

HOW TO INSPECT A CIU/ SIU

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SUCCESSFUL INSPECTION

- Before
- During
- After





WHAT YOU NEED TO KNOW BEFORE THE INSPECTION

- ❑ 40 CFR 403 and any guidance documents
- ❑ Pretreatment Streamlining Rules adopted
- ❑ Pretreatment Program SOP
- ❑ Your Pretreatment Ordinance

40 CFR 403

- ❑ 403.8(f)(1)(v) – Carryout all **inspection**, surveillance and monitoring procedures necessary to determine, independent information supplied by Industrial Users....
- ❑ 403.8(f)(1)(vi)(B) – Pretreatment requirements which will be enforced through the remedies set forth in paragraph (f)(1)(vi)(A) of this section, will include but not limited to, the duty to allow or carry out **inspections**, entry, or monitoring activities... POTW shall have authority to... and procedures immediately and effectively to halt or prevent any discharge... imminent endangerment to the health or welfare of persons...

40 CFR 403

- ❑ 403.8(f)(2)(v)(A) – Where the POTW has authorized the Industrial User subject to a categorical Pretreatment Standard to forgo sampling of a pollutant regulated by categorical Pretreatment Standard... POTW subsequently determines that a waived pollutant is present or expected to be present... POTW must immediately begin at least annual effluent monitoring of User's discharge and **inspection**.
- ❑ 403.8(f)(2)(v)(C) – In the case of Industrial Users subject to reduced reporting requirements under § 403.12(e)(3), the POTW must randomly sample and analyze the effluent from Industrial User and conduct **inspections** at least once every two years.

ORDINANCE

- ❑ § 15-10-101(7) – Provide access to a permitted facility to allow **inspection**, sampling or enforcement activities under this chapter;
- ❑ § 15-10-241(B)(1) ...enter, **inspect**, sample, monitor or conduct surveillance or enforcement activities relating to the sewer system servicing a premises...

PRETREATMENT PROGRAM SOP

- ❑ The field monitoring activities such as **inspections**, sampling or other monitoring conducted by the Director may be used to survey the service area for potential new Industrial Users.
- ❑ **Inspections**, monitoring and surveillance of all discharge to the POTW are to be conducted in accordance with applicable local, state and federal rules and regulations.
- ❑ The Director shall randomly conduct **inspections** of the IUs of the POTW in order to identify, independent of information supplied by IUs...

PRETREATMENT PROGRAM SOP

- ❑ Sampling and **inspections** may also be conducted to verify and supplement information submitted on the IU survey and identify other sources of industrial waste discharging to the POTW.
- ❑ The **inspection** of the facility's process area is used to determine and observe the actual industrial waste source.
- ❑ A site **inspection** will be performed where applicable in order to verify the nature and concentration of pollutants.



BEFORE A SCHEDULED INSPECTION

- ☐ Wastewater Discharge Permit
- ☐ Slug Control Plan
- ☐ Toxic Organic Management Plan (TOMP)
- ☐ Self Monitoring Report
- ☐ Previous Inspection

WASTEWATER DISCHARGE PERMIT

(BEFORE A SCHEDULED INSPECTION CONT.)

- ☐ Effluent Limits
- ☐ Monitoring Requirements
- ☐ Signatory Requirements
- ☐ Expiration Date of Permit
- ☐ Flow Requirements
- ☐ Narrative Requirements
- ☐ Outfall locations
- ☐ Notification Requirements
- ☐ BMPs



SLUG CONTROL PLAN

(BEFORE A SCHEDULED INSPECTION CONT.)

- ☐ Review discharge practice
- ☐ Review chemical use, storage and disposal method
- ☐ review handling and loading procedures
- ☐ review emergency notification procedures
- ☐ Review inspection and maintenance of the chemical storage areas



TOXIC ORGANIC MANAGEMENT PLAN - TOMP SOLVENT MANAGEMENT PLAN – SMP (BEFORE A SCHEDULED INSPECTION)

- ☐ Review the potential sources for toxic organic compounds to be discharged
- ☐ Review complete list of all toxic organics in use on site
- ☐ Review approximate quantities indicated in waste stream
- ☐ Review method of application
- ☐ Review disposal
- ☐ review volume and location
- ☐ Review storage location



SELF MONITORING REPORT

BEFORE A SCHEDULED INSPECTION)

- ☐ Repetitive minor deficiencies
- ☐ Chain of Custody issues
- ☐ Future Changes stated
- ☐ Violations and corrective actions
- ☐ Milestone deadlines



REPORT

BEFORE A SCHEDULED INSPECTION (CONT.)

- ❑ Deficiencies note
- ❑ What are they doing right?



INSPECTION FORM

- ❑ Model form after Approval Authority checklists
 - General information:
 - **Facility identifying information**
 - **Authorized Representative**
 - **Duly Authorized Representative**
 - **Contact Person**
 - **Facility Operational Information**



INSPECTION FORM

- Business Activity and Wastewater Discharge Information:
- **Brief description of the type of business, activity or service conducted at the facility**
- **Production levels for the past year & estimates for the current year.**
- **Number of employees & shifts working**
- **Operational shut downs & dates**
- **New processes, activities or wastewater sources**
- **Type of waste water discharge: batch or continuous?**
- **Wastewater sources and flows**

INSPECTION FORM



- ❑ Wastewater Treatment & Pollution Control:
 - **Pretreatment Process or operation changes**
 - **Sampling/outfall/drain pipe locations changes**
 - **Flow monitoring equipment change**
 - **Slug Control Plan**
 - **MSDS**
 - **TOMP/SMP**
 - **Pretreatment locations to be inspected.**

INSPECTION FORM

- **Discharge Monitoring:**
 - **Last Self Monitoring Report (SMR)**
 - **Any permit violations since the last inspection?**
 - **Discharge records**
 - **Flow metering**
 - **pH metering**
 - **Sampling Procedures**
- **Hazardous Waste Documentation:**
 - **Hazardous waste manifest**
 - **Quantity of hazardous waste currently on site.**

INSPECTION FORMS

- **Pollution Prevention:**
- **Document success stories.**
- ☐ **document any employee training and participation.**
- ☐ **Have an area for a Summary of your inspection findings and,**
- ☐ **An area for all required signatures**

WHAT TO BRING TO INSPECTION

- ☐ Inspection form
- ☐ Current and previous year's files
- ☐ Appropriate Personal Protection equipment (PPE)
- ☐ Questions for inspection
- ☐ Partner?
- ☐ Business cards





DURING THE INSPECTION

- ☐ Arrive with a clear mind, attitude needs to be left at the door.
- ☐ Arrive on time
- ☐ Dress appropriately
- ☐ Be professional
- ☐ Keep small talk to a minimum
- ☐ Listen to the industry representative and refrain from interrupting them
- ☐ Do not use threatening language
- ☐ Be empathetic
- ☐ Bring a blank inspection form

INSPECTION – RECORDS REVIEW

- ☐ Give Blank form to contact
- ☐ General Information
- ☐ Business Activity & Wastewater Discharge Information
- ☐ Wastewater Treatment & Pollution Control
- ☐ Discharge Monitoring
- ☐ Hazardous Waste Documentation
- ☐ Pollution Prevention



INSPECTION - FACILITY

- ☐ Process area
- ☐ Production/manufacture area
- ☐ Chemical storage area
- ☐ Hazardous waste area
- ☐ Pretreatment area
- ☐ outfall/sampling location



INSPECTION – PROCESS AREA



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INSPECTION – PROCESS AREA



INSPECTION – PROCESS AREA



INSPECTION – CHEMICAL STORAGE



INSPECTION – PRETREATMENT AREA



INSPECTION – PRETREATMENT AREA



INSPECTION – CHEMICAL STORAGE



INSPECTION - PRETREATMENT AREA



INSPECTION – HAZARDOUS WASTE AREA



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INSPECTION HAZARDOUS WASTE AREA



INSPECTION – HAZARDOUS WASTE AREA



INSPECTION – SAMPLING AREA



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INSPECTION – SAMPLING AREA

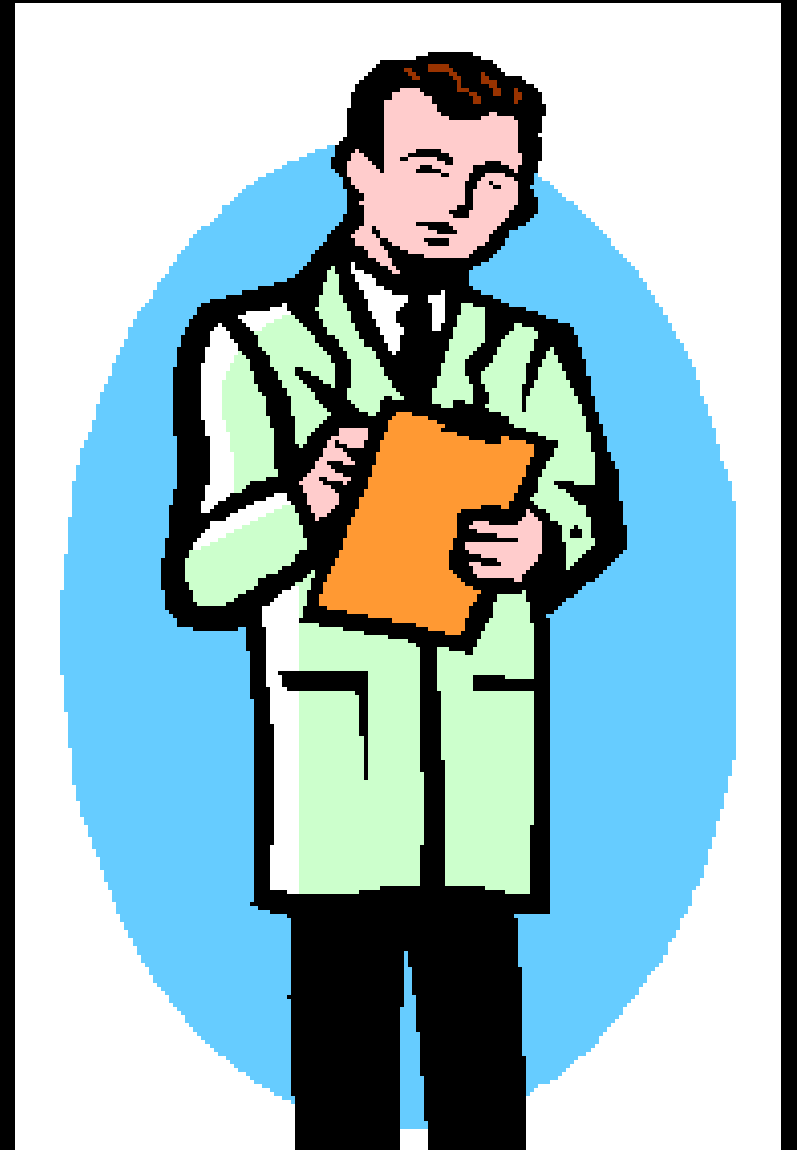


INSPECTION – SAMPLING AREA



AFTER INSPECTION

- ☐ Acknowledge your findings
- ☐ List all Violations
- ☐ List all accomplishments
- ☐ Provide deadline for action items
- ☐ Sign Inspection form
- ☐ Representative sign inspection form



BACK AT THE OFFICE

- ☐ Send copy of signed inspection form to contact person & Duly Authorized or Authorized Representative.
- ☐ Note action item due dates on calendar
- ☐ Place inspection form in file.

SURPRISE INSPECTION

- ❑ Anonymous tip
- ❑ Compliance issue
- ❑ Analytical results
- ❑ collection system issue



WHAT TO BRING

- ❑ Current and previous year's files
- ❑ Appropriate Personal Protection Equipment (PPE)
- ❑ A colleague if possible
- ❑ A camera
- ❑ Sampling equipment
- ❑ Notebook



DURING THE INSPECTION

- ☐ Usually Unannounced for surprise inspection, if possible.
- ☐ Leave attitude at the office
- ☐ Act professionally
- ☐ Small talk to a minimum
- ☐ Listen
- ☐ Do Not interrupt
- ☐ No threatening language
- ☐ Ask a lot of questions



DURING INSPECTION

- ❑ You have Right of Entry
- ❑ Go directly to the location of issue
- ❑ collect a sample (if possible)
- ❑ Ask a lot of questions
- ❑ Take as many pictures as necessary
- ❑ Cease and Desist Order



INSPECTION – PROCESS AREA



INSPECTION PROCESS AREA



INSPECT SAMPLE AREA



INSPECT - SAMPLING AREA



AFTER INSPECTION

- ☐ Notes in the file
- ☐ Issue violations
- ☐ Issue fines
- ☐ Issue citations
- ☐ Court



QUESTIONS?

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