



Audit Findings: How to Improve Your Pretreatment Program

Indiana Water Environment Association Conference
November 16, 2010

Natalie Maupin, OWQ, IDEM
nmaupin@idem.in.gov
(317) 232-8729



POTW Pretreatment Programs

- The requirement for a POTW to develop and implement a local pretreatment program is a condition of its NPDES permit.
- Two types of pretreatment programs in Indiana.
 - Delegated
 - Non-Delegated



POTW Pretreatment Programs

- Delegated
 - U.S.EPA is the approval authority.
 - POTW is the control authority.



POTW Pretreatment Programs

- Part III Delegated Pretreatment Program Requirements
 - Perform a technical evaluation of local limits and submit to EPA Region 5 and IDEM within 90 days of the effective date of the permit.
 - Submit QNCRs on the 28th of January, April, July, and October (for most) of each year.
 - Annual report due April 1 of each year (for most).
 - Publish a list of SIUs in SNC for the previous calendar year by January 28th of each year.



POTW Pretreatment Programs

- Part III Delegated Pretreatment Program Requirements (cont.)
 - Develop and maintain legal authority (SUO).
 - Issue permits to SIUs prior to commencing discharge to the POTW.
 - Sample and inspect each SIU in accordance with approved plan or at least once per calendar year.
 - Initiate appropriate enforcement in accordance with approved ERP.
 - Maintain records for a minimum of 3 years.
 - Maintain interjurisdictional agreements and the legal authority to ensure compliance.



POTW Pretreatment Programs

- Non-delegated
 - IDEM is the approval authority.
 - IDEM and POTW are the control authority.
 - IDEM issues permits to SIUs.
 - POTW performs sampling and inspections at SIUs





POTW Pretreatment Programs

- Part III Non-Delegated Pretreatment Program Requirements
 - Submit to IDEM within 90 days of the effective date of the permit, either:
 - A certification statement explaining that an evaluation was done of the existing SUO and copy of the SUO highlighting the proposed modifications; or
 - SUO along with a certification statement, explaining that no modifications are needed.



POTW Pretreatment Programs

- Part III Non-Delegated Pretreatment Program Requirements (cont.)
 - Within 90 days of the effective date of the permit, submit an ERP to IDEM.
 - Notify IDEM of new IUs.
 - Sample and analyze sludge either:
 - 1st and 3rd Quarter, or
 - 2nd and 4th Quarter each year.
 - Conduct an industrial user survey every two years and submit with annual report.
 - Annual report due April 1 of each year (includes industrial user survey).



Audit Findings:

Common deficiencies and violations noted during a pretreatment audit.



Audit Findings

- Improper application of Total Toxic Organic (TTO) standards.
 - 40 CFR 413 & 433 have specific requirements for implementing the TTO monitoring and monitoring alternative requirements.
 - Permit language must contain monitoring alternative language for the IU to certify that no dumping of TTO is occurring.



Audit Findings

- Improper application of TTO standard (cont.)
 - Two options for determining compliance with TTO standard.
 1. Either monitor and analyze for only those pollutants reasonably expected to be present;
 2. Submit a certification statement specified in 40 CFR 433.12(a). The IU must also submit a Toxic Organic Management Plan (TOMP) to its control authority (City or IDEM) for approval.



Audit Findings

- TOMP should specify the following:
 - The toxic compounds used at the IU;
 - The method of disposal used instead of dumping, such as reclamation, hauling, or incineration;
 - And procedures for ensuring that toxic organics do not routinely spill or leak into wastewater.





Audit Findings

- TOMP
 - If an IU does not use any materials that contain toxic compounds and wants to use the certification statement in lieu of monitoring for TTO, the IU must submit a TOMP for approval.
 - The TOMP would simply explain that no toxic compounds are on-site.



Audit Findings

- TTO standards with Oil and Grease Monitoring Alternative:
 - 40 CFR 465, Subpart D, Coil Coating (can making);
 - 40 CFR 467, Aluminum Forming, and;
 - 40 CFR 468, Copper Forming.



Audit Findings

- These three categorical standards have shortened TTO lists. You may monitor for Oil and Grease instead of TTO or monitor for all TTO listed within the standards, not those reasonably expected to be present.



Audit Findings

- Not Permitting Zero Discharging Categorical Industrial Users (CIU)
 - Do they have the potential to discharge process wastewater to the POTW?
 - Keeps a foot in the door for inspections and sampling.





Audit Findings

- Slug Discharge Control Plans
 - POTWs are not evaluating the need for a plan during inspections. Must be done at least once and well documented.
 - If one is required, then the plan must be submitted to the POTW for review and approval.
 - POTW must document approval.
 - Permit should contain language requiring IU to implement plan once it has been approved.
 - POTW should re-evaluate existing plan during inspections.



Audit Findings

- Chain of Custody Forms
 - Chain of custody forms are either not being used or improperly completed.
 - Missing signatures, dates, times of sampling and relinquishing of samples to laboratory;
 - No field notes (i.e., physical appearance, odor of wastewater, preservation methods used, etc.);
 - pH and temperature are not being performed in the field in accordance with 40 CFR 136 and therefore not being recorded properly on chain of custody form.
 - Must be a grab sample and analyzed within 15 minutes of collection.



Audit Findings

- Chain of Custody Form
 - Wastewater Compliance Evaluation webpage
<http://www.IN.gov/idem/5090.htm>



Guidance Documents

- EPA Website
 - Local limits development document and spreadsheet.
 - SUO model.
 - Streamlining fact sheets.
- IDEM
 - Industrial user survey form.
 - Pretreatment inspection form.
 - ERP guidance document for non-delegated pretreatment programs.
 - Annual report form for non-delegated pretreatment programs.



Questions?

