FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCE MANAGEMENT
PRETREATMENT COMPLIANCE INSPECTION (PCI) CHECKLIST

Completed by		INSPECTION CHECKLIST CONTENTS	
CA	FDEP		
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			Copy of Local Limits
			CA additional Information:
			CA additional Information:
			CA additional Information:

AUIDITOR GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section III of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section III as needed to document a representative number of files according to the discussion in the Introduction.

2. The auditor should ensure that during the inspection, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the inspection.

3. Throughout the course of the evaluation, the inspector should look for areas in which the CA should improve the effectiveness and quality of its program.

. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

CONTROL AUTHORITY GENERAL INSTRUCTIONS

1. The control authority representative should **complete the Interview Form and the Pretreatment Program Profile** before the scheduled Pretreatment Audit (PPA) or Inspection (PCI). Additional information may be collected by the FDEP representative and reviewed off site. Please complete the Interview Form and the Pretreatment Program Profile with the information requested for each block to the best of your knowledge and then **print out a copy**. If you encounter a problem with completing the form on the computer, please let us know so that we may correct the problem.

2. The FDEP representative will be reviewing approximately 10% of the CAs industrial user files. Please have all documentation readily accessible.

3. If you submitted a pretreatment discharge monitoring report (DMR) with your last annual report, please have all data that was used to complete the pretreatment DMRs available for review. Both the MDLs and PQLs for all analyses will be needed in order determine if the DMR was filled out properly. You should be able to obtain the MDLs and PQLs from your laboratories. Note, even if you are not submitting pretreatment DMRs yet, you should ensure that your laboratories include both MDLs and PQLs for all analyses used to complete the annual report.

4. For PCIs please have a copy of your local limits, sewer use ordinance (SUO), and enforcement response plan (ERP) available.

5. For PPAs please provide the FDEP representative a copy of your local limits, template permit, sewer use ordinance (SUO), enforcement response plan (ERP) and any multijurisdictional agreements (MJAs).

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCE MANAGEMENT
PRETREATMENT PROGRAM AUDIT (PPA) / COMPLIANCE INSPECTION (PCI)

(To be completed by Control Authority)

Control Authority (CA) name and mailing address **Date(s) of audit**

CA physical address (if same as mailing address write "SAME")

Treatment Plant Name	Permit Number	Effective Date	Expiration Date
Control Facility			

Covered Facilities

Treatment Plant Name	Permit Number	Effective Date	Expiration Date

FDEP REPRESENTATIVE(S)

Name	Present(✓)	Title/Affiliation	Telephone Number	Email Address

CA REPRESENTATIVE(S)

Name	Present(✓)	Title/Affiliation	Telephone Number	Email Address

✓ Check if present at the inspection.

Please include individuals that should be copied on correspondences, even if not present at the inspection.

ACRONYM AND ABBREVIATION LIST

Acronym / Abbreviation	Term	Acronym / Abbreviation	Term
BMP	Best management practices	N/A	Not applicable
BMR	Baseline Monitoring Report	ND	Not determined
CA	Control Authority	NOV	Notice of Violation
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act	NPDES	National Pollutant Discharge Elimination System
CFR	*Code of Federal Regulations*	NSCIU	Non-significant Categorical Industrial User
CIU	Categorical Industrial User	O&G	Oil and grease
CWF	Combined Waste stream Formula	PPA	Pretreatment Program Audit
FDEP	Florida Department of Environmental Protection	PCI	Pretreatment Compliance Inspection
DMR	Discharge Monitoring Report	QA/QC	Quality assurance/quality control
EPA	U.S. Environmental Protection Agency	RCRA	Resource Conservation and Recovery Act
ERP	Enforcement Response Plan	RNC	Reportable Noncompliance
F.A.C.	Florida Administrative Code	SIU	Significant Industrial User
F.S.	Florida Statutes	SNC	Significant Noncompliance
FTE	Full-time equivalent	SUO	Sewer Use Ordinance
FWA	Flow-Weighted Average	TCLP	Toxicity Characteristic Leachate Procedure
gpd	Gallons per day	TMDL	Total maximum daily load
ICIS	Integrated Compliance Information System	TOMP	Toxic Organic Management Plan
IU	Industrial User	TRC	Technical Review Criteria
IWS	Industrial Waste Survey	TTO	Total toxic organics
mgd	Million gallons per day	WWF	Wastewater Facility
MSW	Municipal solid waste	Y/N	Yes or no

SECTION I: PRETREATMENT INSPECTION/AUDIT DATA ELEMENTS WORKSHEET

(To be completed by Auditor)

NPDES ID: _____

Compliance Monitoring Actual End Date: _____ (Inspection Date) _____

Significant Industrial Users (SIUs):
SIUs:
SIUs w/o control mechanisms:
SIUs not inspected:
SIUs not sampled:
SIUs in SNC w/ Pretreatment Standards:
SIUs in SNC w/ Reporting Requirements:
SIUs in SNC w/ Pretreatment Schedule:
SIUs in SNC Published in Newspaper:
SIUs on Schedules:
Violation Notices Issued to SIUs:
Administrative Orders Issued to SIUs:
Civil Suits Filed Against SIUs:
Criminal Suits File Against SIUs:

Categorical Industrial Users (CIUs):
CIUs:
CIUs in SNC:

Penalties:
Dollar Amount of Penalties Collected:
Industrial Users (IUs) from which Penalties have been collected:

Other Information:
SUO Reference:
SUO date:
Pass-Through/Interference Indicator:
Violation of IU Schedule for Remedial Measures:
Formal Response to Violation of IU Schedule for Remedial Measures:

Number of Days conducting:
Number of Hours conducting:

Local Limits:
Date Most Recent Technical Evaluation For Local Limits:
Date Most Recent Adoption of Technically Based Local Limits:
Local Limit Pollutants:
Arsenic
Cadmium
Chromium
Copper
Cyanide
Lead
Mercury
Molybdenum
Nickel
Selenium
Silver
Zinc
BOD (5 Day)
Total Suspended Solids
Additional pollutants list attached

Acceptance of Waste:
Acceptance of Hazardous Waste:
Acceptance of Non-Hazardous Industrial Waste:
Acceptance of Hauled Domestic Waste:

Deficiencies:
Deficiencies Identified During File Review:
Control Mechanism Deficiencies:
Legal Authority Deficiencies:
Deficiencies in Data Management and Public Participation:
Deficiencies in Interpretation and Application of Pretreatment Standards:
Inadequacy of Sampling and Inspections:
Adequacy of Resources:

DATA ENTRY WORKSHEET
COMPLETED BY: ..... **DATE:**
TITLE: ..... **TELEPHONE NO.:**

SECTION II: INTERVIEW FORM (To be completed by Control Authority)

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of CA treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [62-625.540, F.A.C.]; [40 CFR 403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)? ☐Yes ☐No

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, and required pretreatment provisions from the May 10, 2010 revisions to Chapter 62-625, F.A.C., multijurisdictional situation, and others)? ☐Yes ☐No

If yes, describe.

c. Has the CA made any nonsubstantial changes to the pretreatment program (i.e., pH limit modification, reallocation of the maximum allowable headworks loading, etc…)? ☐Yes ☐No

If yes, describe.

SECTION II: INTERVIEW FORM (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [62-625.540, F.A.C.]; [40 CFR 403.18]

1. d. Has the CA amended its pretreatment program to include the following components required under the May 10, 2010 revisions to Chapter 62-625, F.A.C.:

	Yes	No
• Slug control requirements in control mechanisms. [62-625.500(2)(a)2.g, F.A.C.]; [40 CFR 403.8(f)(1)(iii)(B)(6)]	☐	☐
• Notification requirements to include changes that might affect the potential for a slug discharge. [62-625.500(2)(b)6, F.A.C.]; [40 CFR 403.8(f)(2)(vi)]	☐	☐
• Revised SNC definition. [62-625.500(2)(b)8., F.A.C.]; [40 CFR 403.8(f)(2)(viii)]	☐	☐
• Clarification that SIU reports must include any applicable BMP compliance information. [62-625.600(1)(e)2, (4)(a), (7)(a), F.A.C.]; [40 CFR 40.12(b), (e), (h)]	☐	☐
• SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law. [62-625.500(2)(a)2.c, F.A.C.]; [40 CFR 403.8(f)(1)(iii)(B)(3)]	☐	☐
• Record-keeping requirements for BMPs. [62-625.600(14)(a), F.A.C.]; [40 CFR 403.12(o)]	☐	☐
• Clarification that CAs that perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation. [62-625.600(6)(b), F.A.C.]; [40 CFR 403.12(g)(2)]	☐	☐
• Modifications to the sampling frequency and number of grab requirements for all SIUs. [62-625.600(6)(c) and (g), F.A.C.]; [40 CFR 403.12(g)]	☐	☐
• Requirement to report all monitoring results. [62-625.600(6)(h), F.A.C.]; [40 CFR 403.12(g)]	☐	☐

If not, when?

e. Has the CA adopted, or does the CA plan to adopt, any of the optional measures provided by the May 10, 2010 revisions to Chapter 62-625, F.A.C.?

☐Yes ☐No

If yes, check which ones.

☐Issuance of monitoring waivers for pollutants that are not present [62-625.500(2)(b)5.a and 600(4)(b)-(c), F.A.C.]; [40 CFR 403.8(f)(2)(v) and 403.12(e)(2)]

☐Issuance of general control mechanisms to regulate multiple industrial dischargers with similar wastes [62-625.500(2)(a)7 and 8, F.A.C.]; [40 CFR 403.8(f)(1)(iii)(A)]

☐Using BMPs as an alternative to numeric local limits [62-625.200(2), 400(3)(d), 500(2)(a)2.c, 500(2)(b)5.h, 600(4)(a), and 600(7)(a), F.A.C.]; [40 CFR 403.3(e), 403.5(c)(4), 403.8(f), 403.12(b), (e), and (h)]

☐Authority to implement alternative sampling, reporting, and inspection frequencies for NSCIUs [62.625.200(14), 200(25), 500(2)(b)5.b, 600(17), F.A.C.]; [40 CFR 403.3(v)(2), 403.8(f)(2)(v)(B), 403.8(f)(6), 403.12(e)(1), 403.12(g), (i), and (q)]

☐Authority to implement alternative sampling, reporting, and inspection frequencies for reduced reporting CIUs [62-625.500(2)(b)5.c, 600(4)(d), 600(14),F.A.C]; [40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), and 403.12(i)]

☐Authority to implement equivalent concentration limits for production or flow-based standards [62-625.410(b)-(d) and (i), F.A.C]; [40 CFR 403.6(c)(2)-(4) and (6)]

☐Authority to implement equivalent mass limits for concentration-based standards [62-625.410(e), F.A.C]; [40 CFR 403.6(c)(5)]

SECTION II: INTERVIEW FORM (CONTINUED)

A. CA PRETREATMENT PROGRAM MODIFICATION (continued) [62-625.540, F.A.C.]; [40 CFR 403.18]

2. a. Are there any planned changes to the CA's treatment plant(s)? ☐Yes ☐No

If yes, describe. –

☐Yes ☐No

b. Are these changes to the treatment plant(s) due to pretreatment issues?

If yes, what were the issues?

B. LEGAL AUTHORITY [62-625.500(2)(a), F.A.C]; [40 CFR 403.8(f)(1)]

☐Yes ☐No

1. a. Are there contributing jurisdictions discharging wastewater to any of the CA's WWFs?

If yes, complete questions b–e.

b. List the contributing jurisdictions.

c. Does the CA have an agreement in place that addresses pretreatment program responsibilities? ☐Yes ☐No

d. Is the CA or the contributing jurisdiction responsible for the following:

Responsibilities	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS		
Notifying IUs of requirements		
Issuance of control mechanisms		
Receiving and reviewing IU reports		
Conducting inspections		
Conducting compliance monitoring		
Enforcement of Pretreatment Standards and Requirements		

SECTION II: INTERVIEW FORM (CONTINUED)

B. LEGAL AUTHORITY (continued) [62-625.500(2)(a), F.A.C]; [40 CFR 403.8(f)(1)]

e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions? ☐Yes ☐No

If yes, explain.

2. a. Has the CA updated its legal authority to reflect the May 10, 2010 revisions to Chapter 62-625, F.A.C.? ☐Yes ☐No

b. Did all contributing jurisdictions update their SUOs to be as stringent as the CA's? ☐Yes ☐No

c. Did the CA update its procedures and ERP to implement the changes in its SUO? ☐Yes ☐No

If no, please explain

3. Has the CA experienced difficulty in implementing its legal authority [i.e., SUO, multijurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]? ☐Yes ☐No

If yes, explain.

SECTION II: INTERVIEW FORM (CONTINUED)

C. IU CHARACTERIZATION [62-625.500(2)(b)1 and 2, F.A.C.]; [40 CFR 403.8(f)(2)(i)&(ii)]

1.

a. Is the CA's definition of SIU different from the definition at 62-625.200(25), F.A.C.?

If yes, please attach a copy. ☐Yes ☐No

b. Are all contributing jurisdictions definitions of SIU the same as the CA's? ☐Yes ☐No

If no, please attach a copy.

c. If the CA has implemented the reduced reporting CIU provisions, are the CA's requirements the same as found in paragraph 62-625.600(4)(d), F.A.C.? ☐Yes ☐No

If no, please attach a copy.

d. If the CA has implemented the NSCIU provisions, is the CA's definition of *NSCIU* different from the definition at 62-625.200(14), F.A.C.? ☐Yes ☐No

If no, please attach a copy.

2. a. How and when does the CA update its IWS to identify new IUs and changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

b. How are SIU determinations made (including those in contributing jurisdictions)?

Discuss any problems.

SECTION II: INTERVIEW FORM (CONTINUED)

C. IU CHARACTERIZATION (continued) [62-625.500(2)(b)1 and 2, F.A.C.]; [40 CFR 403.8(f)(2)(i)&(ii)]

3. How many IUs are identified by the CA in each of the following groups?

a. [ ] SIUs (as defined by the CA)
- [ ] CIUs, excluding reduced reporting CIUs and NSCIUs
- [ ] Reduced reporting CIUs** (specify below)
- [ ] Noncategorical SIUs

b. [ ] Other regulated nonsignificant IUs (specify)
- [ ] Noncategorical nonsignificant IUs
- [ ] NSCIUs**, excluding zero-discharging CIUs [as defined by 62-625.200(14), F.A.C.] (specify below)
- [ ] Zero-discharging CIUs** (specify below)

c. [ ] TOTAL

**** The following section is to be completed only if the CA has adopted reduced reporting permitting, general control mechanisms, or NSCIUs. In addition the CA's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs:

List of Reduced reporting CIUs:

If reduced reporting CIU classification is used, what is 0.01% of the WWF's dry-weather capacity? _____

SECTION II: INTERVIEW FORM (CONTINUED)

D. CONTROL MECHANISM EVALUATION [62-625.500(2)(a)2., F.A.C.]; [40 CFR 403.8(f)(1)(iii)]

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism?

b. Has the CA implemented any general control mechanisms? ☐Yes ☐No

c. If yes, how many SIUs (as defined by the CA) are covered by a general control mechanism? List the types of SIUs covered under a general control mechanism:

d. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years?

If any, explain.

2. a. Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated groundwater sites discharge wastewater to the CA?

b. How are control mechanisms (specifically limits) developed for these facilities?

Discuss

	Yes	No
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?		
b. Is any of the waste hazardous as defined by RCRA?	☐	☐
c. Do any SIUs discharge via truck, rail, or dedicated pipe?	☐	☐

d. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [62-625.400(2)(h), F.A.C.]; [40 CFR 403.5(b)(8)]

SECTION II: INTERVIEW FORM (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the WWF (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [62-625.110(1)(a), F.A.C.]; [40 CFR 403.1(b)(1)]

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [62-625.500(2)(b)3, F.A.C.]; [40 CFR 403.8(f)(2)(iii)]

3. Local limits evaluation: [62-625.500(2)(c), F.A.C.]; [40 CFR 403.8(f)(4), 122.21(j)(2)(ii)]

a. For what pollutants have local limits been set (please attach a copy)?

b. Which allocation method(s) were used?

I. Uniform concentration method based on total industrial flow ☐
ii. Concentration limit method based on industrial contributory flow ☐
iii. Mass Proportion Method ☐
iv. Selected Industrial Reduction Method ☐
v. Other: (specify below) ☐

c. When was the CA's last local limits evaluation? What was the approval date?

d. Has the CA or FDEP District office identified any pollutants of concern beyond those in its local limits?
If yes, how has this been addressed? ☐Yes ☐No

SECTION II: INTERVIEW FORM (CONTINUED)

F. COMPLIANCE MONITORING

1. a. How often does the CA conduct IU inspections and monitoring?

d. Does the CA perform any IU monitoring in lieu of requiring the IU to conduct self-monitoring? If yes, list IUs. If it is the practice of the CA to perform all IU monitoring, please indicate this below and list any exceptions were the IU monitors.

2. In the past 12 months, how many, and what percentage of, SIUs were: [62-625.500(2)(b)5, F.A.C.]; [40 CFR403.8(f)(2)(v)]
(Define the 12-month period _____ to _____.)

a. Not sampled or not inspected at least once _____%
b. Not sampled at least once _____%
c. Not inspected at least once (all parameters)? _____%

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following since the last annual report:

SNC Evaluation Periods _____

_____%	Applicable Pretreatment Standards	*SNC defined by:
_____%	Reporting requirements	CA _____
_____%	Self-monitoring requirements	FDEP _____
_____%	Pretreatment compliance schedule(s)	

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment Annual Report still in SNC status? If yes, list SIUs and reason for SNC.

c. Does the CA have a program for recognizing outstanding SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements? If yes, please list SIUs that have been recognized since the last inspection.

SECTION II: INTERVIEW FORM (CONTINUED)

F. COMPLIANCE MONITORING (continued)

4. Please check the inspection areas you routinely cover during an IU inspection:

a. Process areas ☐
b. Pretreatment facilities ☐
c. Chemical and hazardous waste storage areas ☐
d. Chemical spill prevention areas (containment structures) ☐
e. Sampling procedures ☐
f. Monitoring records ☐
g. Laboratory procedures (if applicable) ☐
h. Hazardous waste handling procedures ☐
i. Slug control plan evaluation ☐
j. Other: ☐

Please provide a copy of the CA's inspection form, if applicable.

5. Who performs the CA's compliance monitoring analysis?

	Laboratory Name	**DOH Certification**
A.Metals/Cyanide	_____	_____
B.Organics	_____	_____
C.Other(Specify)	_____	_____

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [62-625.500(2)(b)7, F.A.C.]; [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	☐	Sample Splits	☐
Chain-of-custody forms	☐	Sample Blanks	☐
New Sampling Tubes	☐	Sample Spikes	☐
Field Blanks	☐	Other:	☐
Other:	☐		

Note, please maintain current approved analyte list from contracted laboratories in pretreatment files. Provide documentation that the CA's laboratory is in compliance with the DEP's requirements for field sampling (FDEP SOPs 01/001 and subsequent revisions). Example documentation includes, but is not limited to, field data records, calibration logs, field quality assurance program, duplicate and split samples, etc.

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

SECTION II: INTERVIEW FORM (CONTINUED)

F. COMPLIANCE MONITORING (continued)

8. Hazardous Waste Notification: [62-625.600(15), F.A.C.]

a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PPA?

If yes, summarize. ☐Yes ☐No

b. How does the CA notify its users of the hazardous-waste reporting requirement? When was the last time the CA notified its IUs?

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [62-625.500(2)(b)6, F.A.C.]

List SIUs required to have a slug discharge control plan. If it is the practice of the CA to require this from all IUs, please indicate this below and list any exceptions:

b. Have all new significant industrial users been evaluated to determine the need for a slug discharge control plan within 1 year of being designated a significant industrial user? ☐Yes ☐No

If not, which SIUs have not been evaluated?

G. ENFORCEMENT

1. Is the CA's definition of SNC the same as Rule 62-625.500(2)(b)8a-h, F.A.C. ? ☐Yes ☐No

If not, please attach a copy of the CA's definition.

2. ERP implementation: [62-625.500(2)(d), F.A.C.]

a. When was the ERP approved by FDEP? _____

SECTION II: INTERVIEW FORM (CONTINUED)

G. ENFORCEMENT (continued)

2. ERP implementation: (continued) [62-625.500(2)(d), F.A.C.]

b. Does the ERP describe how the CA will investigate instances of noncompliance? ☐Yes ☐No

c. Does the ERP describe types of escalating enforcement responses and the time frames for each response? ☐Yes ☐No

d. Does the ERP identify the title of official(s) responsible for implementing each type of enforcement response? ☐Yes ☐No

e. Does the ERP reflect the CA's responsibility to enforce all applicable Pretreatment Standards and Requirements? ☐Yes ☐No

f. Does the CA document escalating enforcement in accordance with the approved ERP? ☐Yes ☐No

g. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available. ☐Yes ☐No

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)] ☐Yes ☐No

b. If yes, are they effective? Provide a list of SIUs on compliance schedules.

4. a. Did the CA publish at least annual public notification, of industrial users which were in significant noncompliance with applicable pretreatment requirements at any time during the previous 12 months, in a newspaper(s) of general circulation within the jurisdiction served by the WWF that meets the requirements of Sections 50.011 and 50.013, F.S.? ☐Yes ☐No

If no, explain.

5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)? _____

b. How many SIUs are in SNC with self-monitoring requirements and were not sampling (in the four most recent full quarters)? _____

c. Is the CA conducting quarterly SNC evaluations using rolling quarters for the previous six months?

☐YES ☐NO

SECTION II: INTERVIEW FORM (CONTINUED)

G. ENFORCEMENT (continued)

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Cause
• Interference	☐	☐	_____
• Pass through	☐	☐	_____
• Fire or explosions (flashpoint, and such)	☐	☐	_____
• Corrosive structural damage	☐	☐	_____
• Flow obstruction	☐	☐	_____
• Excessive flow rates	☐	☐	_____
• Excessive pollutant concentrations	☐	☐	_____
• Heat problems	☐	☐	_____
• Interference due to fats, oils, and grease (FOG)	☐	☐	_____
• Toxic fumes	☐	☐	_____
• Illicit dumping of hauled wastes	☐	☐	_____
• Worker health and safety	☐	☐	_____
• Other (specify)	☐	☐	_____

b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? ☐Yes ☐No

7. a. Did the WWF have any sanitary sewer overflows since the last PCI or PPA? ☐Yes ☐No

b. If yes, how many were due to nondomestic waste issues (*non-residential blockages)*?

SECTION II: INTERVIEW FORM (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. Does the CA handle confidential information in accordance with 62-625.800, F.A.C.? ☐Yes ☐No

2. How are requests by the public to review files handled?

3. a. Does the CA accept electronic reporting? ☐Yes ☐No

   b. If no, does it plan to do so? ☐Yes ☐No

4. Is the CA's data management system is effective in supporting pretreatment implementation and enforcement activities? ☐Yes ☐No

If no, please explain.

5. How does the CA ensure public participation during revisions to the SUO and/or local limits? [62-625.400(3)(c), F.A.C.]; [40 CFR 403.5(c)(3)]

6. Explain any public or community issues affecting the CA's pretreatment program.

7. How long are records maintained? [62-625.600(14), F.A.C.]; [403.12(o)]

SECTION II: INTERVIEW FORM (CONTINUED)

I. RESOURCES [62-625.500(3) , F.A.C.]; [40 CFR 403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program.

a. Has there been any change in the staffing levels since the last inspection? ☐Yes ☐No
If yes, explain.

Activity	FTEs	Activity	FTEs
Legal Assistance		Sample Analysis	
Permitting		Data Analysis: Review and Response	
Inspections		Enforcement	
Sample Collection		Administration	
		Total Number of FTEs	

2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.) ☐Yes ☐No
If not, explain.

3. a. Estimate the annual operating budget for the CA's program. $ ----------

b. Is funding expected to stay the same, increase, decrease (note time frame; e.g., following year, next 3 years)? Discuss any changes in funding.

4. Discuss any problems in program implementation that appear to be related to inadequate resources.

5. a. How does the CA ensure that personnel are qualified and up-to-date with current program requirements?

b. Does the CA have adequate reference material to implement its program?
☐Yes ☐No

SECTION II: INTERVIEW FORM (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times was the WWF monitored in the past year?

	Influent	Effluent	Sludge
• Metals	_____	_____	_____
• Priority pollutants	_____	_____	_____
• Toxicity Characteristic Leachate Procedure (TCLP)	_____	_____	_____
• Whole Effluent Toxicity (WET) test	_____	_____	_____
• Other (specify)	_____	_____	_____

b. Is this frequency less than, equal to, or more than that required by the WWF permit? ☐Less ☐Equal ☐More

Explain any differences.

c. Is the CA reporting these results to the Approval Authority? ☐Yes ☐No
If yes, at what frequency?

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on the following:

- Improvements in WWF operations ☐Yes ☐No
- Loadings to and from the WWF ☐Yes ☐No
- WWF permit compliance ☐Yes ☐No
- Sludge quality ☐Yes ☐No
- Sludge disposal options ☐Yes ☐No

b. Has the CA documented these findings ☐Yes ☐No

(Please have a copy of the lab reports from the most recent priority pollutant scan available for review.)

SECTION II: INTERVIEW FORM (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the WWF, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

4. Has the CA investigated the sources contributing to current pollutant loadings to the WWF (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)? ☐Yes ☐No

If yes, what was found?

5. a. Has the CA implemented any kind of public education program? ☐Yes ☐No
   b. Are there any plans to initiate such a program to educate users about pollution prevention?
   Explain.

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

7. Does the CA have any documentation concerning successful pollution-prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)? ☐Yes ☐No
   Explain.

8. Does the CA have a Fats, Oil, and Grease program? ☐Yes ☐No

SECTION II: INTERVIEW FORM (CONTINUED)

K. ADDITIONAL EVALUATIONS/INFORMATION and AUDITOR COMMENTS

I have personally examined and am familiar with the information contained in Section II of this form and any attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete.

COMPLETED BY: _____ DATE: ___/___/_____

TITLE: _____ TELEPHONE: (____) ____-_____

FDEP REPRESENTATIVE: _____ DATE: ___/___/___