

###### 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 Submittal Date 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 [ ] Nob. [ ] Yes [ ] No | a. [ ] Yes [ ] Nob. [ ] Yes [ ] No | a. [ ] Yes [ ] Nob. [ ] Yes [ ] No |
| 74. For 40 CFR 413 and 433 TTO Certification, Does File Contain a Toxic Organic Management Plan (TOMP)? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A |
| 75. a. Does File Contain Original Permit Review Letter from Division? b. All Issues Resolved? | a. [ ] Yes [ ] Nob.[ ] Yes[ ] No[ ] N/A | a. [ ] Yes [ ] Nob.[ ] Yes[ ] No[ ] N/A | a. [ ] Yes [ ] Nob.[ ] Yes[ ] No[ ] N/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? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A |
| 79. During Most Recent Semi-Annual Period, Did SIU submit all reports on time? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A |
| 80a. For categorical IUs with Combined Wastestream Formula (CWF), does file include process/dilution flows as Required by IUP? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A |
| 80b. For categorical IUs with Production based limits, does file include production rates and/or flows as Required by IUP? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/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? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/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.[ ] Yes[ ] No[ ] N/Ab.[ ] Yes[ ] No[ ] N/Ac.[ ] Yes[ ] No[ ] N/A | a.[ ] Yes[ ] No[ ] N/Ab.[ ] Yes[ ] No[ ] N/Ac.[ ] Yes[ ] No[ ] N/A | a.[ ] Yes[ ] No[ ] N/Ab.[ ] Yes[ ] No[ ] N/Ac.[ ] Yes[ ] No[ ] N/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.)? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A |
| 86. Does File Contain Penalty Assessment Notices? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A |
| 87. Does File Contain Proof Of Penalty Collection? | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A | [ ] Yes[ ] No[ ] N/A |
| 88. a. Does File Contain Any Current Enforcement Orders? b. Is SIU in Compliance with Order? | a.[ ] Yes[ ] No[ ] N/A b.[ ] Yes[ ] No[ ] N/A | a.[ ] Yes[ ] No[ ] N/A b.[ ] Yes[ ] No[ ] N/A | a.[ ] Yes[ ] No[ ] N/A b.[ ] Yes[ ] No[ ] N/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**