

# Pretreatment Inspecting 101

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# Mission Possible— Excellent Pretreatment Inspections

- Preparing for the inspection
- Greeting the facility contact
- Conducting the inspection
- The Inspection Report
- Multi-media issues
- Follow-up

# Preparing for the inspection

- Initial or Repeat Inspection?
- File review
- Water and sewer volumes
- Appointment vs. Unannounced
- Categorical IU?
  - Review 40 CFR categories
  - Incorporate categorical requirements into inspection plan

# Preparing for the inspection: Supplies

- Cell phone
- Digital camera
- Sampling equipment
- PPE
- Safety equipment

# Preparing for the inspection: Supplies

- Inspection checklist or report form
- Business cards/ID
- Handouts/outreach information
- Reference information
  - ordinance
  - 40 CFR
  - referrals to other departments/agencies

# Greeting your contact



# The Inspection

- Facility Description
  - What the business does at this site
  - How they do it
  - Quantity/scale of operation
- Reality Checks
  - Does information from files and facility contact agree with observations?



# The Inspection (continued)

- Follow the process
  - Receiving
  - Process, manufacturing, service
  - Products
  - Shipping
- Track water used in each step of process
- Water consumed
  - product
  - evaporation
- Water discharged
  - process flow (categorical)
  - dilution/unregulated

# The Inspection (continued)

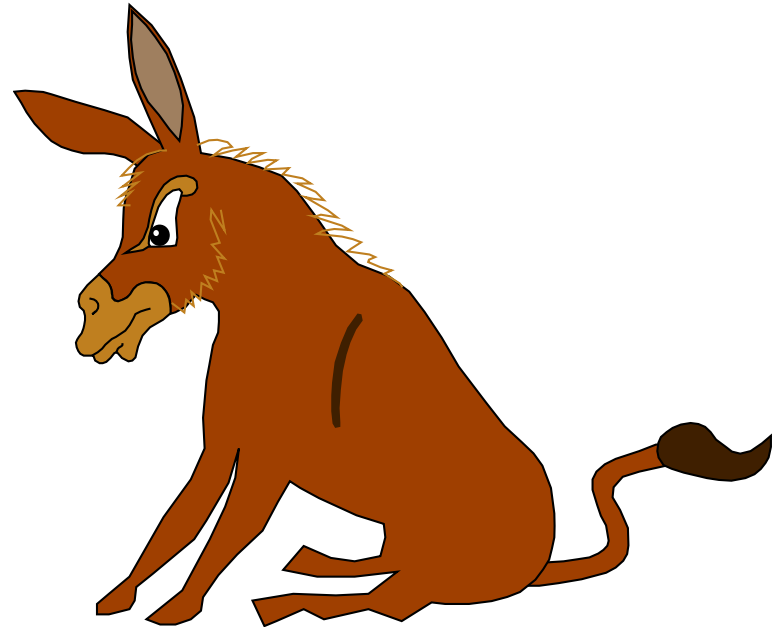
- Water Meters--Read Them!
  - Process water meters
  - Influent/effluent meters (cooling towers, etc.)
    - diversion credits
  - End-of-pipe meters
  - Meter calibration requirements

# The Inspection (continued)

- Overall facility issues
  - Piping labeling and complexity
  - Hard plumbing vs. portable pumps
  - Housekeeping/Safety
- Ancillary operations
  - May cause categorical status
  - May have significant discharges
- Chemical use
  - MSDS
  - Appropriate segregation of materials
  - Chemical storage, containment
- Liquid and solid wastes

# The Inspection (continued)

- Actions if prohibited entry
  - Try again with contact
    - Note ordinance authority if necessary
  - Follow agency procedure for refused entry
  - **Collect sample downstream!**



# Pretreatment Systems

- Which flows go to the pretreatment system?
- Have contact describe system
- Follow the pretreatment “process”--input to discharge
- Review equipment, chemicals, and operation (e.g., NaOH concentration)

# Sampling Locations

- Determine or confirm proper sampling locations
- Federal monitoring requirements
- Local agency sampling point
- Collect sample if appropriate



# Inspection Documentation

- Make notes
- Process schematic
- Take photographs if approved by facility contact
- Document sample location--photograph!

# The Inspection Report

- Complete while on-site OR later
- Checklist and/or narrative
- Diagrams
- Why you are there
- What you did and did NOT inspect (e.g. roof)
- Follow-up necessary?

# Multimedia Issues

- Stormwater
- Hazardous Materials
- Air Pollution
- Zoning
- Building/Plumbing



# Follow-Up

- Discuss enforcement issues with your supervisor
- Sampling to be scheduled
- Permitting
  - CIU
  - SIU
  - Other

# Follow-Up (continued)

- Awards, opportunities for collaboration
- Provide information on pollution prevention opportunities (e.g. zero discharge)
- Referrals: Know your contacts
  - RWQCB
  - EPA
  - DA
  - Regulators in other media

## P3S Committee Honors California Companies for Pretreatment Excellence

Award Winner: Huntsman Advanced Materials

