

Facility Inspection Procedures

Building Blocks of a Pretreatment Program

40 CFR Part 403.8(f) (1-6)

- **Legal Authority**
- **Implementation Procedures**
- **Funding/Resources**
- **Local Limits**
- **Enforcement Response Plan**
- **Industrial Waste Inventory**



Regulatory Framework

Pretreatment Regulations

40 CFR 403.8(f)(1)(v)

- Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by industrial users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users.
- Representatives of the POTW shall be authorized to enter any premises of any Industrial User in which a Discharge source or treatment system is located or in which records are required to be kept under 40 CFR 403.12(o) to assure compliance with Pretreatment Standards.

Pretreatment Regulations

40 CFR 403.8(f)(1)(vi)(B)

- Right of Entry – require POTWs with approved pretreatment programs to have the legal authority to enter industrial user facilities to carry out inspections and monitoring activities.
- Adopted in Local Ordinance/Rules and Regulations
- Provides the POTW's representatives the authority to enter, inspect, review records, gather information (e.g., take photos, ask questions, copy records), and sample wastewater at an industrial facility

Pretreatment Regulations

40 CFR 403.8(f)(2)(v)

- Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year...

Facility Inspections

- Inspection and sampling activities:
- The core of the POTW's compliance monitoring program
- Require POTW personnel to enter private property to gather information to assess or determine the compliance status of the facility.
 - IU Inventory and Characterization
 - SIU inspections
 - Unannounced or Emergency inspections

Facility Inspections

- Opening Conference
- Facility Tour
- Records Review
- Closing Conference
- Reporting Writing
- Notification of Applicable Pretreatment Stds
- Follow Up

Practical Exercise

- × Virtual Walk Through Inspection and Sampling of an Industrial User