



Inspections and POTW Monitoring



40 CFR § 403.8(f)(2)(v)

**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...

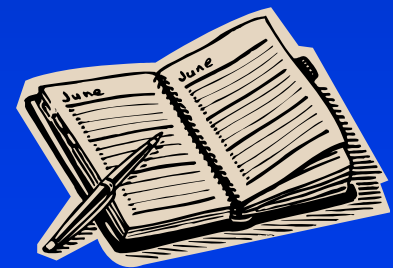
- **Water use/billing records**
- **POTW sewer maps**
- **Categorical regulations**
- **Enforcement actions taken**
- **POTW problems**
- **Compliance status**



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



40 CFR § 403.8(f)(2)(v)

**Evaluate need for a slug
discharge control plan at
least every two years**



Operations/Sources of Discharge

- ä Restrooms/showers
- ä Air pollution control devices
- ä Backwash water
- ä Boilers
- ä Cafeteria/Breakroom
- ä Contact Cooling Water
- ä Equipment Washdown
- ä Fleet Maintenance
- ä In-product
- ä Lab
- ä Maintenance Shop
- ä Noncontact Cooling Water
- ä Cooling Tower Bleed Off
- ä Off Spec/out of date/returned product or raw materials
- ä Pump sealant water
- ä Remediated groundwater
- ä Storm water
- ä Tank Bottoms



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

- ä Comment on housekeeping and/or compliance issues
- ä Identify potential P2 opportunities
- ä 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:

- ä **Collection containers**
- ä **Preservatives**
- ä **Holding times**
- ä **Preferred sample type**
- ä **Approved methods**





Unique Circumstances

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