SECTION III: FILE REVIEW FORM (To be completed by Auditor)

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or PPA should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE__Industry name and address

_____

_____

[ ] CIU 40 CFR _____,_____, _____

Category(ies) _____

Type of industry

_____

SIC Code: _____

NAICS Code: _____

Average total flow (gpd) _____

Average process flow _____

[ ] Other SIU [ ] Non-SIU [ ] NSCIU

Industry visited during audit Yes [ ] No [ ]

Comments

_____

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_____

FILE__Industry name and address

_____

_____

[ ] CIU 40 CFR _____,_____, _____

Category(ies) _____

Type of industry

_____

SIC Code: _____

NAICS Code: _____

Average total flow (gpd) _____

Average process flow _____

[ ] Other SIU [ ] Non-SIU [ ] NSCIU

Industry visited during audit Yes [ ] No [ ]

Comments

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_____

IU IDENTIFICATION (Continued)

FILE__Industry name and address

_____

_____

[ ] CIU 40 CFR _____,_____, _____

Category(ies) _____

Type of industry

_____

SIC Code: _____

NAICS Code: _____

Average total flow (gpd) _____

Average process flow _____

[ ] Other SIU [ ] Non-SIU [ ] NSCIU

Industry visited during audit Yes [ ] No [ ]

Comments

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FILE__Industry name and address

_____

_____

[ ] CIU 40 CFR _____,_____, _____

Category(ies) _____

Type of industry

_____

SIC Code: _____

NAICS Code: _____

Average total flow (gpd) _____

Average process flow _____

[ ] Other SIU [ ] Non-SIU [ ] NSCIU

Industry visited during audit Yes [ ] No [ ]

Comments

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_____

IU IDENTIFICATION (Continued)

FILE__Industry name and address

_____

_____

[ ] CIU 40 CFR _____,_____, _____

Category(ies) _____

Type of industry

_____

SIC Code: _____

NAICS Code: _____

Average total flow (gpd) _____

Average process flow _____

[ ] Other SIU [ ] Non-SIU [ ] NSCIU

Industry visited during audit Yes [ ] No [ ]

Comments

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_____

_____

FILE__Industry name and address

_____

_____

[ ] CIU 40 CFR _____,_____, _____

Category(ies) _____

Type of industry

_____

SIC Code: _____

NAICS Code: _____

Average total flow (gpd) _____

Average process flow _____

[ ] Other SIU [ ] Non-SIU [ ] NSCIU

Industry visited during audit Yes [ ] No [ ]

Comments

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Industry Name					Industrial Users File Review Checklist	
					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 a 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.	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					A. ISSUANCE OF IU CONTROL MECHANISM	
					1. Control mechanism application form	
					2. Fact sheet	
					3. Issuance or reissuance of control mechanism	500(2)(a)2.
					a. Individual control mechanism	
					b. General control mechanism	500(2)(a)7.
					4. Control mechanism contents	
					a. Statement of duration (5 years)	500(2)(a)2.a.
					b. Statement of non-transferability w/o prior notification/approval and provide copy to new owner.	500(2)(a)2.b
					c. Applicable effluent limits (local limits, categorical standards, BMPs	500(2)(a)2.c

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	IU FILE REVIEW	Reg. 62-625, F.A.C.
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					d. Self-monitoring requirements	500(2)(a)2.d
					Identification of pollutants to be monitored	
					• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	500(2)(a)2.e
					Is the monitoring waiver certification language included in the control mechanism? (Y/N)	500(2)(a)2.e
					• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	500(2)(a)2.e
					• Sampling frequency	
					- Has the CA reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
					Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements (including all monitoring results and best management practices (BMPs))	
					• Record-keeping requirements	

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					e. Statement of applicable civil and criminal penalties (at least the amount of $1,000 a day for each violation)	500(2)(a)2.f
					f. Compliance schedules/progress reports (if applicable)	500(2)(a)2.f & 600(2)
					g. Notice of slug loadings (immediate oral notice and 5 day follow-up)	500(2)(a)2.d & 600(5)
					h. Notification of spills, bypasses, upsets, etc. (24-hr. oral notice and 5 day follow-up)	500(2)(a)2.d
					i. Notification of significant change in discharge (prompt notification required)	500(2)(a)2.d & 600(9)
					j. Notification of change affecting the potential for a slug discharge	500(2)(a)2.d & 500(2)(b)6.
					k. 24-hour notification of violation/resample requirement	500(2)(a)2.d & 600(6)(b)
					l. Slug discharge control plan conditions and requirements, if determined by the CA to be necessary	500(2)(a)2.g & 500(2)(b)6

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	IU FILE REVIEW	Reg. 62-625, F.A.C.
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
					5. Issuance of General Control Mechanisms	500(2)(a)8
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					Any requests for a monitoring waiver for a pollutant neither present nor expected to be present	
					e. Documentation to support the CA's determination	

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
					1. IU categorization	500(2)(b)3
					2. Calculation and application of categorical standards	500(2)(b)3
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification as an NSCIU	200(14)
					e. Documentation for the qualification to be classified as NSCIU	
					f. Documentation of reasons for supporting sampling wavier for pollutant not present	600(4)(b)
					3. Application of local limits	400(3)-(4) & 500(2)(c)
					4. Application of required BMPs	400(3)(d) & 500(2)(a)2.c
					5. Calculation and application of production-based standards	410(4)(b)-(d)

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
					6. Calculation of equivalent mass limits for concentration limits	410(4)(e)
					a. IU has demonstrated or will demonstrate substantially reduced water usage	410(4)(e)1
					b. IU uses control and technologies adequate to achieve compliance	410(4)(e)2
					c. IU has provided information regarding actual average daily flow	410(4)(e)3
					d. IU does not have variable flow rates, production levels, or pollutant levels	410(4)(e)4
					e. IU has consistently complied with applicable categorical requirements	410(4)(e)5
					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	410(4)(g)1
					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	410(4)(g)2
					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
					7. Calculation of equivalent concentration limits for flow-based standards	410(4)(i)
					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
					b. Documentation that dilution is not being used as treatment? (Y/N)	
					8. Calculation and application of CWF or FWA (for adjusted pretreatment standard)	410(5)-(6)
					9. Application of most stringent limit	600(8)(a)

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					C. CA COMPLIANCE MONITORING	
					1. Inspection (at least once a year, except as otherwise specified)	500(2)(b)5
					a. If the CA has determined a discharger to be an NSCIU • Evaluation of discharger with the definition of NSCIU once per year	500(2)(b)5.b
					b. If the CA has reduced an IU's reporting requirements • Inspect at least once every 2 years	500(2)(b)5.c
					2. Documentation of inspection activities	500(2)(b)7
					3. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	500(2)(b)6
					4. Sampling (at least once a year, except as otherwise specified)	500(2)(b)5
					a. If the CA has waived monitoring for a CIU • Sample waived pollutant(s) at least once during the term of the control mechanism	500(2)(b)5.a
					b. If the CA has reduced an IU's reporting requirements • Sample and analyze IU discharge at least once every 2 years	500(2)(b)5.c
					6. Documentation of sampling activities (chain-of-custody; QA/QC)	500(2)(b)7
					7. Analysis for all regulated parameters	500(2)(b)5
					8. Appropriate analytical methods (40 CFR Part 136 & 62-160, F.A.C.)	500(2)(b)7

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					D. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	500(2)(b)7
					a. Discharge violations	
					• IU self-monitoring	
					CA compliance monitoring	
					b. Monitoring/reporting violations	
					• IU self-monitoring	
					– Reporting (e.g., frequency, content)	
					– Sampling (e.g., frequency, pollutants)	
					– Record-keeping	
					• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
					• Slug discharge control plan	
					Compliance schedule/reports	
					c. Compliance schedule violations	
					Start-up/final compliance	
					• Interim dates	

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					D. CA ENFORCEMENT ACTIVITIES (continued)	
					2. Determination of SNC (on the basis of rolling quarters)	500(2)(b)8
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
					3. Response to violation	
					4. Adherence to approved ERP	500(2)(d)1
					5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
					6. Escalation of enforcement	500(2)(d)2
					7. Publication for SNC	500(2)(b)8

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	IU FILE REVIEW	Reg. 62-625, F.A.C.
					E. IU COMPLIANCE STATUS	
					1. Self-monitoring and reporting	
					a. Sampling at frequency specified in control mechanism/regulation	600(4)
					b. Analysis of all required pollutants	600(4)
					c. Appropriate analytical methods (40 CFR Part 136)	
					d. Appropriate sample collection methods	
					e. Compliance with sample collection holding times	
					f. Submission of BMR/90-day report	600(1)
					g. Periodic self monitoring reports	600(4)
					h. Reporting all required pollutants and required BMPs	600(4)
					i. Signatory/certification of reports	600(11)
					j. Annual certification by NSCIUs	600(17)
					k. Submission of compliance schedule reports by required dates	600(1)(g)
					l. Notification within 24 hours of becoming aware of violations	
					Discharge violation	600(6)(b)
					• Slug load	600(5)
					Accidental spill	600(5)
					m. Re-sampling/reporting within 30 days of knowledge of violation	600(6)(b)
					n. Notification of hazardous waste discharge	600(15)
					o. Submission/implementation of slug discharge control plan	500(2)(b)6
					p. Notification of significant changes	600(9)

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					E. IU COMPLIANCE STATUS (continued)	
					2. Compliance with all general control mechanism requirements	
					3. If the CA has classified the discharger as a reduced reporting CIU	600(4)(d)
					• Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller)	
					Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the WWF	
					• Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant	
					4. If the CA has granted the discharger a monitoring waiver	600(4)(b) & (c)
					• Certification statements with each compliance report	
					5. Compliance with BMR requirements, if applicable (Y/N)	
					6. If the CA has classified the discharger as an NSCIU	200(14)
					• IU discharges less than 100 gpd of total categorical wastewater	
					• Annual certification statements from the IU	600(17)

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	**IU FILE REVIEW**	**Reg. 62-625, F.A.C.**
					E. IU COMPLIANCE STATUS (continued)	
					7. If the CA has established equivalent mass limits for a CIU	410(4)(g)
					IU is effectively operating treatment technologies to achieve compliance	
					• IU is recording the facility's flow rates	
					• IU is recording the facility's production rates	
					• IU has notified the CA whenever production rates vary	
					IU continues to employ water conservation methods/technologies	

Comments

Industry Name					Industrial Users File Review Checklist	
File	File	File	File	File	IU FILE REVIEW	Reg. 62-625, F.A.C.
					F. OTHER	

Comments

SECTION III COMPLETED BY:	DATE:
TITLE:	TELEPHONE: