

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

