

# I. Control Authority Checklist Facility Inspection of Industrial User

The inspection should encompass a review of the following:

- **Facility information**— This review will ensure that the facility information such as the facility address (physical location versus mailing location) and the location of the sampling point is correct in the permit and permit files.
- **Production processes**— This will help the permit writer identify the following:
  - Applicable categorical Pretreatment Standards
  - Toxic or hazardous substances that might be present in raw materials, products, and by-products that have the potential to be present in the industry's discharge
  - Water uses and resulting wastewater streams
  - Existing in-process pollution controls
  - Potential for spills and leaks

From such information, the permit writer can select pollutants to be limited or require development of additional in-process controls.

- **Sewer layout of the plant**— If a sewer plan exists, the permit writer should review the plan thoroughly to determine the course and destination of each sewer line. He or she should identify the exact source of and the point at which each wastestream enters the sewer. The permit writer should also delineate the existing monitoring point or any potential location for monitoring. Where sewer plans do not exist, he or she should perform smoke or dye testing to locate all points of discharge to the sewer system. This information will be used to determine the appropriate sampling points, to ensure that all points of discharge to the sewer system will be identified in the permit, and to evaluate the need for application of the CWF.
- **Wastewater treatment facilities, including treatment performance and operation and maintenance practices**—Such information can be used to evaluate the adequacy of existing treatment, to assess the feasibility of improvements, and to evaluate performance data.
- **Types of batch discharges that occur at the facility**—This information could affect the design of the monitoring requirements. Cleanup operations usually result in batch discharges of wash-down water. Permit writers should obtain information about cleanup times and water volumes.
- **Raw material and product storage and loading areas, sewage sludge storage and disposal areas, hazardous waste management facilities (if applicable) including on-site disposal areas and all process areas, and the proximity of such areas to sewer discharge points**—This review will help to identify potential pollutants and potential or known problems with spills or leaks. The information is then used to determine the

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need for additional controls by establishing specific Industrial User BMPs (i.e., slug discharge control plans, toxic organic management plans, and good housekeeping practices).

- **Sampling points, sampling methods, and analytical techniques**—This information is necessary to determine appropriate limits to apply at different locations, whether internal monitoring points should be established, and to evaluate the quality of both the Control Authority's and the Industrial User's sampling data.

An adequate inspection of a facility could require a full day or more to conduct. Complex plants with several treatment systems, numerous sewer connections and associated waste delivery piping, and extensive ancillary activities might require more than one day to inspect.

Reference documents:

Guidance Manual for the Control of Wastes Hauled to POTWs -

<http://www.epa.gov/npdes/pubs/hwfinal.pdf>

Control of Slug Loadings to POTWs: Guidance Manual -

<http://www.epa.gov/npdes/pubs/owm021.pdf>

Determining Industrial Significant Noncompliance -

[http://www.epa.gov/npdes/pubs/industrial\\_user.pdf](http://www.epa.gov/npdes/pubs/industrial_user.pdf)

Industrial User Inspection and Sampling Manual for POTWs -

<http://www.epa.gov/npdes/pubs/owm0025.pdf>

Industrial User Permitting Guidance Manual –

[http://www.epa.gov/npdes/pubs/pretreatment\\_iu\\_permitmanual.pdf](http://www.epa.gov/npdes/pubs/pretreatment_iu_permitmanual.pdf)

Other USEPA reference documents can be downloaded from:

[http://cfpub.epa.gov/npdes/docs.cfm?document\\_type\\_id=1&view=Policy%20and%20Guidance%20Documents&program\\_id=3&sort=name](http://cfpub.epa.gov/npdes/docs.cfm?document_type_id=1&view=Policy%20and%20Guidance%20Documents&program_id=3&sort=name)

# Site Visit Data Sheet

<b>INSTRUCTIONS:</b> 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)					
<b>Name</b>		<b>Title</b>		<b>Phone/E-mail</b>	
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):					

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Any unusual conditions or problems with the pretreatment system:			
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?		Any spill control measures?	
General housekeeping of chemical storage area (Describe):			

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12. Are hazardous wastes drummed and labeled?								
13. Does the IU have hazardous waste manifests?								
Any problems associated with hazardous waste:								
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:								