

# Industrial User Inspections

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Pretreatment Training June 2014



# Introduction

- Inspection and Sampling frequency
- Types of Inspections
- Confidential Information
- Inspector responsibilities
- Inspectors field notebook
- Pre-inspection
- On-site activities
- Follow-up



# 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





# 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 (continued)

9. **Water use data**

10. **SIU slug control plan**

11. Raw materials used in production processes

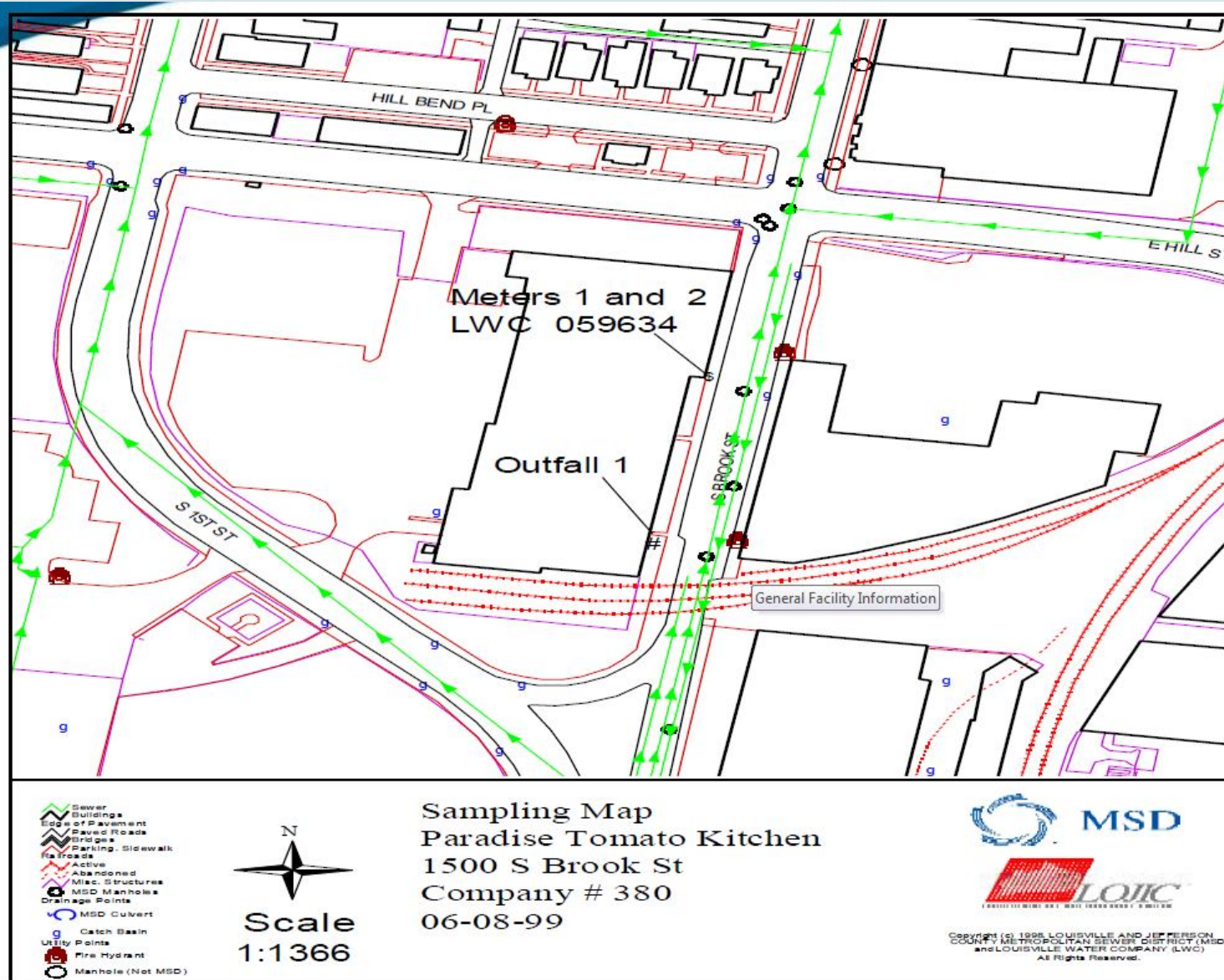
12. Location of storage sites for raw materials

13. **Special permit conditions**

14. **Progress toward meeting any applicable compliance schedule**

15. Sources, volumes, and characteristics of waste discharges



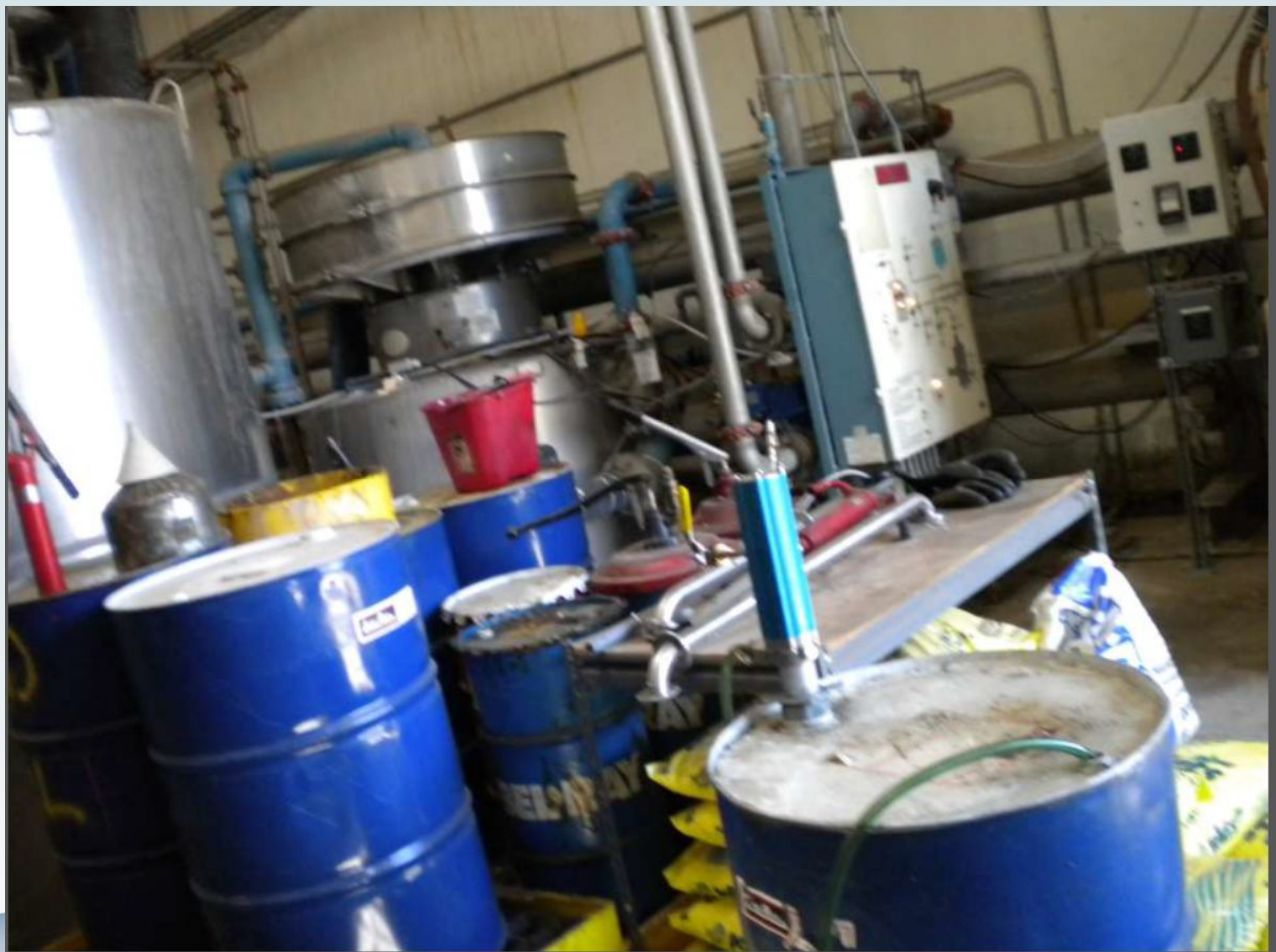




# Wastewater Treatment Systems

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.







# 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. Privately 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 Situation***



# Perimeter Inspection

Prior to entering the facility....

- Examine the facility's perimeter
  - Detect leaky storage areas and other general housekeeping practices at the plant which might affect its discharge to the POTW
- Evaluate the environmental conditions
  - Vegetation, Odor problems or Direct discharges to streams.





# 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

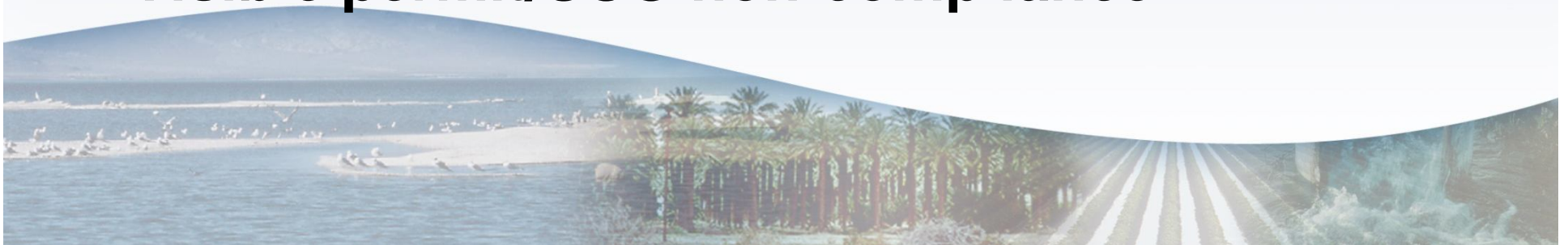
Storm water

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**
- **Visible permit/SUO non-compliance**



# Identifying visible non-compliance

## Biodiesel SIU Monitoring Point





# Identifying visible non-compliance

Four minutes later...





# Identifying visible non-compliance





# Identifying visible non-compliance





# Identifying visible non-compliance





# Identifying visible non-compliance





# Identifying visible non-compliance



# Identifying visible non-compliance



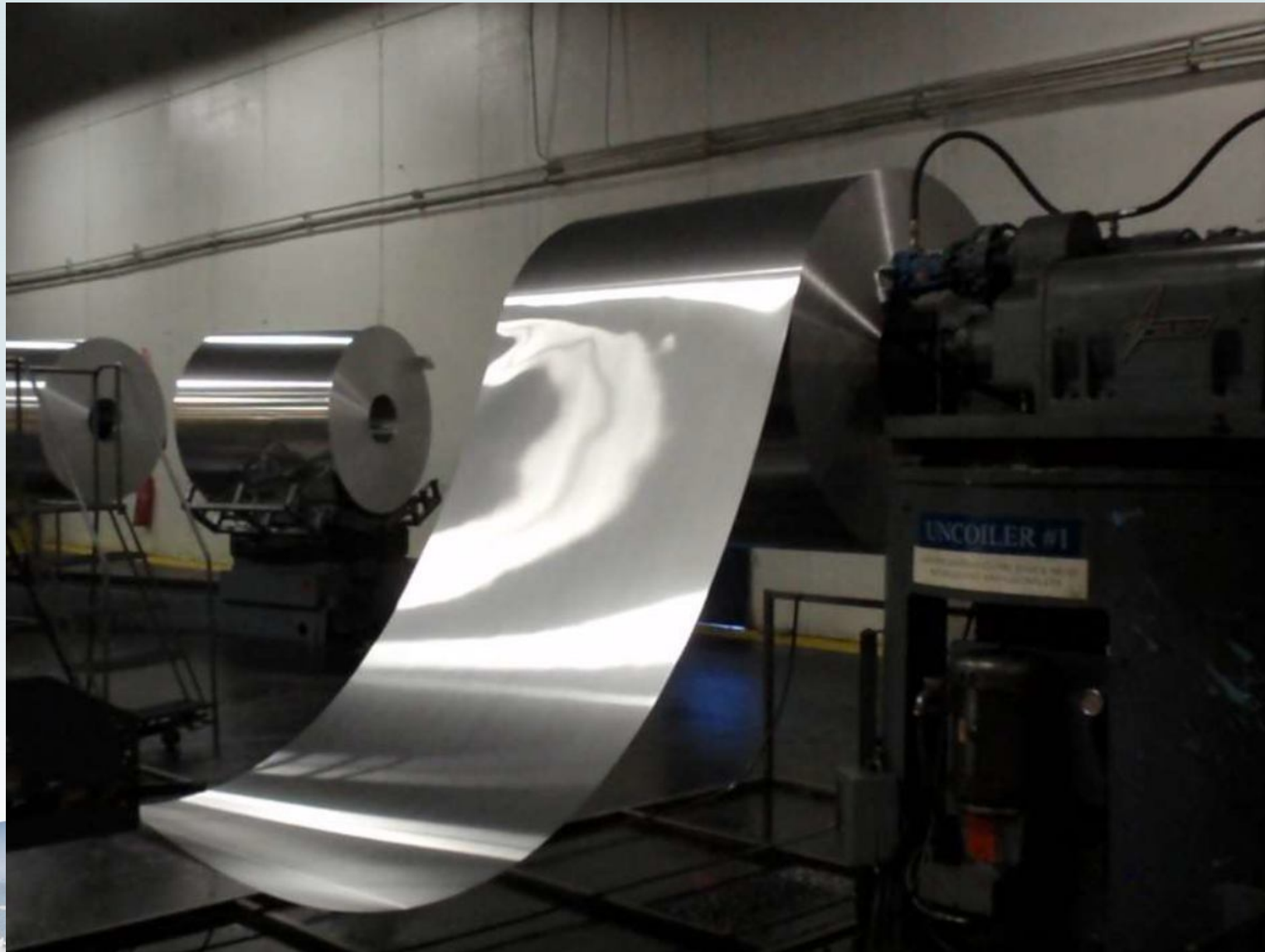


# Identifying visible non-compliance



Walkthroughs can be performed prior to asking questions









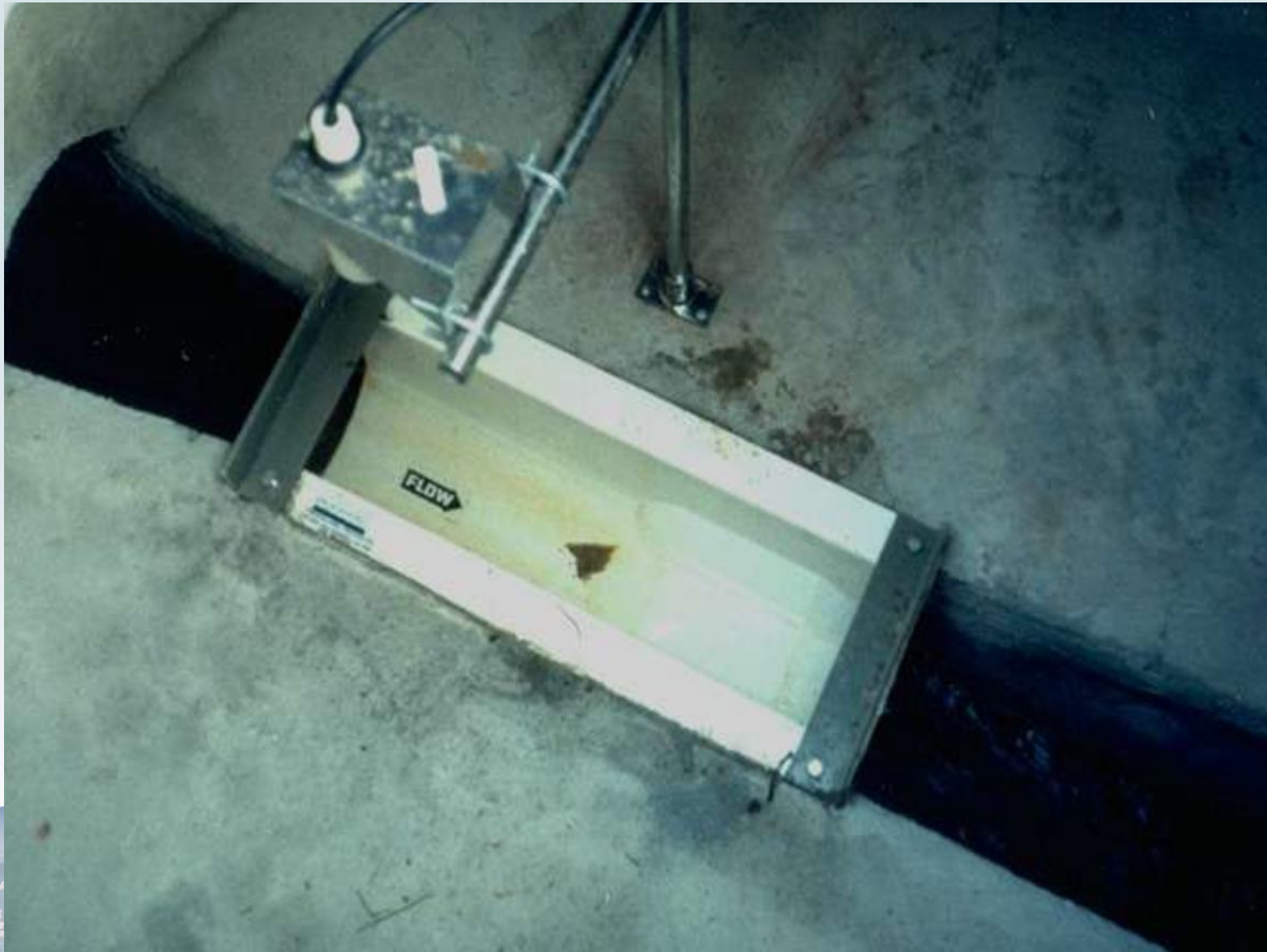
















# Follow-Up with IU Before Leaving

- Comment on housekeeping and/or compliance issues
- Allow IU to ask questions



# Follow-Up Activities

- Once the inspection is completed:
  - Review your notes
  - Identify need for follow-up
  - Organize notes into a report format



# Final Inspection Report Criteria

- Accuracy
- Relevancy
- Comprehensiveness





# Questions?

