

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

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Control Authority (CA) name and address	Date(s) of audit
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Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?

AUDITOR(S)

Name	Title/Affiliation	Telephone Number	Email Address

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number	Email Address
	*		

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	Term
AO	Administrative Order
BMP	Best management practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	<i>Code of Federal Regulations</i>
CIU	Categorical Industrial User
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-Weighted Average
gpd	Gallons per day
ICIS	Integrated Compliance Information System
IU	Industrial User
IWS	Industrial Waste Survey
mgd	Million gallons per day
MSW	Municipal solid waste
N/A	Not applicable
ND	Not determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total toxic organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

<p>1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)? If yes, discuss.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Yes</th> <th style="width: 50%; padding: 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Yes</th> <th style="width: 50%; padding: 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No		
Yes	No									
Yes	No									
<p>b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)? If yes, describe.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Yes</th> <th style="width: 50%; padding: 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Yes</th> <th style="width: 50%; padding: 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No		
Yes	No									
Yes	No									
<p>c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, and such)? If yes, describe.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Yes</th> <th style="width: 50%; padding: 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 50%; padding: 5px;">Yes</th> <th style="width: 50%; padding: 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No		
Yes	No									
Yes	No									

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the 2005 amendments to the General Pretreatment Regulations:

- Slug control requirements in control mechanisms. [40 CFR 403.8(f)(1)(iii)(B)(6)]
- Notification requirements to include changes that might affect the potential for a slug discharge. [40 CFR 403.8(f)(2)(vi)]
- Revised SNC definition. [40 CFR 403.8(f)(2)(viii)]
- Clarification that SIU reports must include any applicable BMP compliance information. [40 CFR 40.12(b), (e), (h)]
- SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [40 CFR 403.8(f)(1)(iii)(B)(3)]
- Record-keeping requirements for BMPs. [40 CFR 403.12(o)]
- Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [40 CFR 403.12(g)(2)]
- Modifications to the sampling requirements. [40 CFR 403.12(g)]
- Requirement to report all monitoring results. [40 CFR 403.12(g)]

	Yes	No

If not, when?

e. Has the CA adopted or does the CA plan to adopt any of the optional measures provided by the 2005 amendments to the General Pretreatment Regulations?

	Yes	No

If yes, check which ones.

	Issuance of monitoring waivers for pollutants that are not present [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]
	Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [40 CFR 403.8(f)(1)(iii)(A)]
	Using BMPs as an alternative to numeric local limits [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]
	Authority to implement alternative sampling, reporting, and inspection frequencies for middle-tier CIUs [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]
	Authority to implement equivalent concentration limits for flow-based standards [40 CFR 403.6(c)(6)]
	Authority to implement equivalent mass limits for concentration-based standards [40 CFR 403.6(c)(5)]

SECTION I: DATA REVIEW (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [403.18]		
2. a. Are there any planned changes to the POTW's treatment plant(s)? If yes, describe.	Yes	No
b. Are these changes to the treatment plant(s) due to pretreatment issues? If yes, what were the issues?	Yes	No
B. LEGAL AUTHORITY [403.8(f)(1)]		
1. a. Are there any contributing jurisdictions discharging wastewater to the POTW? If yes, complete questions b–e.	Yes	No
b. List the contributing jurisdictions.		
c. Does the CA have an agreement in place that addresses pretreatment program responsibilities?	Yes	No
d. Is the CA or the contributing jurisdiction responsible for the following:		
	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS		
Notifying IUs of requirements		
Issuance of control mechanisms		
Receiving and reviewing IU reports		
Conducting inspections		
Conducting compliance monitoring		
Enforcement of Pretreatment Standards and Requirements		

SECTION I: DATA REVIEW (CONTINUED)

B. LEGAL AUTHORITY (continued) [403.8(f)(1)] (continued)		
<p>e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?</p> <p>If yes, explain.</p>	Yes	No
<p>2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?</p> <p>b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?</p> <p>c. Did the CA update its procedures and ERP to implement the changes in its SUO?</p> <p>Explain</p>	Yes	No
<p>3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?</p> <p>If yes, explain.</p>	Yes	No

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?)

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU*?

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)] (continued)

4. How many IUs are identified by the CA in each of the following groups?

a.	<input type="text"/>	SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
	<input type="text"/>	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
	<input type="text"/>	Middle-tier CIUs** (specify below)
	<input type="text"/>	Noncategorical SIUs
b.	<input type="text"/>	Other regulated nonsignificant IUs (specify)
	<input type="text"/>	Noncategorical nonsignificant IUs
	<input type="text"/>	NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
	<input type="text"/>	Zero-discharging CIUs** (specify below)
c.	<input type="text"/>	TOTAL

**** The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs:

List of Middle-Tier CIUs:

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? _____

List of SIUs with general control mechanisms:

SECTION I: DATA REVIEW (CONTINUED)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]																		
<p>1. a. How many and what percent of the total SIUs are <u>not</u> covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]</p>	<input style="width: 100%; height: 20px;" type="text"/>	%																
<p>b. Has the CA implemented any general control mechanisms?</p>																		
<p>c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? List the types of SIUs covered under a general control mechanism:</p>	<input style="width: 100%; height: 20px;" type="text"/>																	
<p>d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]</p> <p>If any, explain.</p>	<input style="width: 100%; height: 20px;" type="text"/>																	
<p>2. a. Do any UST), CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA?</p>																		
<p>b. How are control mechanisms (specifically limits) developed for these facilities?</p> <p>Discuss</p>																		
<p>3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?</p> <p>b. Is any of the waste hazardous as defined by RCRA?</p> <p>c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e0e0e0;"> <th style="padding: 2px;">Yes</th> <th style="padding: 2px;">No</th> </tr> </thead> <tbody> <tr> <td style="width: 50%; height: 20px;"></td> <td style="width: 50%; height: 20px;"></td> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </tbody> </table>	Yes	No							<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e0e0e0;"> <th style="padding: 2px;">Yes</th> <th style="padding: 2px;">No</th> </tr> </thead> <tbody> <tr> <td style="width: 50%; height: 20px;"></td> <td style="width: 50%; height: 20px;"></td> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </tbody> </table>	Yes	No						
Yes	No																	
Yes	No																	
<p>d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)]</p>																		

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

a. For what pollutants have local limits been set?

b. How were these pollutants selected?

c. What was the most prevalent/most stringent criteria (e.g., NPDES permit requirements, plant inhibition, and/or sludge disposal requirements) for the limits?

d. Which allocation method(s) were used?

e. What was the limit basis (i.e., instantaneous maximums, daily maximums, or other) for the local limits?

f. When was the CA's last local limits evaluation? What was the approval date?

g. Has the CA identified any pollutants of concern beyond those in its local limits?
If yes, how has this been addressed?

Yes	No

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (continued)

4. What challenges, if any, were encountered during local limits development and/or implementation?

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

b. Is the frequency established above more, less, or the same as required?

Explain any difference.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12-month period _____ to _____.)

a. Not sampled or not inspected at least once [WENDB – NOIN]

	%
--	---

b. Not sampled at least once [RIDE – SIUs Not Sampled]

	%
--	---

c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]

	%
--	---

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]

SNC Evaluation Period

--

	%	Applicable Pretreatment Standards and reporting requirements
	%	Self-monitoring requirements
	%	Pretreatment compliance schedule(s)

*SNC defined by:

POTW	
EPA	

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs.

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: _____

Number of SIUs: _____

Names of SIUs:

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vi)]

Request a copy of the CA's inspection form, if applicable.

5. Who performs the CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name	

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves		Sample Splits	
Chain-of-custody forms		Sample Blanks	
New Sampling Tubes		Sample Spikes	
Field Blanks		Other:	
Other:			

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

8. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA?
[403.12(j)&(p)]

Yes	No

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

List SIUs required to have a slug discharge control plan:

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

Yes	No

If not, which SIUs have not been evaluated?

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW?

b. Has the ERP been approved by the Approval Authority?

c. Does the ERP describe how the CA will investigate instances of noncompliance?

d. Does the ERP describe types of escalating enforcement responses and the time frames for each response?

e. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response?

f. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements?

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.

Yes	No

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)				
	Yes	No		
<p>4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]</p> <p>If yes, attach a copy.</p> <p>If no, explain.</p>				
<p>5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?</p> <p>b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?</p>				
<p>6. a. Did the CA experience any of the following caused by industrial discharges?</p>				
	Yes	No	Unknown	Explain
• Interference				
• Pass through				
• Fire or explosions (flashpoint, and such)				
• Corrosive structural damage				
• Flow obstruction				
• Excessive flow rates				
• Excessive pollutant concentrations				
• Heat problems				
• Interference due to oil and grease (O&G)				
• Toxic fumes				
• Illicit dumping of hauled wastes				
• Worker health and safety				
• Other (specify)				

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]

Yes

No

7. a. Did the POTW have any sanitary sewer overflows since the last PCI or PCA?

Yes

No

b. If yes, how many were due to nondomestic waste issues (O&G blockages)?

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

2. How are requests by the public to review files handled?

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (continued)

3. Does the CA accept electronic reporting? If no, does it plan to do so?

4. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

6. Explain any public or community issues affecting the CA's pretreatment program.

7. How long are records maintained? [403.12(o)]

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SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES [403.8(f)(3)]			
1. Estimate the number of personnel (in FTEs) available for implementing the program.			
Activity	FTEs	Activity	FTEs
Legal Assistance		Sample Analysis	
Permitting		Data Analysis: Review and Response	
Inspections		Enforcement	
Sample Collection		Administration	
Total Number of FTEs			
2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.) If not, explain.			Yes
			No
3. a. Estimate the annual operating budget for the CA's program.			\$
b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)? Discuss any changes in funding.			
4. Discuss any problems in program implementation that appear to be related to inadequate resources.			

SECTION I: DATA REVIEW (CONTINUED)

I. RESOURCES (continued) [403.8(f)(3)] (continued)

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

Yes	No

b. Does the CA have adequate reference material to implement its program?

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times was the POTW monitored in the past year?

- Metals
- Priority pollutants
- Biomonitoring
- Toxicity Characteristic Leachate Procedure (TCLP)
- Extraction Procedure (EP) toxicity
- Other (specify)

Influent	Effluent	Sludge	Ambient (Receiving Water)

Less	Equal	More

b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Explain any differences.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)

c. Is the CA reporting these results to the Approval Authority?
If yes, at what frequency?

Yes	No

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality?
- Sludge disposal options?

Yes	No

b. Has the CA documented these findings?

Explain. (Attach a copy of the documentation, if appropriate.)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on a pollutant-by-pollutant basis.

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (continued)		
4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?	Yes	No
If yes, what was found?		
5. a. Has the CA implemented any kind of public education program? b. Are there any plans to initiate such a program to educate users about pollution prevention? Explain.	Yes	No
6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?		
7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?	Yes	No
Explain.		

SECTION I: DATA REVIEW (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION I COMPLETED
BY:

TITLE:

DATE:

TELEPHONE:

SECTION II: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or PCA should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE _____ Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		
FILE _____ Industry name and address	Type of industry SIC Code: NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE _____ Industry name and address	Type of industry	
	SIC Code:	
	NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow
Category(ies) _____		
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit	Yes <input type="checkbox"/> No <input type="checkbox"/>
Comments		
FILE _____ Industry name and address	Type of industry	
	SIC Code:	
	NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow
Category(ies) _____		
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit	Yes <input type="checkbox"/> No <input type="checkbox"/>
Comments		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE _____ Industry name and address	Type of industry	
	SIC Code:	
	NAICS Code:	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow
Category(ies) _____		
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non-SIU <input type="checkbox"/> NSCIU	Industry visited during audit	Yes <input type="checkbox"/> No <input type="checkbox"/>
Comments		
General Comments		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name					<p>INSTRUCTIONS: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.</p>	
File	File	File	File	File		
IU FILE REVIEW					Reg. Cite	
A. ISSUANCE OF IU CONTROL MECHANISM						
					1. Control mechanism application form	
					2. Fact sheet	
					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					4. Control mechanism contents	403.8(f)(1)(iii)(B)
					a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
					b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
					c. Applicable effluent limits (local limits, categorical standards, BMPs)	403.8(f)(1)(iii)(B)(3)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					d. Self-monitoring requirements	403.8(f)(1)(iii)(B)(4)
					• Identification of pollutants to be monitored	
					• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
					• Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
					• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
					• Sampling frequency	
					- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements (including all monitoring results)	
					• Record-keeping requirements	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
					f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
					g. Notice of slug loadings	403.12(f)
					h. Notification of spills, bypasses, upsets, etc.	403.16, 403.17
					i. Notification of significant change in discharge	403.12(j)
					j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
					k. 24-hour notification of violation/resample requirement	403.12(g)(2)
					l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					5. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					• Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
					e. Documentation to support the POTW's determination	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification as an NSCIU	403.3(v)(2)
					e. Documentation for the qualification to be classified as NSCIU	
					f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
					5. Calculation and application of production-based standards	403.6(c)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
					6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
					a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
					b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
					c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
					d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
					e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
					7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
					b. Documentation that dilution is not being used as treatment? (Y/N)	
					8. Calculation and application of CWF or FWA	403.6(d)&(e)
					9. Application of most stringent limit	403.8(f)(1)(ii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
					1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Inspect at least once every 2 years	
					2. Inspection at frequency specified in approved program	403.8(c)
					3. Documentation of inspection activities	403.8(f)(2)(v)
					4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
					5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
					• Sample waived pollutant(s) at least once during the term of the control mechanism	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Sample and analyze IU discharge at least once every 2 years	
					6. Sampling at the frequency specified in approved program	403.8(c)
					7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
					8. Analysis for all regulated parameters	403.12(g)(1)
					9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vii)
					a. Discharge violations	
					• IU self-monitoring	
					• CA compliance monitoring	
					b. Monitoring/reporting violations	
					• IU self-monitoring	
					– Reporting (e.g., frequency, content)	
					– Sampling (e.g., frequency, pollutants)	
					– Record-keeping	
					• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
					• Slug discharge control plan	
					• Compliance schedule/reports	
					c. Compliance schedule violations	
					• Start-up/final compliance	
					• Interim dates	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
					2. Determination of SNC (on the basis of rolling quarters)	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
					3. Response to violation	
					4. Adherence to approved ERP	403.8(f)(5)
					5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
					6. Escalation of enforcement	403.8(f)(5)(ii)
					7. Publication for SNC	403.8(f)(2)(viii)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS	
					1. Self-monitoring and reporting	
					a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
					b. Analysis of all required pollutants	403.12(g)(1)&(h)
					c. Appropriate analytical methods (40 CFR Part 136)	
					d. Appropriate sample collection methods	
					e. Compliance with sample collection holding times	
					f. Submission of BMR/90-day report	403.12(b) &(d)
					g. Periodic self monitoring reports	403.12(e)&(h)
					h. Reporting all required pollutants	403.12(g)(1)&(h)
					i. Signatory/certification of reports	403.12(l)
					j. Annual certification by NSCIUs	403.12(q)
					k. Submission of compliance schedule reports by required dates	403.12(c)
					l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					n. Notification of hazardous waste discharge	403.12(j)&(p)
					o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
					p. Notification of significant changes	403.12(j)
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
					2. Compliance with all general control mechanism requirements	
					3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller) 	
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW 	
					<ul style="list-style-type: none"> • Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant 	
					4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
					<ul style="list-style-type: none"> • Certification statements with each compliance report 	
					5. Compliance with BMR requirements, if applicable (Y/N)	
					6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
					<ul style="list-style-type: none"> • IU discharges less than 100 gpd of total categorical wastewater 	
					<ul style="list-style-type: none"> • Annual certification statements from the IU 	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
					7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
					• IU is effectively operating treatment technologies to achieve compliance	
					• IU is recording the facility's flow rates	
					• IU is recording the facility's production rates	
					• IU has notified the CA whenever production rates vary	
					• IU continues to employ water conservation methods/technologies	
Comments						

SECTION II: IU EVALUATION (CONTINUED)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
Comments						
SECTION II COMPLETED BY:					DATE:	
TITLE:					TELEPHONE:	

SECTION III: OBSERVATIONS AND CONCERNS

INSTRUCTIONS: On the basis of the information and data evaluated, summarize the observations and concerns of the audit for each program element shown below. Identify all problems or deficiencies from the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> Status of program modifications 	403.18	I.A.1
<ul style="list-style-type: none"> Modification to the program to accommodate the 2005 General Pretreatment Regulation changes 	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi), 403.12(g)	I.A.1
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> Minimum legal authority requirements 	403.8(f)(1)	I.B.2&3
<ul style="list-style-type: none"> Adequate multijurisdictional agreements 	403.8(f)(1)	I.B.1&3

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> Application of <i>significant industrial user</i> definition 	403.3(v)(1)	I.C.1; Attach B.E.2
<ul style="list-style-type: none"> Application of <i>middle-tier CIU</i> definition 		
<ul style="list-style-type: none"> Application of <i>NSCIU</i> definition 		
<ul style="list-style-type: none"> Identify and categorize IUs 	403.8(f)(2)(i)&(ii)	I.C.2&3; II.B
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> Issuance of individual or general control mechanisms to all SIUs 	403.8(f)(1)(iii)	I.D.1
<ul style="list-style-type: none"> Adequate control mechanisms 	403.8(f)(1)(iii)(B)	II.A.4
<ul style="list-style-type: none"> Adequate control of trucked, railed, and dedicated pipe wastes 	403.5(b)(8)	I.D.2&3, E.1

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> Appropriately categorize, notify, and apply all applicable pretreatment standards 	403.8(f)(1)(ii)&(iii) 403.5	II.B
<ul style="list-style-type: none"> Basis and adequacy of local limits 	403.8(f)(4); 122.21	I.E.3&4
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency 	Approved program 403.8(f)(2)(ii)&(v)	I.F.1&2; II.C
<ul style="list-style-type: none"> Adequate inspections 	403.8(f)(2)(v)&(vi)	I.F.2&4; II.C.1-3
<ul style="list-style-type: none"> Adequate sampling protocols and analysis 	403.8(f)(2)(vii)	I.F. 5&6; II.C.5-9

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (continued)		
<ul style="list-style-type: none"> Adequate IU self-monitoring 	403.8(f)(2)(iv)	I.F.6,G.5; II.E
<ul style="list-style-type: none"> Notification of changed and hazardous waste discharges 	403.12(j)&(p)	I.F.8; II.D.1.b
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans 	403.8(f)(2)(vi)	I.F.9; II.C.4
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) 	403.12(g)(1)&(2) 403.8(f)(2)(vi)	II.A.4.j & II.C.5
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of <i>significant noncompliance</i> definition 	403.8(f)(2)(viii)	I.G.1; II.D.2; Attach B.I.1
<ul style="list-style-type: none"> Develop and implement an ERP 	403.8(f)(5)	I.G.2; II.D.3
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC 	403.8(f)(2)(viii)	I.G.4; II.D.7

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
G. ENFORCEMENT (continued)		
<ul style="list-style-type: none"> Effective enforcement 	403.8(f)(5)	I.G.2.c, 5&6; II.D.1.c, 4&5
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation 	403.5(c)(3); 403.12(o); 403.14	I.H
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources 	403.8(f)(3)	I.I

SECTION III: OBSERVATIONS AND CONCERNS (CONTINUED)

Description	Regulatory Citation	Checklist Question(s)
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources 		I.J.1&3
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness 		I.J.2
<ul style="list-style-type: none"> Integration of pollution prevention 		I.J.6
K. ADDITIONAL EVALUATIONS/INFORMATION		
SECTION II COMPLETED BY:	DATE:	
TITLE:	TELEPHONE:	

ATTACHMENT A: PRETREATMENT PROGRAM STATUS UPDATE

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PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. Either the auditor or CA should updated this form before each audit on the basis of information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.

A. CA INFORMATION

1. CA name

2. a. Pretreatment contact

b. Mailing address

c. Title

d. Telephone number

3. Date of last CA report to Approval Authority

4. Is the CA operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?

Yes

No

5. Effluent and sludge quality

a. List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated

Cause(s)

b. Has the treatment plant sludge violated these tests?

- EP toxicity
- TCLP

Yes

No

6. Does the treatment plant discharge to a 303(d) impaired waterbody?
If yes, list the pollutants of concern.

Yes

No

7. Does the treatment plant discharge to a waterbody that has a TMDL that has been developed or is being developed?

Yes

No

If yes, include the information on the TMDL (i.e., pollutants of concern, limits, effective date).

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS			
1. Indicate components that were identified as deficient.			
a. Program modification b. Legal authority c. Local limits d. IU characterization e. Control mechanism f. Application of Pretreatment Standards g. Compliance monitoring h. Enforcement program i. Data management j. Program resources k. Other (specify)	Last PCI	Last Audit	Program Report
	Date:	Date:	Date:
2. Is the CA presently in RNC for any of these violations?		Data Source	Yes
a. Failure to enforce against pass through and/or interference [RNC - I][SNC]			
b. Failure to submit required reports within 30 days [RNC - I][SNC]			
c. Failure to meet compliance schedule milestones within 90 days [RNC - I][SNC]			
d. Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months [RNC - II]			
e. Failure to inspect or sample 80% of SIUs within the past 12 months [RNC - II]			
f. Failure to enforce standards and reporting requirements [RNC - II]			
g. Other (specify) [RNC - II]			
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)			
Name of SIU in SNC	Compliance Status	Source	
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.			
			SNC Evaluation Period
	%	Applicable Pretreatment Standards and reporting requirements	*SNC defined by:
	%	Self-monitoring requirements	POTW
	%	Pretreatment compliance schedules	EPA

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS (continued)

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.

ATTACHMENT A COMPLETED BY:

DATE:

TITLE:

TELEPHONE:

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ATTACHMENT B: PRETREATMENT PROGRAM PROFILE

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PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. The auditor or CA should obtain the needed information from the original, approved pretreatment program submission and modifications and the NPDES permit. The auditor or CA should update this from, as appropriate, in response to approved modifications and revised NPDES permit requirements.

A. CA INFORMATION

1. CA name
2. Original pretreatment program submission date
3. Required frequency of reporting to Approval Authority
4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?
If yes, provide the following information.

Yes	No

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation?
2. Identify any substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]

Date Approved	Name of Modification	Date Incorporated in NPDES Permit

PRETREATMENT PROGRAM PROFILE (Continued)

C. TREATMENT PLANT INFORMATION						
INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.						
1. Treatment plant name			2. Location address			
3. a. NPDES permit number	b. Expiration date	4. Treatment plant wastewater flows				
		Design <input style="width: 50px;" type="text"/> mgd	Actual <input style="width: 50px;" type="text"/> mgd			
5. Sewer System	a. Separate	%	b. Combined	%	c. Number of CSOs	
6. a. Industrial contribution (mgd)	b. Number of SIUs discharging to plant		c. Percent industrial flow to plant			
<input style="width: 100%;" type="text"/>	<input style="width: 100%;" type="text"/>		<input style="width: 100%;" type="text"/>			
7. Level of treatment	Type of Process(es)					
a. Primary	<input style="width: 100%;" type="text"/>					
b. Secondary	<input style="width: 100%;" type="text"/>					
c. Tertiary	<input style="width: 100%;" type="text"/>					
8. Indicate methods of sludge disposal.						
Quantity of sludge			Quantity of sludge			
a. Land application	<input style="width: 50px;" type="text"/>	dry tons/year	e. Public distribution	<input style="width: 50px;" type="text"/>	dry tons/year	
b. Incineration	<input style="width: 50px;" type="text"/>	dry tons/year	f. Lagoon storage	<input style="width: 50px;" type="text"/>	dry tons/year	
c. Monofill	<input style="width: 50px;" type="text"/>	dry tons/year	g. Other (specify)	<input style="width: 50px;" type="text"/>	dry tons/year	
d. MSW landfill	<input style="width: 50px;" type="text"/>	dry tons/year				
D. APPLICATION OF STANDARDS						
If there is more than one treatment plant, were local limits established specifically for each plant?				N/A	Yes	No
				<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>	<input style="width: 50px;" type="text"/>

PRETREATMENT PROGRAM PROFILE (Continued)

E. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED
BY:

TITLE:

DATE:

TELEPHONE:

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ATTACHMENT C: LEGAL REVIEW CHECKLIST

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CHECKLIST – PRETREATMENT PROGRAM LEGAL AUTHORITY REVIEWS

NAME OF POTW: _____

DATE OF REVIEW: _____

Note: Several changes to the National Pretreatment Regulations made as a result of the 2005 revisions to the General Pretreatment Regulations (streamlining rule, 70 FR 60134-60198: October 14, 2005) are more stringent than the previous federal requirements and therefore are considered required modifications for the POTW. Therefore, to the extent that existing POTW legal authorities are inconsistent with those required changes, they must be revised. Where local authorities are already consistent with the required provisions, further changes are not necessary.

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
A. Definitions [403.3 & 403.8(f)(2)]							
1. Act, Clean Water Act	403.3(b)	§ 1.4 A					
2. Authorized or Duly Authorized Representative of the User	403.12(l)	§ 1.4 C					
3. Best Management Practices or BMPs	403.3(e)	§ 1.4 E					
4. Categorical Pretreatment Standard or Categorical Standard	403.6	§ 1.4 F					
5. Indirect Discharge or Discharge	403.3(i)	§ 1.4 M					
6. Industrial User (or equivalent)	403.3(j)	§ 1.4 LL					
7. Interference	403.3(k)	§ 1.4 O					
8. National Pretreatment Standard, Pretreatment Standard, or Standard	403.3(l)	§ 1.4 BB					
9. New Source	403.3(m)	§ 1.4 T					
10. Pass Through	403.3(p)	§ 1.4 V					
11. Pretreatment Requirement	403.3(t)	§ 1.4 AA					
12. Publicly Owned Treatment Works or POTW	403.3(q)	§ 1.4 DD					
13. Significant Industrial User <i>[NOTE: §1.4 GG(3) is an optional streamlining provision for Nonsignificant Categorical Industrial User classification.]</i>	403.3(v)	§ 1.4 GG					
14. Significant Noncompliance	403.8(f)(2)(vii)	§ 9 (A-H)					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
15. Slug Load or Slug Discharge	403.8(f)(2)(vi)	§ 1.4 HH					
16. Other definitions based on terms used in the POTW Ordinance							
B. National Pretreatment Standards – Prohibited Discharges							
1. General Prohibitions							
a. Interference	403.5(a)	§ 2.1A					
b. Pass Through	403.5(a)	§ 2.1A					
2. Specific Prohibitions [403.5(b)]							
a. Fire/Explosion Hazard (60 °C or 140 °F flashpoint)	403.5(b)(1)	§ 2.1B(1)					
b. pH/Corrosion	403.5(b)(2)	§ 2.1B(2)					
c. Solid or Viscous/Obstruction	403.5(b)(3)	§ 2.1B(3)					
d. Flow Rate/Concentration (BOD, etc.)	403.5(b)(4)	§ 2.1B(4)					
e. Heat; exceeds 40 °C (104 °F)	403.5(b)(5)	§ 2.1B(5)					
f. Petroleum/Nonbiodegradable Cutting/Mineral Oils	403.5(b)(6)	§ 2.1B(6)					
g. Toxic Gases/Vapor/Fumes	403.5(b)(7)	§ 2.1B(7)					
h. Trucked/Hauled Waste	403.5(b)(8)	§ 2.1B(8)					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
3. National Categorical Standards	403.8(f)(1)(ii)	§ 2.2					
4. Local Limits Development <i>[NOTE: POTWs may develop Best Management Practices (BMPs) to implement the prohibitions listed in 40 CFR 403.5(a)(1). Such BMPs shall be considered local limits and Pretreatment Standards.]</i>	403.5(c) & (d)	§ 2.4					
5. Prohibition Against Dilution as Treatment	403.6(d)	§ 2.6					
6. Best Management Practices Development <i>[NOTE: Optional streamlining provision.]</i>	403.5(c)(4)	§ 2.4C					
C. Control Discharges to POTW System							
1. Deny/Condition New or Increased Contributions	403.8(f)(1)(i)	§§ 4.8 & 5.2					
2. Individual Control Mechanism (e.g., permit) to ensure compliance - <i>Permit Content</i>	403.8(f)(1)(iii)	§ 4.2					
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)					
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§5.2A(2)					
c. Effluent Limits	403.8(f)(1)(B)(3)	§ 5.2A(3)					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
d. Best Management Practices <i>[Note: This is a required streamlining provision for a CIU with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, this provision would be optional and is required only if the POTW has incorporated the use of BMPs (§ 2.4 C).]</i>	403.8(f)(1)(B)(3)	§ 5.2A(3)					
e. Self-Monitoring Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)					
f. Reporting & Notification Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)					
g. Record-Keeping Requirements	403.8(f)(1)(B)(4)	§ 5.2A(4)					
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B)(4) & 403.12(e)(2)	§ 5.2A(5)					
i. Statement of Applicable Civil and Criminal Penalties	403.8(f)(1)(B)(5)	§ 5.2A(6)					
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. Where the POTW has determined that slug controls are necessary, the ordinance must provide authority for the POTW to include such requirements in IU permits.]</i>	403.8(f)(1)(B)(6)	§ 5.2A(7)					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
k. Specific Waived Pollutant <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated § 6.4B of the Model SUO.]</i>	403.8(f)(1)(B)(4)	§ 5.2A(8)					
l. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7					
m. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4					
n. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8					
o. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1					
p. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7					
q. Requirement to Submit Chain-of-Custody Forms with Monitoring Data <i>[Note: Optional permit provision]</i>							
3. General Control Mechanism to Ensure Compliance <i>[NOTE: Optional streamlining provision. Required only if the POTW has incorporated the use of General Permits (§ 4.6 of the Model SUO).]</i> - Permit Content	403.8(f)(1)(iii)(A)	§ 4.2 & 4.6					
a. Statement of Duration	403.8(f)(1)(B)(1)	§§ 5.1 & 5.2A(1)					
b. Statement of Nontransferability	403.8(f)(1)(B)(2)	§ 5.2A(2)					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
c. Effluent Limits	403.8(f) (1)(B)(3)	§ 5.2A(3)					
d. Best Management Practices <i>[Note: This is a required streamlining provision for a CIU with BMP requirements as part of its Categorical Standards. But if BMPs are being applied to other CIUs or noncategorical SIUs without categorical BMP requirements, this provision would be optional and is required only if the POTW has incorporated the use of BMPs (§ 2.4C).]</i>	403.8(f) (1)(B)(3)	§ 5.2A(3)					
e. Self-Monitoring Requirements	403.8(f) (1)(B)(4)	§ 5.2A(4)					
f. Reporting & Notification Requirements	403.8(f) (1)(B)(4)	§ 5.2A(4)					
g. Record-Keeping Requirements	403.8(f) (1)(B)(4)	§ 5.2A(4)					
h. Process for Seeking a Waiver for Pollutants Not Present or Expected to be Present <i>[Note: Required only if POTW has incorporated the use of Pollutants Not Present and § 6.4 of the Model SUO.]</i>	403.8(f) (1)(B)(4) & 403.12(e) (2)	§ 5.2A(5)					
i. Statement of Applicable Civil and Criminal Penalties	403.8(f) (1)(B)(5)	§ 5.2A(6)					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
j. Slug Discharge Requirements (if necessary) <i>[NOTE: Required streamlining change. The ordinance should indicate that a user is required to develop a slug discharge control plan if determined by the POTW to be necessary.]</i>	403.8(f)(1)(B)(6)	§ 5.2A(7)					
k. Permit Application/Reapplication Requirements <i>[Note: Optional permit provision]</i>		§§ 5.3 & 5.7					
l. Permit Modification <i>[Note: Optional permit provision]</i>		§ 5.4					
m. Permit Revocation/Termination <i>[Note: Optional permit provision]</i>		§§ 5.6 & 10.8					
n. Proper Operation and Maintenance <i>[Note: Optional permit provision]</i>		§ 3.1					
o. Duty of Halt/Reduce <i>[Note: Optional permit provision]</i>		§ 10.7					
p. Requirement to Submit Chain-of-Custody Forms with Monitoring Data <i>[Note: Optional permit provision]</i>							
D. Required Reports							
1. Develop Compliance Schedule for Installation of Technology	403.8(f)(1)(iv)	§§ 5.2b(2) & 10.4					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
2. Reporting Requirements [403.12] <i>Types of Reports</i>							
a. Baseline Monitoring Report	403.12(b)	§ 6.1					
(i) Identifying Information	403.12(b)(1)	§ 6.1B(1) & § 4.5A(1)a					
(ii) Other Environmental Permits Held	403.12(b)(2)	§§ 6.1B(1) & 4.5A(2)					
(iii) Description of Operations	403.12(b)(3)	§§ 6.1B(1) & 4.5A(3)a					
(iv) Flow Measurements	403.12(b)(4)	§§ 6.1(b)(2) & 4.5A(6)					
(v) Measurement of Pollutants	403.12(b)(5)	§ 6.1B(2)					
(vi) Certification	403.12(b)(6)	§ 6.1B(3)					
(vii) Compliance Schedule	403.12(b)(7)	§ 6.1B(4)					
b. Compliance Schedule Progress Report	403.12(c)	§ 6.2					
c. Report on Compliance with Categorical Pretreatment Standard Deadline	403.12(d)	§ 6.3					
d. Periodic Reports on Continued Compliance							
- From categorical users	403.12(e)	§ 6.4A					
- From significant noncategorical users	403.12(h)	§ 6.4A					
e. Notice of Potential Problems to be Reported Immediately (Including Slug Loads)	403.12(f)	§ 6.6					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
f. Notification of Changes Affecting Potential for a Slug Discharge <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(vi)	§ § 6.5 & 6.6					
g. Notice of Violation/Sampling Requirement <i>[NOTE: Required streamlining revision.]</i>	403.12(g)(2)	§ 6.8					
h. Requirement to Conduct Representative Sampling	403.12(g)(3)	§ 6.4E					
i. Notification of Changed Discharge	403.12(j)	§ 6.5					
j. Notification of Discharge of Hazardous Waste	403.12(p)	§ 6.9					
<i>Other Reporting Requirements</i>							
k. Data Accuracy Certification & Authorized Signatory	403.6(a)(2)(ii) & 403.12(l)	§§ 6.4D & 6.14					
l. Record-Keeping Requirement (3 years or longer)	403.12(o)	§ 6.13					
- Including documentation associated with Best Management Practices <i>[NOTE: Required streamlining provision.]</i>	403.12(o)	§ 6.13					
m. Submission of All Monitoring Data <i>[NOTE: Required streamlining revision]</i>	403.12(g)(6)	§ 6.4F					
n. Annual Certification by Nonsignificant Categorical Industrial Users <i>[Note: Optional provision, required only if the POTW has incorporated §1.4GG(3) of the Model SUO.]</i>	403.3(v)(2)	§§ 4.7C & 6.14B					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
o. Certification of Pollutant Not Present <i>[NOTE: Optional provision, required only if the POTW has incorporated § 6.4 B of the Model SUO]</i>	403.12(e)(2)(v)	§ 6.14C					
E. Test Procedures [40 CFR Part 136 & 403.12(g)]							
1. Analytical Procedures (40 CFR Part 136) <i>[NOTE: Required streamlining provisions]</i>	403.12(g)	§ 6.10					
2. Sample Collection Procedures <i>[NOTE: Required streamlining provisions]</i>	403.12(g)(3) & (4)	§ 6.11					
F. Inspection and Monitoring Procedures [403.8(f)]							
1. Right to Enter All Parts of the Facility at Reasonable Times	403.8(f)(1)(v)	§ 7.1					
2. Right to Inspect Generally for Compliance	403.8(f)(1)(v)	§ 7.1					
3. Right to Take Independent Samples	403.8(f)(1)(v), 403.8(f)(2)(v) & 403.8(f)(2)(vii)	§ 7.1					
4. Right to Require Installation of Monitoring Equipment	403.8(f)(1)(iv)	§ 7.1					
5. Right to inspect and copy records	403.12(o)(2)	§ 7.1					
G. Remedies for Noncompliance (Enforcement) [403.8(f)(1)(vi)]							
1. Non-Emergency Response							
a. Injunctive Relief	403.8(f)(1)(vi)	§ 11.1					
b. Civil/criminal Penalties	403.8(f)(1)(vi)	§§ 11.2 & 11.3					

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
2. Emergency Response							
a. Immediately Halt Actual/Threatened Discharged	403.8(f)(1)(vi)(B)	§ 10.7					
3. Legal Authority to Enforce Enforcement Response Plan							
	403.8(f)(1)(vi)	§ 11.4					
H. Public Participation							
1. Publish List of Industrial Users in Significant Noncompliance <i>[NOTE: Required streamlining revision]</i>	403.8(f)(2)(viii)	§ 9					
2. Access to Data [403.8(f)(1)(vii) & 403.14]							
a. Government	403.14(a) & (c)	§ 8					
b. Public	403.14(b)	§ 8					
I. Optional Provisions							
1. Net/Gross Adjustments <i>[streamlining provision]</i>	403.15	§ 2.2 D					
2. Equivalent Mass Limits for Concentration Limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 E					
3. Equivalent Concentration Limits for Mass Limits <i>[streamlining provision]</i>	403.6(c)	§ 2.2 F					
4. Upset Notification	403.16	§ 13.1					
5. Waive Monitoring for Pollutant Not Present or Expected to be Present <i>[streamlining provision]</i>	403.12(e)(2)	§ 6.4B					
6. Reduce Periodic Compliance Reporting <i>[streamlining provision]</i>	403.12(e)(3)	§ 6.4C					
7. Other Special Agreement or Waivers (Excluding Wavier of National Categorical Pretreatment Standards and Requirements)							

NONE = No revision necessary

REQ = Require Revision

REC = Recommend Revision

	Part 403 Citation	Model SUO Section	REVISIONS			POTW Ordinance Section	Comments/Notes
			NONE	REQ	REC		
8. Hauled Waste Reporting/Requirements		§ 3.4					
9. Grease Interceptor Reporting/Requirements		§ 3.2 C					
10. Authority to Issue Notice of Violations (NOVs)		§ 10.1					
11. Authority to Issue Administrative Orders (AOs)							
12. Authority to Issue Administrative Penalties		§ 10.6					
13. Authority to Enforce Against Falsification or Tampering							
14. Any Other Supplemental Enforcement Actions as Noted in the POTW's Enforcement Response Plan							
15. Permit Appeals Procedures							
16. Penalty or Enforcement Appeals Procedures							
17. Bypass Notification	403.17	§ 13.3					

Document(s) submitted for review:

Name of Reviewers

**ATTACHMENT D: SITE VISIT DATA SHEET, WENDB DATA ENTRY WORKSHEET, PCA
REQUIRED ICIS DATA ELEMENTS WORKSHEET, RNC WORKSHEET**

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SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry:					
Address of industry:					
Date of visit:			Time of visit:		
Name of inspector(s):					
Provide the name(s) and title(s) of industry representative(s)					
Name		Title		Phone/E-mail	
IU Permit Number:		Exp Date:		IU Classification:	
Inspection		Scheduled		Unscheduled	
Type/Purpose		PCI		New Company	
				PCA	
				Complaint	
Please provide the following documentation:					
1. Nature of operation:					
2. Number of employees		Number of shifts:		Hours of operation:	
3. Water source:					
4. Wastestream flow(s) discharged to the POTW:					
Sanitary:		(gpd)	Process:		(gpd)
					Combined:
					(gpd)
5. Describe any significant changes in process or flow:					
6. Type of pretreatment system (Describe):					
Continuous flow		Batch		Combined	
7. Condition/operation of pretreatment system (Describe):					
Any unusual conditions or problems with the pretreatment system:					

SITE VISIT DATA SHEET (Continued)

8. Process area description (identify raw materials and processes used):
9. Condition/operation of process area (Describe):
Any unusual conditions or problems with the process area:
10. General housekeeping in process area (Describe):
Any unusual conditions or problems with general housekeeping in process area:
11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored):
Any floor drains? <input type="checkbox"/>
Any spill control measures? <input type="checkbox"/>
General housekeeping of chemical storage area (Describe):
12. Are hazardous wastes drummed and labeled? <input type="checkbox"/>
13. Does the IU have hazardous waste manifests? <input type="checkbox"/>
Any problems associated with hazardous waste:

SITE VISIT DATA SHEET (Continued)

14. Solid waste production:					
Solid waste disposal method(s):					
15. Description of sample location:					
Sampling method/technique:					
16. Evaluation of self-monitoring data:		Yes	No	N/A	
If yes, was self-monitoring adequate:					
17. Who performs the self-monitoring analysis?					
Notes:					

WENDB DATA ENTRY WORKSHEET

WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name			
NPDES number			
Date of inspection		Date entered into PCS	
<ul style="list-style-type: none"> • Number of SIUs* <ul style="list-style-type: none"> - Number of SIUs without control mechanism - Number of SIUs not inspected or sampled - Number of SIUs in SNC** with standards or reporting - Number of SIUs in SNC with self-monitoring - Number of SIUs in SNC with self-monitoring and not inspected or sampled • Number of CIUs 	PCS Code	Checklist Reference	Data
	SIUS	I.B.2.a	
	NOCM	I.C.1.b	
	NOIN	I.E.2	
	PSNC	I.F.3.a	
	MSNC	I.F.3.a	
	SNIN	I.G.5	
	CIUS	I.B.2.a	
<p>*The number of SIUs entered into PCS is based on the CA's definition of <i>Significant Industrial User</i>.</p> <p>**As defined in EPA's 1986 <i>Pretreatment Compliance Monitoring and Enforcement Guidance</i>.</p>			

WENDB DATA ENTRY WORKSHEET COMPLETED BY: TITLE:	DATE: TELEPHONE:
---	-------------------------

PCA REQUIRED ICIS DATA ELEMENTS WORKSHEET

▶ TYPE OF COMPLIANCE MONITORING: PCA	
▶ NAME OF PRETREATMENT PROGRAM:	
▶ CONTROLLING AUTHORITY NPDES ID:	
START DATE OF INSPECTION	▶ END DATE OF INSPECTION
LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]):	
ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]):	

SIGNIFICANT INDUSTRIAL USERS (SIUs)	PCI CHECKLIST REFERENCE	PCA CHECKLIST REFERENCE	DATA
▶ SIUs*:	II.B.2.a	I.C.4.a	
▶ SIUs Without Control Mechanism:	II.C.1.c	I.D.1 and II.A	
▶ SIUs Not Inspected:	II.E.2.c	I.F.2.c	
▶ SIUs Not Sampled:	II.E.2.b	I.F.2.b	
▶ SIUs in SNC with Pretreatment Standards** :	II.F.3.a	I.F.3.a	
▶ SIUs in SNC with Reporting Requirements:	II.F.3.a	I.F.3.a	
SIUs in SNC with Pretreatment Schedule:		I.F.3.a	
SIUs in SNC Published in Newspaper:		I.G.4; II.D.7	
Criminal Suits Filed Against SIUs:	II.F.1		
CATEGORICAL INDUSTRIAL USERS (CIUs)			
▶ CIUs:		I.C.4.a	
OTHER INFORMATION			
Pass-Through/Interference Indicator (none, Yes, or No)		I.G.6	
DEFICIENCIES			
Control Mechanism Deficiencies (No or Yes)		I.D.1; II.A.4	
Inadequacy of Sampling and Inspections (No or Yes)		II.C and Site Visit Sheets	
Adequacy of Pretreatment Resources (Yes or No)		I.I	
FOOTNOTES: ▶ denotes required information * The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User." ** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.			

DATA ENTRY WORKSHEET COMPLETED BY:	DATE:
TITLE:	TELEPHONE NO.:

RNC WORKSHEET

RNC WORKSHEET		
INSTRUCTIONS: Place a check in the appropriate box to the left, if the CA is found to be in RNC or SNC.		
CA name		
NPDES number		
Date of audit		
	Level	Checklist Reference
<input type="checkbox"/> Failure to enforce against pass through and/or interference	I	I.G.6
<input type="checkbox"/> Failure to submit required reports within 30 days	I	Attach A.B.2.b
<input type="checkbox"/> Failure to meet compliance schedule milestone date within 90 days	I	Attach A.B.2.c
<input type="checkbox"/> Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	I.D.1.c
<input type="checkbox"/> Failure to inspect or sample 80% of SIUs within the past 12 months	II	I.F.2.a
<input type="checkbox"/> Failure to enforce Pretreatment Standards and reporting requirements (more than 15% of SIUs in SNC)	II	II.D.1; I.G.2
<input type="checkbox"/> Other (specify)	II	
SNC		
<input type="checkbox"/> CA in SNC for violation of any Level I criterion		
<input type="checkbox"/> CA in SNC for violation of two or more Level II criterion		
<p>For more information on RNC, see EPA's 1990 <i>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</i></p>		

RNC WORKSHEET COMPLETED BY:	DATE:
TITLE:	TELEPHONE: