence, meeting notes, phone logs
Inspection Documentation

- Date and time
- Names of inspectors and facility contacts
- Notes on areas inspected
- Identified changes from previous inspection
- Findings from records review
- Evaluation of facility plans (e.g., TOMPs, SPCCs)
Monitoring Documentation

- Date, time, and location
- Sample type
- Characteristics of wastewater
- Preservatives used
- QA/QC for sampling and analysis
- Sampler and custody signatures
- Analytical methods
- Identification of violations
Enforcement Documentation

• Comprehensive explanation of violation
• Assume any action could be used in an enforcement case
• Document **ALL** actions (includes phone calls, meetings, etc.)
Data Tracking

- Industrial waste survey
- Permit reissuance
- IU report due dates
- POTW enforcement actions
- IU reporting requirements
- IU compliance status and violation dates
Significant Noncompliance (SNC)

- Chronic violations
- Technical Review Criteria (TRC) violations
- Failure to meet, within 90 days, a compliance schedule milestone
- Failure to submit a report within 30 days of the due date
SNC (continued)

- Violation that causes pass-through or interference
- Discharge that causes imminent endangerment
- Failure to accurately report noncompliance
- Other violations that adversely affect the POTW Pretreatment Program
Chronic and TRC SNC Calculations

- Calculate SNC quarterly
- Evaluate daily maximums and long-term averages
- “But I only collected one sample for the month”
Tracking Systems

- Manual
- Automatic
- Standardized forms
Approval Authority Oversight

- EPA or the State **WILL** review your files (and will expect the files to make sense and present a clear picture of the chronology of events)
- Expect IU compliance tracking summaries
- Expect each violation (reporting and discharge) to be noted with POTW/IU response
- Anything less will complicate the review