INDUSTRIAL USER INSPECTIONS

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Introduction

- Developing and maintaining an industrial user survey
- Inspection and Sampling frequency
- Types of Inspections
- Confidential Information
- Inspector responsibilities
- Inspectors field notebook
- Pre-inspection
- On-site activities
- Follow-up

Developing and Maintaining an Industrial User Survey

- Chamber of Commerce
- Drive by reconnaissance
- Newspaper
- Advertising - Phone book
- Building Permits

Inspection and Sampling Frequency

- POTW's with an approved program are required to Inspect and Sample each Significant Industrial User at least once a year.
- Risk based
- Compliance based

Types of Inspections

- **Scheduled**
  - Announced
  - Unannounced
- **On Demand**
  - Complaint Investigation
  - Emergency Situations
  - Response to Noncompliance

Confidential Information

- What constitutes confidential information?
- Disclosure of confidential information.
- Repercussions of improper disclosure
- Section 308 of the Federal Clean Water Act

Responsibilities of the Inspector

- Examine the environmental activities of a single regulated facility.
- Be knowledgeable about the requirements which apply to the industrial user.

Proper Inspection Practices

- Legal Authority
  - Inspect within Legal Framework
  - Apply appropriate regulations
- On-site Procedures
- Evidence Collection
- Safety
- Professional/Ethical Conduct
- Quality Assurance Responsibilities
- Documentation of Evaluation of Findings

Inspector's Field Notes

- Observations
- Documents and Photographs
- Unusual Conditions and Problems
- General Information

Pre-Inspection Activities

- Plan effectively
- Review background information

General Facility Information

- 1. Previous inspection report
- 2. Maps and schematics
- 3. Names, titles, and telephone numbers of responsible facility officials
- 4. Any special entry requirements
- 5. Nature of the IU processing operations and wastewater characteristics
- 6. General layout of the facility
- 7. Production levels
- 8. Changes in facility conditions since the last inspection or permit application

General Facility Information (cont'd)

- 9. Water use data
- 10. SIU slug control plan
- 11. Raw materials used in production processes
- 12. Location of storage sites for raw materials
- 13. Special permit conditions
- 14. Progress toward meeting any applicable compliance schedule
- 15. Sources, volumes, and characteristics of waste discharges

Requirements, Regulations, and Limitations

- 1. Copies of all applicable Federal, State and Local regulations and requirements, including any joint agreements or multi jurisdictional agreements.
- 2. Copy of the industrial user's permit and permit application.
- 3. Any applicable compliance schedule which the industry might be under.

Facility Compliance and Enforcement History

- 1. Any correspondence between the facility and Local, State or Federal agencies
- 2. Documentation, past violations, permit requirements,compliance schedules
- 3. Self-monitoring data and reports
- 4. Post inspection reports
- 5. Past notices of violation
- 6. Laboratory capability and analytical methods used by the industrial user's lab

Wastewater Treatment Systems

1. Description and design specifications for the wastewater treatment process employed at the industrial user
2. Process description, specifications, and schematic diagram
3. Available bypasses for existing pretreatment systems
4. Type and amount of wastes discharged
5. Spill control and contingency plans.

Developing an Inspection Plan

- Must be flexible
- Provide an organized approach to conduct the inspection
- The basic components of the inspection plan should include the following areas:

- 1. The inspection SOPs and associated rationale for these activities.
- 2. The definition of team task assignments and time scheduling
- 3. Resource requirements
- 4. What kinds of evidence should be collected and documented.
- 5. A QA Plan, where necessary.
- 6. A safety contingency plan, where necessary.

Safety and Sampling Equipment

Preparation

- Pretreatment personnel should review and check the types of equipment which are necessary to meet the objectives of the site visit.
- An inspector must carry enough equipment to gather the necessary information during the inspection.

Notification of the Facility

- Appropriate Timeframe Considerations
- Who, What, When, and Where
- Pros and Cons for Prior Notification
- Notification without Notification

Entry to the Industrial Facility

- Proper, lawful entry onto an inspection site is crucial.
- Should have the ability to enter all areas of facility.

Entry Procedures

- Arrive during normal business hours unless it is an emergency situation or if other arrangements have been made with the industry.
- Enter the facility through the main gate unless the facility has designated another point of entry.
- Locate the person in charge at the facility as soon as possible. Consent to enter the facility must be given by the owner, operator, or designated representative.

Refused Entry

- A. Present Credentials
- B. Tactfully Discuss the Reason for Denial
- C. Record Observations in the Field Notebook
- D. Call your Supervisor for Direction
- E. Leave and immediately collect samples

When Consent to Inspect is NOT Necessary

A. Emergency Situations

B. Open Fields and Plain View Situations

Perimeter Inspection

Prior to entering the permittee's facility, the inspector should examine the facility's perimeter. By doing this, the inspector may detect leaky storage areas and other general housekeeping practices at the plant which might affect its discharge to the POTW. In addition, the inspector should also evaluate the environmental conditions near the plant such as vegetation, odor problems or direct discharges to streams.

On-Site Activities

The principal goal of an inspection is to gather information which can be used to determine compliance with all applicable requirements including permit conditions, regulations and other state or local requirements.

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)(vi)

IUs must be evaluated to determine if the IU needs to develop a plan or action to control slug discharges within one year of being classified as an SIU.

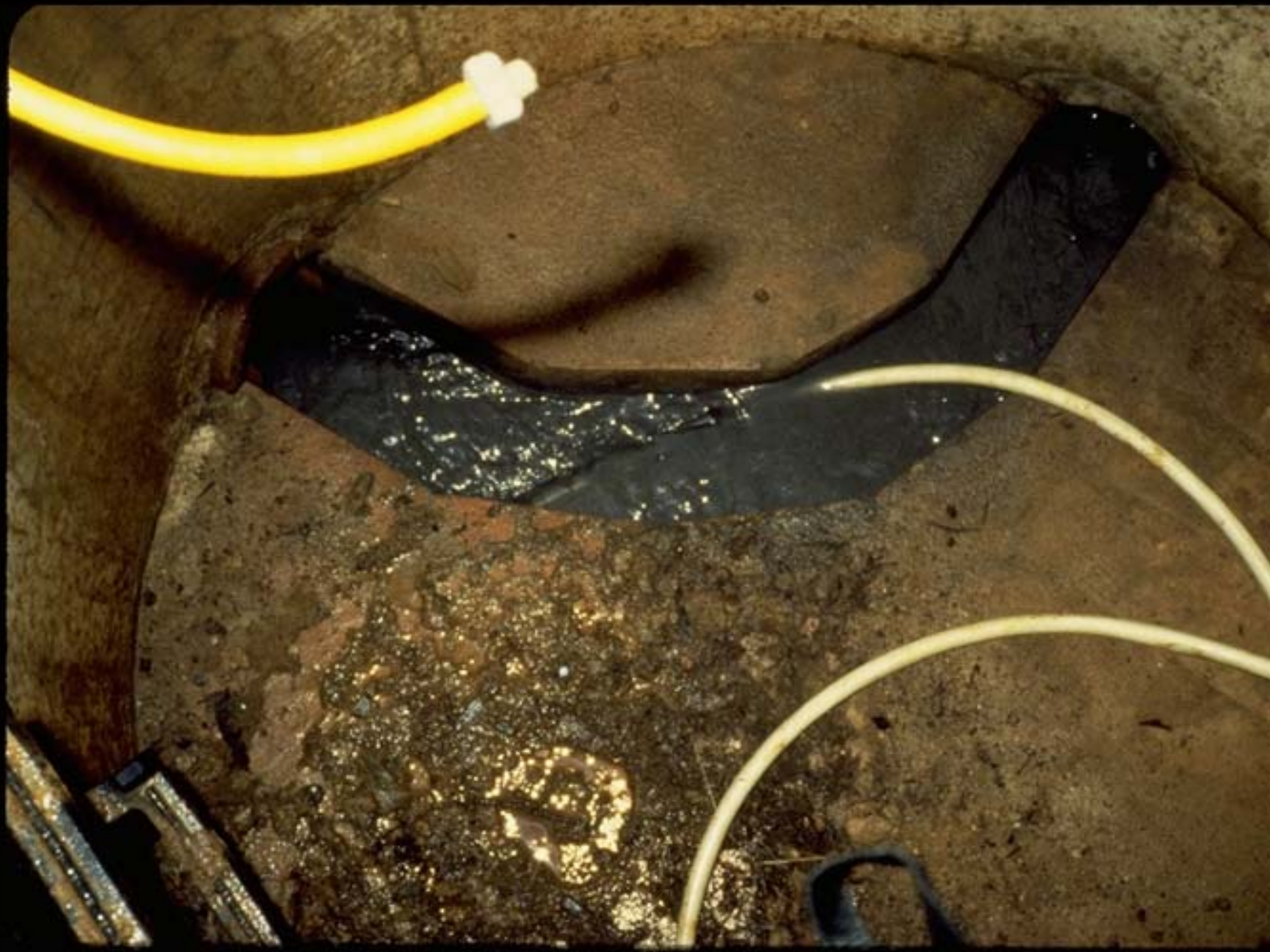
Operations/Sources of Discharge

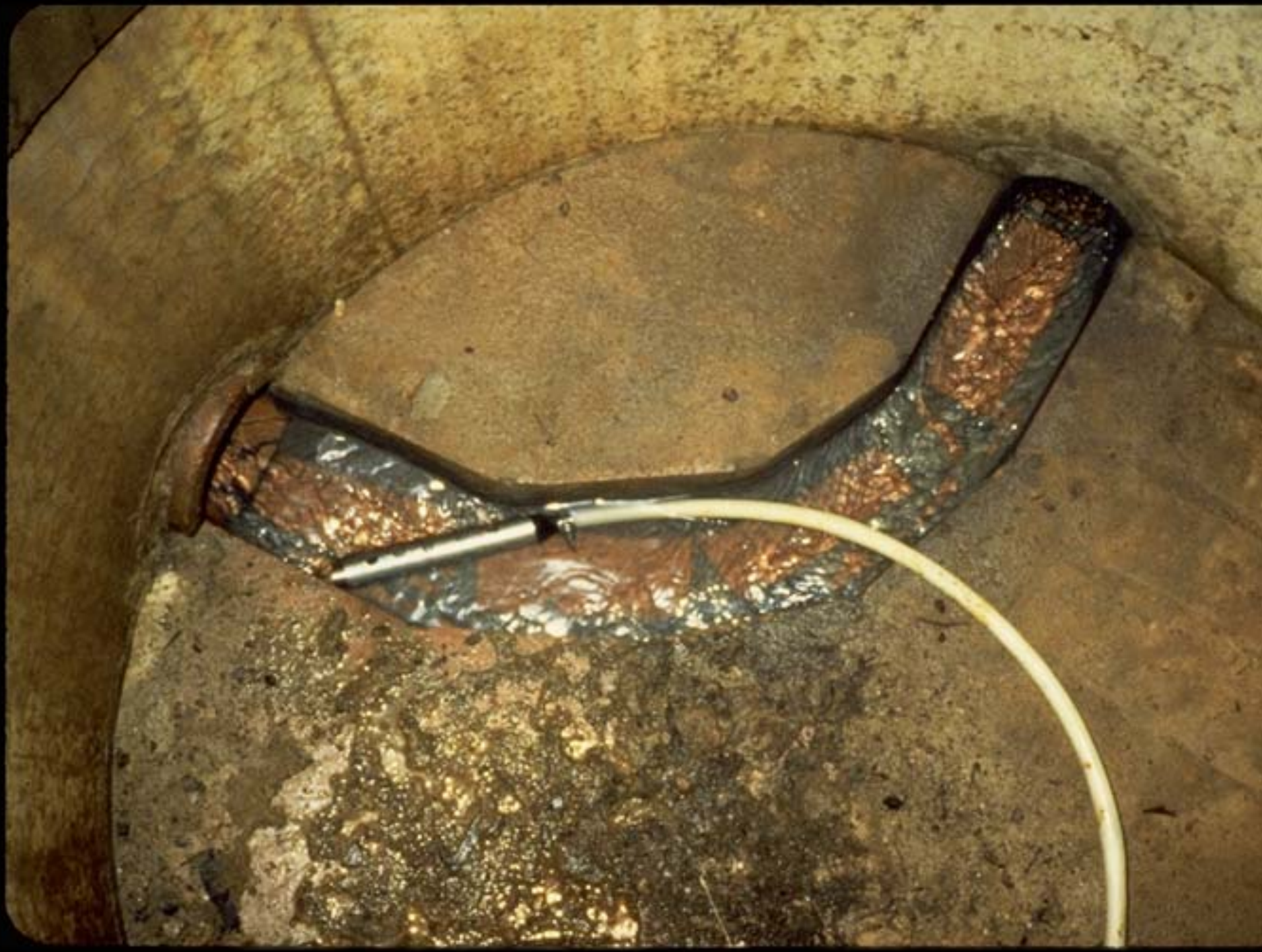
- Restroom/showers
- Air pollution control devices
- Backwash water
- Boilers
- Cafeteria/breakroom
- Contact cooling water
- Equipment washdown
- Fleet maintenance
- In-product
- Lab
- Maintenance shop
- Noncontact cooling water
- Cooling tower bleed off
- Off spec/out of date returned product or raw material
- Pump sealant water
- Remediated groundwater
- Storm water
- Tank bottoms

Walkthrough

- Housekeeping
- Labels & containment
- Dilution sources
- Piping configurations
- Identify potential P2 opportunities
- 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**
- **Allow IU to ask questions**

Follow-Up Activities

- Once the inspection has been completed, the inspector should review his or her notes to identify areas which may require follow-up activities. The notes from the inspection should be organized into a report format. This report should meet the following characteristics:

Final Inspection Report Criteria

- Accuracy
- Relevancy
- Comprehensiveness