PAR Workshop 2022

February 9th, 2023

Compliance Judgment, SNC, and PARs
What Do I Do?

Presented by:
Division of Water Resources
NPDES Municipal Permitting Unit - Pretreatment

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Learn about and refresh yourself on:

- How to Judge SIU Compliance
- When are Industries Really Bad
- What needs to be in the PAR
- How to Fill Out All Those Forms
- Who, What, and Where to Publish
- What DWR Really Wants to See in a Narrative

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Today's Outline

1. Introduction-NPDES Requirement
2. Compliance Judgment
   - SNC Definition
   - SNC for Reporting/Permit Conditions
   - SNC for Limits Violations
   - Data Summary Form
   - Compliance Judgment Examples

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Today's Outline (cont.)

3. IDSF
4. SNCR Form
5. PPS Form
6. Narrative
7. Waste Reduction
8. Public Notice
9. Enforceable Compliance Schedules (Orders)
10. Allocation Table

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Introduction -NPDES Requirements

PART IV (from NPDES Permit)
OTHER REQUIREMENTS

D. <u>Pretreatment Program Requirements</u>

10. Pretreatment Annual Reports (PAR)

The permittee shall report to the Division in accordance with 15A NCAC 2H .0908. In lieu of submitting annual reports, Modified Pretreatment Programs developed under 15A NCAC 2H .0904 (b) may be required to meet with Division personnel periodically to discuss the enforcement of pretreatment requirements and other pretreatment implementation issues.

For all other active pretreatment programs, the permittee shall submit two copies of a Pretreatment Annual Report (PAR) describing its pretreatment activities over the previous twelve months to the Division at the following address:

NC DENR / Division of Water Resources / Surface Water Protection Section
Pretreatment, Emergency Response, and Collection Systems (PERCS) Unit
1617 Mail Service Center
RALEIGH, NC 27699-1617

Introduction -NPDES Requirements (cont.)

These reports shall be submitted by March 1 of each year and shall contain the following:

a.) Narrative

A narrative summary detailing actions taken, or proposed, by the Permittee to correct significant non-compliance and to ensure compliance with pretreatment requirements;

b.) Pretreatment Program Summary (PPS)

A pretreatment program summary (PPS) on forms or in a format provided by the Division;

c.) Significant Non-Compliance Report (SNCR)

A list of Industrial Users (IUs) in significant noncompliance (SNC) with pretreatment requirements, and the nature of the violations on forms or in a format provided by the Division;

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Introduction -NPDES Requirements (cont.)

d.) Industrial Data Summary Forms (IDSF)

Monitoring data from samples collected by both the POTW and the Significant Industrial Users (SIUs). These analytical results must be reported on Industrial Data Summary Forms (IDSF) or on other forms or in a format provided by the Division;

e.) Other Information

Copies of the POTW's allocation table, new or modified enforcement compliance schedules, public notice of IUs in SNC, a summary of data or other information related to significant noncompliance determinations for IUs that are not considered SIUs, and any other information, upon request, which in the opinion of the Director is needed to determine compliance with the pretreatment implementation requirements of this permit;

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Introduction – NC Pretreatment Rules

Introduction – NC Pretreatment Rules

- from 15A NCAC 2H .0908(b)

- Control Authorities with active approved pretreatment programs shall submit once per year a pretreatment report describing its pretreatment activities over the previous 12 months. Two copies of each pretreatment report shall be submitted to the Division by March 1 of each year for activities conducted for two six-month periods, January 1 through June 30 and July 1 through December 31 of the previous year. This annual report shall contain the following information in accordance with forms specified by the Division:

- (1) a narrative summary of actions taken by the control authority to ensure compliance with pretreatment requirements;
- (2) a pretreatment program summary on forms or in a format provided by the Division;

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Introduction - NC Pretreatment Rules (cont.)

- from 15A NCAC 2H .0908(b) (cont.)

- (3) A list of industrial users in significant noncompliance with pretreatment requirements, the nature of the violations, and actions taken or proposed to correct the violations; on forms or in a format provided by the Division;

- (4) An allocation table as described in Rule .0916(c)(4) listing permit information for all significant industrial users, including but not limited to permit limits, permit effective and expiration dates, and a comparison of total permitted flows and loads with Division approved maximum allowable loadings of the POTW, including flow, on forms or in a format provided by the Division;

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Introduction - NC Pretreatment Rules (cont.)

- from 15A NCAC 2H .0908(b) (cont)

- (5) Other information which in the opinion of the Division Director is needed to determine compliance with the implementation of the pretreatment program, including, but not limited to, significant industrial user compliance schedules, public notice of industrial users in significant noncompliance, a summary of significant industrial user effluent monitoring data as described in Paragraphs (a) and (e) of this Rule, a summary of information related to significant non-compliance determination for industrial users that are not considered significant industrial users, and Long or Short Term Monitoring Plan data on forms or in a format provided by the Division;

Introduction - NC Pretreatment Rules (cont.)

- 40 CFR 403.12(i) *Annual POTW reports*

(1) Updated list of SIUs (AT)

(2) Compliance status (SNCR)

(3) Summary of enforcement activities (PPS & narrative)

(4) Summary of program changes (narrative & program info sheet)

(5) Any other relevant information

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Compliance Judgment

Compliance Judgment

Detection of Violations of <u>ALL</u> Types:

1. **Limits**
2. **Reporting**
3. **Permit Conditions**

References:

- **DWR Approved Enforcement Response Plan (ERP) for Your POTW**
- ***Comprehensive Guide*, Chapter 7, Sections D and E**
- ***Comprehensive Guide*, Chapter 8**
- **PERCS web-site files "So your SIU has a limits violation-What do you do?" and "So your SIU has a reporting violation-What do you do?"**

Compliance Judgment – What must be done

- **POTW must identify all violations in a timely fashion as outlined in your ERP (preferably monthly).**
- **POTW must issue a Notice of Violation (NOV) for all violations.**
- **Significant Noncompliance (SNC) is a way of separating out the more significant violations for escalated enforcement action.**

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Compliance Judgment - What must be done (cont.)

- **POTW must do a SNC determination at a minimum of every six months.**
  - **It is strongly recommended that a preliminary SNC determination be done halfway through the six-month period, especially where there was SNC in the previous period.**

- **The SNC determination must be within 30 days of receiving all the data for that period.**

- **SNC determination and follow-up enforcement action for the January through June reporting period should be completed no later than September 1 of that same year.**

- **SNC Determination and follow-up enforcement action for the July through December reporting period should be completed no later than March 1 of the following year.**

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Compliance Judgment - What must be done (cont.)

Repeat SNCs

- **Repeat SNCs are a serious matter.**

- **If an Industry will be in SNC for a second consecutive period for the same parameter or requirement, the Division expects the POTW to take "appropriate action."**

- **The typical choices for "appropriate action" are:**
  1. **modify permit**
  2. **place SIU on an enforceable compliance schedule**
  3. **SIU ceases discharge (on their own or by order of POTW)**
  4. **SIU dropped from POTW's list of SIUs**

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Compliance Judgment - What must be done (cont.)

Repeat SNCs (cont.)

- **The POTW should make every effort to take the "appropriate action" before the end of the second consecutive SNC Period.**

- **In those special cases where this is not possible, take the "appropriate action" within two months after the end of that second period. If this is not done, the Division may take enforcement action against the POTW for failure to take adequate enforcement.**

- **Call DWR to discuss extenuating circumstances**

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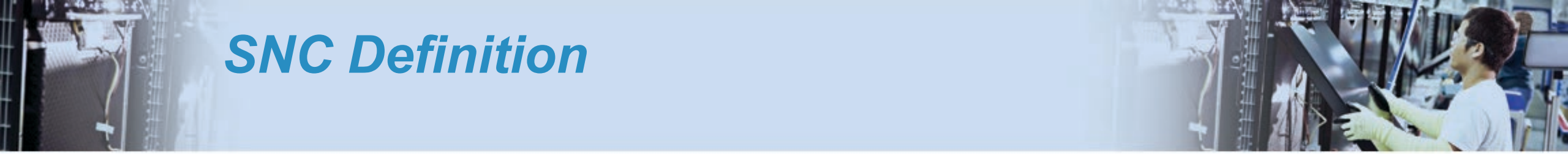
SNC Definition

SNC Definition



Significant Noncompliance is defined by 15A NCAC 2H .0903(b)(31) and Section 1.2(a)(35) of the NC Model Sewer Use Ordinance (SUO) as follows:

'Significant Noncompliance' or 'SNC' is the status of noncompliance of a significant industrial user when one or more of the following criteria are met:….

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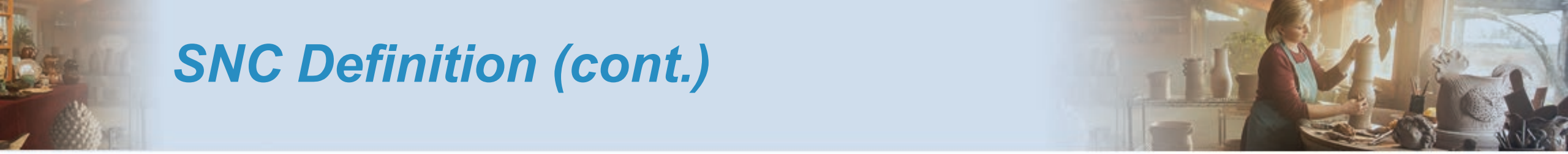
SNC Definition (cont.)



(A) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent or more of all the measurements taken for the same pollutant parameter (not including flow) during a six-month period exceed (by any magnitude) a numeric pretreatment standard or requirement including instantaneous limits, as defined by 40 CFR Part 403.3(l);

Chronic SNC is when 66% or more are > limit!

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SNC Definition (cont.)

(B) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent or more of the measurements taken for the same pollutant parameter (not including flow) during a six-month period equal or exceed the product of the numeric pretreatment standard or requirement, including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC; (TRC = 1.4 for BOD, TSS, fats, oil and grease, 1.2 for all other pollutants (except flow and pH));

TRC SNC is when 33% or more are > or = TRC value!

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SNC Definition (continued)

(C) Any other violation of a pretreatment standard or requirement as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative standard) that the control authority (or POTW, if different from the control authority) determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of POTW personnel or the general public);

(D) Any discharge of a pollutant or wastewater that has caused imminent endangerment to human health, welfare or to the environment or has resulted in either the control authority's or the POTW's, if different than the control authority, exercise of its emergency authority under 40 CFR Part 403.8(f)(1)(vi)(B) to halt or prevent such a discharge;

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SNC Definition (continued)

(E) Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a pretreatment permit or enforcement order for starting construction, completing construction, or attaining final compliance;

(F) Failure to provide, within 45 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, self-monitoring reports, and reports on compliance with compliance schedules;

(G) Failure to accurately report noncompliance;

(H) Any other violation or group of violations that the control authority or POTW determines will adversely affect the operation or implementation of the local pretreatment program.

Additionally, effective January 1, 2012, any industrial user which meets the criteria in Parts (C), (D), or (H) of this Subparagraph shall also be in SNC;

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Compliance Judgment for Reporting
(includes permit condition)

Applies to any kind of report or notification

- 1) Failure to collect self-monitoring samples
- 2) Failure to submit reports or follow permit conditions. Includes reports being late or incomplete as well as complete failure to submit report or follow IUP condition at all. Types of reports include but are not limited to:

✓sample results
✓flow monitoring reports
✓24 hour notification
✓resample and submit results within 30 days
✓properly operate pretreatment units
✓change in process
✓obtain Authorization to Construct
✓file application for IUP renewal
✓sludge management plans
✓slug/spill plans
✓TTO certification

SNC For Reporting/Permit Conditions

You only need to make this determination if there were violations

a) Miss due dates for compliance schedule milestones in IUP or order by more than 90 days

- Only required to apply this to due dates for:
  - starting construction,
  - completing construction, or
  - attaining final compliance
- Can be applied to other major one-time reports like slug/spill plans

SNC For Reporting/Permit Conditions (cont.)

b) Miss due date for report in IUP or order by more than 45 days

- Applies to due dates for reports such as:
  - Baseline monitoring reports,
  - 90-day compliance reports,
  - Self-monitoring reports, and
  - Reports on compliance with compliance schedules
- Can be applied to other routine reports like:
  - TTO certification
  - 24 hour notifications, and
  - Resampling

SNC For Reporting/Permit Conditions (cont.)

c) Inaccurately report noncompliance;

d) Any other violation or group of violations that the control authority or POTW determines will adversely affect the operation or implementation of the local pretreatment program.

SNC For Reporting/Permit Conditions (cont.)

- Completed on a Six-Month Basis, but really applies to each report

Examples:

1) An Industry is required by their IUP to sample monthly for 10 parameters and report the results to the POTW by the 20th day of the month following the month in which the samples were collected. The results of the samples collected in July, due August 20, are not received until October 23.

SNC For Reporting/Permit Conditions (cont.)

2) Industry fails to collect the required samples in November at all.

3) An Industry is required by their IUP to re-apply by February 1 (180 days before the IUP expires on August 1) and the application is not received until May 15.

Call DWR to discuss any extenuating circumstances

See Addendum for discussion and some examples of extenuating circumstances

SNC for Limits Violations

You only need to make this determination if there were violations

<u>SNC for Limits Categories</u>

a) Pass-through/Interference

b) Threat to Human Health, Welfare or the Environment

c) Emergency Suspension from such a Discharge

SNC for Limits Categories (cont.)

d) Chronic Violations (those that exceed limit by any quantity)

e) Technical Review Criteria (TRC) Violations
(those that equal or exceed an adjusted limit by any quantity)

- Limit * 1.4 for BOD, TSS, fats, oils, and grease
- Limit * 1.2 for all other parameters, except pH

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SNC for Limits Categories (cont.)

f) Any other violation or group of violations that the control authority or POTW determines will adversely affect the operation or implementation of the local pretreatment program.

SNC for Limits Violations (continued)

Completed on a Six Month Basis

Calculated For Each Limit

For Example:

An Industry has both a daily maximum concentration limit as well as a monthly average concentration limit for BOD. At the end of the six month period, when calculating SNC for the parameter of BOD, you judge SNC for BOD separately for the daily max and the monthly average limits. (Note: was effective as of January 1, 2012).

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SNC for Limits Violations (continued)

Forms Used For SNC

- Industrial Data Summary Forms (IDSF) or other forms or in a format provided by the Division;
- Compliance Judgment Worksheet (Ch. 7, *North Carolina Comprehensive Guidance for Pretreatment Programs*)

See Comp Guide for discussion of SNC for pH and flow, also see Addendum Questions 32-36 for more info on SNC evaluation for flow.

Other

- SNC for pH (no TRC required)
- SNC for Flow (flow is not a "pollutant")

See Addendum for discussion and some examples of extenuating circumstances.

Call DWR to discuss extenuating circumstances

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Data Summary Form

Sample Location: Will Plateit			FLOW	BOD				TSS				AMMONIA			
Sample Date	POTW or SIU Sample		MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/12	SIU	Spreadsheet Instructions: 1) Data entered only in Heavy Bordered cells. Rest of worksheet is protected, password is "2". 2) For below detection data, enter "<" in "<" column, and enter detection level in Influent or Effluent mg/l columns. Spreadsheet will auto-matically calculate averages and removal rates using 1/2 value entered.	0.0752												
7/24/12	POTW		0.0469												
8/7/12	SIU		0.0313												
8/23/12	SIU		0.0538												
9/3/12	SIU		0.079												
10/9/12	SIU		0.0676												
10/21/12	SIU		0.0681												
11/1/12	SIU		0.0657												
11/16/12	SIU		0.0678												
12/11/12	SIU		0.0292												
Column Averages =>			0.0585												
Maximum			0.0790												
Minimum			0.0292												

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Data Summary Form

Sample Location: Will Plateit		FLOW	ARSENIC				CADMIUM				CHROMIUM			
Sample Date	POTW or SIU Sample	MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/12	SIU	0.0752						0.042	0.042	0.0263		0.32	0.315	0.1976
7/24/12	POTW	0.0469						0.086	0.086	0.0336		0.53	0.532	0.2081
8/7/12	SIU	0.0313						0.087	0.087	0.0227		0.37	0.373	0.0974
8/23/12	SIU	0.0538						0.077	0.077	0.0345				
9/3/12	SIU	0.079						0.067	0.067	0.0441		0.82	0.818	0.5389
10/9/12	SIU	0.0676						0.089	0.089	0.0502		0.23	0.231	0.1302
10/21/12	SIU	0.0681						0.076	0.076	0.0432				
11/1/12	SIU	0.0657						0.091	0.091	0.0499		0.21	0.206	0.1129
11/16/12	SIU	0.0678						0.069	0.069	0.0390				
12/11/12	SIU	0.0292						0.057	0.057	0.0139		0.72	0.721	0.1756
Column Averages =>		0.0585							0.0741	0.0357			0.4566	0.2087
Maximum		0.0790							0.0910	0.0502			0.8180	0.5389
Minimum		0.0292							0.0420	0.0139			0.2060	0.0974

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Data Summary Form

Sample Location:		FLOW	COPPER				CYANIDE				LEAD			
Will Plateit														
Sample Date	POTW or SIU Sample	MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/12	SIU	0.0752		1.71	1.713	1.0743	<	0.01	0.005	0.0031		0.02	0.02	0.0125
7/24/12	POTW	0.0469		1.12	1.121	0.4385	<	0.01	0.005	0.0020		0.10	0.1	0.0391
8/7/12	SIU	0.0313		1.32	1.321	0.3448	<	0.01	0.005	0.0013		0.03	0.03	0.0078
8/23/12	SIU	0.0538												
9/3/12	SIU	0.079		0.86	0.862	0.5679	<	0.01	0.005	0.0033	<	0.01	0.005	0.0033
10/9/12	SIU	0.0676		0.78	0.781	0.4403	<	0.01	0.005	0.0028		0.01	0.01	0.0056
10/21/12	SIU	0.0681												
11/1/12	SIU	0.0657		0.93	0.927	0.5079	<	0.01	0.005	0.0027		0.09	0.09	0.0493
11/16/12	SIU	0.0678												
12/11/12	SIU	0.0292		1.53	1.531	0.3728	<	0.01	0.005	0.0012		0.07	0.07	0.0170
Column Averages =>		0.0585			1.1794	0.5352			0.0050	0.0024			0.0464	0.0193
Maximum		0.0790			1.7130	1.0743			0.0050	0.0033			0.1000	0.0493
Minimum		0.0292			0.7810	0.3448			0.0050	0.0012			0.0050	0.0033

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Data Summary Form

Sample Location: Will Plateit		FLOW	MERCURY				MOLYBDENUM				NICKEL			
Sample Date	POTW or SIU Sample	MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/12	SIU	0.0752	<	0.0002	0.0001	0.00006						1.98	1.98	1.2418
7/24/12	POTW	0.0469	<	0.0002	0.0001	0.00004						1.64	1.64	0.6415
8/7/12	SIU	0.0313	<	0.0002	0.0001	0.00003						2.86	2.86	0.7466
8/23/12	SIU	0.0538										2.02	2.02	0.9064
9/3/12	SIU	0.079	<	0.0002	0.0001	0.00007						1.72	1.72	1.1332
10/9/12	SIU	0.0676	<	0.0002	0.0001	0.00006						3.03	3.03	1.7083
10/21/12	SIU	0.0681										2.52	2.52	1.4312
11/1/12	SIU	0.0657	<	0.0002	0.0001	0.00005						2.38	2.38	1.3041
11/16/12	SIU	0.0678										1.57	1.57	0.8878
12/11/12	SIU	0.0292	<	0.0002	0.0001	0.00002						1.79	1.79	0.4359
Column Averages =>		0.0585			0.000100	0.000047							2.1510	1.0437
Maximum		0.0790			0.000100	0.000066							3.0300	1.7083
Minimum		0.0292			0.000100	0.000024							1.5700	0.4359

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Data Summary Form

Sample Location: Will Plateit		FLOW	SELENIUM				SILVER				ZINC			
Sample Date	POTW or SIU Sample	MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/05	SIU	0.0752					<	0.005	0.0025	0.0016		1.02	1.02	0.6397
7/24/05	POTW	0.0469					<	0.005	0.0025	0.0010		1.10	1.1	0.4303
8/7/05	SIU	0.0313					<	0.005	0.0025	0.0007		1.31	1.31	0.3420
8/23/05	SIU	0.0538												
9/3/05	SIU	0.079					<	0.005	0.0025	0.0016		0.78	0.78	0.5139
10/9/05	SIU	0.0676					<	0.005	0.0025	0.0014		0.91	0.91	0.5130
10/21/05	SIU	0.0681												
11/1/05	SIU	0.0657					<	0.005	0.0025	0.0014		0.96	0.96	0.5260
11/16/05	SIU	0.0678												
12/11/05	SIU	0.0292					<	0.005	0.0025	0.0006		0.71	0.71	0.1729
olumn Averages =>		0.0585							0.0025	0.0012			0.9700	0.4483
Maximum		0.0790							0.0025	0.0016			1.3100	0.6397
Minimum		0.0292							0.0025	0.0006			0.7100	0.1729

Data Summary Form

Sample Location: Will Plateit		FLOW	OIL & GREASE				Phosphorus							
Sample Date	POTW or SIU Sample	MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/05	SIU	0.0752						21	21	13.1705				
7/24/05	POTW	0.0469						20	20	7.8229				
8/7/05	SIU	0.0313						19	19	4.9598				
8/23/05	SIU	0.0538												
9/3/05	SIU	0.079						15	15	9.8829				
10/9/05	SIU	0.0676						21	21	11.8395				
10/21/05	SIU	0.0681												
11/1/05	SIU	0.0657						16	16	8.7670				
11/16/05	SIU	0.0678												
12/11/05	SIU	0.0292						23	23	5.6011				
Column Averages =>		0.0585							19.2857	8.8634				
Maximum		0.0790							23.0000	13.1705				
Minimum		0.0292							15.0000	4.9598				

Examples

Example 1

- WillPlateit Metal Finishers
- 1st 6-month period
- Cadmium

IUP, Part I, Section F:

Effluent Limits and Monitoring Requirements:

The permittee may discharge from this specific pipe number according to these

Receiving POTW name =>	Typicalville	IU name =>	Will Plateit
Receiving POTW NPDES # =>	NC0012345	IUP # =>	006
Effective date for these Limits =>	6/30/2011	Pipe # =>	001
Expiration date for these Limits =>	12/30/15	40 CFR # =>	433.17
		if not applicable put N/A	

THE LIMITS ON THIS PAGE ARE, (Check one below):

LIMITS for ENTIRE permit period =>	Yes
INTERIM Limits for period # 1 =>	No
INTERIM Limits for period # 2 =>	No
FINAL Limits Page =>	No

	CONVENTIONAL PARAMETERS	Concentration Limits Daily Max	Concentration Limits Monthly Avg.	Concentration Limits Units	Mass-Based Limits Daily Max	Mass-Based Limits Monthly Avg	Mass-Based Limits Units	Monitoring Frequency by Industry	Monitoring Frequency by POTW	Sample Collection Method (C or G)	Required Laboratory Detection Limits
1.	Flow	0.098		MGD			MGD	Monthly	Once/6 Months	Metered	
2.				mg/l			lbs/day				
3.				mg/l			lbs/day				
4.	temperature			Deg. C			Deg. C				
5.	pH			Std. Units			Std. Units				
	OTHER PARAMETERS, Please list alphabetically										
6.	Cadmium	0.07		mg/l			lbs/day	Monthly	Once/6 Months	C	0.002
7.	Chromium	1.71		mg/l			lbs/day	Monthly	Once/6 Months	C	0.005
8.	Copper	2.07		mg/l			lbs/day	Monthly	Once/6 Months	C	0.002
9.	Cyanide	0.01		mg/l			lbs/day	Monthly	Once/6 Months	G	0.01
10.	Lead	0.43		mg/l			lbs/day	Monthly	Once/6 Months	C	0.01
11.	Mercury	0.0002		mg/l			lbs/day	Monthly	Once/6 Months	C	0.0002
12.	Nickel	2.38		mg/l			lbs/day	Monthly	Once/6 Months	C	0.01
13.	Phosphorous	30		mg/l			lbs/day	Monthly	Once/6 Months	C	0.05
14.	Silver	0.24		mg/l			lbs/day	Monthly	Once/6 Months	C	0.005
15.	Zinc	1.48		mg/l			lbs/day	Monthly	Once/6 Months	C	0.01
16.	TTO	2.13*		mg/l			lbs/day	Once/6 Months		G	0.005
17.				mg/l			lbs/day				
18.				mg/l			lbs/day				
19.				mg/l			lbs/day				
20.				mg/l			lbs/day				

*See Special Conditions, Part III

(See next section, IUP, PART I, Section G.) for Definitions and Limit Page(s) notes:

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *1/1/2012-6/30/12*	

See next page for definitions

Daily Max. or ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: _____ * 1.2 or 1.4 = TRC Daily Limit: ____ mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: ____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if below limit, "1" if at or above, tally at bottom as "

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*1/7/12*	*.0691*	*.059*						
P	*2/1/12*	*.0543*	*.060*						
I	*2/4/12*	*.0783*	*.062*						
I	*3/6/12*	*.0796*	*.096*						
I	*3/22/12*	*.0748*	*.102*						
I	*4/2/12*	*.0667*	*.083*						
I	*4/17/12*	*.0612*	*.082*						
I	*5/1/12*	*.0342*	*.078*						
I	*5/16/12*	*.0589*	*.079*						
I	*6/3/12*	*.0547*	*.064*						
I	*6/18/12*	*.0693*	*.080*						
I	*6/30/12*	*.0712*	*.076*						

List these Totals on next page => A = B = C=

Count- The number of daily or the number of average sample values used for checking compliance. (Daily values for this example)

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *1/1/2012-6/30/12*	

See next page for definitions

Daily Max. or ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: *.07* * 1.2 or 1.4 = TRC Daily Limit: *.084* mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: ____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*1/7/12*	*.0691*	*.059*				*1*		
P	*2/1/12*	*.0543*	*.060*				*1*		
I	*2/4/12*	*.0783*	*.062*				*1*		
I	*3/6/12*	*.0796*	*.096*				*1*		
I	*3/22/12*	*.0748*	*.102*				*1*		
I	*4/2/12*	*.0667*	*.083*				*1*		
I	*4/17/12*	*.0612*	*.082*				*1*		
I	*5/1/12*	*.0342*	*.078*				*1*		
I	*5/16/12*	*.0589*	*.079*				*1*		
I	*6/3/12*	*.0547*	*.064*				*1*		
I	*6/18/12*	*.0693*	*.080*				*1*		
I	*6/30/12*	*.0712*	*.076*				*1*		

List these Totals on next page => A = 12 | B = | C=

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *1/1/2012-6/30/12*	

See next page for definitions

Daily Max. or ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: *.07* * 1.2 or 1.4 = TRC Daily Limit: *.084* mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if at or below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*1/7/12*	*.0691*	*.059*				*1*	*0*	
P	*2/1/12*	*.0543*	*.060*				*1*	*0*	
I	*2/4/12*	*.0783*	*.062*				*1*	*0*	
I	*3/6/12*	*.0796*	*.096*				*1*	*1*	
I	*3/22/12*	*.0748*	*.102*				*1*	*1*	
I	*4/2/12*	*.0667*	*.083*				*1*	*1*	
I	*4/17/12*	*.0612*	*.082*				*1*	*1*	
I	*5/1/12*	*.0342*	*.078*				*1*	*1*	
I	*5/16/12*	*.0589*	*.079*				*1*	*1*	
I	*6/3/12*	*.0547*	*.064*				*1*	*0*	
I	*6/18/12*	*.0693*	*.080*				*1*	*1*	
I	*6/30/12*	*.0712*	*.076*				*1*	*1*	

List these Totals on next page => A = 12 | B = 8 | C=

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *1/1/2012-6/30/12*	

See next page for definitions

Daily Max. or ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: *.07* * 1.2 or 1.4 = TRC Daily Limit: *.084* mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*1/7/12*	*.0691*	*.059*				*1*	*0*	*0*
P	*2/1/12*	*.0543*	*.060*				*1*	*0*	*0*
I	*2/4/12*	*.0783*	*.062*				*1*	*0*	*0*
I	*3/6/12*	*.0796*	*.096*				*1*	*1*	*1*
I	*3/22/12*	*.0748*	*.102*				*1*	*1*	*1*
I	*4/2/12*	*.0667*	*.083*				*1*	*1*	*0*
I	*4/17/12*	*.0612*	*.082*				*1*	*1*	*0*
I	*5/1/12*	*.0342*	*.078*				*1*	*1*	*0*
I	*5/16/12*	*.0589*	*.079*				*1*	*1*	*0*
I	*6/3/012*	*.0547*	*.064*				*1*	*0*	*0*
I	*6/18/12*	*.0693*	*.080*				*1*	*1*	*0*
I	*6/30/12*	*.0712*	*.076*				*1*	*1*	*0*

List these Totals on next page => A = 12 | B = 8 | C= 2

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry SNC determination for Flow optional, see Section 7-E Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *1/1/2012-6/30/12*	

SIGNIFICANT NON-COMPLIANCE **(SNC)** LIMITS DETERMINATION	Calculate % and Circle Answers

1) Calculate the % of Regular violations: B/A = *66.7%*
2) Is B/A greater than or equal to 0.66 (or 66 %) ? *8/12* Chronic violator? (Yes) / No

3) Calculate the % of TRC Violations: C/A = *16.7%*
4) Is C/A greater than or equal to 0.33 (or 33 %) ? *2/12* TRC Violator? (Yes) / No

5) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / (No)

Per ORC

6) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / (No)

7) If the answer to <u>any</u> of these questions is <u>yes</u>, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for <u>this six month period</u>? CIRCLE ONE: YES (NO)

Was the SIU in SNC for THE SAME PARAMETER in the <u>previous six month compliance period</u>? CIRCLE ONE: YES (NO)

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

- Consent Order with Enforceable schedule;
- Administrative Order with Enforceable schedule;or
- Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Definitions:

Count, The number of daily sample data values or the number of average of sampling events used for checking compliance with average limits.

TRC Technical Review Criteria, Multiply the actual IUP limits by the proper TRC Criteria value to get a TRC Limit:

- TRC Criteria = 1.4 for BOD, TSS, oil, fat, grease
- TRC Criteria = 1.2 for all other pollutants

Not required to perform TRC compliance judgment for pH.

SNCR Significant Non-Compliance Report

SNC Significant Non-Compliance

Example 2

- WillPlateit Metal Finishers
- 2nd 6-month period
- Cadmium

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period:*7/1/2012-12/31/12*	

See next page for definitions

Daily Max. or ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: _____ * 1.2 or 1.4 = TRC Daily Limit: ____ mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: ____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*7/17/12*	*.0752*	*.042*						
P	*7/24/12*	*.0469*	*.086*						
I	*8/7/12*	*.0313*	*.087*						
I	*8/23/12*	*.0538*	*.077*						
I	*9/3/12*	*.0790*	*.067*						
I	*10/9/12*	*.0676*	*.089*						
I	*10/21/12*	*.0681*	*.076*						
I	*11/1/12*	*.0657*	*.091*						
I	*11/16/12*	*.0678*	*.069*						
I	*12/17/12*	*.0292*	*.057*						

List these Totals on next page => A = B = C=

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *7/1/2012-12/31/12*	

See next page for definitions

Daily Max. or ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: *.07* * 1.2 or 1.4 = TRC Daily Limit: *.084* mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: ____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*7/17/12*	*.0752*	*.042*				*1*		
P	*7/24/12*	*.0469*	*.086*				*1*		
I	*8/7/12*	*.0313*	*.087*				*1*		
I	*8/23/12*	*.0538*	*.077*				*1*		
I	*9/3/12*	*.0790*	*.067*				*1*		
I	*10/9/12*	*.0676*	*.089*				*1*		
I	*10/21/12*	*.0681*	*.076*				*1*		
I	*11/1/12*	*.0657*	*.091*				*1*		
I	*11/16/12*	*.0678*	*.069*				*1*		
I	*12/17/12*	*.0292*	*.057*				*1*		

List these Totals on next page => A = 10 | B = | C=

Compliance Judgement Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *7/1/2012-12/31/12*	

See next page for definitions

Daily Max. or ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: *.07* * 1.2 or 1.4 = TRC Daily Limit: *.084* mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*7/17/12*	*.0752*	*.042*				*1*	*0*	
P	*7/24/12*	*.0469*	*.086*				*1*	*1*	
I	*8/7/12*	*.0313*	*.087*				*1*	*1*	
I	*8/23/12*	*.0538*	*.077*				*1*	*1*	
I	*9/3/12*	*.0790*	*.067*				*1*	*0*	
I	*10/9/12*	*.0676*	*.089*				*1*	*1*	
I	*10/21/12*	*.0681*	*.076*				*1*	*1*	
I	*11/1/12*	*.0657*	*.091*				*1*	*1*	
I	*11/16/12*	*.0678*	*.069*				*1*	*0*	
I	*12/17/12*	*.0292*	*.057*				*1*	*0*	

List these Totals on next page => A = 10 | B = 6 | C=

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry | SNC determination for Flow optional, see Section 7-E | Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *7/1/2012-12/31/12*	

See next page for definitions

Daily Max. or ____Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to each individual Limit

Daily Maximum Limit: *.07* * 1.2 or 1.4 = TRC Daily Limit: *.084* mg/l or lbs/day

_____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above,put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above,put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	*7/17/12*	*.0752*	*.042*				*1*	*0*	*0*
P	*7/24/12*	*.0469*	*.086*				*1*	*1*	*1*
I	*8/7/12*	*.0313*	*.087*				*1*	*1*	*1*
I	*8/23/12*	*.0538*	*.077*				*1*	*1*	*0*
I	*9/3/12*	*.0790*	*.067*				*1*	*0*	*0*
I	*10/9/12*	*.0676*	*.089*				*1*	*1*	*1*
I	*10/21/12*	*.0681*	*.076*				*1*	*1*	*0*
I	*11/1/12*	*.0657*	*.091*				*1*	*1*	*1*
I	*11/16/12*	*.0678*	*.069*				*1*	*0*	*0*
I	*12/17/12*	*.0292*	*.057*				*1*	*0*	*0*

List these Totals on next page => A = 10 B = 6 C= 4

Compliance Judgement Worksheet For SNC With Limits

Use separate sheets for each Industry SNC determination for Flow optional, see Section 7-E Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*	IUP Number: *0006*	Pipe Number: *0001*
Parameter: *Cadmium*	Six Month SNC Determination Period: *7/1/2012-12/31/12*	

SIGNIFICANT NON-COMPLIANCE **(SNC)** LIMITS DETERMINATION	Calculate % and Circle Answers

60.0%

1) Calculate the % of Regular violations: *6/10* B/A = _____
2) Is B/A greater than or equal to 0.66 (or 66 %) ? Chronic violator? Yes / (No)

3) Calculate the % of TRC Violations: C/A = _____
4) Is C/A greater than or equal to 0.33 (or 33 %) ? *4/10* TRC Violator? *40.0%* (Yes) / No

5) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / (No)

6) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / (No)

Per ORC

7) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: YES (NO)

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: YES (NO)

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Now What?

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

- Consent Order with Enforceable schedule;
- Administrative Order with Enforceable schedule;
- Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Definitions:

Count, The number of daily sample data values or the number of average of sampling events used for checking compliance with average limits.

TRC Technical Review Criteria, Multiply the actual IUP limits by the proper TRC Criteria value to get a TRC Limit:

TRC Criteria = 1.4 for BOD, TSS, oil, fat, grease
TRC Criteria = 1.2 for all other pollutants

Not required to perform TRC compliance judgment for pH.

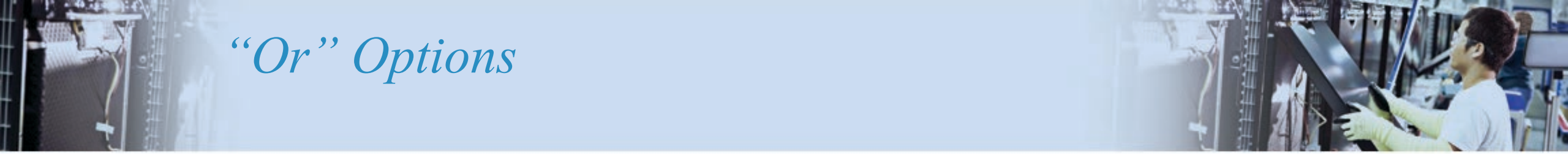
SNCR Significant Non-Compliance Report

SNC Significant Non-Compliance

"Or" (separate)

As of 1/1/2012 NC will use "or". Compliance for daily max & monthly (or other) average limits judged separately.

Potential for more SNC.



"Or" Options

1. Keep same daily max & monthly average limits
   a. No change to allocation table
   b. Have to perform SNC calculations treating daily & monthly limits separately
      a. Some POTWs may have to revise compliance judgment programs
   c. May cause more SIU violations and SNC
2. Remove monthly avg. Daily max = old monthly avg
   a. No change to allocation table
   b. Simplifies compliance judgment
   c. May cause more SIU violations and SNC

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"Or" Options

3. Remove monthly average limit and keep daily max limit
    a. Have to use higher daily max limit in allocation table.

May reduce reserve; may cause over allocation.

    b. Simplifies compliance judgment
    c. Should not create more violations

Note: Options 2 &3 may not be available for some categorical SIUs. Contact PERCS to discuss.

Data Summary Form as Limits Compliance Judgment Worksheet

Sample Location: Will Plateit		FLOW	ARSENIC				CADMIUM				CHROMIUM			
Sample Date	POTW or SIU Sample	MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/12	SIU	0.0752						0.042	0.042	0.0263		0.32	0.315	0.1976
7/24/12	POTW	0.0469						0.086	0.086	0.0336		0.53	0.532	0.2081
8/7/12	SIU	0.0313						0.087	0.087	0.0227		0.37	0.373	0.0974
8/23/12	SIU	0.0538						0.077	0.077	0.0345				
9/3/12	SIU	0.079						0.067	0.067	0.0441		0.82	0.818	0.5389
10/9/12	SIU	0.0676						0.089	0.089	0.0502		0.23	0.231	0.1302
10/21/12	SIU	0.0681						0.076	0.076	0.0432				
11/1/12	SIU	0.0657						0.091	0.091	0.0499		0.21	0.206	0.1129
11/16/12	SIU	0.0678						0.069	0.069	0.0390				
12/11/12	SIU	0.0292						0.057	0.057	0.0139		0.72	0.721	0.1756
Column Averages =>		0.0585							0.0741	0.0357			0.4566	0.2087
Maximum		0.0790							0.0910	0.0502			0.8180	0.5389
Minimum		0.0292							0.0420	0.0139			0.2060	0.0974

10 daily samples

6 Viol = 6/10 =60%

4 TRC = 4/10 = 40%

Limit = 0.07 mg/l

TRC = 0.084

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Industrial Data Summary Form (IDSF)

Industrial Data Summary Form (IDSF)

- **Summarizes <u>All</u> Data Collected for an Industry**
  - 1) SIU and POTW Sampling for Limited Parameters
  - 2) SIU and POTW Sampling for "Monitoring Only" Parameters
- **Required to Complete a Separate IDSF for Each Pipe at Each SIU**
- **You May Use Your Own Form with Prior Division Approval of the Form**

NORTH CAROLINA
Department of Environmental Quality

Industrial Data Summary Form (IDSF)

- **For Each Parameter, Include at Least One of the Following:**
  1) Maximum Concentration
  2) Maximum Loading
  3) Average Concentration
     - Specifying what type of average
     - If BDL, ½BDL, or 0 was used
  4) Average Loading

If readily available, the Division prefers both maximum and average values

NORTH CAROLINA
Department of Environmental Quality

Industrial Data Summary Form (IDSF)

- Blank sections indicate that there was no monitoring performed for particular parameter during a six-month period.

- For “monitoring only” parameters, list “N/A” for not applicable in the % violations and % TRC violations rows (<u>do not</u> list “0”)

NORTH CAROLINA
Department of Environmental Quality

IDSF for SIUs with both daily and average limits

Pretreatment Annual Report (PAR)
Industrial Data Summary Form
(IDSF)
Use separate forms for each industry/pipe

Control Authority, Town Name =>	Typicalville		Industry Name	Chicken Pluckers, Inc.	
WWTP Name =>	Typicalville WWTP		IUP #	0008	
NPDES # =>	NC0012345		Pipe #	001	
1st 6 months, dates =>	1/1/2012	to 6/30/2012			
2nd 6 months, dates =>	7/1/2012	to 12/31/2012			

		Flow, mgd		BOD		TSS		Ammonia	
		1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>		121	123	13	32	13	27	1	1
* Maximum (mg/l) =>		0.712 mgd	0.806 mgd	725	587	162	114	23.6	14.60
* or Maximum (lb/d) =>				4,220	2448	960	703.6	168.28	103.99
* or 6 month using BDL Average (mg/l) =>		0.586 mgd	0.613 mgd	445	304	142	47	23.6	14.60
* or Average Loading (lb/d) =>				2,175	1554	694	274.00	168.28	103.99
% violations, (chronic SNC is >= 66%) =>	Daily	0	0	15.4	3.1	0	0	N/A	N/A
% TRC violations, (SNC is >= 33 %) =>	Daily	0	0	7.7	0	0	0	N/A	N/A
% violations, (chronic SNC is >= 66%) =>	Monthly	N/A	N/A	100	33.3	0	0	N/A	N/A
% TRC violations, (SNC is >= 33 %) =>	Monthly	N/A	N/A	66.7	0	0	0	N/A	N/A

		Oil & Grease		Zinc		pH	
		1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>		7	7	1	1	13	27
* Maximum (mg/l) =>		25.5	62.1	0.11	0.08	5.0/9.75	6.5/9.5
* or Maximum (lb/d) =>		170.14	447.48	0.6752	0.5698		
* or 6 month using BDL Average (mg/l) =>		11.75	27	0.11	0.08		
* or Average Loading (lb/d) =>		79.8	189.69	0.6752	0.5698		
% violations, (chronic SNC is >= 66%) =>	Daily	0	0	N/A	N/A	15.4	0
% TRC violations, (SNC is >= 33 %) =>	Daily	0	0	N/A	N/A	N/A	N/A
% violations, (chronic SNC is >= 66%) =>	Monthly	N/A	N/A	N/A	N/A	N/A	N/A
% TRC violations, (SNC is >= 33 %) =>	Monthly	N/A	N/A	N/A	N/A	N/A	N/A

* POTW must enter at least one of these four rows, Please indicate how averages were calculated
Avg period could be month, Qtr, or 6-month & if BDL, 1/2BDL, or zero val

BDL => Below Detection Limit
IUP => Industrial User Permit
SNC => Significant Non-Comp
TRC => Technical Review Crite

mg/l => milligrams per liter
lb/d => pounds per day

N/A because no IUP Limit for these Parameters

Pretreatment Annual Report (PAR)
Industrial Data Summary Form (IDSF)

Use separate forms for each industry/pipe
Enter BDL values as < (value)

Control Authority,			Industry	
Town Name =>	Typicalville		Name	Slugem Hosiery Mill, Inc.
WWTP Name =>	Typicalville WWTP		IUP #	0007
NPDES # =>	NC0012345		Pipe #	001
1st 6 months, dates =>	1/1/2012	to 6/30/12		
2nd 6 months, dates =>	7/1/2012	to 12/31/12		

	Flow, mgd		BOD		TSS		Ammonia	
	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>	12	10	12	10	7	7		1
* Maximum (mg/l) =>	0.248 mgd	0.358 mgd	177	325	367	330		5.4
* or Maximum (lb/d) =>			342.62	737.26	752.96	864.19	not	15.23
* or 6 month using BDL Average (mg/l) =>	0.197 mgd	0.313 mgd	157	226	0.252	218	required	5.4
* or Average Loading (lb/d) =>			257.34	571.23	431.18	549.46		15.23
% violations,(chronic SNC is >= 66%) =>	0	0	0	0	0	0		N/A
% TRC violations, (SNC is >= 33 %) =>	0	0	0	0	0	0		N/A

	Chromium		Copper		Mercury		Zinc	
	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>	8	8	8	7		1	7	7
* Maximum (mg/l) =>	0.48	0.460	0.49	0.49		0.0002	0.187	0.501
* or Maximum (lb/d) =>	0.863	1.3730	0.94	1.314	not	0.0006	0.359	1.32
* or 6 month using BDL Average (mg/l) =>	0.407	0.390	0.393	0.383	required	0.0002	0.162	0.359
* or Average Loading (lb/d) =>	0.693	1.0190	0.667	0.999		0.0006	0.266	0.935
% violations, (chronic SNC is >= 66%) =>	12.5	0	12.5	0		N/A	0	0
% TRC violations, (SNC is >= 33 %) =>	0	0	0	0		N/A	0	0

	Oil & Grease		MBAS		Phosphorous	
	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>	7	7		1		
* Maximum (mg/l) =>	75.9	79		0.12		
* or Maximum (lb/d) =>	124.33	205	not	0.358		
* or 6 month using BDL Average (mg/l) =>	45.5	62.78	required	0.12		
* or Average Loading (lb/d) =>	66.9	161.6		0.358		
% violations, (chronic SNC is >= 66%) =>	0	0		N/A		
% TRC violations, (SNC is >= 33 %) =>	0	0		N/A		

Why was this data not required? Discuss in narrative.

* POTW must enter at least one of these four rows, Please indicate how averages were calculated
Avg period could be month, Qtr, or 6-month & if BDL , 1/2BDL, or zero value

BDL => Below Detection Limit
IUP => Industrial User Permit
SNC => Significant Non-Compliance
TRC => Technical Review Criteria

mg/l => milligrams per liter
lb/d => pounds per day
mgd => million gallons per day
WWTP => wastewater treatment plant

Pretreatment Annual Report (PAR)
Industrial Data Summary Form (IDSF)

Use separate forms for each industry/pipe
Enter BDL values as < (value)

Control Authority,			Industry	
Town Name =>	Typicalville		Name	Will Plateit Metal Finishing, Inc.
WWTP Name =>	Typicalville WWTP		IUP #	0006
NPDES # =>	NC0012345		Pipe #	001
1st 6 months, dates =>	1/1/2012	to 6/30/12		
2nd 6 months, dates =>	7/1/2012	to 12/31/12		

	Flow, mgd		Cadmium		Chromium		Copper	
	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>	12	10	12	10	7	7	7	7
* Maximum (mg/l) =>	0.0796 mgd	0.079 mgd	0.102	0.091	0.012	0.023	1.43	1.830
* or Maximum (lb/d) =>			0.0637	0.050	0.0063	0.0095	0.7836	0.7146
* or 6 month using BDL Average (mg/l) =>	0.0644 mgd	0.0585 mgd	0.077	0.074	0.008	0.010	1.089	1.245
* or Average Loading (lb/d) =>			0.042	0.036	0.0037	0.004	0.5238	0.506
% violations,(chronic SNC is >= 66%) =>	0	0	66.7	60	0	0	0	0
% TRC violations, (SNC is >= 33 %) =>	0	0	16.7	40	0	0	0	0

	Cyanide		Lead		Mercury		Nickel	
	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>	7	7	7	7		7	7	10
* Maximum (mg/l) =>	0.005	0.005	0.027	0.013		0.0002	2.52	3.03
* or Maximum (lb/d) =>	0.0033	0.0033	0.0171	0.0067	Not	0.00013	1.4034	1.7083
* or 6 month using BDL Average (mg/l) =>	0.005	0.005	0.021	0.011	Required	0.0002	1.735	2.15
* or Average Loading (lb/d) =>	0.0024	0.0021	0.0104	0.0043		0.00013	0.8713	1.0490
% violations, (chronic SNC is >= 66%) =>	0	0	0	0		0	14.3	30
% TRC violations, (SNC is >= 33 %) =>	0	0	0	0		0	0	20

	Silver		Zinc		Phosphorous		TTO	
	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months	1st 6 months	2nd 6 months
Total # of samples =>	7	7	7	7	7	7		
* Maximum (mg/l) =>	0.173	0.171	0.407	0.487	3.84	3.05	*Certifies for TTO as	
* or Maximum (lb/d) =>	0.114	0.114	0.2682	0.2198	2.321	1.2677	Not Being Present	
* or 6 month using BDL Average (mg/l) =>	0.125	0.124	0.369	0.34	2.608	2.622		
* or Average Loading (lb/d) =>	0.064	0.0549	0.1802	0.1339	1.2099	1.0338		
% violations, (chronic SNC is >= 66%) =>	0	0	0	0	0	0		
% TRC violations, (SNC is >= 33 %) =>	0	0	0	0	0	0		

* POTW must enter at least one of these four rows, Please indicate how averages were calculated
Avg period could be month, Qtr, or 6-month & if BDL , 1/2BDL, or zero value

BDL => Below Detection Limit
IUP => Industrial User Permit
SNC => Significant Non-Compliance
TRC => Technical Review Criteria

mg/l => milligrams per liter
lb/d => pounds per day
mgd => million gallons per day
WWTP => wastewater treatment plant

Data Summary Form as IDSF

Limit = 0.07 mg/l

TRC = 0.084

Sample Location: Will Plateit		FLOW	ARSENIC				CADMIUM				CHROMIUM			
Sample Date	POTW or SIU Sample	MGD	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day	<	mg/L	Used in Calculation	Calculated lbs/day
7/17/12	SIU	0.0752						0.042	0.042	0.0263		0.32	0.315	0.1976
7/24/12	POTW	0.0469					⊗⊗	0.086	0.086	0.0336		0.53	0.532	0.2081
8/7/12	SIU	0.0313					⊗⊗	0.087	0.087	0.0227		0.37	0.373	0.0974
8/23/12	SIU	0.0538					⊗	0.077	0.077	0.0345				
9/3/12	SIU	0.079						0.067	0.067	0.0441		0.82	0.818	0.5389
10/9/12	SIU	0.0676					⊗⊗	0.089	0.089	0.0502		0.23	0.231	0.1302
10/21/12	SIU	0.0681					⊗	0.076	0.076	0.0432				
11/1/12	SIU	0.0657					⊗⊗	0.091	0.091	0.0499		0.21	0.206	0.1129
11/16/12	SIU	0.0678						0.069	0.069	0.0390				
12/11/12	SIU	0.0292						0.057	0.057	0.0139		0.72	0.721	0.1756
Column Averages =>		0.0585						0.0741	0.0357			0.4566	0.2087	
Maximum		0.0790						0.0910	0.0502			0.8180	0.5389	
Minimum		0.0292						0.0420	0.0139			0.2060	0.0974	

10 daily samples

6 Viol = 6/10 =60%

4 TRC = 4/10 = 40%

Significant Non-Compliance Report (SNCR)

Significant Non-Compliance Report (SNCR)

- List all IUs in SNC with any IUP requirement for the PAR Year
  1) Limits Violations
  2) Pass-Through and Interference
  3) SNC for Reporting and/or IUP Conditions

- Remember to attach copy of Historical SNC Report so DWR can review for repeat SNCs

- POTW must still take that appropriate enforcement or other action for SIUs that will be in SNC for a second consecutive six-month period

- Remember, repeat SNCs are a serious matter.

Pretreatment Annual Report (PAR)
Significant Non-Compliance Report (SNCR)

PAR covers this calendar year => 2012

Control Authority=Program=Town Name => Town of Typicalville

WWTP Name => Typicalville WWTP

NPDES # => NC0012345

WWTP = Wastewater Treatment Plant, use separate form for each WWTP.

SIU = Significant Industrial User

SNC = Significant Non-Compliance

A SNCR Form must be submitted with every PAR, please write "*None*" if you had No SIUs in SNC during calendar year

IUP #	Pipe #	Industry Name	Parameter or "Reporting"	SNC ? (Yes / No) for each 6-month period. Jan. - June	July - Dec.
0006	001	Will Plateit Metal Finishing, Inc.	Cadmium	Yes	Yes
0008	001	Chicken Pluckers, Inc.	BOD	Yes	No
0008	001	Chicken Pluckers, Inc.	Reporting	Yes	No

Attach a copy of the Division's "SIUs in SNC Historical Report" for your POTW's SIUs behind this page .

Is the database correct ? Notify the Division of any errors ! Database indicates SNC history for previous years.

EVERY SNC MUST be explained in the Narrative, How was, is, or will it be resolved?

REPEAT SNCs are serious matters that MUST be explained in the Narrative.

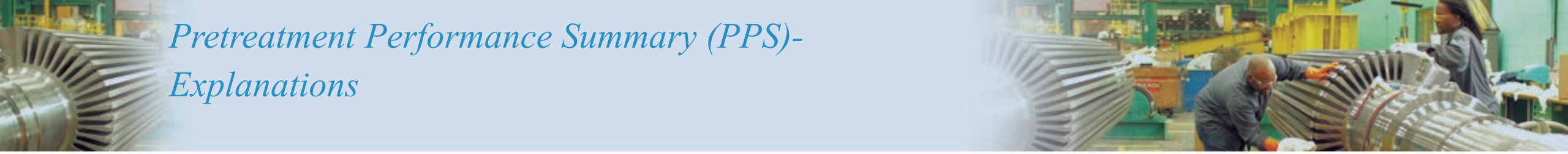
Typicalville

		2005	2006	2007	2008	2009	2010	2011
		1st half | 2nd half	1st half | 2nd half	1st half | 2nd half	1st half | 2nd half	1st half | 2nd half	1st half | 2nd half	1st half | 2nd half
Slugem Hosiery Mills, Inc.		PreviousNames:						
IUP # 0007	Pipe # 01				SIU Word Description: Textile			
IUP_Status: Active								
	Chromium							X
	Copper							X
Chicken Pluckers, Inc.		PreviousNames:						
IUP # 0008	Pipe # 01				SIU Word Description: Poultry Processing			
IUP_Status: Active								
	Reporting						X	
Will Plateit Metal Finishing, Inc.		PreviousNames:						
IUP # 0006	Pipe # 01				SIU Word Description: Metals-433			
IUP_Status: Active								
	Nickel					X		

An 'X' in a semi-annual period indicates snc for the period for the respective parameter.

Pretreatment Performance Summary (PPS)

- Form adapted to gather information for the EPA database
- Counts # of:
  - SIUs and CIUs
  - NOVs and similar actions
  - SIUs in SNC
  - Public Notices
  - Enforcement Cases
  - Penalties Assessed and Collected
  - Compliance Schedules



Pretreatment Performance Summary (PPS)- Explanations

- Line # 5. Number of SIUs permitted and/or discharged during PAR year. Discuss new or dropped SIUs in narrative.
- Line # 12. A SIU is in SNC if they fail to meet a compliance schedule milestone within 90 days of the scheduled date for starting construction, completing construction or attaining final compliance; if progress reports required by the compliance schedule are over 45 days late; or there are violations of any interim limits meeting the chronic or TRC definition of SNC.
- Line # 15. This is the total number of industries on a compliance schedule as part of an enforcement action during the reporting period. If the compliance schedule was entered into in July 2016, it would be counted on the PPS form in 2016 and 2017 and subsequent PARs until the schedule is completed or expires. These schedules are issued outside of, or separate from, the IUP. If an industry is on a compliance schedule that is part of an IUP, this is not included in the PAR. This type of compliance schedule is not considered an enforcement action that includes stipulated penalties, and it should therefore not be included.
- Lines # 16,17,18,19, 20. are based on number of events during PAR year, and do not include events occurring after PAR year.
- Line # 19. Total amount of Civil Penalties collected: This is the actual amount in fines that was collected from the industries during this twelve month period. This can include collection of penalties assessed during prior reporting periods.
- Line # 20. Number of SIUs from which penalties collected. This is the total number of industries that actually paid penalties during the year.

NORTH CAROLINA
Department of Environmental Quality

Chapter 9, PAR Guidance
Pretreatment Performance Summary (PPS)

1. Pretreatment Town Name: Typicalville
2. "Primary" NPDES Number NC00 12345
   or Non_Discharge Permit # if applicable =>

Line # 5. Number of SIUs actually permitted and/or discharging during PAR year. Discuss new or dropped SIUs in narrative.

3.	PAR begin Date, please enter 01/01/yy	3. =>	1/1/2012
4.	PAR end Date, please enter 12/31/yy	4. =>	12/31/2012
5.	Total number of SIUs, includes CIUs	5. =>	3
6.	Number of CIUs	6. =>	
7.	Number of SIUs with no IUP, or with an expired IUP	7. =>	
8.	Number of SIUs not inspected by POTW	8. =>	
9.	Number of SIUs not sampled by POTW	9. =>	
10.	Number of SIUs in SNC due to IUP Limit violations	10. =>	
11.	Number of SIUs in SNC due to Reporting violations	11. =>	
12.	Number of SIUs in SNC due to violation of a compliance schedule, CO, AO or similar	12. =>	
13.	Number of CIUs in SNC	13. =>	
14.	Number of SIUs included in public notice	14. =>	
15	Total number of SIUs on a compliance schedule, CO, AO or similar	15. =>	
16.	Number of NOVs, NNCs or similar assesed to SIUs	16. =>	
17.	Number of Civil Penalties assessed to SIUs	17. =>	
18.	Number of Criminal Penalties assessed to SIUs	18. =>	
19.	Total Amount of Civil Penalties Collected	19. =>	$
20.	Number of IUs from which penalties collected	20. =>	

Foot Notes:

AO	Administrative Order	IUP	Industrial User Pretreatment Permit	POTW	Publicly Owned Treatment W
CIU	Categorical Industrial User	NNC	Notice of Non-Compliance	SIU	Significant Industrial User
CO	Consent Order	NOV	Notice of Violation	SNC	Significant Non-Compliance
IU	Industrial User	PAR	Pretreatment Annual Report		

Chapter 9, PAR Guidance
Pretreatment Performance Summary (PPS)

1. Pretreatment Town Name: Typicalville
2. "Primary" NPDES Number NC00 12345
   or Non_Discharge Permit # if applicable =>

3.	PAR begin Date, please enter 01/01/yy	3. =>	1/1/2012
4.	PAR end Date, please enter 12/31/yy	4. =>	12/31/2012
5.	Total number of SIUs, includes CIUs	5. =>	3
6.	Number of CIUs	6. =>	1
7.	Number of SIUs with no IUP, or with an expired IUP	7. =>	0
8.	Number of SIUs not inspected by POTW	8. =>	0
9.	Number of SIUs not sampled by POTW	9. =>	0
10.	Number of SIUs in SNC due to IUP Limit violations	10. =>	2 Will Plateit
11.	Number of SIUs in SNC due to Reporting violations	11. =>	1
12.	Number of SIUs in SNC due to violation of a compliance schedule, CO, AO or similar	12. =>	0
13.	Number of CIUs in SNC	13. =>	1 Will Plateit
14.	Number of SIUs included in public notice	14. =>	
15	Total number of SIUs on a compliance schedule, CO, AO or similar	15. =>	
16.	Number of NOVs, NNCs or similar assesed to SIUs	16. =>	
17.	Number of Civil Penalties assessed to SIUs	17. =>	
18.	Number of Criminal Penalties assessed to SIUs	18. =>	
19.	Total Amount of Civil Penalties Collected	19. =>	$
20.	Number of IUs from which penalties collected	20. =>	

Foot Notes:

AO	Administrative Order	IUP	Industrial User Pretreatment Permit	POTW	Publicly Owned Treatment W
CIU	Categorical Industrial User	NNC	Notice of Non-Compliance	SIU	Significant Industrial User
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IU	Industrial User	PAR	Pretreatment Annual Report		

Chapter 9, PAR Guidance
Pretreatment Performance Summary (PPS)

1. Pretreatment Town Name: Typicalville
2. "Primary" NPDES Number NC00 12345
   or Non_Discharge Permit # if applicable =>

3.	PAR begin Date, please enter 01/01/yy	3. =>	1/1/2012
4.	PAR end Date, please enter 12/31/yy	4. =>	12/31/2012
5.	Total number of SIUs, includes CIUs	5. =>	3
6.	Number of CIUs	6. =>	1
7.	Number of SIUs with no IUP, or with an expired IUP	7. =>	0
8.	Number of SIUs not inspected by POTW	8. =>	0
9.	Number of SIUs not sampled by POTW	9. =>	0
10.	Number of SIUs in SNC due to IUP Limit violations	10. =>	2
11.	Number of SIUs in SNC due to Reporting violations	11. =>	1
12.	Number of SIUs in SNC due to violation of a compliance schedule, CO, AO or similar	12. =>	0
13.	Number of CIUs in SNC	13. =>	1
14.	Number of SIUs included in public notice	14. =>	2
15	Total number of SIUs on a compliance schedule, CO, AO or similar	15. =>	
16.	Number of NOVs, NNCs or similar assesed to SIUs	16. =>	
17.	Number of Civil Penalties assessed to SIUs	17. =>	
18.	Number of Criminal Penalties assessed to SIUs	18. =>	
19.	Total Amount of Civil Penalties Collected	19. => $	
20.	Number of IUs from which penalties collected	20. =>	

Will Plateit

Foot Notes:					
	AO	Administrative Order	IUP Industrial User Pretreatment Permit	POTW	Publicly Owned Treatment W
	CIU	Categorical Industrial User	NNC Notice of Non-Compliance	SIU	Significant Industrial User
	CO	Consent Order	NOV Notice of Violation	SNC	Significant Non-Compliance
	IU	Industrial User	PAR Pretreatment Annual Report		

Chapter 9, PAR Guidance
Pretreatment Performance Summary (PPS)

1. Pretreatment Town Name: Typicalville
2. "Primary" NPDES Number NC00 12345
   or Non_Discharge Permit # if applicable =>

3.	PAR begin Date, please enter 01/01/yy	3. =>	1/1/2012
4.	PAR end Date, please enter 12/31/yy	4. =>	12/31/2012
5.	Total number of SIUs, includes CIUs	5. =>	3
6.	Number of CIUs	6. =>	1
7.	Number of SIUs with no IUP, or with an expired IUP	7. =>	0
8.	Number of SIUs not inspected by POTW	8. =>	0
9.	Number of SIUs not sampled by POTW	9. =>	0
10.	Number of SIUs in SNC due to IUP Limit violations	10. =>	2
11.	Number of SIUs in SNC due to Reporting violations	11. =>	1
12.	Number of SIUs in SNC due to violation of a compliance schedule, CO, AO or similar	12. =>	0
13.	Number of CIUs in SNC	13. =>	1
14.	Number of SIUs included in public notice	14. =>	2
15	Total number of SIUs on a compliance schedule, CO, AO or similar	15. =>	0
16.	Number of NOVs, NNCs or similar assesed to SIUs	16. =>	
17.	Number of Civil Penalties assessed to SIUs	17. =>	
18.	Number of Criminal Penalties assessed to SIUs	18. =>	
19.	Total Amount of Civil Penalties Collected	19. => $	
20.	Number of IUs from which penalties collected	20. =>	

Will Plateit schedule not in effect until 2013

Foot Notes:

AO	Administrative Order	IUP	Industrial User Pretreatment Permit	POTW	Publicly Owned Treatment W
CIU	Categorical Industrial User	NNC	Notice of Non-Compliance	SIU	Significant Industrial User
CO	Consent Order	NOV	Notice of Violation	SNC	Significant Non-Compliance
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Chapter 9, PAR Guidance
Pretreatment Performance Summary (PPS)

1.	Pretreatment Town Name:	Typicalville	
2.	"Primary" NPDES Number	NC00 12345	
	or Non_Discharge Permit # if applicable =>		
3.	PAR begin Date, please enter 01/01/yy	3. =>	1/1/2012
4.	PAR end Date, please enter 12/31/yy	4. =>	12/31/2012
5.	Total number of SIUs, includes CIUs	5. =>	3
6.	Number of CIUs	6. =>	1
7.	Number of SIUs with no IUP, or with an expired IUP	7. =>	0
8.	Number of SIUs not inspected by POTW	8. =>	0
9.	Number of SIUs not sampled by POTW	9. =>	0
10.	Number of SIUs in SNC due to IUP Limit violations	10. =>	2
11.	Number of SIUs in SNC due to Reporting violations	11. =>	1
12.	Number of SIUs in SNC due to violation of a compliance schedule, CO, AO or similar	12. =>	0
13.	Number of CIUs in SNC	13. =>	1
14.	Number of SIUs included in public notice	14. =>	2
15	Total number of SIUs on a compliance schedule, CO, AO or similar	15. =>	0
16.	Number of NOVs, NNCs or similar assesed to SIUs	16. =>	16
17.	Number of Civil Penalties assessed to SIUs	17. =>	8
18.	Number of Criminal Penalties assessed to SIUs	18. =>	0
19.	Total Amount of Civil Penalties Collected	19. =>	$
20.	Number of IUs from which penalties collected	20. =>	

Lines # 16, 17, 18 are based on number of events during PAR year, and do not include events occurring after PAR year.

Foot Notes:

AO	Administrative Order	IUP	Industrial User Pretreatment Permit	POTW	Publicly Owned Treatment W
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3.	PAR begin Date, please enter 01/01/yy	3. =>	1/1/2012
4.	PAR end Date, please enter 12/31/yy	4. =>	12/31/2012
5.	Total number of SIUs, includes CIUs	5. =>	3
6.	Number of CIUs	6. =>	1
7.	Number of SIUs with no IUP, or with an expired IUP	7. =>	0
8.	Number of SIUs not inspected by POTW	8. =>	0
9.	Number of SIUs not sampled by POTW	9. =>	0
10.	Number of SIUs in SNC due to IUP Limit violations	10. =>	2
11.	Number of SIUs in SNC due to Reporting violations	11. =>	1
12.	Number of SIUs in SNC due to violation of a compliance schedule, CO, AO or similar	12. =>	0
13.	Number of CIUs in SNC	13. =>	1
14.	Number of SIUs included in public notice	14. =>	2
15	Total number of SIUs on a compliance schedule, CO, AO or similar	15. =>	0
16.	Number of NOVs, NNCs or similar assesed to SIUs	16. =>	16
17.	Number of Civil Penalties assessed to SIUs	17. =>	8
18.	Number of Criminal Penalties assessed to SIUs	18. =>	0
19.	Total Amount of Civil Penalties Collected	19. =>	$ 1,350
20.	Number of IUs from which penalties collected	20. =>	

Line # 19 is the actual amount in fines that was collected from the industries during this twelve month period. This can include collection of penalties assessed during prior reporting periods.

Foot Notes:

AO	Administrative Order	IUP	Industrial User Pretreatment Permit	POTW	Publicly Owned Treatment W
CIU	Categorical Industrial User	NNC	Notice of Non-Compliance	SIU	Significant Industrial User
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Chapter 9, PAR Guidance
Pretreatment Performance Summary (PPS)

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3.	PAR begin Date, please enter 01/01/yy	3. =>	1/1/2012
4.	PAR end Date, please enter 12/31/yy	4. =>	12/31/2012
5.	Total number of SIUs, includes CIUs	5. =>	3
6.	Number of CIUs	6. =>	1
7.	Number of SIUs with no IUP, or with an expired IUP	7. =>	0
8.	Number of SIUs not inspected by POTW	8. =>	0
9.	Number of SIUs not sampled by POTW	9. =>	0
10.	Number of SIUs in SNC due to IUP Limit violations	10. =>	2
11.	Number of SIUs in SNC due to Reporting violations	11. =>	1
12.	Number of SIUs in SNC due to violation of a compliance schedule, CO, AO or similar	12. =>	0
13.	Number of CIUs in SNC	13. =>	1
14.	Number of SIUs included in public notice	14. =>	2
15	Total number of SIUs on a compliance schedule, CO, AO or similar	15. =>	0
16.	Number of NOVs, NNCs or similar assesed to SIUs	16. =>	16
17.	Number of Civil Penalties assessed to SIUs	17. =>	8
18.	Number of Criminal Penalties assessed to SIUs	18. =>	0
19.	Total Amount of Civil Penalties Collected	19. => $	1,350
20.	Number of IUs from which penalties collected	20. =>	3

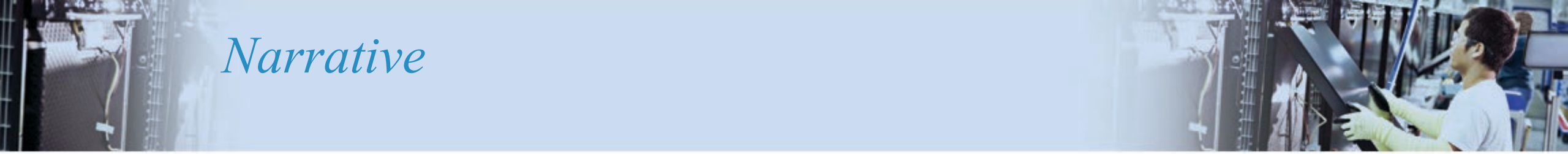
Line # 20 is the total number of industries that actually paid penalties during the year.

Foot Notes:

AO	Administrative Order	IUP	Industrial User Pretreatment Permit	POTW	Publicly Owned Treatment W
CIU	Categorical Industrial User	NNC	Notice of Non-Compliance	SIU	Significant Industrial User
CO	Consent Order	NOV	Notice of Violation	SNC	Significant Non-Compliance
IU	Industrial User	PAR	Pretreatment Annual Report		

Narrative

Narrative



- Recommended Outline for Narrative

- Provided to:
  - Help you organize your PAR Narratives.
  - Help you determine what information is required or optional.
  - Help you understand how information is checked
  - Make it easier for us to find specific and useful information in the narratives.

- Some information is optional. It has been noted or italicized in both the guidance text and in the examples.

- This Guidance is available by e-mail, and on our web page.

  http://deq.nc.gov/about/divisions/water-resources/water-resources-permit-guidance/pretreatment-guide/annual-report-guidance

NORTH CAROLINA
Department of Environmental Quality

Outline of a Typical Narrative:

1. General Information:

    A. General Program Information.

    B. General Permit Information.

2. IU Information:

    A. IUs in SNC Information.

    B. Orders and Schedule Information.

    C. A to C and Construction Information.

    D. SIUs with Missing Data.

Optional:

E. Enforcement Actions by POTW, and Industry Responses, for Non-SNC, Non-Order, Non-construction events

F. Other Information

NORTH CAROLINA
Department of Environmental Quality

Outline of a Typical Narrative (cont.):

- If you have no IUs in SNC, on Orders, or having pretreatment construction activities, or missing data, your PAR Narrative may be as simple as the Division's two database items, with any corrections noted.
  - Program Info. Sheet
  - Historical SNC database sheet(s)

Still need all other required PAR forms for your type of Program – Full versus Modified Programs!

NORTH CAROLINA
Department of Environmental Quality

Description of Narrative details:

General Information:

A. General Program Information:

1. Pretreatment Program Info. Sheet

(provided to you by the PERCS Unit with the end of year mailing)

Status of Major Pretreatment Program Elements - LTMP/STMP, HWA, ERP, SUO, IWS - Are the dates and information correct, especially due dates?

Include any needed corrections marked on the Info Sheet returned with the PAR

Note, copies of the Program Info. Sheet are available upon request from the PERCS Unit.

2. Discuss Planned updates of major program elements in narrative.

Description of Narrative details:

General Information:

B. General Permit Information:

1. Did you have any permits expire before being renewed ? LIST THEM, & WHY.

2. Did you have any SIU Permits that were Brand New, Dropped, or Changed Names during the Year ? Please list them.

NORTH CAROLINA
Department of Environmental Quality

Description of Narrative details:

General Information:

B. General Permit Information (cont.):

Optional

Dates for these permit actions may be listed here as useful reference.

We realize that some or all of these dates will have already been submitted to the Division with permit renewals, modifications, and drops.

If you have permits that have been submitted to the Division and you have not received review letter back from the Division, you may note that here.

For new permits, when did the permit become effective and when did the SIU actually begin discharge? Note, if a lag between these dates results in "missing" data, it must be explained (see "Missing" Data section below).

NORTH CAROLINA
Department of Environmental Quality

Description of Narrative details:

IU INFORMATION:

Please LIST alphabetically by IU name:

A. IUs in SNC Information:

1. All IUs in SNC MUST be included in the Narrative and listed on the SNCR Form !

2. Note the reason(s) and which six-month period(s) they were in SNC.

3. If SNC for limits, note if was due to chronic, TRC, or both. Information should match what is on your IDSF and SNCR Forms.

4. If SNC for something other than limits, such as: reporting, missing data/self monitoring, interference, pass-through, permit conditions, etc. please explain.

NORTH CAROLINA
Department of Environmental Quality

Description of Narrative details:

IU INFORMATION:

A. IUs in SNC Information: (cont.)

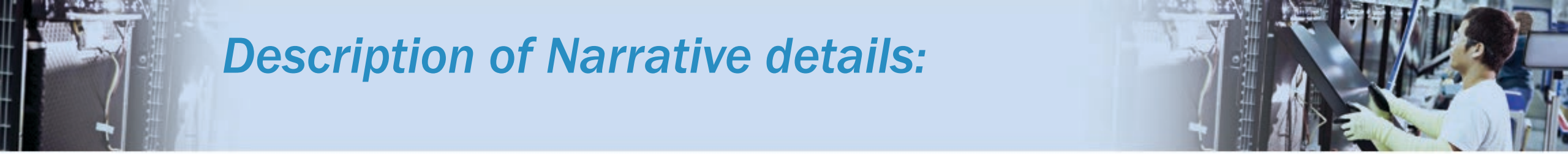
5. Enclose a copy of the Public Notice for SNC, or affidavit. If Public Notice is not in the PAR explain why not. PAR will not be considered complete until Public Notice is received.

6. Explain how a SNC situation was or will be resolved; such as: increased limit, shut down, installed or improved pretreatment, better operations, production changes, etc.

7. Explain how previous SNC situations were resolved if resolution occurred in this PAR year.

NORTH CAROLINA
Department of Environmental Quality

Description of Narrative details:



IU INFORMATION: (cont.)

B. Orders or Schedule Information: For SIUs on an Order of any kind (including Administrative Orders, Consent Orders, Compliance Schedules) at any time during the PAR year, include the following information:

1. A copy of the Order/Schedule with the PAR. If Order/Schedule has been modified since last submitted, include a new copy with the PAR.

2. Notes on all successfully completed Orders/Schedules.

3. Notes on all due dates in the Order/Schedule.

4. Notes on violations of any interim limits or due dates. Explain what and why and discuss penalties assessed and penalties collected. You may *(optional)* attach copies of NOVs and correspondence.

Description of Narrative details:

IU INFORMATION (cont.):

C. Pretreatment (AtoC) and Construction Info:

1. Narrative must include information on any SIUs who have submitted plans and specifications, requested an AtoC, or had construction activities on their pretreatment systems during the PAR year. This information will document or measure improvements to pretreatment facilities and the work of pretreatment coordinators towards improving the environment.

2. Please include the following information:

   a. Brief description of what is, was, or will be constructed.

   b. Approx. cost.

   c. Date submitted and/or date of AtoC.

   d. Date construction begun, or scheduled to began.

   e. Date construction completed or scheduled to end.

NORTH CAROLINA
Department of Environmental Quality

Description of Narrative details:

IU INFORMATION (cont.):

D. SIUs with Missing Data:

1. Explain WHY any required sampling may "appear" to have not been done for any SIU. Missing data may be required to be repeated. Missed self-monitoring is a violation and may be considered SNC. Reasons for missing data are:

A permit is issued (became effective) well before the actual discharge began.

A Permit is officially dropped well after the actual discharge was stopped.

Temporary shut downs / No process discharge.

Missed self monitoring, "botched" sampling, act of god, act of nature, or other reason. (EXPLAIN !)

NORTH CAROLINA
Department of Environmental Quality

Description of Narrative details:

IU INFORMATION (cont.):

OPTIONAL:

E. POTW Enforcement Actions and SIU Response Information, for Non-SNC, Non-Order, Non-Construction, Non-missing data events:

1. Enforcement actions taken by the POTW, may include NOVs, meetings, extra inspections, increased monitoring, penalties assessed, penalties collected. Note, assessing penalties and collecting penalties should be documented as separate actions.

2. Briefly explain how SIU responded to the enforcement action(s). Information such as any known cause for the violations, and what the SIU has done or is doing to correct the problem. Did the SIU deny the problem, request a meeting, appeal the NOV, etc.

Description of Narrative details:

IU INFORMATION (cont.):

OPTIONAL:

F. Other Information:

1. Information on SIUs with minor violations may be listed in the narrative very briefly. This may be general and does not have to list the specifics about limits violations (note, the percent violations is already summarized on the IDSF form).

2. Any other information you think is important.

NORTH CAROLINA
Department of Environmental Quality

GENERAL INFORMATION:

GENERAL PROGRAM INFORMATION:

- AT, LTMP, HWA, SUO, ERP, IWS and Permits are up to date, except we now have enough Method 1631 mercury data to revise our HWA and resolve our over allocation. Plan to do this in the next 4 months.
- All Dates on the Division's Database Program Info Sheet are correct
- A copy of our Program Info sheet is enclosed with corrections.

GENERAL INFORMATION (cont.):

GENERAL PERMIT INFORMATION:

- No permits lapsed or expired prior to renewal
- No new or Name Changes at any SIUs

NORTH CAROLINA
Department of Environmental Quality

Slugem Hosiery Mill, Inc. (IUP # 0007, Textile)

SNC INFORMATION:

- SIU was not in SNC this PAR Year
- Previous SNC situation, see 2011 PAR, was resolved with permit modification effective February 1, 2012. The POTW increased IUP limits for chromium and copper. The cause of the violations and SNC in 2011 was determined to be increased production and flow.

.

ORDERS AND SCHEDULE INFORMATION: None

A to C and CONSTRUCTION INFORMATION: None

MISSING DATA: Please note there is no monitoring for ammonia, mercury, or MBAS for the first six months as this is only an annual monitoring requirement

- **Slugem Hosiery Mill, Inc. (IUP # 0007, Textile) - Cont.**

OPTIONAL:

- *ENFORCEMENT ACTIONS by POTW, and Industry responses for Non-SNC, Non-Order, Non-Construction, Non-"missing" data events:*
  - *The $500 penalty ($250 per SNC) assessed in the last PAR Year (2011) was paid on February 22, 2012.*
  - *There were also two reporting violations for late sample reporting (two weeks late for March and 8 days late for October). NOVs were issued and penalties were assessed at ($50 each). Penalties were paid on May 5, and November 30, respectively.*
  - *Overall, this Industry has been very cooperative with the Town in resolving all issues.*
  - *A couple limit violations occurred in 2012, (see IDSF form, NOVs were issued), but overall the SIU was not in SNC for either six month period in 2012.*

- **Terrible Textiles. (IUP # 0009)**
  - As noted in the 2012 PAR, Terrible Textiles burned down on 12/1/2011 and the permit was formally dropped effective 12/31/2011. There was no monitoring, no data, and therefore no IDSF for this industry in this PAR.

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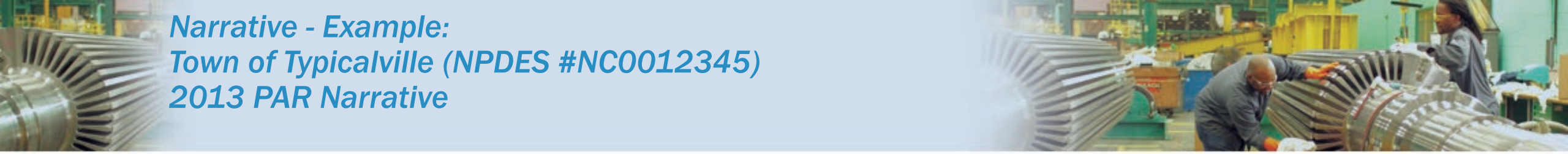

- **Will Plateit Metal Finishers, Inc. (IUP # 0006, 40CFR433)**

  SNC INFORMATION:

  - This SIU was in SNC for the parameter of Cadmium (Cd) for both the January 1-June 30, 2012, and the July 1-December 31, 2012, reporting periods.
  - SIU was SNC for two periods in a row for Cadmium.
  - In general, this Industry cannot identify or resolve the cause of their SNC. They also do not promptly pay the penalties. Several meetings between the Town and the Industry, as well as letters from our attorney have improved the industry's cooperation, but have still been unable to determine the source or reason for the increased Cadmium levels. Consent Order issued to require resolution, with upfront penalty.
  - Copy of Public Notice is enclosed.

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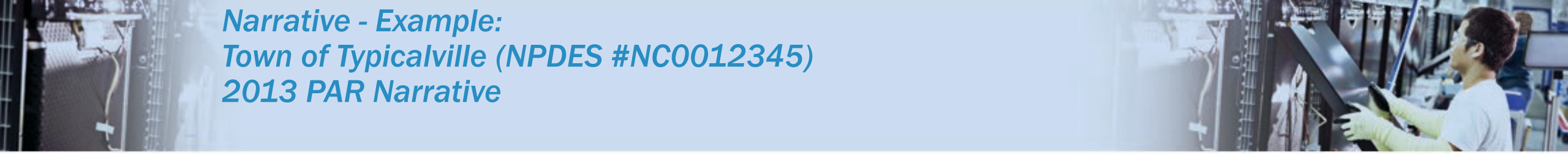
Department of Environmental Quality



- **Will Plateit Metal Finishers, Inc. (IUP # 0006, 40CFR433) – Cont.**

  ORDER/SCHEDULE INFORMATION:

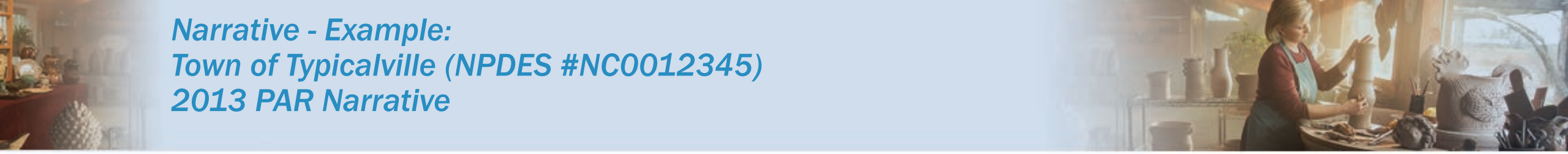
  - POTW and the SIU entered into a Consent Order (copy enclosed). Effective date of 2013, so not included on the PPS form.

  AtoC and CONSTRUCTION INFORMATION: None

  MISSING DATA: NONE

Optional - OTHER MISC. INFORMATION:

- *The SIU filed both required semi-annual TTO certifications in lieu of monitoring for organics.*



- **Will Plateit Metal Finishers, Inc. (IUP # 0006, 40CFR433) – Cont.**

OPTIONAL:

- *ENFORCEMENT ACTIONS by POTW, and Industry responses, for Non-SNC, Non-Order, Non-Construction, Non-"missing" data events:*
  - *Several other NOVs were issued throughout the year.*
  - *A penalty of $250 was issued for the Jan-Jun 2012 SNC. SIU failed to pay the penalty within the required 30 days. It was paid on September 30, 2012 after a strong letter from the POTW's attorney indicating failure to pay would result in termination of service.*
  - *Another $1000 penalty for the Jul-Dec SNC was incorporated into the Consent Order. It has not been collected, but documentation of collection will be included in our next PAR.*

NORTH CAROLINA
Department of Environmental Quality

Pretreatment Program Info Database

printed on: 1/2/2013

for Program Name **Typicalville**

WWTP Name Town of Typicalville WWTP

Program Approval Date 06/30/1983

Pretreatment Status Full

Region WSRO

County Typical

NPDES Number NC0012345

NPDES Effective Date 02/01/2012

NPDES Expire Date 04/30/2016

POTW is Primary WWTP TRUE

Design Flow mgd 13.5000

Stream Information

IWC % at 7Q10 5.35

7Q10 Flow cfs / mgd 370 / 239.02

1Q10 Flow cfs / mgd 299.26 / 193.41

Stream Classification WS-IV

Basin Number CAR03

Receiving Stream Name Carolina River

Last PAR Rec 02/23/2012

PAR Due Date 03/01/2013

Current Fiscal Year PCI Done

Last Audit on 10/29/2010

Audit Year Next 15/16

mercury 1631 required

% Design mgd is SIU permitted 10.80

Permitted SIU flow (mgd) [Pt_SIU] 1.458

WWTP SIU's 3

WWTP CIU's 1

Program SIUs 3

Program CIUs 1

date Inactive	HWA	LTMP	IWS	SUO	ERP
Date Next Due	04/01/2017		10/01/2015		
Date Received by DWQ	03/23/2012	11/06/2012	11/22/2010	12/11/2012	05/18/2001
Date Approved	07/12/2012	11/08/2012	03/14/2011	12/14/2012	05/22/2001
Adopt Date Required					
Date Adopted				11/20/2012	

Info in this Box from Pt_Contacts

Formal Name	PT_Prog.Prime	Phone1	ext	Fax	Date Attended HWA Wksp	Date Attended IUP Wksp	Date Attended PAR Wksp	
Ms. Jane Wastewater		555-123-4567		555-123-4589	1/30/2008	6/11/2012		
Jane.Wastewater@Typicalville.com		Director of Public Utilities		PO Box 101				27123
Mr. John Basin	Prim	555-123-4576		555-123-4589	1/30/2008	6/11/2012	1/24/2012	
John.Basin@Typicalville.com		Pretreatment Coordinator		PO Box 101				27123

No Corrections Needed.

Pretreatment Related NOVs from DWQ

DWQ Central Office Contact Monti Hassan

DWQ Regional Contact George Smith

Waste Reduction:

Per .0916 of the Rule and G.S 143-215.1(g), required only to be submitted with IUP applications.

No longer required for the PAR!

Public Notice

Public Notice

- Required to be done a minimum of once per year
  - What is in your SUO?
  - Largest Daily Newspaper Circulated in Area?
  - Newspaper of General Circulation that provides meaningful public notice?

- Generally completed in January or February for all SNC for Previous Year and Included in PAR due March 1;

- Optional to complete Public Notice after each six month period, i.e., in July or August for January through June SNCs, and again in January or February for July through December SNCs
  - may help SIU relations for SIUs in SNC for January through June for the POTW to issue Public Notice while problem is on-going instead of 6 months or more after they have fixed the problem

NORTH CAROLINA
Department of Environmental Quality

Public Notice (cont.)

- Public Notice Must Include All IUs in SNC due to Limits Violations or Reporting or IUP Condition Violations

- Along with the IU Names, the Public Notice should include:
  - Periods of SNC (January - June or July –December)
  - the Parameter(s), Reporting, or Specific IUP Condition
  - OPTIONAL: any other discussion you want, for example how the SNC did not affect your WWTP or the environment, or how hard the SIU has worked to fix the problem, or how their negligence caused the problem in the first place, or how uncooperative they have been

Public Notice (cont.)

- In PAR, either include Affidavit provided by Newspaper, or cut out the Public Notice from the newspaper (make sure the piece of the newspaper is large enough to include the Public Notice and the part of the page with the name of the paper and the date.

- If unable to include Public Notice in PAR, explain in the narrative why it couldn't be done earlier. Submit Copy of Affidavit or cut out from Newspaper ASAP. NOTE: PAR will not be considered complete until Public Notice is received.

PUBLIC NOTICE
OF SIGNIFICANT INDUSTRIAL
WASTEWATER PERMIT
VIOLATIONS

The Town of Typicalville, in accordance with Federal and State Regulations is hereby giving Public Notice. Listed below are Significant Industrial Users that were in significant noncompliance (SNC) with national pretreatment regulations, 40 CFR Part 403, and state pretreatment regulations, 15 NCAC 2H .0900, and local pretreatment regulations during the period of January 1 thru June 30, 2012; Will Plateit Metal Finishers, Inc.- Cadmium. And July 1 thru December 31, 2012; Will Plateit Metal Finishers, Inc.- Cadmium

A continuing effort is being made by all the listed industries to achieve compliance, including installation of new equipment and upgrading of existing equipment and continued progress is expected until full compliance can be attained.
Town of Typicalville, Department of Public Utilities, Jane Wastewater, Director.
January 17, 2013

Affidavit of Publication

The Typicalville Herald
Typicalville, N.C.

Personally appeared before me, a Notary Public of the County of Typical, State of North Carolina, on this the __17__day of _____January_____2013

_____*Suzy Newsy*_____

of The Typicalville Herald, who, bring duly sworn, state that
the notice entitled
PUBLIC NOTICE OF SIGNIFICANT INDUSTRIAL WASTEWATER PERMIT VIOLATIONS

_____
a true copy of which is attached hereto, appeared in The Typicalville Herald, a newspaper published in the Town of
Typicalville, County of Typical,
State of North Carolina, _____once____ a week for _____one____week(s), on the following dates:
January 17_____20___13_
_____20_____
_____20_____
_____20_____

_____
The Typicalville (N.C.) Herald
of _____January_____2013

_____*Peter Public*_____
Notary Public

Enforceable Compliance Schedules

Enforceable Compliance Schedules

- **Two basic kinds**

  - **Signed by both POTW and SIU: Consent orders, Compliance Agreements, SOCs, etc,;**

  - **Signed by POTW only: Administrative Orders**
    - **either when SIU refuses to agree to an order, or when SIU has failed to comply with original "consent" type order**

Enforceable Compliance Schedules (cont.)

- **When to issue**
  - **Issued when SIU will be in SNC for second period in a row for same parameter/reporting violation**
  - **Can be issued earlier to help SIU avoid further violations (i.e. if you already know the violations will continue and you have a good idea of the steps the SIU must take to comply, then why wait to issue the order?)**

Enforceable Compliance Schedules (cont.)

- <u>What's in it</u>
  - •Up-front penalties to address violations up to the time of issuance of order.

  - •Interim limits SIU can comply with, i.e., gets SIU back in "compliance" temporarily. These limits supercede IUP limits during term of order. These limits are the SIU's "carrot."
    - Interim limits can be higher than categorical limits
    - No over allocation without prior DWR approval

Enforceable Compliance Schedules (cont.)

- **What's in it (cont.)**
  - **Schedule of items, each with a specific due date, that SIU will complete in order to return to compliance with original/final IUP limits. This is the POTW's "carrot," i.e. commitment from SIU to do specific things by specific dates.**
    - Specific items can vary greatly from SIU to SIU, and should be developed for each specific circumstance
  - **Stipulated penalties for violations of conditions in order (limits, due dates, etc.). This is POTW's "stick."**

NORTH CAROLINA
Department of Environmental Quality

North Carolina

County of Typical

In the matter of Town of Typicalville

Pretreatment Permit No. 0006

held by Will Plateit Metal Finishers, Inc.

CONSENT ORDER AND COMPLIANCE SCHEDULE

Pursuant to provisions of the Sewer User Ordinance of the Town of Typicalville, this Consent Order is made effective the 1st day of February, 2013, between Will Plateit Metal Finishers, Inc. (hereinafter the "User") and the Town of Typicalville (hereinafter the "Town").

The User and Town hereby stipulate and agree as follows:

1. User holds Town of Typicalville Pretreatment Permit No. 0006 (hereinafter the "Permit", which shall refer to User's existing permit and any subsequent renewals or modifications thereof) for the operations of existing pretreatment units and discharges from said treatment works into the Town's sewer system.

2. User has been unable to meet the permit limitations for Cadmium (Cd) set forth in its Permit.

3. Achievement of these limits will require resolution of existing problems in the present treatment train and possibly, development of alternative solutions to alleviate noncompliance, including but not limited to the construction of additional pretreatment facilities as well as the preparation of plans and specifications as necessary.

4. User hereby agrees to do and perform all of the following:

a. Meet and comply with all terms and conditions of the Permit (except as modified by the Order) provided, however, subject to the terms and conditions of the Consent Order, the following shall apply:

Parameter	Daily Max (mg/L)	Monitoring Frequency	Detection Limit
Cadmium (Cd)	0.13	Weekly	0.002 mg/L

b. Unless and until Compliance is achieved, the User will undertake activities necessary to bring the User into Compliance in accordance with the following schedule:

• COMPLIANCE SCHEDULE

	Activities	**Deadline for Completion**
(i)	Prepare an Engineering Report of process alternatives and/or pollution prevention/waste minimization alternative designed to achieve Compliance	April 1, 2013
(ii)	Complete Pilot Studies or waste minimization studies and identify alternatives chosen to achieve Compliance	July 1, 2013
(iii)	If required, submit necessary drawings and information to obtain any necessary permits and/or authorization to construct from the Town of Typicalville	September 1, 2013
(iv)	Begin construction and/or implement identified process alternative(s), pollution prevention, and waste minimization alternatives.	December 1, 2013
(v)	Complete identified construction/pollution prevention/ waste minimization alternatives and/or process alternatives.	March 1, 2014
(vi)	Complete analysis of implemented changes, including daily monitoring from April 1st to May 1st and make necessary modifications to optimize and obtain full operational status.	June 1, 2014
(vii)	Achieve compliance with final (IUP) limit 0.07 mg/L.	July 1, 2014

c. User shall perform each of the activities set forth in subparagraph (b) on or before the dates established thereby unless such dates are extended by agreement of User and the Town. The User may request such extensions for good cause, and the Town will not unreasonably withhold its consent to such extension.

d. User shall submit a comprehensive written report within five (5) days following each milestone date specified in subparagraph (b). Each such report shall be in narrative form, shall state in detail the activities undertaken since the last report to achieve Compliance, and shall indicate whether User has met the due date for the relevant milestone established in this Consent Order. If any report contains notice of failure to meet a milestone date, the report shall also include a statement explaining the cause of the failure, any remedial actions taken, and the probability of meeting the next milestone.

During any period of construction, User shall submit on or before the 10th day of each month, detailed construction progress reports stating therein in narrative form the work performed during the month and the percentage of completion of the project.

All reports required by the Consent Order shall be submitted to the Town by Certified Mail, Return Receipt Requested, addressed to:

Director of Public Utilities

Town of Typicalville

PO Box 123

Typcialville, NC 12345

e. The User shall pay the Town $1,000, no later than February 27, 2013, for the Significant Non-Compliance during the July through December 2012 reporting period.

f. Any violation of the terms of this Consent Order shall subject the User to the enforcement authority outlined in the Ordinance. Such action may include, but is not limited to such fines, penalties and assessments as may be set forth in the Code of Ordinance of the Town of Typicalville, as amended from time to time.

g. In lieu of other penalties, the following stipulated penalties shall apply for violations of the User's limits or failure to meet a milestone date under this Consent Order, or failure to achieve full compliance with Consent Order.

Violation of limits	$200 per day, per violation
Failure to collected required samples, meet compliance schedule deadlines, required reports, or other milestone dates contained herein	$200 per day, per violation
Failure to achieve full compliance with Final IUP limit at expiration of Order	$1,000 per day

h. Once Compliance is achieved, this Consent Order shall terminate and all obligations hereunder except any obligation to pay identified moneys to the Town shall expire. Upon termination of this Order, the User shall be subject to all terms of the Permit.

i. In the performance of activities under this Consent Order, User must otherwise follow the procedures, rules, regulations, ordinances, and statutes of the Town, State, and Federal governments as they may apply to User. Nothing contained herein shall be construed as a waiver thereof by the Town.

Signed on this 26th day of January 2013.

USER: Will Plateit Metal Finishers, Inc.

BY: *William B Plateit*

TITLE: President

TOWN: Town of Typicalville

BY: *Jane Wastewater*

TITLE: Director of Public Utilities

This Order expires July 11, 2014.

Allocation Tables (ATs)

- Should be current as of December 31st, the last day of the end of the PAR Reporting Period
- Includes Effective and Expiration Dates; May Include Permit Modification Date(s)
- Includes Permit Limits For Each SIU and Pipe
- Includes Information from Headworks Analysis (HWA)
  - MAHL
  - Uncontrollable Loading
  - MAIL

Do YOU have any Over Allocations??? – Explain in Narrative!

NORTH CAROLINA
Department of Environmental Quality

Allocation Tables (ATs)

Allocation Table
Town of Typicalville
NC0012345

Headworks last approved: 7/12/12
Allocation Table updated: 9/30/12
Permits last modified: 9/30/12

IUP Count	INDUSTRY NAMES (please list alphabeticly)	Industry Permit/Pipe number	Type of Industry	Original Effective Date	Most Recent Modification Effective Date	Date Permit Expires	FLOW Permit Limits MGD	FLOW Permit Limits gal/day	BOD Permit Limits Conc. mg/l	BOD Permit Limits Load lbs/day	TSS Permit Limits Conc. mg/l	TSS Permit Limits Load lbs/day
1	Chicken Pluckers, Inc.	0008/01	poultry	6/30/11	9/30/12	12/30/15	1.0000	1,000,000	300	2502	300	2502
2	Slugem Hosiery Mill, Inc.	0007/01	dye and finish	6/30/11	2/1/12	12/30/15	0.3600	360,000	300	901	300	901
3	Will Plateit Metal Finishing, In	0006/01	433-metal finishing	6/30/11		12/30/15	0.0980	98,000				
4												
	Column Totals =>						1.4580	1,458,000		3403		3403
										npdes		npdes(5 mg/l)
	MAHL from HWA (lbs/day) =>						5.0000			9800		19599
	Uncontrollable Loading (lbs/day) =>						1.8900			2115		3214
	Total Allowable for Industy (MAIL) (lbs/day)=>						3.1100			7685		16385
	Total Permitted to Industry (lbs/day) =>						1.4580			3403		3403
	MAIL left (lbs/day) =>						1.6520			4282		12983
	Percent Allow. Ind. (MAIL) still available (%) =>						53.1 %			55.7 %		79.2 %
	Percent MAHL still available (%) =>						33.0 %			43.7 %		66.2 %
	5 Percent MAHL (lbs/day) =>						0.2500			489.98		979.95

Total Allowable for Industry is also known as Maximum Allowable Industrial Load or MAIL

NORTH CAROLINA
Department of Environmental Quality

Allocation Tables (ATs) (cont.)

Allocation Table
Town of Typicalville
NC0012345

IUP Count	INDUSTRY NAMES (please list alphabeticly)	Industry Permit/Pipe number	AMMONIA Permit Limits Conc. mg/l	AMMONIA Permit Limits Load lbs/day	ARSENIC Permit Limits Conc. mg/l	ARSENIC Permit Limits Load lbs/day	CADMIUM Permit Limits Conc. mg/l	CADMIUM Permit Limits Load lbs/day	CHROMIUM Permit Limits Conc. mg/l	CHROMIUM Permit Limits Load lbs/day	COPPER Permit Limits Conc. mg/l	COPPER Permit Limits Load lbs/day	CYANIDE Permit Limits Conc. mg/l	CYANIDE Permit Limits Load lbs/day
1	Chicken Pluckers, Inc.	0008/01		monitor										
2	Slugem Hosiery Mill, Inc.	0007/01							0.5000	1.5012	0.6000	1.8014		
3	Will Plateit Metal Finishing, Inc	0006/01					0.0700	0.0572	1.7100	1.3976	2.0700	1.6919	0.0100	0.0082
4														
	Column Totals =>			0		0		0.0572		2.8988		3.4933		0.0082
				npdes										
	MAHL from HWA (lbs/day) =>			784		1.5679		0.1048		3.9198		6.2717		0.2630
	Uncontrollable Loading (lbs/day) =>			243		0.0226		0.0226		0.3770		0.8746		0.0377
	Total Allowable for Industry(MAIL) (lbs/day) =>			541		1.5453		0.0822		3.5428		5.3971		0.2253
	Total Permitted to Industry (lbs/day) =>			0		0.0000		0.0572		2.8988		3.4933		0.0082
	MAIL left (lbs/day) =>			541		1.5453		0.0250		0.6440		1.9038		0.2171
	Percent Allow. Ind. (MAIL) still available (%) =>			100.0 %		100.0 %		30.4 %		18.2 %		35.3 %		96.4 %
	Percent MAHL still available (%) =>			69.0 %		98.6 %		23.8 %		16.4 %		30.4 %		82.6 %
	5 Percent MAHL (lbs/day) =>			39.20		0.0784		0.0052		0.1960		0.3136		0.0132

Total Allowable for Industry is also known as Maximum Allowable Industrial Load or MAIL

NORTH CAROLINA
Department of Environmental Quality

Allocation Tables (ATs) (cont.)

Allocation Table

Town of Typicalville

NC0012345

IUP Count	INDUSTRY NAMES (please list alphabeticly)	Industry Permit/Pipe number	LEAD Permit Limits Conc. mg/l	LEAD Load lbs/day	MERCURY Permit Limits Conc. mg/l	MERCURY Load lbs/day	NICKEL Permit Limits Conc. mg/l	NICKEL Load lbs/day	Phosporous Permit Limits Conc. mg/l	Phosporous Load lbs/day	SILVER Permit Limits Conc. mg/l	SILVER Load lbs/day	ZINC Permit Limits Conc. mg/l	ZINC Load lbs/day
1	Chicken Pluckers, Inc.	0008/01												monitor
2	Slugem Hosiery Mill, Inc.	0007/01								monitor			0.6500	1.9516
3	Will Plateit Metal Finishing, Inc	0006/01	0.4300	0.3514	0.0002	0.00016	2.3800	1.9452	30.00	24.52	0.2400	0.1962	1.4800	1.2096
4														
	Column Totals =>			0.3514		0.00016		1.9452		24.52		0.1962		3.1612
									npdes(summer)					
	MAHL from HWA (lbs/day) =>			1.0453		0.00047		2.6244		239.00		3.9198		7.8396
	Uncontrollable Loading (lbs/day) =>			0.3317		0.00226		0.1583		66.49		0.0377		0.9424
	Total Allowable for Industry (MAIL) (lbs/day) =>			0.7136		-0.0018		2.4661		172.51		3.8821		6.8972
	Total Permitted to Industry (lbs/day) =>			0.3514		0.00016		1.9452		24.52		0.1962		3.1612
	MAIL left (lbs/day) =>			0.3622		-0.00196		0.5209		147.99		3.6859		3.7360
	Percent Allow. Ind. (MAIL) still available (%) =>			50.8 %		109.1 %		21.1 %		85.8 %		94.9 %		54.2 %
	Percent MAHL still available (%) =>			34.6 %		-416.1 %		19.8 %		61.9 %		94.0 %		47.7 %
	5 Percent MAHL (lbs/day) =>			0.0523		0.0000		0.1312		11.95		0.1960		0.3920

Total Allowable for Industry is also known as Maximum Allowable Industrial Load or MAIL

See narrative for resolution of mercury over allocation.

Allocation Tables (ATs) (cont.)

Allocation Table
Town of Typicalville
NC0012345

IUP Count	INDUSTRY NAMES (please list alphabeticly)	Industry Permit/Pipe number	Oil & Grease Permit Limits Conc. mg/l	Oil & Grease Permit Limits Load lbs/day	MBAS Permit Limits Conc. mg/l	MBAS Permit Limits Load lbs/day	Molybdenum Permit Limits Conc. mg/l	Molybdenum Permit Limits Load lbs/day	Selenium Permit Limits Conc. mg/l	Selenium Permit Limits Load lbs/day	Other Permit Limits Conc. mg/l	Other Permit Limits Load lbs/day
3	Chicken Pluckers, Inc.	0008/01	75	626								
2	Slugem Hosiery Mill, Inc.	0007/01				monitor		monitor				
1	Will Plateit Metal Finishing, Inc	0006/01										
4												
	Column Totals =>			626		0.0000		0.0000		0.0000		
	MAHL from HWA (lbs/day) =>			2036		63.7366		3.0044		0.1730		
	Uncontrollable Loading (lbs/day) =>			109		16.0739						
	Total Allowable for Industry (MAIL) (lbs/day) =>			1927		47.6627		3.0044		0.1730		
	Total Permitted to Industry (lbs/day) =>			626		0.0000		0.0000		0.0000		
	MAIL left (lbs/day) =>			1302		47.6627		3.0044		0.1730		
	Percent Allow. Ind. (MAIL) still available (%) =>			67.5 %		100.0 %		100.0 %		100.0 %		
	Percent MAHL still available (%) =>			63.9 %		74.8 %		100.0 %		100.0 %		
	5 Percent MAHL (lbs/day) =>			101.81		3.1868		0.1502		0.0087		

Total Allowable for Industry is also known as Maximum Allowable Industrial Load or MAIL

PARs due MARCH 1

NC DIVISION OF WATER RESOURCES

NPDES Permitting Section

1617 MAIL SERVICE CENTER

RALEIGH, NC 27699-1617

Send a Copy

(Please send to Central Office in Raleigh…We forward the copy to the Region.)

Division Pretreatment Contacts

Al Woodall: (919) 707-3608
Octavio Henriquez: (919) 707-3662
Keyes McGee: (919) 707-3626

Email: firstname.lastname@ncdenr.gov

Physical Address: 1617 Mail Service Center
Raleigh, NC 27699-1617

Website:
https://deq.nc.gov/about/divisions/water-resources/water-quality-permitting/municipal-npdes-pretreatment-and-collection-system/pretreatment