

Industrial Wastewater Pretreatment Programs 101 - Audits

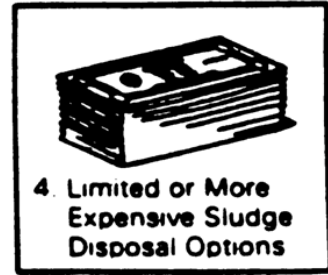
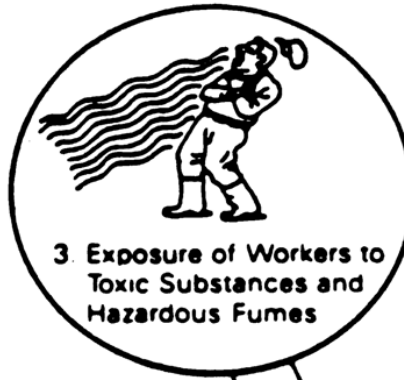
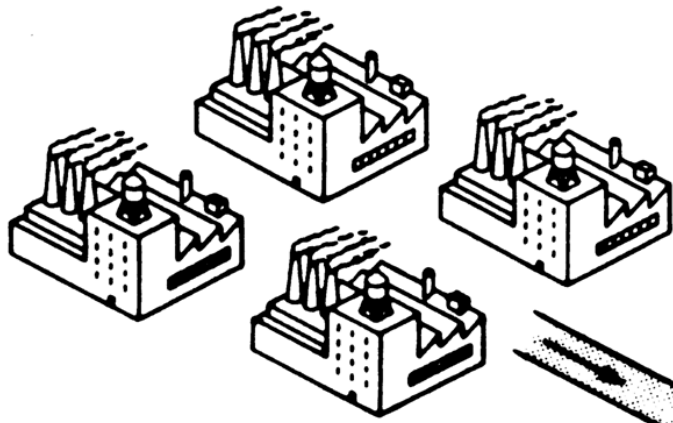
Presented by:
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EPA Region 2
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NYWEA-NEWEA Joint Spring
Technical Conference

What is the Pretreatment Program?

- Clean Water Act Regulatory Program
- 40 CFR part 403
- Pollutant control requirements for nondomestic (industrial) sources discharging wastewater to publicly owned treatment works (POTWs), aka “indirect dischargers”
- National program implemented through partnerships with state and local governments

Common Terms and Concepts

- Approved pretreatment program
- Control Authority (CA)
- Approval Authority (AA)
- Interference
- Pass through
- “Improve opportunities for sludge”
- Definitions for pretreatment terms at 40 CFR 403.3

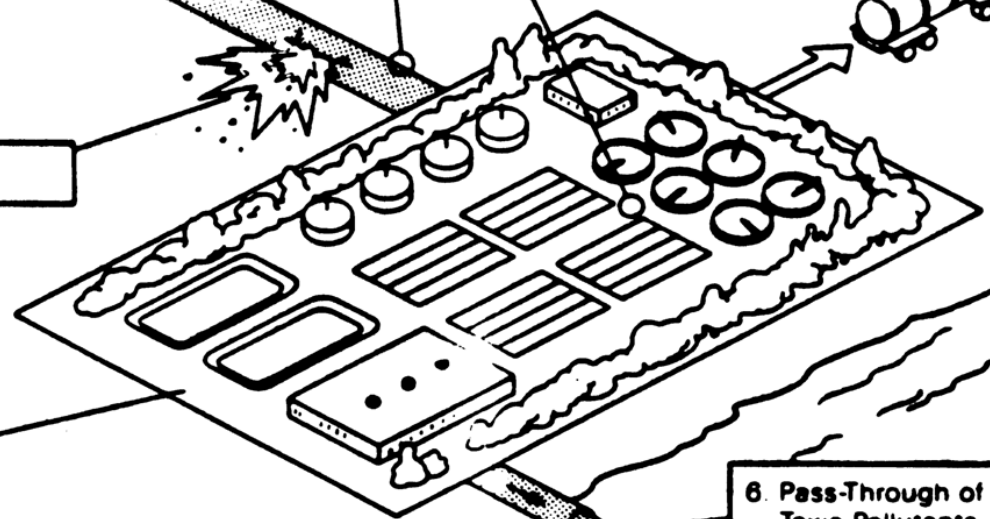


1. Corrosion of Collection System or of the Sewage Treatment Plant

2 Explosions



6. Pass-Through of Toxic Pollutants into Surface Waters



3. Exposure of Workers to Toxic Substances and Hazardous Fumes

4. Limited or More Expensive Sludge Disposal Options

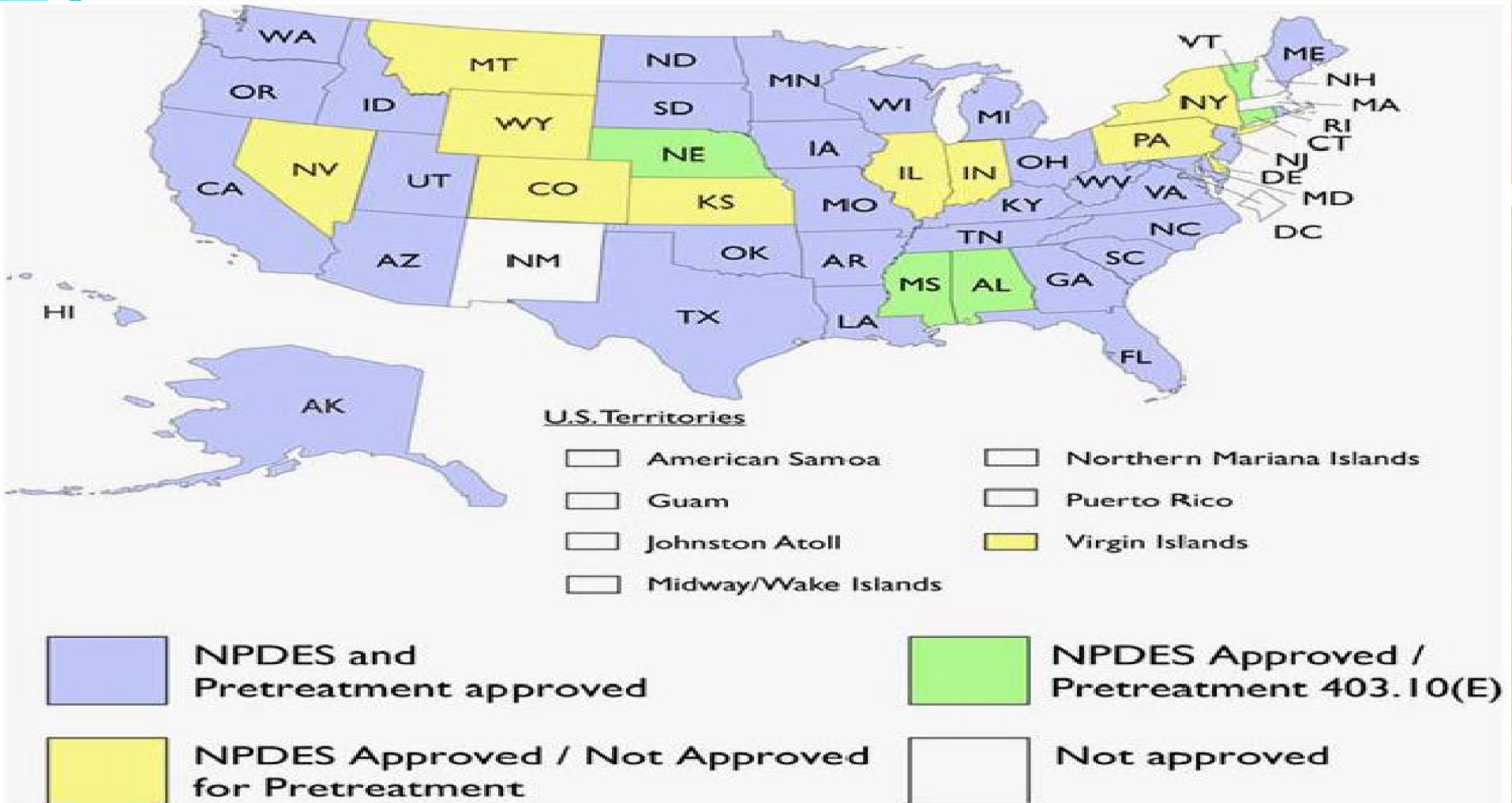
5. Interference with Plant Treatment System

What We Do in Region 2

- Conduct Audits and Inspections
- Technical support and answer questions
- Review POTW Annual Reports
- Enforcement (Administrative Orders, Criminal or Civil Prosecution, etc...)
- Approval of Major Modifications (SUOs, Local Limits, etc...)
- Outreach and Training
- Directly implement pretreatment program in non-approved areas
- National Pretreatment Program Coordination
- Two Divisions:
 - Water Division (Approved Programs, Audits, Technical Support...)
 - Enforcement Compliance Assurance Division (Enforcement, Inspections, Non-Approved Program, Review of annual IPP reports)

Background – How Often do Audits and Inspections Occur

- EPA HQ national audit goal is once every five years or 20% of regional/state program annually
- EPA HQ national pretreatment compliance inspection goal is 40% of regional/state program over five years.
- Region 1 – EPA is Approval Authority for NH and MA – 62 Approved programs in total
- Region 2 – EPA is the Approval Authority for NY, PR and USVI – 58 approved programs in total.
- EPA Authorized for NPDES Permitting (3) – NH, MA, and NM + PR (All other States are authorized)
- EPA Direct Implementation States (13) – NH, MA, NY, PA, DE, IL, IN, NM, KS, CO, MT, WY, NV + PR, USVI
- Other States are delegated to manage the pretreatment program – examples: VT, ME, RI, CT, NJ



Pretreatment Compliance Audits vs Inspections

Inspections:

- Interview
- File Review
- Site Visits

Audits:

- Additional interview questions on:
 - Data collection
 - Public Participation
 - Pollution Prevention
 - Staffing and Resources
 - Industrial Waste Surveys
 - Review of legal authority
- Increased File Review and Site Visits, in particular:
 - Categorical determinations, BMPs, TOMPs, etc...
 - Application of Combined Wastestream Formula

Pre-Audit Communication

- ~ 30 – 60 Days advance notice is given, first via phone call, then by email
- Notify program of “what to expect” and what documents will be reviewed on site:
 - SIU File: permits, inspection reports, SIU and POTW monitoring, correspondence, Notice of Violations (NOVs,) etc...
 - Sewer Use Ordinance, Intermunicipal Agreements Enforcement Response Plans and Local Limit Evaluation
 - Industrial waste surveys and BMP programs (if applicable)
 - SIU inspections to be conducted (announced or unannounced)
 - Audit can last anywhere from 2-5+ days depending on size of program
 - Decide on a mutually agreeable date
- Send audit checklist (February 2010) to be reviewed or completed by POTW
 - Section 1 (Data Review)
 - Attachment A – Program Status

Selection of Industrial User (IU) file review and site visits

- Selection intended to be a representative cross section of the program
- Both Categorical IUs and non-categorical Significant IUs can be chosen, with focus on:
 - New SIUs
 - SIUs with compliance issues
 - CIUs with complicated processes; i.e., multiple categorical determinations, complex calculations, etc...
 - SIUs whose files were not reviewed previously
 - SIUs for which POTWs request technical assistance

Selection of IU Site Visit Locations

- EPA recommends at least 2 IU site visits and/or approximately 20% of SIUs
- Priority given to:
 - New facilities
 - IUs whose files were reviewed
 - Input from the POTW
- IUs which are positive examples that can be shared:
 - Outstanding pollution prevention programs
 - Innovative processes
 - Advanced pretreatment systems
- Zero-discharging CIUs

Hybrid Audits

- Prior to Visit:
 - Share easily available documents ahead of the audit for review by auditors
 - Identify additional documents that are needed prior to in-person visit
- Interview with Pretreatment Program Staff can be done either virtually or in person
- Closing conference often done via Teams

Hybrid Audits

- Benefits:
 - No travel time
 - Screen sharing capabilities
 - Findings and recommendations can be shared live on screen
 - Collaborative editing of documents
 - Better technical assistance
 - Can be scattered over a few days to allow for a more thorough and less time restricted review
- Cons:
 - Not all pretreatment programs have scanned their documents
 - POTW staff might not be familiar with EPA's remote platform (Microsoft Teams)

EPA Pre-Audit Review

- Review NPDES permit for pretreatment requirements
- Review latest annual report
- Review latest audit/PCI reports
- Review SUOs, ERPs, Local Limits, other documents
- Look up information on industrial users; search for potentially unpermitted SIUs
- Enforcement status via ECHO (Enforcement and Compliance History On-line)
- Any other pertinent information that exists
- Notify State, if applicable, to see if they want to assist or participate

Audit Procedure

- Opening conference
 - Include all personnel related to program
- Conduct an interview: Review checklists (Section 1) and any other information previously requested and submitted
- Review SIU files:
 - Permit, permit application, fact sheet, POTW and SIU Monitoring data, and inspection
 - Reports, notice of violation, correspondence, etc.
- Legal Authority documents review
- Review any other information as necessary
- Tour of POTW (time permitting)
- SIU Inspections (EPA/State or POTW lead)
- Close-out conference

Audit Checklist and Instructions

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST AND INSTRUCTIONS

833-B-10-001

February 2010



Office of Wastewater Management
Office of Enforcement and Compliance Assurance

Checklist Example

SECTION II: IU EVALUATION (Continued)					
Industry Name					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 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.
Meat Packers Inc.	ABC Metal Finishing	Electroplating USA			
File	File	File	File	File	Reg. Cite
<u>1</u>	<u>2</u>	<u>3</u>	___	___	IU FILE REVIEW
					A. ISSUANCE OF IU CONTROL MECHANISM
✓	✓	✓			1. Control mechanism application form
✓	✓	✓			2. Factsheet
					3. Issuance or reissuance of control mechanism
✓	✓	✓			a. Individual control mechanism
NA	NA	NA			b. General control mechanism
					4. Control mechanism contents
1	1	1			a. Statement of duration (≤ 5 years)
✓	✓	✓			b. Statement of nontransferability w/o prior notification/approval
✓	2	3			c. Applicable effluent limits (local limits, categorical standards, BMPs)
Comments					
1. The permit duration exceeds the 5 year max. Permit terms are for 10 years.					
2. ABC's permit does not include all applicable categorical effluent limits. Permit just includes daily maximum limits.					
3. Electroplating USA's permit does not include local limits. The permit only requires the IU to comply with categorical limits.					

SECTION II: IU EVALUATION (Continued)

File 1	File 2	File 3	File 4	File 5	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
✓	4	✓			1. Inspection (at least once a year, except as otherwise specified)	403.810(2)(1)
					a. If the CA has determined a discharger to be an NSCIU	403.810(2)(1)(B)
NA	NA	NA			▪ Evaluation of discharger with the definition of NSCIU once per year	
					b. If the CA has reduced an IU's reporting requirements	403.810(2)(1)(C)
NA	NA	NA			▪ Inspect at least once every 2 years	
1	4	✓			2. Inspection at frequency specified in approved program	403.8(c)
✓	4	✓			3. Documentation of inspection activities	403.810(2)(1)
✓	4	5			4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.810(2)(1)
✓	✓	✓6			5. Sampling (at least once a year, except as otherwise specified)	403.810(2)(1)
					a. If the CA has waived monitoring for a CIU	403.810(2)(1)(A)
NA	NA	NA			▪ 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	403.810(2)(1)(C)
NA	NA	NA			▪ Sample and analyze IU discharge at least once every 2 years	
✓	✓	✓6			6. Sampling at the frequency specified in approved program	403.8(c)
2	2	NA			7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.810(2)(1)
✓	✓	NA			8. Analysis for all regulated parameters	403.129(1)
3	3	NA			9. Appropriate analytical methods (40 CFR Part 136)	403.810(2)(1)
Comments						
1. During the interview, City personnel indicated that all SIUs are inspected twice a year. Only found one inspection report for 2009.						
2. <u>COCs</u> did not specify the sample collection times (composite start and stop times), indication of preservatives.						
3. Sample result reports indicate that solid waste methods were used.						
4. Only stormwater inspection reports were found. No pretreatment inspection reports in files.						
5. Did not find any document slug discharge evaluation in file.						
6. There were no compliance sampling data in the files, but there was a letter from the IU indicating that the facility will be closed for 2009 for company restructure and therefore no production or discharge.						

Comments on File Review

- If the POTW does not have any documentation of its compliance activities, then the auditors have to assume that it was not performed.
- Compliance monitoring must be performed so that the results can be used in enforcement proceedings or in judicial actions.
- Auditor will look at lab reports: analytical methods, chain of custody, QA/QC, holding times, etc...

IU Inspections: What We Look For

- Mass-balance: what goes in the process, what is the process and what comes out of the process
- Adequacy of IU classification:
 - Has the POTW correctly classified the IU?
 - New source vs. Existing source?
- Has the POTW identified all sources of wastewater?
- Type of pretreatment system
 - Operational status during visit
- Process area:
 - Housekeeping observations and procedures
 - Chemical storage; secondary storage and spill kits
 - Chemical and hazardous waste storage and disposal
- Adequacy of the POTW's inspection procedures
- Adequacy of categorical and/or local limit sampling point(s) and sampling procedures
- Unusual issues

Closing Conference

- Summarize observations and concerns
- Share preliminary observations (not final findings)
- Explain report process
- Explain POTW response and corrective actions

Next Steps: EPA Evaluates Compliance

Evaluate Reportable Noncompliance/Significant Noncompliance:

- Failure to enforce against Pass Through or Interference
- Failure to submit reports within 30 days of due date
- Failure to meet compliance schedule dates within 90 days
- Failure to issue/reissue permits to 90% of SIUs
- Failure to inspect or sample 80% of SIUs within past 12 months
- Failure to enforce Pretreatment Standards or reporting requirements (more than 15% of SIUs in SNC)
- Other items of concern to the Approval Authority

These are Significant Non-Compliance or Reportable Non-Compliance triggers that result in EPA enforcement.

Next Step: Audit Report

- EPA/State may contact POTW for additional information or clarifications prior to finalizing report
- Audit Report Submitted to Pretreatment Program
- POTW has 30-60 days to respond to findings (optional)
- EPA/State reviews any revised documents and provides technical assistance

Example: Albany County Water Purification District Audit, 2019

III. Industrial User (IU) Characterization	
IUs currently identified by the Control Authority (CA)	IU Type
9	Discharging Significant Industrial Users
	6 Discharging Non-Categorical SIUs (as defined by the CA)
	3 Categorical Industrial Users (CIUs)
	0 Middle Tier CIUs
0	Zero-Discharging CIUs
0	Non-significant CIU (NSCIU)
4	Other Regulated IUs (e.g. permitted IUs) Describe: At the time of the audit, the District permitted Surpass Chemicals (two locations), Passant Paint, and Midland Farms as non-significant industrial users.
85	Waste Haulers Describe: The City District received hauled wastes that include portable toilet waste, grease trap waste, and septic tank cleanout waste

IV. Findings Summary Table

Part V Section Reference – Finding	Requirement(s)	Recommendation(s)
Finding A.1.a – The District’s ERP was not updated during the most recent revisions to the SUO.		1
Finding A.1.b – The District’s local limits have not been revised since the District’s pretreatment program was adopted.		2
Finding A.2 – The District should confirm that the legal authorities of contributing jurisdictions are at least as stringent as the District’s SUO.	1	
Finding B.1 – The District’s procedures for identifying industrial users could be improved.		3
Finding C.4.a – The permits reviewed did not properly identify the current discharge and sample locations.	2	
Finding C.4.b – The Bimbo Bakeries permit has incomplete records retention requirements.	3	
Finding C.4.c – The Bimbo Bakeries and Mohawk permits do not require flow-proportional composite samples.	4	

Example Finding/Requirement

2. Are there any contributing jurisdictions discharging wastewater to the POTW? Does the CA have an agreement in place that addresses pretreatment program responsibilities?

Yes, the District receives nondomestic flows from several jurisdictions as noted in Section II above. According to the District representatives, the County's laws give the District the legal authority to implement the pretreatment program in contributing jurisdictions.

Finding A.2 – The District should confirm that the legal authorities of contributing jurisdictions are at least as stringent as the District's SUO.

As noted above, the District is receiving nondomestic discharges from several jurisdictions. At the time of the audit, the District representatives were unsure if the contributing jurisdictions had legal authorities that were at least as stringent as those in the District's SUO.

Regulatory Requirement

The federal regulations at 40 CFR 403.8(f)(1) require that the POTW operate pursuant to its legal authority enforceable in federal, state, and local courts, which authorizes or enables the POTW to apply and to enforce the requirements of 40 CFR Part 403. Such authority may be contained in a statute, ordinance, or series of contracts or joint powers agreements.

Requirement 1

The District is required to ensure that contributing jurisdictions have legal authorities that are at least as stringent as those in the District's SUO.

CHECKLIST – PRETREATMENT PROGRAM LEGAL AUTHORITY REVIEWS

NAME OF POTW: Albany County Water Purification District

DATE OF REVIEW: January 12, 2021

Note: Several changes to the National Pretreatment Regulations made as a result of the Streamlining Rule 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 these required changes, they must be revised. Where local authorities are already consistent with these 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	X			2.1(b)	
2. Authorized or Duly Authorized Representative of the User	403.12(l)	§ 1.4 C		X		2.1(d)	See Below
3. Best Management Practices or BMPs	403.3(e)	§ 1.4 E		X		Missing	BMPs should be included because of transportation and other categorical standards.
4. Categorical Pretreatment Standard or Categorical Standard		§ 1.4 F	X			2.1(h)	
5. Indirect Discharge or Discharge	403.3(i)	§ 1.4 M	X			2.1(w)	
6. Industrial User (or equivalent)	403.3(j)	§ 1.4 LL	X			2.1(x)	
7. Interference	403.3(k)	§ 1.4 O	X			2.1(cc)	
8. National Pretreatment Standard, Pretreatment Standard or Standard	403.3(l)	§ 1.4 BB	X			2.1(ss)	
9. New Source	403.3(m)	§ 1.4 T	X			2.1(ff)	
10. Pass Through	403.3(p)	§ 1.4 V			X	2.1(ll)	Should be “pass through” rather than “passthrough.”
11. Pretreatment Requirement	403.3(t)	§ 1.4 AA	X			2.1(rr)	

Benefits of Pretreatment Audits

- Provides insight to POTW as to success/effectiveness of program at the time of audit
- Our primary goal is to give useful feedback and help the POTW manage their program properly
- Provides EPA/State with big picture assessment of overall program compliance
- Identifies programs in need of additional guidance/assistance
- Identify need for program modification/development
- Builds relationship between POTW and EPA/State

Be An Audit-Ready Program: Get Organized!

- Documentation is a key component of the program
- Consistent file management; maintain a solid file structure
- General Rule of Thumb: Organized files = Good audit results (typically...)
- Keep accurate notes

Audit-Ready Program: Knowledge is Key

- Be familiar with the pretreatment regulations, laws, EPA documents
- Attend trainings and online presentation
- Be familiar with online resources
- Talk to other pretreatment coordinators in your area
- Contact your State or Region's Pretreatment Coordinator if you have a difficult question (but you are responsible for your program decisions)
- Solicit feedback from industrial users and the greater community
- I often hear "My predecessor did it this way, so I kept on doing it this way"...
- Understand pretreatment, not just the how but also the why...

Useful Resources

- [EPA National Pretreatment Program](#)
- [EPA Pretreatment Program Publications:](#)
 - [Introduction to the National Pretreatment Program](#)
 - [EPA Model Pretreatment Ordinance](#)
- [40 CFR 403 Federal Pretreatment Regulations](#)
- **Subscribe to Listservs:**
 - EPA's [Pretreatment Happenings listserv](#)
 - [Pretreatment Coordinator's groups listserv](#)
- [North Carolina's Pretreatment Website](#)
- **Professional Associations:** [NACWA](#), [NERPCA](#), etc...

Audit-Ready Program: Continuous Improvement

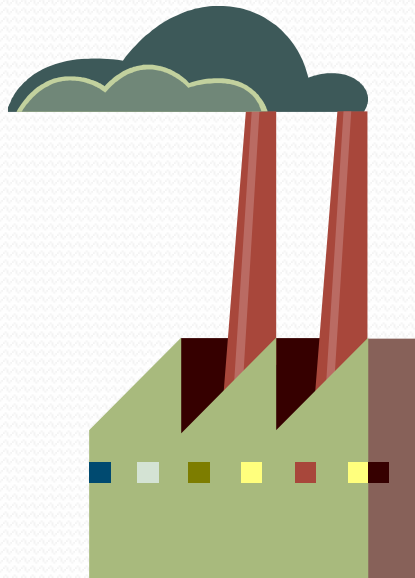
- Look at your legal documents with a critical eye (Is it clear to the public? To the industries? How would a judge interpret the SUO and permits?)
- Local limits...they are supposed to be evaluated every 5-years and revised as needed. The local limits should not be too lax, or too strict...but just right.
- Be proactive in locating industries; communicate with other departments, conduct industrial waste surveys periodically
- Industrial user permits need to be clear and specific, if you or your IU contact were not there, would current protocols be understood?
- Don't just collect data, use the data: What are the loadings? Are there patterns? Is there opportunities to reduce loadings further?

Contact Information

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Addendum: Findings from Pretreatment Compliance Audits

The following examples were taken from U.S. EPA findings made during an audit of cities' pretreatment programs.



Common Findings – Documentation & Communication

- Documents not saved appropriately or easily available:
 - Files should have a formal filing plan and archiving schedule
 - All confidential information must be kept in a separate, locked file cabinet
 - All reports that are received should be stamped and marked with a “Date Received” date
- Critical older documents such as the original approval documents, local limit development packages, enforcement response plans, etc... are lost
- Permit Application from industrial users are not made available
- Industrial and POTW Sampling Data are not saved in a database
- Industrial user permit files are not used; these would include memos to the file to explain decisions, a communication log, etc...
- Hard-copies of the industrial user compliance reports with a wet ink signature are not submitted; only POTWs with CROMERR approval can accept reports only in electronic format.

Common Findings - Resources

- Staff training is inadequate resulting in stagnant program and missed industrial processes – among many other things
- Resources need to be re-evaluated

Common Findings – Legal Authority

- SUO have not been updated since the 1980s or 1990s for some POTWs
- Failure to update SUOs to comply with 2005 Required Pretreatment Streamlining Rule and/or out of date Legal Authority...plus the 2005 Optional streamlining rules that were just promulgated by NY State.
- Control Authority modified approved pretreatment program without proper notification to, or approval from, State/Region
- Interjurisdictional agreements poor quality or non-existent; do not have pretreatment-specific requirements
- Other jurisdictions have not been required to develop legal authority equivalent to approved POTWs where appropriate
- Enforcement Response Plan out of Date (and Enforcement authority in IU permits is inconsistent with legal authority)

Common Findings – Local Limits

- POTW staff not familiar with local limits in general
- Local limit development documents are missing altogether or are decades old
- Even if documents are available, calculation spreadsheets, sampling plans and data and other supporting information is missing
- Failure of POTW to periodically evaluate local limits and develop local limits when necessary.
- POTW has failed to maintain records for last local limits evaluation
- POTW has over allocated the Maximum Allowable Industrial Loading (MAIL) through SIU permits
- POTW approved local limits are not adopted into legal authority and/or POTW includes local limits in industrial user permits which are not in the SUO
- Metric(s) not specified (maximum daily average, maximum monthly average, instantaneous maximum)
- Surcharges: concentrations should be below the local limits specified in the SUO and IU permits (normally for conventional pollutants such as BOD and TSS)

Common Findings – IU Oversight by POTWs

- Industrial Waste Survey (IWS) are not done consistently and/or there is no relationship with the building permits department: POTWs are missing IU changes and identifying sources of FOGs
- Permit applications of poor quality and completed permit applications have blanks (not filled in)
- Dentists have not submitted One Time Compliance Forms
- The POTW needs checklist for reviewing SIU self-monitoring reports (data reviews are inconsistent)
- Zero discharge status not verified (and permits have incorrect language for zero discharge facilities)

Common Findings - Inspections/Sampling by POTW

- Failure to inspect SIUs annually
- SIU inspections could be more thorough; checklists need to be useful and detailed
- Some industries and institutions are not willing to have POTW staff walk through the facility; POTW staff should point to the SUO and IU permit and be firm that this is a requirement.
- Inspections are declining in quality:
 - Inspectors using last inspection and updating rather than using a fresh form
 - No rotation of inspectors
- Inspections done same time each year
- POTW staff asking leading questions during interviews, filling out the form on-behalf of the industrial user
- Lack of documentation of evaluations for the need for IUs to develop slug discharge control plans
- Secondary containment issues affecting potential for slug discharge are not included in inspection reports

Common Findings – POTW and IU Sampling and Analytical Methods

- POTW not conducting “independent” compliance monitoring – POTW has lab conduct IU sampling, and lab bills IU directly for cost
- Laboratory reports not signed by IU representative
- Incorrect analytical methods; in particular not specifying 24-hour flow-proportional composite sampling requirements in permits (or documenting why not required)
- Use of incorrect analytical methods; for example the SW 846 Test Method for VOCs is not approved for wastewater
- Ph and temp must be analyzed immediately
- Chain of custody forms:
 - Time, date, relinquished by
 - Grabs vs. composites

Common Findings - Enforcement

- Failure to identify violations in IUs' periodic compliance reports, and subsequent lack of appropriate enforcement
- Failure to escalate enforcement in accordance with approved Enforcement Response Plan
- Enforcement: All violations need to have a timely and appropriate response. SNC violations must have a formal response

Common Findings – IU Permits

- Permit inconsistency with associated documents (SUO, ERP, Federal Regulations, etc...)
- Permits are missing required elements and permit fact sheets are not documenting decisions (flow vs. time composite sampling, CWF, etc.)
- Incomplete list of effluent limits from the sewer use ordinance and the categorical rule in the permit
- Failure to properly categorize Industrial users (IUs):
 - Electroplating (413) vs. Metal Finishing (433)
 - Phosphating is Metal Finishing
 - Cleaning typically not a Metal Finishing operation (refer to EPA/State Coordinator for determination)

Common Findings – IU Permits

- Failure to include more than one category in complex cases
- New source vs existing source: process modification will change the designation of the industry from an existing source to a new source
- Local limits vs. categorical standards in permit (need to apply most stringent limit in permit)
- Failure to identify a single sampling point to show compliance
- Sampling method not included in the permit
- Grab or time-proportional composite sampling specified in permit in lieu of flow-proportional composite sampling

Common Findings – IU Permits

- Total toxic organic (TTO) limit or a Toxic Organic Management Plan (TOMP):
 - Failure to determine whether an Industrial User permit must have a TTO or TOMP
 - Failure to require minimum elements in a TOMP
 - TOMP not on file
- Failure to include a slug control plan requirement
- Failure to add a violation notice
- Failure to add a requirement to notify about a significant change in discharge
- Failure to limit effective duration of permit to five years

Incomplete List of Effluent Limits from the SUO and the Categorical Rule In The Permit

Sewer Use Ordinance

- Arsenic
- Cadmium
- Chromium (total)
- Chromium (hex)
- Copper
- Cyanide (amenable)
- Lead
- Nickel
- PCBs
- Petroleum Hydrocarbons (Total)
- pH
- Phenol
- Pentachlorophenol
- Zinc
- Mercury
- Silver

IU permit

- Cadmium
- Chromium (total)
- Copper
- Cyanide (amenable)
- Lead
- Nickel
- PCBs
- Petroleum Hydrocarbons (Total)
- pH
- Phenols, 4-AAP
- Zinc
- Mercury

Incomplete List of Effluent Limits

Where the 2005 optional streamlining rules have been adopted by the State (soon to be adopted by NY State...), the Control Authority may waive monitoring requirements for a categorical limit if the IU demonstrates that:

- The pollutant is not present, nor expected to be present in the discharge, or
- Is present only at background levels and without any increase in the pollutant due to activities of the IU.
- Some POTWs chose local limits in the permit which are different than in the local limits development package and SUO: some limits are added, some are omitted, some are different...

Significant Change in Discharge

- All IUs shall promptly notify the Control Authority (and the POTW if the POTW is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their discharge
- As a general rule, changes greater than 20 percent are considered substantial
- An IU is also required to notify the CA/POTW immediately of any changes at its facility that affect the potential for a slug discharge [40 CFR 403.8(f)(2)(vi)]
- An IU must also provide notification if it expects to discharge a pollutant for which it has been granted a waiver under the pollutants not present provision [40 CFR 403.12(e)]