



Annual Inspections—What To Expect

POTWs (through Pretreatment Services) are required to inspect all permitted Significant Industrial Users (SIUs) at least once a Pretreatment year pursuant to 40 CFR 403.8(f)(2)(v). Although EPA regulations establish a minimum frequency for inspections, additional inspections by the POTW might be necessary depending on issues such as the variability of an SIU's effluent, the effect of the SIU's discharge on the POTW, and the facility's compliance history.

Information gathered from inspection:

- Provide current data on the Industrial User (IU).
- Confirm or determine the IU's compliance status.
- Determine completeness and accuracy of the IU's performance/compliance records.
- Assess the adequacy of the IU's self-monitoring and reporting requirements.
- Assess the adequacy of monitoring locations and IU's sampling techniques.
- Assess the adequacy of imposed limitations and pollutants of concern.
- Develop a rapport with the IU.
- Evaluate operation and maintenance and overall performance of an IU's pretreatment system.
- Assess the potential for spills and slug loadings.
- Evaluate the effectiveness of slug control plan.
- Reveal issues requiring action.
- Identify noncompliance needing resolution.
- Suggest pollution prevention opportunities.
- Collect samples if needed.
- Obtain data to support enforcement actions.

Scheduled inspections are useful when the POTW wants to gather specific information from the facility that necessitates meeting with specific SIU contacts. However, on-demand inspections or unscheduled inspections might more accurately reflect SIU compliance status because scheduled inspections sometimes interrupt normal operations. (For example, the production schedule might be altered as a result of preparatory work undertaken by the SIU.) On-demand inspections are nonroutine and occur in response to a concern such as POTW collection problems downstream from an IU, elevated enforcement actions against an IU, suspicious IU behavior, or an informer's complaint.

Routine POTW inspections of SIUs typically consist of three activities—preparation, on-site assessment, and follow-up:

Preparation: POTW personnel should review POTW records for an SIU to be inspected to familiarize themselves with the facility. The information reviewed might include compliance status, compliance schedule activities, reports and plans, upcoming report and plan due dates, enforcement activities, permit applications, waste surveys, previous inspection summaries, categorical regulations, water use/billing records, and POTW collection system maps. POTW personnel should also be familiar with any specific issues and concerns regarding the POTW's treatment plant or collection system potentially caused by the SIU's discharge.

On-site assessment: POTW personnel typically discuss IU operations with IU contacts and walk through the facility to update IU information regarding contacts, processes, production rates, pretreatment, and other waste management activities; review records that the IU is required to keep; visually verify the need for a slug control plan; and review pretreatment system maintenance, categorical standards applicable

to processes employed, metering and sampling equipment, sampling procedures, chemicals used, processes employed, management practices, containment structures, locations of floor drains, and the like. Many POTWs have developed a standard inspection questionnaire to facilitate the interview process and promote consistency during the inspection.

Follow-up: The POTW should prepare an inspection report as soon as possible after the inspector returns to the office. Unanswered questions, required permit modifications, or necessary enforcement actions should be processed in a timely manner.

Non-routine inspections such as on-demand inspections might not encompass all the activities and steps specified above. Like routine inspections, however, such activities should provide the POTW an opportunity to collect samples of the IU's discharge.

Excerpt taken from US EPA document "Introduction to the National Pretreatment Program" June 2011. <http://www.epa.gov/npdes/pretreatment>

Inside this issue:

<i>Self-Monitoring Requirements</i>	2
<i>Batch Discharge Requirements</i>	2
<i>Watering Restrictions</i>	3
<i>Village Creek Tours</i>	4

Things to know:

- **Semi Annual Reports are due on July 12, 2013. Don't be late!**
- Self monitoring deficiency deadlines: Take notice of deadlines for submittal of corrections to avoid enforcement action.



Self Monitoring Requirements—A Quick Overview

Self-monitoring can be an important part of ensuring and verifying an industry's compliance. Self-monitoring allows independent sampling event to be evaluated towards an industry's compliance history. There are certain requirements for self-monitoring to be used in the evaluation of an industry's compliance status.

The external contract laboratories are responsible for providing data of known and consistently high quality, meeting method specifications as referenced in 40 CFR Part 136.

It is an integral part of the quality assurance policy of the Fort Worth Water Department - Pretreatment Services Division to provide a general review of all analytical data used in support of division functions. All data collected as a part of a self-monitoring event will undergo the same data review procedures to ensure usability for compliance determination and enforcement actions.

What should be submitted in a self-monitoring report?

1. Statement of Self-monitoring coversheet: properly filled out and signed by the authorized signatory.
2. Chain of Custody documentation: showing collection date and time, collection location, preservation, sample collector, and proper relinquishment of sample.
3. Analytical results: showing results.
4. Quality Control Summary: showing analytical batch information, holding times and proper methods.

5. Case Narrative: indicator of any issue at laboratory that would effect results.

Self-monitoring and split sample results are due the **15th of the month following the sample collection.**

Some important information to remember when collecting self-monitoring:

1. Samples must be collected in accordance with 40CFR403.12(g)(3) to ensure representative sampling.
2. Samples must be collected from the outfall listed in the wastewater discharge permit.
3. Samples must be preserved properly according to the analytical requirements.
4. Proper chain of custody procedures must be followed. Each individual who has the sample in their custody must sign the chain of custody.
5. Samples must be analyzed using approved EPA methods for wastewater analysis.
6. If the result for the self-monitoring comes back in violation, PSD **must** notified within 24 hours of becoming aware of the violation.

Self-monitoring can be a useful tool for compliance purposes as well and a check and balance on the pretreatment system an industry has in place. However, the information gathered from these sampling events can only be used if the samples are collected, analyzed and submitted properly. If you have any questions regarding sampling techniques, analysis or self-monitoring submittal, please contact PSD QC Specialist.



Batch Discharge Notification Requirements

An important requirement of industrial user permits is the notification requirement for those facilities that are batch/intermittent dischargers.

A written schedule detailing the discharges must be submitted; if a schedule cannot be determined then the permittee will be required to provide adequate notification as listed below to the Control Authority. The information required in all cases will be the

same: describe the nature, the time, the date, duration and volume of such discharges.

- Written Schedule - Any change in scheduling will require immediate written response describing the modification.
- All telephone notification will be given during normal working hours Monday through Friday. 24 hour prior notification will be given to Pretreatment Services Division for discharges Tuesday

through Saturday. Discharges on Sunday will require 48 hour prior notification. Discharges over holidays will require 72 hour prior notification and approval. Samples will be taken as needed regardless of duration of discharge.

These notification requirements are in place so that PSD can collect representative samples of all discharges from a facility. If notification is not made, it is a permit violation and subject to enforcement action.



Stage I Watering Restrictions in Effect Starting June 3rd

Know the rules | Know your schedule

KNOW YOUR WATERING SCHEDULE

MONDAY

No watering allowed

TUESDAY & FRIDAY

Non-residential sites (apartments, businesses, parks, common areas)

WEDNESDAY & SATURDAY

Residential addresses ending in 0, 2, 4, 6, 8

THURSDAY & SUNDAY

Residential addresses ending in 1, 3, 5, 7, 9



Fort Worth initiated Stage I of its Drought Contingency Plan on Monday, June 3, 2013. In Stage I, landscape watering is limited to the above twice per week schedule.

Year-round requirements remain in effect.

Watering with a soaker hose, drip irrigation or by hand-held hose is allowed at any time.

No watering with irrigation systems or sprinklers between 10 a.m.- 6 p.m.;

No watering hard surfaces;

No watering during precipitation; and

No water waste through runoff, missing, misaligned or broken sprinkler heads.

Exceptions to the Restrictions:

Water may not run off a lawn of yard more than 50 feet. Supervised testing, repair or maintenance of an irrigation system is an exception.

Foundations may be watered up to two hours on any day using a handheld hose, soaker hose or drip irrigation system placed within 24-inches of the foundation, that does not produce a spray of water above the ground.

Establishing new turf is discouraged. If hydromulch, grass sod, or grass seed has been installed, a variance is required.

All users are encouraged to reduce the frequency of draining and refilling swimming pools.

All users are encouraged to use native and adapted drought tolerant plants in landscaping.

Washing of any motorized vehicle (including a motorbike, boat, trailer, airplane, etc.) is limited to the use of a hand-held bucket or a hand-held hose equipped with a positive-pressure shutoff nozzle for quick rinses. Vehicle washing may be done at any time on the premises of a commercial car wash or service station.

Discourage hosing of paved areas (sidewalks, driveways, parking lots, tennis courts, patios or other impervious surfaces), except to alleviate an immediate health or safety hazard. (See Drought Plan for specific examples.)

No hosing of buildings or other structures for purposes other than fire protection or surface preparation prior to painting.

Violations will receive an initial warning. Repeat offenses will be subject to an irrigation system lock-out which carries an administrative fee. Subsequent offenses may be issued a citation, with a fine of up to \$2,000 per day. Each day is considered a separate violation.

City of Fort Worth

Pretreatment Services Division
920 Fournier St.
Fort Worth, TX 76102

Phone: 817-392-8305
Fax: 817-392-8566
Alternate fax: 817-877-3458
E-mail: pretreatment@fortworthtexas.org



Visit our website at : www.fortworthtexas.org

Pretreatment Services Division

Laly Joseph, REM	Environmental Program Manager	(817) 392-8040
Christy Anderson, REM	Senior Environmental Specialist	(817) 392-8406
Angela Bullock	Senior Environmental Specialist	(817) 392-8427
Stephanie Nikirk	Senior Environmental Specialist	(817) 392-7292
Rita Rob	Senior Environmental Specialist	(817) 392-5899
Michelle Scherrieb	Quality Control Specialist	(817) 392-7235
Jennifer Flood	Environmental Specialist	(817) 392-7279
Adrienne Holt	Environmental Specialist	(817) 392-7250
Michael Moreno	Environmental Specialist	(817) 392-7238
Karen Probert	Environmental Specialist	(817) 392-8013
Brad Risinger	Environmental Specialist	(817) 392-8291
Marlene Gates	Administrative Assistant	(817) 392-8305

Waste Hauler and Restaurant Program / Investigation

Alphonse Newton, REM	Environmental Supervisor	(817) 392-2865
Gary Piksie	Senior Environmental Specialist	(817) 392-7277
Lawrence Prine	Environmental Specialist	(817) 392-7276
Jeremy Pressley	Environmental Specialist	(817) 392-8273
Jesus Rodriguez	Environmental Specialist	(817) 392-7291
Paul Smith	Environmental Specialist	(817) 392-7238
Patricia Martinez	Office Assistant II	(817) 392-5809

Cross -Connection / Backflow

Steve Nutter, REM, CEA	Environmental Program Manager	(817) 392-4965
Arthur England	Cross Control Supervisor	(817) 392-8281
Richard Munoz	Cross Control Technician	(817) 392-7273
Jeff LeGrand	Cross Control Technician	(817) 392-7236
John Rasor	Cross Control Technician	(817) 392-7236
Rene Villalobos	Cross Control Technician	(817) 392-7236
Tara Duplanty	Administrative Technician	(817) 392-8375
Shelvia Smith	Office Assistant II	(817) 392-8005

Village Creek Water Reclamation Facility Tours

The Village Creek Water Reclamation Facility tour walks you through the biological process used to treat sewage water and prepare it for release into the Trinity River. The 90-minute tour includes a preliminary overview highlighting the various phases of wastewater treatment. Tours are available Monday-Friday, 8 a.m. – 3:30 p.m.

General Tour information:

- ◆ Tours are available on a first-come, first-served basis and depend on staff availability.
- ◆ Tours can accommodate up to 40 individuals
- ◆ All participants must be at least 10 years old.
- ◆ Please dress comfortably and wear tennis or other closed-toe

shoes.

Note: A change in security levels can require cancellation of scheduled tours at the last minute.

Submit Request for a Facility

Tour

or call 817-392-4927

