

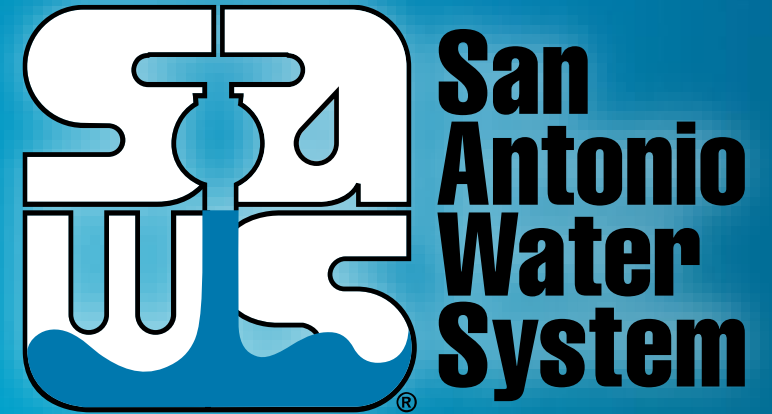
Pretreatment Inspections I01 Training – RVIPA #38

Martin Miller

Industrial Compliance Supervisor

RVIPA # 38

July 26, 2023



MAKING SAN ANTONIO
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Summary

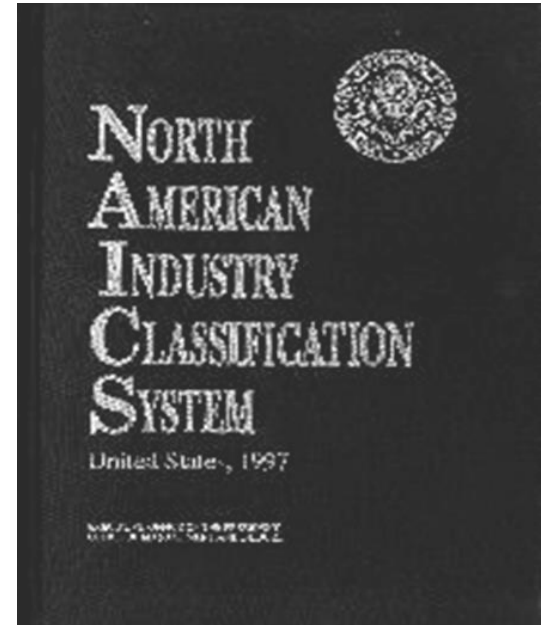
- Preparation
 - Understanding the applicable regulations
 - Knowing the company / type of Industry
- Documents
- Inspection
- Follow up
- Forms
- Checklists



Category

CFR Regulations

- Discharge permit should list the facility category
- Effluent Guidelines for that NAICS
- Understand the manufacturing process
- Research the location
- Understand the Utilities – sewer, water, recycle water
- History – permit fact sheets



Categorical Pretreatment Standards

40 CFR 405 – 471



- More than 26 categories
- Developed as a result of 1976 agreement between EPA and National Resource Defense Council (NRDC)
- Regulate the disposal of industrial wastewater into the sanitary sewer collection system
- Prevent illegal discharge of industrial pollutants into the sanitary sewer

Effluent Limits

<https://www.epa.gov/eg>

- PSNS – Pretreatment Standards for New Sources (40CFR403.3(m))
 - CWA 307(c) – prevent pass through, interference with POTW treatment
 - Users have 90 days from commencement of ELG to meet limits using Best Available Technology
- PSES - Pretreatment Standards for Existing Sources
 - Like PSNS these are national uniform technology-based standards.
 - Required to be complied no more than 3 years after the effective date of the Categorical standard



Pretreatment Inspections



Pretreatment Standards

Definitions

- **New Sources** - building, structure, or installation from which there is or may be a discharge of pollutants, no other source is located, or in which the total replacement of the existing process or production equipment happens, or it is independent of an existing source.
- **BAT – Best Available Control Technology** - basis for categorical effluent standards considered “state of the art” control and treatment

Application of Best Available Technology

Clean Water Act of 1972

- Major EPA Shift from conventional pollutants to control Toxic pollutants
- More stringent controls on Industrial Waste
- Based upon available technology rather than receiving water quality standards



Pretreatment Inspections

EPA's Office of Compliance

Online Guidance documents

Region VI

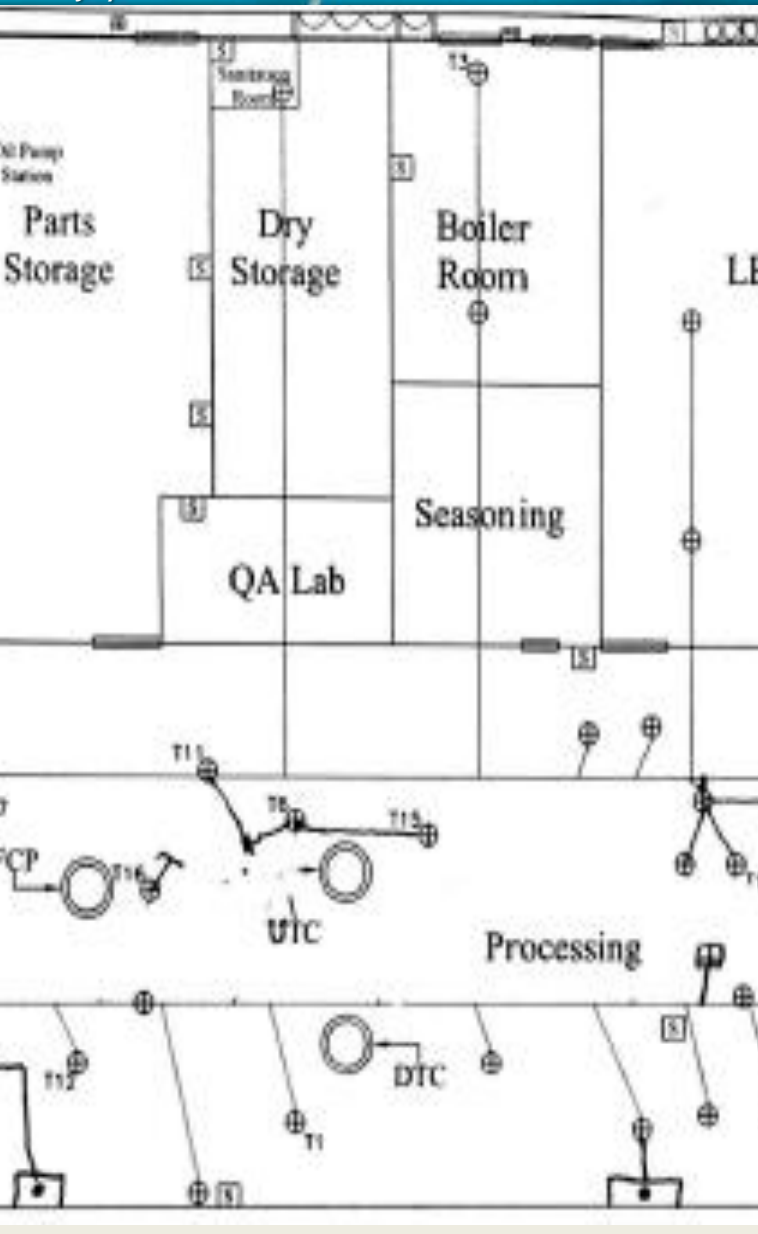
EPA Pretreatment

EPA Effluent Limit Guidance

TCEQ Pretreatment

- www.tceq.texas.gov/permitting/wastewater/pretreatment/EPA_categories_standards.html
 - Policy and Guidance documents
 - Information to make categorical determinations
 - Effluent limits





Preparing for the Inspection

Checklist for the site

- Checking the water account balance.
- Reviewing if the facility has a sewer surcharge.
- Review the site map including location of sewer discharges and infrastructure.
- Review the internal piping diagrams
 - locations for manufacturing equipment, raw material loading, production and waste treatment.

Preparing for the Inspection

Permit Review checklist

- Print out the last inspection for reference.
- Review the Permit Fact Sheet information.
 - Upcoming due dates for items such as SM reports, BMP requirements
 - Does it reflect current contact information (including email)?
- Review sampling data to look at trends for pollutant levels.
- You can forward a previous copy.
 - Asking the representative to review and provide updates to SDS, # of employees, recent manifests, other administrative items.



Preparing for the Inspection

Contact

- Call ahead to make an appointment.
- Surprise Site Visit
- Visit the site with the sampling crew prior to your inspection.
- Phone call pre-inspection to review the administrative tasks.
 - Allows for more time to focus on site inspection separately.



Four Major Key Elements to a Successful Industrial Inspection

- Introduction
- Documentation Review
- Site Assessment
- Exit Interview



At the facility



- Face to face contact with inspector
- Check credentials (id / business card)
- Secure contact information
- Professional working relationship
- Establish common ground
- Discuss what type of inspection is being conducted
- Ask if there are any current unresolved violations or other issues

Building Relationships



When inspecting a new facility, try to remember the following:

Be professional and be courteous but know also that you are not dependent upon the kindness of others, and you should not just accept what you are told.

Look inside cabinets and under sinks, ask workers questions about their jobs, ask why there is a hose going from a production unit to a floor drain...



Site Assessment

Site presentation is priceless

- Look at the obvious
- Implementation of Best Management Practices (BMPs):
 - Raw Material
 - Intermediate Products
 - Byproducts
 - Waste Products
 - Final Products



Sampling for Compliance

40 CFR 136

- Required under the permit
- Collection of samples
- Chain of Custody
 - *Transfer of samples*
 - *Notes and comments from sampling crew*
 - *Pictures of issues concerning sample event*
 - *Other indicators of an issue*





Plans required by permit

Review checklist for each type

- Toxic Organic Management Plan
- Pollution Prevention Plan
- Slug Control Plan
- Best Management Practices
- Narrative Standards

Employee Training Program and Employee Education

Documentation

Employee training on the operations at the facility

- Pollution Prevention & Good Housekeeping
- Used oil and spent solvent management
- Management of other waste materials
- TOMP implementation
- Treatment process



Narrative Best Management Practice

Improvements to Wastewater Quality

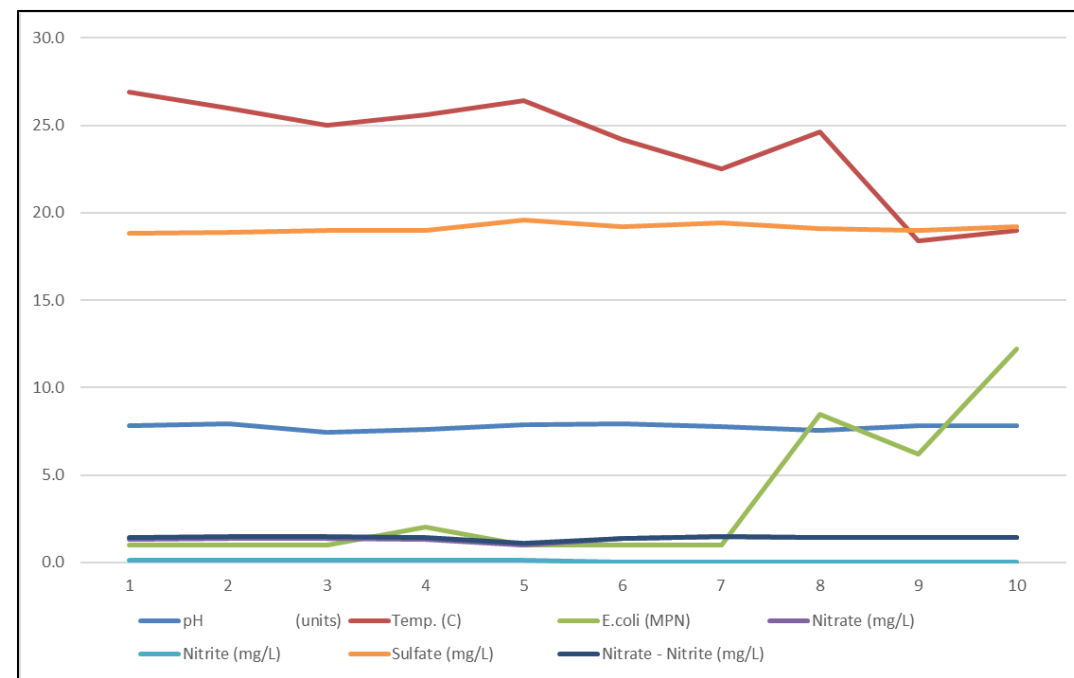
- Self-monitoring of facilities
- Benchmark milestones for compliance
- Exceedances / permit violations
- Narrative BMPs or other permit requirement updates to reflect any issues with exceedances or permit violations.



Why perform self-monitoring ?



- Determine effectiveness of wastewater treatment & management
 - Qualitative feedback
 - Quantitative feedback
- Process Control
- Trend analysis

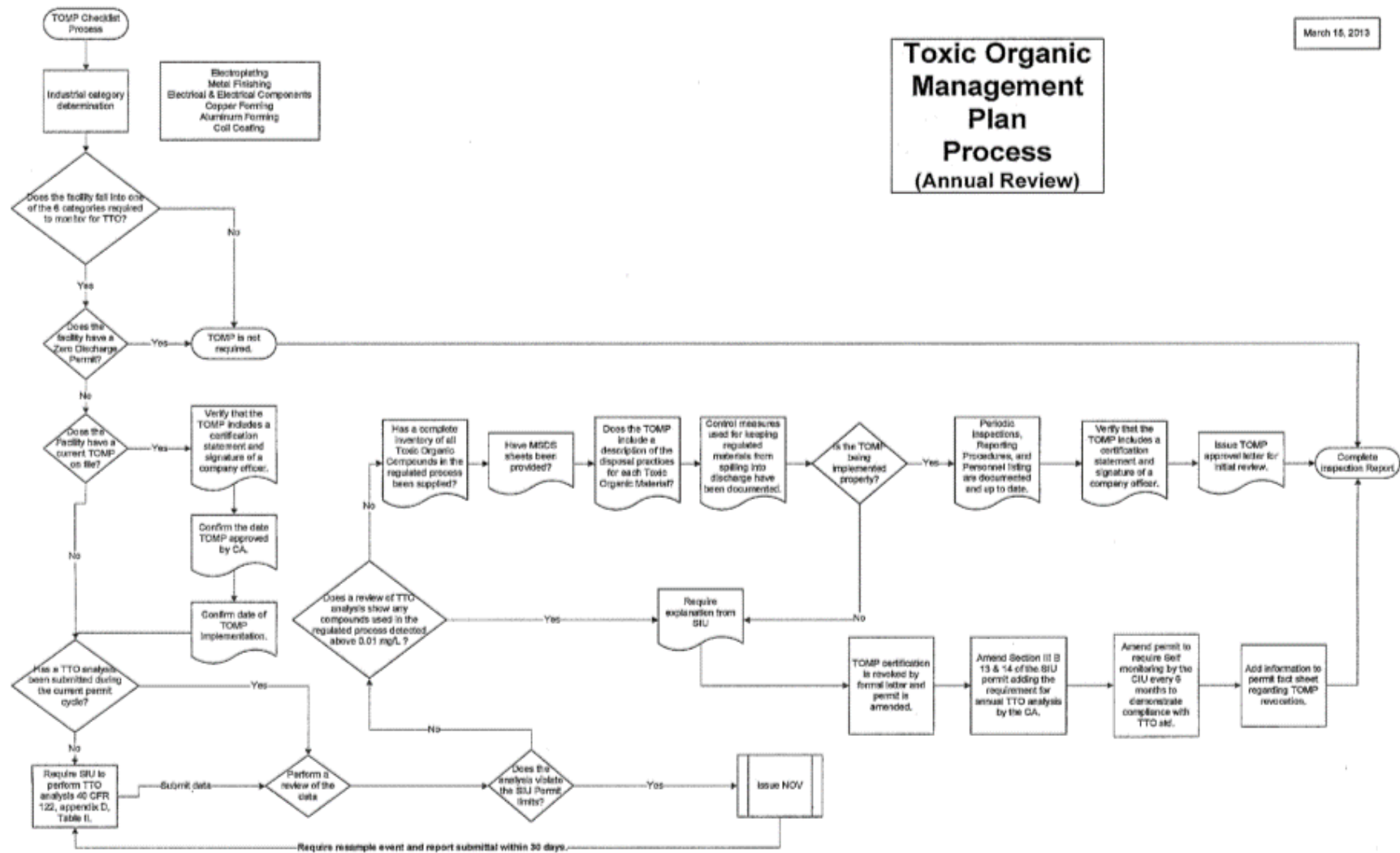


Develop a process flowchart for each function.

Consistency across the program.

March 16, 2013

Toxic Organic Management Plan Process (Annual Review)



Toxic Organic Management Plan

Control Authority checklist - approval

- List of all toxic organic compounds (TOC) used.
- Describe how TOC are used in the regulated processes.
- Estimates of how much is used and how much is discharged.
- Description of the methods of disposal.
- Control measures used to prevent spills and leaks.
- Periodic inspection frequency
- Reporting procedures
- Implementation date
- Certification & signature





TOMP checklist

Inventory & labels

- List of all toxic organic compounds (TOC) used.
- Describe how TOC are used in the regulated processes.
- Estimates of how much is used and how much is discharged.
- Description of the methods of disposal.
- Control measures used to prevent spills and leaks.
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Pollution Prevention Program

Taking Waste out of the Equation

- Minimizing the threat
 - inspections, education & enforcement
- Employee Training Programs
- Technology



Proactively keeping up with Technology

Pretreatment – emerging contaminants, solids, mercury, and Hospitals



- Amalgam Separator
- Nondispersible Wipes
- Medical devices
- Disposal of medical waste



Exit Interview

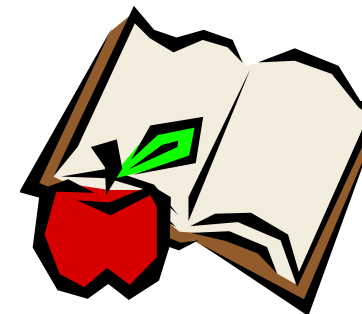
Inspector should provide a summary of findings and follow up in writing with the facility.

- Corrective Actions & Violations
- Compliance status and requirements
- Timelines to make necessary corrections
- Recommendations and tips
- Be very clear to distinguish the required vs. recommended elements.
- Notification of re-inspection



Conclusion

- A successful Inspection requires planning.
- Be positive and prepared.
- Ask questions if you are not certain about something.
- Maintain accurate records and know where you have stored these documents.
- Keep current with applicable regulations.



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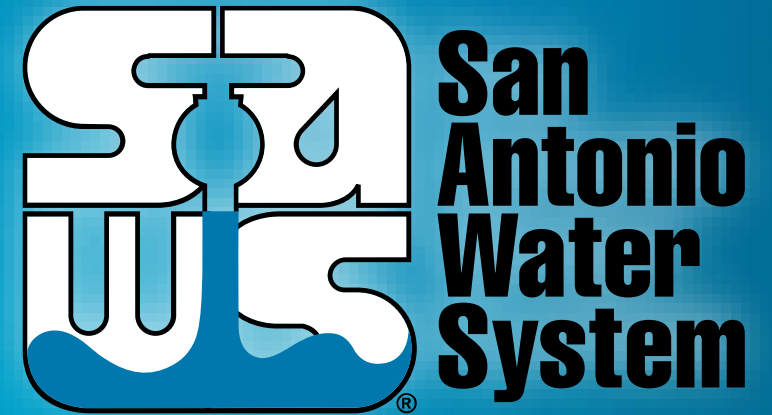
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