

Pretreatment Program Audits

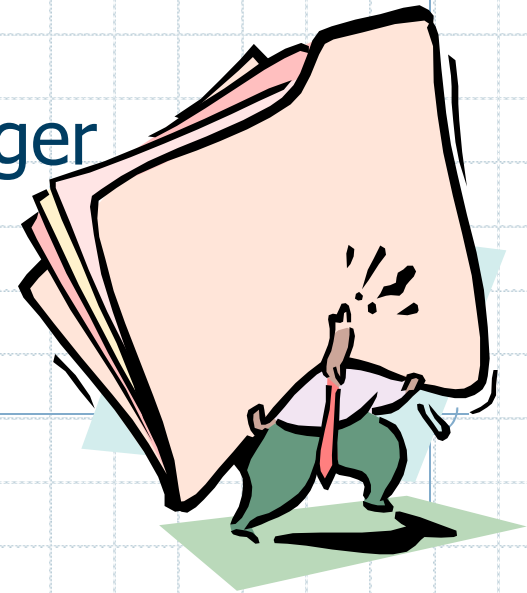
Common Problems and How to Avoid Them

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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

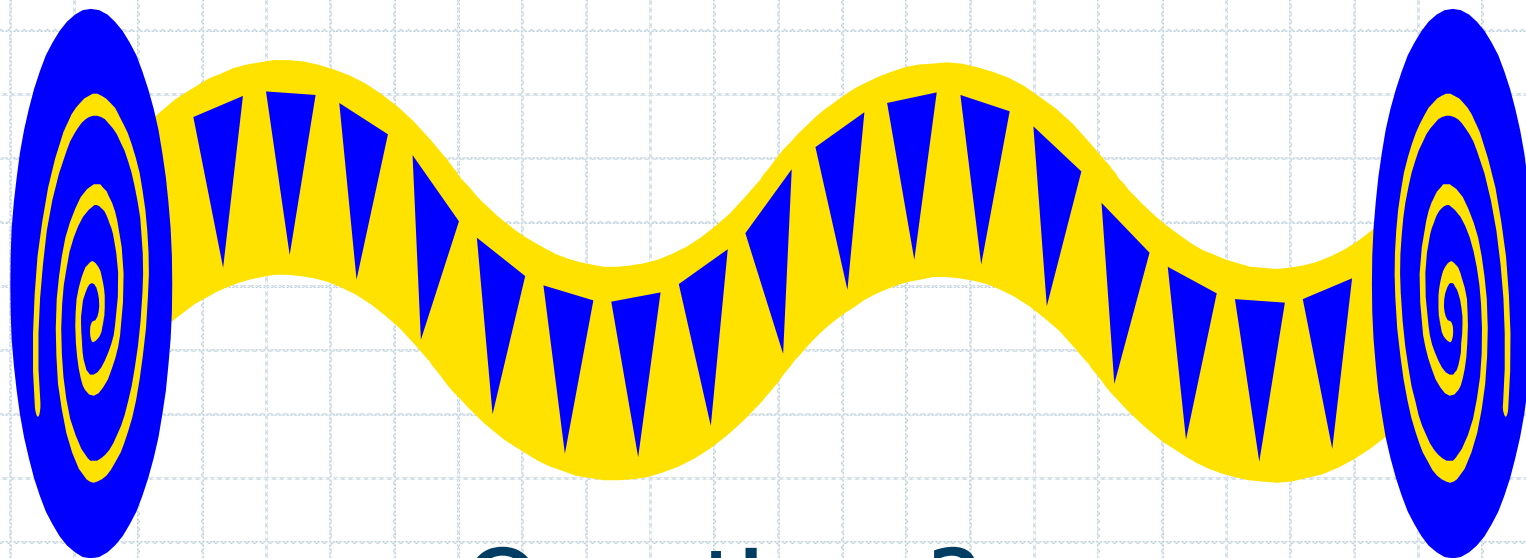
- ◆ Categorization
- ◆ Existing/new source
- ◆ Incorporation of recent categorical standards
- ◆ Incorporation of local limit
- ◆ Narrative standards
- ◆ Changing monthly categorical standards

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?