

###### NORTH CAROLINA DIVISION OF WATER RESOURCES

PRETREATMENT AUDIT REPORT

## Background Information [Complete prior to audit; review Program Info Database Sheet(s)]

1. Control Authority (POTW) Name:

2. Control Authority Representative(s):

1. Title(s):
2. Address of POTW:

Mailing

City  Zip Code

Phone Number  Fax Number  E-Mail

5. Audit Date //

6. Last Inspection Date: // Inspection Type:  PCI  Audit

7. Has Program Completed All Requirements from the Previous Inspection and Program Info Sheet(s) ?  Yes  No

If No, Explain.

8. In the last year has the POTW experienced any NPDES or Sludge Permit compliance problems?  Yes  No

If Yes, Explain.

9. Is POTW under an Order That Includes Pretreatment Conditions?  Yes  No

Order Type and Number:  Are Milestone Dates Being Met?  Yes  No  NA

Parameters Covered Under Order

ICIS Coding

Main Program Permit Number MM/DD/YY

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **N** | **C** | **0** | **0** |  |  |  |  |  |  |  |  |  |  |

|  |  |
| --- | --- |
| 10. Current Number of Significant Industrial Users (SIUs)? |  |
| 11. Number of SIUs with No IUP, or with an Expired IUP? |  |
| 12. Number of SIUs Not Inspected by POTW in Last Calendar Year? |  |
| 13. Number of SIUs Not Sampled by POTW in Last Calendar Year? |  |
| 14. Number of SIUs in SNC for Limits Violations During Either of Last 2 Semi-Annual Periods? |  |
| 15. Number of SIUs in SNC for Reporting During Either of Last 2 Semi-Annual Periods? |  |
| 16. Number of SIUs in SNC with Pretreatment Schedule? |  |
| 17. Number of SIUs on Schedules? |  |
| 18. Current Number of Categorical Industrial Users (CIUs)? |  |
| 19. Number of CIUs in SNC? |  |

**20. PRETREATMENT PROGRAM ELEMENTS REVIEW**- Review POTW files, verify POTW has copy of each Program Element in their File, complete with all supporting documents and PERCS Approval Letter, and dates consistent with Program Info:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Program Element** | Last SubmittalDate In file? | | Last ApprovalDate In file | | **Date Next Due, If Applicable** |
| **Headworks Analysis (HWA)** |  | Yes  No |  | Yes  No |  |
| **Industrial Waste Survey (IWS)** |  | Yes  No |  | Yes  No |  |
| **Sewer Use Ordinance (SUO)** |  | Yes  No |  | Yes  No |  |
| **Enforcement Response Plan (ERP)** |  | Yes  No |  | Yes  No |  |
| **Long Term Monitoring Plan (LTMP)** |  | Yes  No |  | Yes  No |  |

**Legal Authority (Sewer Use Ordinance-SUO)**

21. Do you have any towns and/or areas from which you receive wastewater which are not in your annexed jurisdiction?

Yes  No If yes, Please list these towns and/or areas.

22. If yes to #21, Do you have current Interjurisdictional Agreements (IJAs) or other Contracts?  Yes  No  NA

A copy, if not already submitted, should be sent to Division.

23. If yes to #21, Have you had any trouble working with these towns or districts?  Yes  No  NA

If yes, Explain.

24. Date of Last SUO Adoption by Local Council //

25. Have you had any problems interpreting or enforcing any part of the SUO?  Yes  No

If yes, Explain.

**Enforcement (Enforcement Response Plan-ERP)**

26. Did you send a copy of the ERP to your industries?  Yes  No

If no, POTW must send copy within 30 days.

27. Have you had any problems interpreting or enforcing any part of the ERP (i.e. any adjudication, improper enforcement, etc?  Yes  No If yes, Explain.

28. List Industries under a Schedule or Order and Type of Schedule or Order

**Resources**

29. Please Rate the Following: S=Satisfactory M=Marginal U=Unsatisfactory

|  |  |  |
| --- | --- | --- |
|  | **Rating** | Explanation, if Unsatisfactory |
| Personnel Available for Maintaining POTW’s Pretreatment Program | **S** **M** **U** |  |
| Access to POTW Vehicles for Sampling, Inspections, and Emergencies | S M U |  |
| Access to Operable Sampling Equipment | **S M U** |  |
| Availability of Funds if Needed for Additional Sampling and/or Analysis | **S M U** |  |
| Reference Materials | **S M U** |  |
| Staff Training (i.e. Annual and Regional Workshops, Etc.) | **S M U** |  |
| Computer Equipment (Hardware and Software) | **S M U** |  |

30. Does the POTW have an adequate data management system to run the pretreatment program?  Yes  No

Explain Yes or No.

31. How does the POTW recover the cost of the Pretreatment Program from their industries? Explain.

**Public Perception/ Participation**

32. Are there any local issues affecting the pretreatment program (e.g.. odor, plant closing, new or proposed plants)?

Yes  No If yes, Explain.

33. Has any one from the public ever requested to review pretreatment program files?  Yes  No

If yes, Explain procedure. If no, how would the request be addressed?

34. Has any industry ever requested that certain information remain confidential from the public?  Yes  No If yes, Explain procedure for determining whether information qualified for confidential status, as well as procedure for keeping files confidential from public. If no how would the request be addressed?

35. In addition to annual inspection, does the POTW periodically meet with industries to discuss pretreatment?  Yes  No

36. Is the public notified about changes in the SUO or Local Limits?  Yes  No

37. Were all industries in SNC published in the last notice?  Yes  No

**Permitting (Industrial Waste Survey-IWS)**

38. How does the POTW become aware of new or changed Users?

39. Once the POTW becomes aware of new or changed Users, how does the POTW determine which industries have the reasonable potential to adversely impact the WWTP and therefore require a new permit or a permit revision? (Who is an SIU?)

40. Does the POTW receive waste from any groundwater remediation projects (petroleum, CERCLA) or landfill leachate? Yes No If Yes, How many are there?

Please list each site and how it is permitted, if applicable.

41. Does the POTW accept waste by (mark if applicable)  Truck Dedicated Pipe  NA

42. If the POTW accepts trucked waste, what controls are placed on this waste? (example. designated point, samples drawn, manifests required)

43. How does the POTW allocate its loading to industries? Mark all that apply

Uniform Limits  Historical Industry Need  By Surcharge  Categorical Limits  Other

Explain Other:

44. Review POTW’s copies of current allocation tables for each WWTP. Are there any over allocations?  Yes  No

If yes, what parameters are over allocated?

45. If yes to #44, What is being done to address the over allocations? (short-term IUPs, HWA to be revised, pollutant study, etc.)

46. Does the POTW keep pollutant loading in reserve for future growth / safety?  Yes  No

If yes, what percentage of each parameter %

47. Has the POTW experienced any difficulty in allocation? (for example: adjudication by an industry)  Yes  No

If yes, Explain.

48. How does the POTW decide on which pollutants to limit in the permits? Monitor for? (for example: were only those pollutants listed on the application limited; categorical parameters; NPDES Pollutants of Concern)

49. How does the POTW decide what the monitoring frequency should be for the various pollutants in industry permits? Explain.

**Permit Compliance**

50. Does the POTW currently have or during the past year had any permits under adjudication?  Yes  No

If yes, which industries? What was (will be) the outcome of the adjudication?

51. Demonstrate how the POTW judges compliance. This should include compliance judgment on all violations of limits, reporting requirements, and permit conditions, as well as for SNC.

52. Does the POTW use the Division’s model inspection form or equivalent?  Yes  No

If no, does the POTW form include all Division data?  Yes  No

53. Were all SIUs evaluated for the need of a slug/spill control plan during their most recent inspections?  Yes  No

If no, Explain.

54. What criteria are used to determine if a slug/spill control plan is needed?

55. What criteria does the POTW use to determine if a submitted slug/spill control plan is adequate?

56. How does the POTW decide where the sample point for an SIU should be located?

57. Has the POTW established a procedure to ensure that representative samples will be taken by the POTW or SIU each time? (example: correct location; proper programming of sampler; clean equipment; swirling the sample bucket uniformly) POTW:  Yes  No SIU:  Yes  No If yes, Explain.

58. Who performs sample analysis for the POTW for Metals

Conventional Parameters

Organics

59. Explain the Chain of Custody Procedure used for both in house and commercial lab samples.

**Long/Short Term Monitoring Plan (L/STMP) and Headworks Analysis (HWA)**

60a. Is LTMP/STMP Monitoring Being Conducted at Appropriate Locations and Frequencies?  **YES  NO**

60b. Are Correct Detection Levels being used for all LTMP/STMP Monitoring?  **YES  NO**

60c. Is LTMP/STMP Data Maintained in Table or Equivalent?  **YES  NO** Is Table Adequate?  **YES  NO**

60d. All LTMP/STMP effluent data on Discharge Monitoring Report (DMR)?  **YES  NO** Division Inspector, verify yourself!

60e. If NO to any above, list violations \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

60f. Should any Pollutants of Concern be Eliminated from or Added to LTMP/STMP?  **YES  NO**

If yes, which ones? Eliminated: ­­­ Added:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

61. Do you complete your own headworks analysis (HWA) ?  Yes  No

If no, who completes your HWA?  Phone ()--

62. Do you have plans to revise your HWA in the near future?  Yes  No

If yes, what is the reason for the revision? (mark all that apply) Increased average flow NPDES limits change

More LTMP data available Resolve over allocation 5 year expiration Other

Explain.

63. In general, what is the most limiting criteria of your HWA? Inhibition  Pass Through Sludge Quality

64. Do you see any way to increase your loading in the future (Example: obtaining more land for sludge disposal)?  Yes  No Explain.

# Summary

65. Do you plan any significant changes to the pretreatment program or changes to the WWTP that may affect pretreatment?

**INDUSTRIAL USER PERMIT (IUP) FILE REVIEW** (3 IUP FILE REVIEWS AND 1 IU INSPECTION)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| 66. User Name | 1. | 2. | | 3. | |
| 67. IUP Number | | |  |  |  |
| 68. Does File Contain Current Permit? | | | Yes  No | Yes  No | Yes  No |
| 69. Permit Expiration Date | | |  |  |  |
| 70. Categorical Standard Applied (I.E. 40 CFR, Etc.) Or N/A | | |  |  |  |
| 71. Does File Contain Permit Application Completed Within One Year Prior to Permit Issue Date? | | | Yes  No | Yes  No | Yes  No |
| 72. Does File Contain Inspection Completed Within Last Calendar Year? | | | Yes  No | Yes  No | Yes  No |
| 73. a. Does File Contain Slug/Spill Control Plan?  b. If No, is One Needed? (See Inspection Form from POTW) | | | a. Yes No  b. Yes No | a. Yes No  b. Yes No | a. Yes No  b. Yes No |
| 74. For 40 CFR 413 and 433 TTO Certification, Does File Contain a Toxic Organic Management Plan (TOMP)? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 75. a. Does File Contain Original Permit Review Letter from Division?  b. All Issues Resolved? | | | a. Yes No  b.YesNoN/A | a. Yes No  b.YesNoN/A | a. Yes No  b.YesNoN/A |
| 76. During Most Recent Semi-Annual Period, Did POTW Complete its Sampling as Required by IUP, including Flow? | | | Yes  No | Yes  No | Yes  No |
| 77. Does File Contain POTW Sampling Chain-Of-Custody Forms? | | | Yes  No | Yes  No | Yes  No |
| 78. During Most Recent Semi-Annual Period, Did SIU Complete its Sampling as Required by IUP, including Flow? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 79. During Most Recent Semi-Annual Period, Did SIU submit all reports on time? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 80a. For categorical IUs with Combined Wastestream Formula (CWF), does file include process/dilution flows as Required by IUP? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 80b. For categorical IUs with Production based limits, does file include production rates and/or flows as Required by IUP? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 81. During Most Recent Semi-Annual Period, Did POTW Identify All Limits Non-Compliance from Both POTW and SIU Sampling? | | | Yes  No | Yes  No | Yes  No |
| 82. During Most Recent Semi-Annual Period, Did POTW Identify All Reporting Non-Compliance from SIU Sampling? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 83. a. Was POTW Notified by SIU (Within 24 Hours) of All Self- Monitoring Violations?  b. Did Industry Resample and submit results to POTW within 30 Days?  c. If applicable, did POTW resample and obtain results within 30 days of becoming aware of SIU limit violations in the POTW’s sampling of SIU? | | | a.YesNoN/A  b.YesNoN/A  c.YesNoN/A | a.YesNoN/A  b.YesNoN/A  c.YesNoN/A | a.YesNoN/A  b.YesNoN/A  c.YesNoN/A |
| 84. During Most Recent Semi-Annual Period, Was SIU in SNC? | | | Yes  No | Yes  No | Yes  No |
| 85. During Most Recent Semi-Annual Period, Was Enforcement Taken as Specified in POTW's ERP (NOVs, Penalties, timing, etc.)? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 86. Does File Contain Penalty Assessment Notices? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 87. Does File Contain Proof Of Penalty Collection? | | | YesNoN/A | YesNoN/A | YesNoN/A |
| 88. a. Does File Contain Any Current Enforcement Orders?  b. Is SIU in Compliance with Order? | | | a.YesNoN/A b.YesNoN/A | a.YesNoN/A b.YesNoN/A | a.YesNoN/A b.YesNoN/A |
| 89. Did POTW Representative Have Difficulty in Obtaining Any Requested Information For You? | | | Yes  No | Yes  No | Yes  No |

**FILE REVIEW COMMENTS:**

**INDUSTRY INSPECTION ICIS CODING:**

Main Program Permit Number MM/DD/YY

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **N** | **C** | **0** | **0** |  |  |  |  |  |  |  |  |  |  |

1. Industry Inspected:

2. Industry Address:

3. Type of Industry/Product:

4. Industry Contact:  Title:  Phone:  Fax:

5. Does the POTW Use the Division Model Inspection Form or Equivalent?  Yes  No

6. Did the POTW Contact Conduct the Following Parts of the Industrial Inspection Thoroughly?

Comments:

A. Initial Interview  Yes  No

B. Plant Tour  Yes  No

C. Pretreatment Tour  Yes  No

D. Sampling Review  Yes  No

1. Exit Interview  Yes  No

**Industrial Inspection Comments:**

**Audit SUMMARY AND COMMENTS:**

Audit Comments:

Requirements:

Recommendations:

**NOD:  Yes  No**

# NOV: Yes No

**QNCR:  Yes  No**

**POTW Rating:**

**Satisfactory  Marginal  Unsatisfactory**

**Audit COMPLETED BY:** **DATE: ­­­­­­­­­­­­­**

**XXXX, PERCS, and XXXX, XXXX Regional Office**