

# INDUSTRIAL USER INSPECTIONS

Pretreatment Workshop

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Sponsored by Colorado River Basin & EPA Region 9

Chuck Durham  
Tetra Tech, Inc.

Ann Laduca  
Tetra Tech, Inc.

# 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





# Pre-Inspection Activities

- Plan effectively
- Review background information

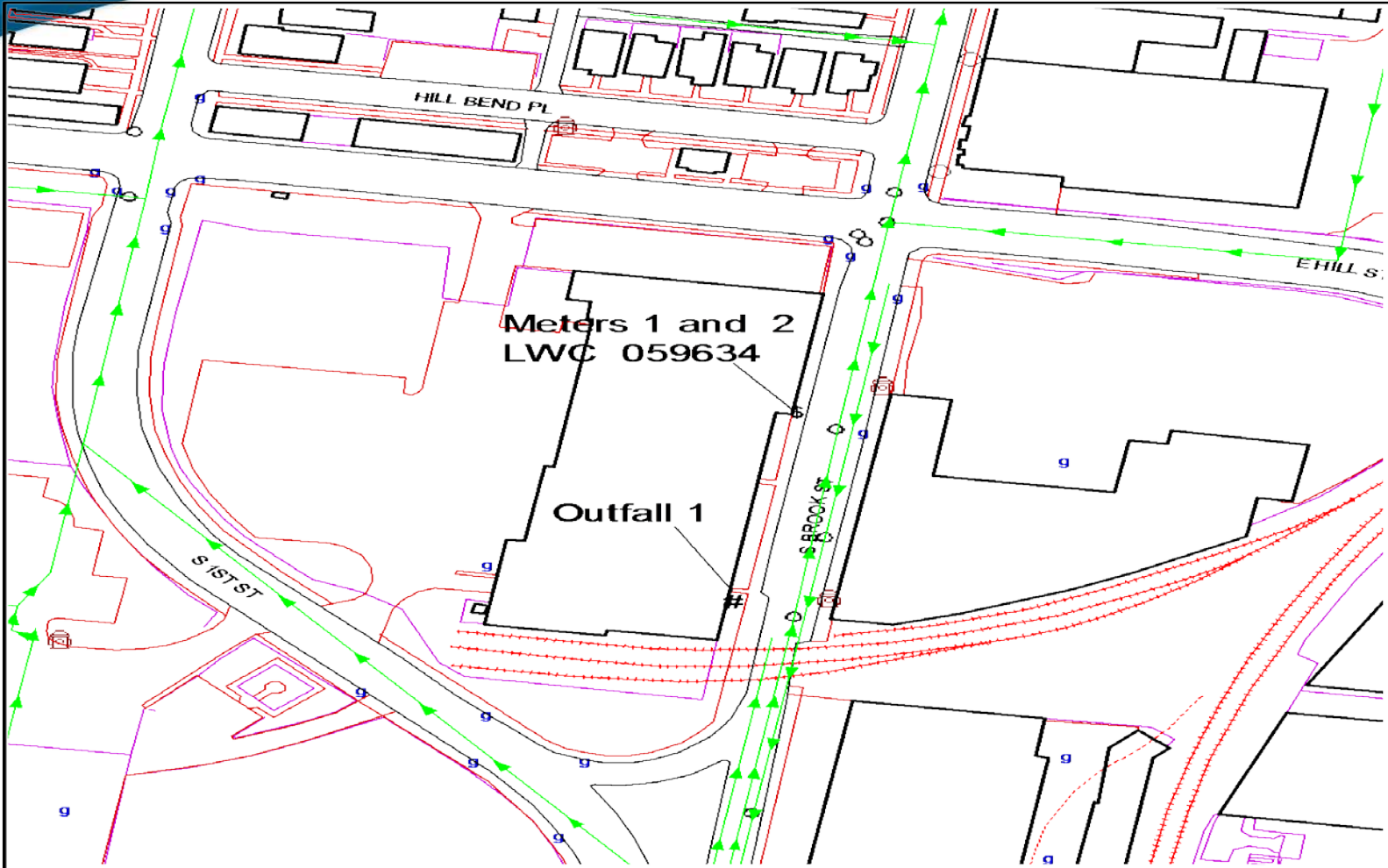


# General Facility Information

- 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



- Sewer
- Edge of Pavement
- Edge of Road
- Parking, Sidewalk
- Roads
- Active
- Abandoned
- Misc. Structures
- MSD Manholes
- Drainage Points
- MSD Culvert
- Catch Basin
- Utility Poles
- Fire Hydrant
- Manhole (Not MSD)

**Scale**  
**1:1366**

**Sampling Map**  
**Paradise Tomato Kitchen**  
**1500 S Brook St**  
**Company # 380**  
**06-08-99**



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# 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.





# 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 Situations

# 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.











# Inspection Form



- **Use as a prompting and documentation tool, not as your inspection report.**
- **Verify answers you receive with visual observations, and note discrepancies.**

# Evaluate Need for SDCP

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.**

- **Document your evaluation of need for SDCP**
- **Retain copy of SDCP if req'd and approved**
- **In SIU permit, make enforceable!**

# Operations/Sources of Discharge

**Restroom/showers Lab**

Air pollution control devices Maintenance shop  
Noncontact cooling water

Backwash water Cooling tower bleed off

Boilers **Off spec/out of date returned**

**Cafeteria/breakroom product or raw material**

Contact cooling water Pump sealant water

**Equipment washdown Remediated groundwater**

Fleet maintenance Storm water

In-product 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 -

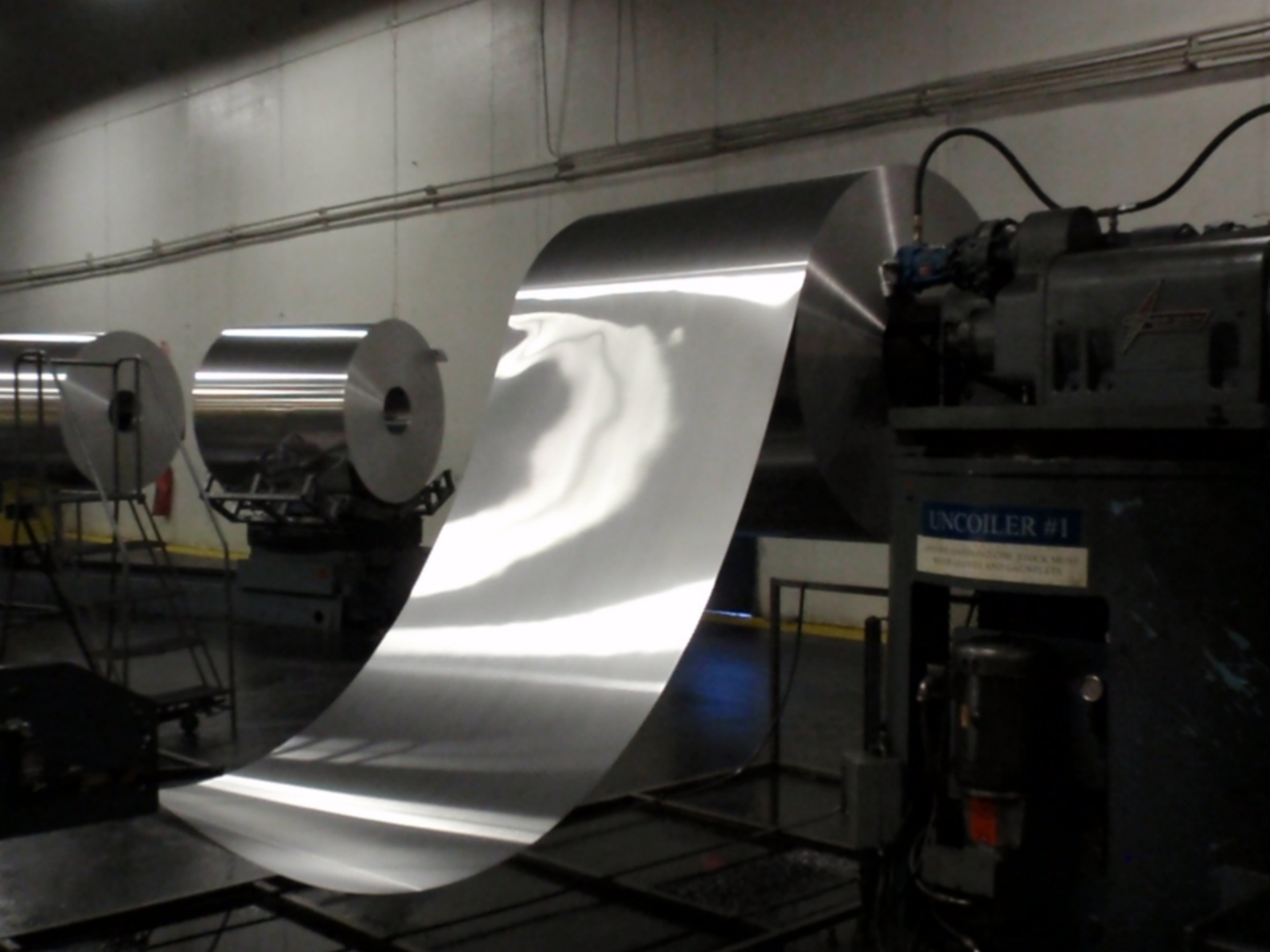


Evidence of connection at some point due to drainage from pipe.





**Walkthroughs can be performed prior to asking questions**



UNCOILER #1

UNCOILING MACHINE STOCK NO. 1000  
MANUFACTURED BY [unreadable]



PLEASE DO NOT TOUCH THE  
MACHINE IN THE RANGE OF  
THE PROTECTIVE DEVICE  
MUST BE  
STOPPED  
MUST BE STOPPED

PLEASE DO NOT TOUCH THE  
MACHINE IN THE RANGE OF  
THE PROTECTIVE DEVICE  
MUST BE  
STOPPED  
MUST BE STOPPED

**RUN IN AUTO ONLY**



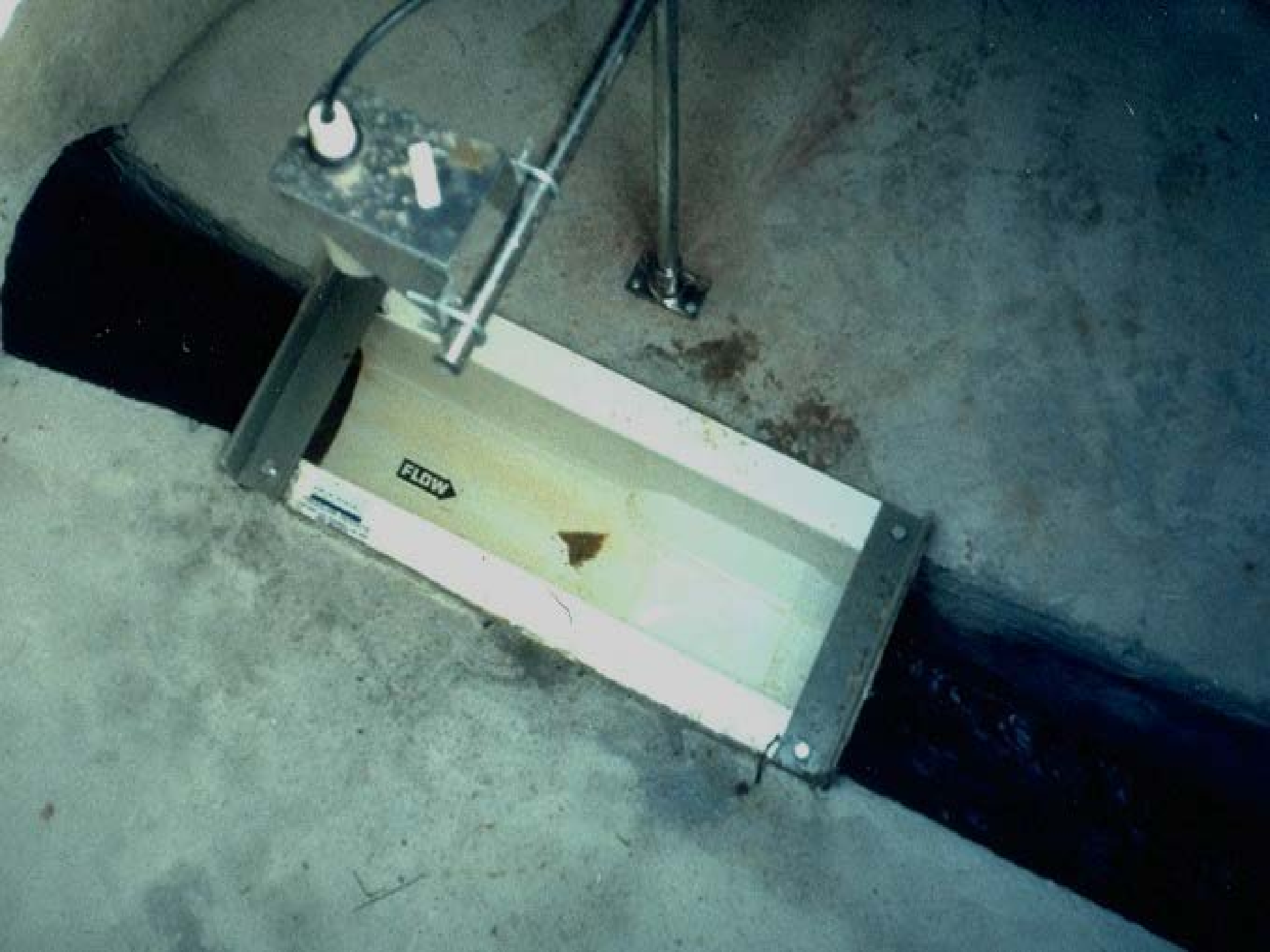


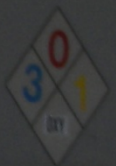


LAMELLA CLARIFIER

FLUME

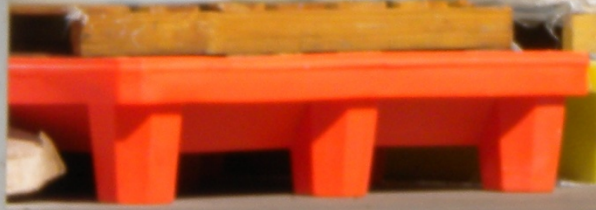






**GRAINGER**  
POW-PAC ONLY WHEN GET IT DONE

PO# 7122  
O.R./BOUFFANT CAPS  
POLYPROPYLENE  
STYLE 11896  
SIZE 21"  
COLOR: BLUE  
PACK 100 BAGS/IN CASE  
QTY 200 PCS





# 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



# Case Study

## -unannounced inspection-

# Findings

- Discovered an upset condition at a ham processing plant
- Observed two employees of the facility watching the event without correcting, diverting or reporting the condition
- Results from samples collected confirmed discharge was a slug load

# Action steps

- Set up composite sampler
- Took pictures of the events
- Documented everything
- Continued to sample







