

PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. Either the auditor or CA should updated this form before each audit on the basis of information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.

A. CA INFORMATION

1. CA name			
2. a. Pretreatment contact		b. Mailing address	
c. Title		d. Telephone number	
3. Date of last CA report to Approval Authority			
4. Is the CA operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?			Yes
			No
5. Effluent and sludge quality			
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)			
Parameters Violated		Cause(s)	
b. Has the treatment plant sludge violated these tests?			Yes
<ul style="list-style-type: none"> • EP toxicity • TCLP 			No
			Yes
			No
6. Does the treatment plant discharge to a 303(d) impaired waterbody? If yes, list the pollutants of concern.			Yes
			No
7. Does the treatment plant discharge to a waterbody that has a TMDL that has been developed or is being developed? If yes, include the information on the TMDL (i.e., pollutants of concern, limits, effective date).			Yes
			No

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B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

- a. Program modification
- b. Legal authority
- c. Local limits
- d. IU characterization
- e. Control mechanism
- f. Application of Pretreatment Standards
- g. Compliance monitoring
- h. Enforcement program
- i. Data management
- j. Program resources
- k. Other (specify)

Last PCI	Last Audit	Program Report
Date:	Date:	Date:

2. Is the CA presently in RNC for any of these violations?

- a. Failure to enforce against pass through and/or interference [RNC - I] [SNC]
- b. Failure to submit required reports within 30 days [RNC - I] [SNC]
- c. Failure to meet compliance schedule milestones within 90 days [RNC - I] [SNC]
- d. Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months [RNC - II]
- e. Failure to inspect or sample 80% of SIUs within the past 12 months [RNC - II]
- f. Failure to enforce standards and reporting requirements [RNC - II]
- g. Other (specify) [RNC - II]

Data Source	Yes	No

3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)

Name of SIU in SNC	Compliance Status	Source

4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.

SNC Evaluation Period		
	%	Applicable Pretreatment Standards and reporting requirements
	%	Self-monitoring requirements
	%	Pretreatment compliance schedules
*SNC defined by:		
POTW		
EPA		

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B. PRETREATMENT PROGRAM STATUS (continued)

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.

ATTACHMENT A COMPLETED BY: TITLE:	DATE: TELEPHONE:
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