

# Chapter 9 Pretreatment Annual Report (PAR) Guidance

## Section A. Quick Reference Information

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### 1. Definition:

Replaces the Semi-Annual Report (SAR).

Pretreatment Annual Report (PAR), a report which must be completed by the Local Control Authority (a town with a pretreatment program) and submitted to the Division of Environmental Management (DEM) Pretreatment Group once a year. The PAR summarizes the activities of the local pretreatment program with an emphasis on the compliance status of the Significant Industrial Users (SIUs) and the enforcement actions taken by the POTW.

### 2. Chapter Acronyms:

|        |   |
|--------|---|
| • AT   | Allocation Table                                |
| • CIU  | Categorical Industrial User                     |
| • DEM  | Division of Environmental Management            |
| • DSF  | Data Summary Forms                              |
| • GWP  | Groundwater Permit                              |
| • HWA  | Headworks Analysis                              |
| • IDMR | Indirect Discharger Monitoring Report           |
| • IDSF | Industrial Data Summary Form                    |
| • IUPs | Industrial User Pretreatment Permits            |
| • PAR  | Pretreatment Annual Report                      |
| • POTW | Publicly Owned Treatment Works                  |
| • PPS  | Pretreatment Program Summary                    |
| • RNC  | Reportable Non-Compliance, now called SNC       |
| • SAR  | Semi Annual Report (pre 1994 rule changes)      |
| • SIU  | Significant Industrial User                     |
| • SNC  | Significant Non-Compliance, formerly called RNC |
| • SNCR | Significant Non-Compliance Report               |
| • SUO  | Sewer Use Ordinance                             |
| • WWTP | Wastewater Treatment Plant                      |

### 3. Purpose of the PAR:

To inform State and EPA of Pretreatment Program implementation activities.

### 4. Regulatory References:

- 15A NCAC 2H. 0908(b)
- 40 CFR 403.12(i)
- NPDES Permit, Part III

### 5. DEM Requirements for the PAR:

The NPDES permittees with pretreatment programs shall submit to the Division Central Office once a year two copies of a Pretreatment Annual Report (PAR) describing the pretreatment activities of the previous appropriate 12 month period.

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The PAR shall contain the following information in the following order on forms or in a format approved by the Division.

**1. Narrative**

A brief discussion of actions taken for all Significant Industrial Users in Significant Non-Compliance (SIUs in SNC). A description of all POTW and SIU waste reduction activities.

**2. Pretreatment Program Summary (PPS)**

The Pretreatment Program Summary (PPS) form includes basic pretreatment program information that the Division must report to EPA.

**3. Significant Non-Compliance Report (SNCR)**

The Significant Non-Compliance Report (SNCR) form includes information about the nature of the violations and the status of the industry based on actions taken by the POTW.

**4. Industrial Data Summary Form (IDSF)**

The Industrial Data Summary Form (IDSF) includes a summary of monitoring data from samples collected by both the POTW and the Significant Industrial Users (SIUs). This data summary shall include all samples collected according to the sampling schedule in the Industrial User Pretreatment Permit (IUP) and any other additional sampling done by the POTW or the Industry.

**5. Allocation Table**

A copy of the current Allocation Table shall be included in the PAR.

**6. Significant Industrial User (SIU) Compliance Schedules**

A copy of any Compliance Schedules issued to Significant Industrial Users (SIUs). Items on the compliance schedule that have been completed and completion dates should also be noted in the Narrative.

**7. Public Notices**

A copy of the publication of each Significant Industrial User in Significant Non-Compliance (SIU in SNC) and their violations in the largest local daily newspaper.

**8. Other Information:**

Any other information, which in the opinion of the Director is needed to determine compliance with the pretreatment requirements of the NPDES permit. This information includes but is not limited to a summary of the LTMP data.

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**6. Implementation Frequency, PAR Due dates:**

If your PAR reporting period is January - December  
Your PAR is due by March 1

If your PAR reporting period is July - June  
Your PAR is due by September 1

**7. Appendices, PAR Chapter 9:**

The PPS, SNCR, and IDSF forms are included in the following sections.

**8. Other Guidance Documents:**

None

**Previous SAR Guidance documents and forms should not be used.**



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## Section B. Completing your PAR

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The PAR shall contain the following information in the following order.  
Focus on one section at a time:

- |                        |                             |
|------------------------|-----------------------------|
| => 1. <i>Narrative</i> | 5. Allocation Table         |
| 2. PPS                 | 6. SIU Compliance Schedules |
| 3. SNCR                | 7. Public Notices           |
| 4. IDSF                | 8. Other Information:       |

The Narrative should include information about each Significant Industrial User (SIU) that has had any violations, that is on a compliance schedule, or that is in Significant Non-Compliance (SIUs in SNC). Please see the Compliance Judgment section in Chapter 7, for help in determining SNC.

- The PAR Narrative:
- Includes the following information :

1. For SIUs in SNC due to limit violations

Describe briefly all SNC violations and enforcement and other actions taken by the POTW for all industries listed on the SNCR form. Comment on pass through or interference if the POTW has had NPDES violations for the same parameters.

2. For SIUs in SNC due to reporting violations

Describe briefly all enforcement and other actions taken by the POTW for all SIUs in SNC for reporting violations.

3. For SIUs that are on Compliance Schedules:

Describe briefly with dates any progress made by Industries on compliance schedule activities. Include a copy of any compliance schedules issued or modified during the PAR period.

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The PAR shall contain the following information in the following order.  
Focus on one section at a time:

- |    |               |                             |
|----|---------------|-----------------------------|
|    | 1. Narrative  | 5. Allocation Table         |
| => | 2. <b>PPS</b> | 6. SIU Compliance Schedules |
|    | 3. SNCR       | 7. Public Notices           |
|    | 4. IDSF       | 8. Other Information:       |

Completing the Pretreatment Program Summary (PPS) form should not be too difficult. Most of the items are self explanatory and if you have any questions call your pretreatment contact in the regional or central office (919) 733-5083. IF you have NO Significant Industrial Users in Significant Non-Compliance (SIUs in SNC) for the entire reporting period, then the answer to most of the questions is ZERO.

Remember to check the revision date on the forms you are using and always use the most up-to-date forms available.

- **The PAR-PPS Form:**
- **Information is described below:**

1. Pretreatment Town Name refers to the local Control Authority.
2. The NPDES number should be entered on the next line. When there is more than one NPDES number associated with the Control Authority, the NPDES number for the Wastewater Treatment Plant (WWTP) which has been designated as the "Primary Pretreatment POTW" should be entered.
- 3&4 The PAR PPS begin date and end date shall correspond with the PAR period covered by your report.
5. Total Number of SIUs, includes CIUs. This number should be the total of all the Significant Industrial Users (SIUs) including the Categorical Industrial Users (CIUs) recognized by the Control Authority at any time during the year. Even if you dropped some industry during the year, count them.
6. Total number of CIUs. This number includes only those Industrial Users recognized by the Control Authority as Categorical Industrial Users (CIUs) regulated by categorical standards specified in the Code of Federal Regulations (40 CFR) at any time during the year.
7. Enter the higher of the two numbers entered for items (7a.) and (7b.) on this line.
  - 7a. Number of SIUs not sampled as required by 15A NCAC .0908. (POTWs must usually sample their SIUs at least 1/6 month).
  - 7b. Number of SIUs not inspected by the POTW. The Control Authority is required to inspect each SIU at least once every year. (Minimum inspection frequency = 1/year).

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8. Number of SIUs with no IUP, or with an expired IUP. This is the number of SIUs which operated without an IUP or whose IUP expired and for which a new IUP has not been issued by the end of the PAR report period.
9. Total Number of SIUs in SNC for either IU Reporting or IUP limit violations. If a SIU is in SNC violation for both Reporting and IUP limits, do not count them twice. To avoid double counting SIUs that had both IU Reporting and IUP Limit violations, a little bit of detective work and calculating is required. The answer to this question is calculated with this simple formula:

$$\text{The Proper result} = 9a + 9b - 9c$$

- 9a. Number of SIUs in SNC for IU Reporting violations. Refer to Chapter 7 for information on SNC. SIUs are required to do self monitoring and to submit reports to their Control Authority. If an SIU has not met these SNC Reporting requirements they must be counted and entered on this line.
- 9b. Number of SIUs in SNC for Limits violations. Refer to Chapter 7 for information on SNC. Local Control Authorities must examine the monitoring data, compare values to the limits in each IUP, tally up any violations, and then determine if the limit violations cause an SIU to be in SNC for any limited pollutant. SIUs found to be in SNC for IUP Limits violations must be counted and entered on this line.
- 9c. Number of SIUs in SNC for both Reporting and limits violations. This is NOT the total of items 9a and 9b above, These SIUs have SNC violations both ways. NOTE, try not to double count an industry. Count only the industries whose names appear on both the Reporting and Limits SNC lists, if you prepared lists for the previous questions.
10. Number of SIUs in SNC for Reporting violations that were not sampled or inspected by the POTW.

Remember, you are the POTW and Control Authority. If you did all of your required sampling and monitoring (items 7a and 7b above should both be zero), you can enter zero here.

Otherwise, if you did not sample and inspect all SIUs as required, you must complete the following to determine what number to enter on this line.

- Make a list of SIUs in SNC for IU Reporting violations (item # 9a above).
- Make a list of all the SIUs that you did not sample or inspect as required (combine both items # 7a and 7b).
- Count how many SIUs are on both lists and enter that number.

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11. Number of SIUs in SNC due to violation of compliance schedule due dates. Refer to Chapter 7 for more information. This is only those SIUs who have missed compliance schedule milestone dates by 90 days or more or who have submitted compliance schedule reports 30 or more days late. Count them and enter that number.
12. Number of NOV's, NNC's, AOs, COs, or similar issued to SIUs. All Notices of Violation (NOV's), Notices of Non-Compliance (NNC's), Administrative Orders (AOs), consent orders, or similar must be counted. Enter the total number on this line.
13. Number of Civil or Criminal Penalties assessed to SIUs for Pretreatment reasons. Enter the number on this line.
14. Number of SIUs included in a public notice. Usually only the SIUs that are in SNC are listed in Public Notice. Count all SIUs that were listed in a notice for the PAR report period and enter the number on this line.
15. Number of SIUs from which penalties were collected. The number of industries that actually paid penalties during the year must be counted and the number entered on this line.
16. Total Amount of Civil Penalties collected. Add up the total Dollar amount that was actually paid by Industries to the Control Authority during the PAR report period and enter the total \$ amount on this line.
17. Total Number of SIUs on a compliance schedule. Any SIU on a compliance schedule at any time during the PAR report period should be counted. Enter this number on this line.

**The PPS Form  
is found on the next page:**



## Chapter 9, PAR Guidance Pretreatment Performance Summary (PPS)

- |   |                 |  |  |
|---|-----------------|--|--|
| 1. Pretreatment Town Name: _____  |                 |  |  |
| 2. "Primary" NPDES Number _____   | NC00 _____      |  | This Column<br>for office<br>use only<br>EPA<br>WENDB<br>codes |
| or Non_Discharge Permit # if applicable => _____  | _____           |  |  |
| 3. PAR begin Date, please enter 01/01/yy or 07/01/yy  | 3. => _____     |  | PSSD   |
| 4. PAR end Date, please enter 06/30/yy or 12/31/yy  | 4. => _____     |  | PSED   |
| 5. Total number of SIUs, includes CIUs  | 5. => _____     |  | SIUS   |
| 6. Number of CIUs   | 6. => _____     |  | CIUS   |
| 7. Enter the Higher Number, either (7a) or (7b) here => _____   |                 |  | NOIN   |
| 7a. Number of SIUs not sampled by POTW  | 7a. => _____    |  |  |
| 7b. Number of SIUs not inspected by POTW  | 7b. => _____    |  |  |
| 8. Number of SIUs with no IUP, or with an expired IUP   | 8. => _____     |  | NOCM   |
| 9. Total Number of SIUs in SNC due to either IU Reporting violations or<br>IUP Limit violations. To avoid double counting some SIUs |                 |  |  |
| Enter ( 9a + 9b ) - 9c here => _____  |                 |  | PSNC   |
| Enter the Number of SIUs in SNC for :   |                 |  |  |
| 9a. IU Reporting violations   | 9a. => _____    |  | MSNC   |
| 9b. IUP Limit violations  | 9b. => _____    |  | SNPS   |
| 9c. Both IU Reporting & Limit violations  | 9c. => _____    |  |  |
| 10. Number of SIUs in SNC due to IU Reporting violations<br>that were not sampled or inspected by POTW                              | 10. => _____    |  | SNIN   |
| 11. Number of SIUs in SNC due to violation of<br>Compliance Schedule due dates  | 11. => _____    |  | SSNC   |
| 12. Number NOVs, NNCs, AOs, or similar assessed to SIUs   | 12. => _____    |  | FENF   |
| 13. Number Civil or Criminal Penalties assessed to SIUs   | 13. => _____    |  | JUDI   |
| 14. Number of SIUs included in public notice  | 14. => _____    |  | SVPU   |
| 15. Number of SIUs from which penalties collected   | 15. => _____    |  | IUPN   |
| 16. Total Amount of Civil Penalties Collected   | 16. => \$ _____ |  |  |
| 17. Total Number of SIUs on a compliance schedule   | 17. => _____    |  | SOCS   |

|                    |   |  |
|--------------------|---|--|
| <b>Foot Notes:</b> | AO Administrative Order                 | NOV Notice of Violation                      |
|                    | CIU Categorical Industrial User         | PAR Pretreatment Annual Report               |
|                    | CO Consent Order                        | POTW Public Operated Treatment Works         |
|                    | IUP Industrial User Pretreatment Permit | SIU Significant Industrial User              |
|                    | NNC Notice of Non-Compliance            | SNC Significant Non-Compliance, formerly RNC |

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The PAR shall contain the following information in the following order.

Focus on one section at a time:

- |                   |                             |
|-------------------|-----------------------------|
| 1. Narrative      | 5. Allocation Table         |
| 2. PPS            | 6. SIU Compliance Schedules |
| => 3. <b>SNCR</b> | 7. Public Notices           |
| 4. IDSF           | 8. Other Information:       |

Each Control Authority (Town with a pretreatment program) is required to include in their Pretreatment Annual Report (PAR) a list of Significant Industrial Users that are in Significant Non-Compliance (SIUs in SNC). SNC used to be called Reportable Non-Compliance (RNC). Each pollutant or parameter that is in SNC must be listed, not just the Industry name.

This list is called the Significant Non-Compliance Report (SNCR), it was formerly called the Semi-Annual Non-Compliance Report (SNCR). The SNCR form covers a period of **TWO YEARS**: the current Pretreatment Annual Report period and the previous year

The criteria for Non-Compliance on which this list is based can be found in the compliance chapter of this book. In order to ensure uniform reporting, the pretreatment staff has developed a standard SNCR form to be used by POTWs and submitted with each Pretreatment Annual Report (PAR).

- **The PAR-SNCR Form:**
- **Header information is described below:**
  1. **Control Authority:** This is the Town, City, or other local government agency that manages the pretreatment program.
  2. **WWTP Name:** Submit a SNCR form for each WWTP operated by the Control Authority. **EVEN IF YOU HAVE NO SIUs in SNC** you must submit a SNCR form with the "No SIUs in SNC for the last two years" box checked.
  3. **NPDES Number:** Enter the NPDES (or Non-Discharge) permit number for the WWTP receiving the discharge from the Industrial Users.
  - 4&5. **PAR begin and end dates:** Please enter the appropriate dates.
  6. **No SIUs in SNC for the last two years:** Check this box if there have been no SIUs in SNC for the previous two years. This way we know that you have not just forgotten to include the form.
  7. **Additional information to be entered into the columns of the SNCR Form is described on the next page.**

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- Each column of the SNCR Form is described below:

| Col. #         | Column Title                     | SNCR Form Column Description  |
|----------------|----------------------------------|---|
| 1.<br>2.<br>3. | IUP #<br>Pipe #<br>Industry Name | These three columns need only be completed once for each industry and pipe which has violations. For example, if pipe one of an industry had violations of five parameters this industry would take up five rows of the SNCR form; however, only the first row would need the IU number, pipe number and industry name completed. Ditto marks may be used.  |
| 4.             | Parameter                        | Identify the pollutant that is in SNC, put only one pollutant on a line.  |
| 5 - 8          | SNC<br>1, 2, 3, 4                | Enter Y (Yes) or N (No) that the industry was in SNC for that parameter during each of the four six month periods. Refer to the compliance chapter for information on how to determine Significant Non-Compliance.  |
|                | 1                                | Previous Pretreatment Annual Report period - 1st 6 months   |
|                | 2                                | Previous Pretreatment Annual Report period - 2nd 6 months   |
|                | 3                                | Current Pretreatment Annual Report period - 1st 6 months  |
|                | 4                                | Current Pretreatment Annual Report period - 2nd 6 months  |
| 9 - 12         | Status<br>1, 2, 3, 4             | Enter NC, RP, or R for each Industry and each parameter during each of the previous four six month periods.   |
|                | NC                               | Non-Compliant - means the Significant Industrial User was in Significant Non-Compliance (SIU in SNC) and no Schedule of Compliance has been issued, or a SIU in violation of a schedule.  |
|                | RP                               | Resolved Pending - means that the Significant Industrial User was in Significant Non-Compliance (SIU in SNC) and that a Schedule of Compliance has been issued, and SIU is in compliance with schedule.   |
|                | R                                | Resolved - means that:<br>1.) The Significant Industrial User was NOT in Significant Non-Compliance (SIU not SNC).<br>2.) The SIU in SNC on a Compliance Schedule has completed the Compliance Schedule and is not SNC.<br>3.) The Significant Industrial User was in Significant Non-Compliance (SIU in SNC) in a previous six month period, and the permit was modified with no over allocation such that the Industry is no longer in SNC. |
| 13 - 16        | NPDES Violation<br>1, 2, 3, 4    | Check each column if the POTW had a violation for that parameter during any of the previous 4 six month periods. Comment on pass through or interference in the Narrative.  |

**The PAR-SNCR Form is found on the next page:**



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The PAR shall contain the following information in the following order.

Focus on one section at a time:

- |                   |                             |
|-------------------|-----------------------------|
| 1. Narrative      | 5. Allocation Table         |
| 1. PPS            | 6. SIU Compliance Schedules |
| 3. SNCR           | 7. Public Notices           |
| => 4. <b>IDSF</b> | 8. Other Information:       |

The Industrial Data Summary Form (IDSF) replaces the Indirect Discharger Monitoring Report (IDMR). The Town may continue to use and even require their Industries to use the IDMRs if they wish. However, the IDMRs should not be submitted to the Division with the PAR. The pretreatment staff will review the Industrial Data Summary Forms (IDSFs) and may request to see individual data sheets and chain of custody forms.

Typical parameters that are either limited or monitored in IUPs are included on the form. Space is provided so that additional parameters not already listed can be added. Temperature and pH do not have to be included on the data summary sheets.

- **The PAR-IDSF Form:**
- **Header information is described below:**

1. **Control Authority, Town Name:** This is the Town, City, or other local government agency that manages the POTW and the pretreatment program.
2. **WWTP Name:** The waste water treatment plant (WWTP) that receives the wastewater from a Significant Industrial User
3. **NPDES Number:** Enter the NPDES (or Non-Discharge) permit number for the WWTP receiving the discharge from the Industrial User.
4. **1st 6 months, dates:** The Pretreatment Annual Report (PAR) covers a 12 month period. However, the POTW and the Industrial self monitoring data must be summarized in 6 month intervals. Please enter the appropriate dates for the 1st six month period covered by your PAR.
5. **2nd 6 months, dates:** The Pretreatment Annual Report (PAR) covers a 12 month period. However, the POTW and the Industrial self monitoring data must be summarized in 6 month intervals. Please enter the appropriate dates for the 2nd six month period covered by your PAR.
6. **Industry name:** Please enter the name of the SIU
7. **Industry IUP #:** Please enter the Industrial User Pretreatment Permit (IUP) number.
8. **Industry Pipe #:** Please enter the pipe number from the Industrial User Pretreatment Permit (IUP) which identifies where the samples were drawn.

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- **The PAR-IDSF Form:**
- **Data Summary information for each parameter is described below:**

9. **Total # of Samples =>**  
For each parameter (Flow, BOD, etc) enter the total number of times the parameter was sampled and measured by both the POTW and by the Industry during each six month period; this number must be at least as many as specified in the IUP.

The POTW must complete at least one of the next four items.

10. **Maximum (mg/l) =>**  
For each parameter, (BOD, TSS, etc) enter the maximum concentration (mg/l) from monitoring done by either the POTW or by the Industry during each six month period. Note that the maximum flow should be reported in mgd.

11. **Maximum (lb/d) =>**  
For each parameter, (BOD, TSS, etc) enter the maximum daily loading (lb/d) calculated from monitoring done by either the POTW or by the Industry during each six month period. This entry is optional if the IUP permit limit is concentration based.

12. **\* \_\_\_\_\_ Average (mg/l) =>**  
For each parameter, (Flow, BOD, TSS, etc) enter the average concentration (mg/l) from monitoring done by either the POTW or by the Industry during each six month period. Note that the average flow should be reported in mgd.

Please note how the averages were calculated.

Some common options for completing the following spaces are:

\* \_\_\_\_\_ Average

Please indicate how averages were calculated:

The maximum of monthly averages

The maximum of quarterly averages

The 6-month average

BDL as: \_\_\_\_\_

Please indicate how averages were calculated:

DL for Detection Limit

1/2 for 1/2 Detection Limit

0 for zero

13. **Average Loading (lb/d) =>**  
For each parameter, (Flow, BOD, TSS, etc) enter the average daily loading (lb/d) calculated from monitoring done by either the POTW or by the Industry during each six month period. Note that the average flow should be reported in mgd. This entry is optional if the IUP permit limit is concentration based. The options used for the average (lb/d) loadings should be the same as the options used in the average concentration calculations above.

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14. % violations, (chronic SNC is  $\geq 66\%$ ) =>  
Refer to the SNC worksheet found in the compliance chapter and enter the % of violations here.
15. % TRC violations, (SNC is  $\geq 33\%$ ) =>  
Refer to the SNC worksheet found in the compliance chapter and enter the % of TRC violations here.

**The PAR-IDSF Forms  
are found on the next 3 pages:**









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### **Section B. Completing your PAR**

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**The PAR shall contain the following information in the following order.  
At this point you should have completed the first four sections:**

- 1. Narrative**
- 2. PPS**
- 3. SNCR**
- 4. IDSF**

- Completion of these sections should be very simple.**
- Just include copies of the following in your PAR:**

- => 5. Allocation Table**
- => 6. SIU Compliance Schedules, if any**
- => 7. Public Notices, if any**

**Section 8 of your PAR is usually not required  
The Division will request additional information if there is a specific need or concern.**

