Inspections and Sampling of IUs

The overall success of a Control Authority's pretreatment program is largely dependent on a comprehensive and properly designed monitoring program of its IUs. It is through monitoring activities that compliance with permits and ordinance requirements is determined, user charges are confirmed, and data are generated for annual pretreatment reports and other reports required by EPA and DEP. Control Authority monitoring of IUs also helps to verify self-monitoring data submitted by the IU, supports enforcement action, and identifies the IU(s) responsible for interference or pass through problems experienced at the WWF. Labor and resources have a direct bearing on how many sampling and inspection visits will be conducted. The Control Authority should develop a list of IUs to be inspected, sampled, and evaluated for a slug control plan and include the frequencies of these activities. This list should be updated annually by the Control Authority and presented in its annual report to the State.

Inspections and sampling are two of the most important ongoing tasks in implementation of a local pretreatment program. Subparagraphs 62-625.500(2)(b)5 and 6, F.A.C., states that Control Authorities must develop procedures to:

- randomly sample and analyze the effluent from IUs and conduct surveillance activities in order to identify, *independent of information supplied by IUs*, occasional and continuing noncompliance with Pretreatment Standards;
- inspect and sample the effluent from each SIU as indicated in Exhibit 7-1; and
- Evaluate, within one year of being designated as a SIU, whether the SIU needs a plan to control slug discharges, and at least once every two years thereafter.

IU type	Minimum Inspection / Sampling Requirements
SIUs	**1 time per year**
CIUs	**1 time per year**
NSCIUs	**Evaluate criteria 1 per year**
Middle Tier CIUs[1]	**1 time every two years**

Exhibit 7-1, Minimum inspection and sampling requirements

Current data on industrial dischargers are necessary in a pretreatment program to identify sources of problems and to provide a foundation for developing or amending local discharge limits for IUs. Industrial inspections will help the Control Authority maintain current data on all its IUs and, if performed on a frequent basis, the Control Authority may use inspections as its primary mechanism to maintain a comprehensive list of users. However, other resources should be used as well.

Monitoring Activities

Industrial inspections set the groundwork for monitoring tasks associated with the pretreatment program and can furnish the Control Authority with information needed to plan future monitoring activities (e.g., operating data, sampling considerations and locations, safety considerations, and laboratory considerations). In addition to this type of logistical information, the inspection can provide information about needed changes in existing procedures at the industrial facility. For example, if a firm changes its

[1] Middle tier CIUs are those defined by Paragraph 62-625.600(4)(d), F.A.C.

processes to use fewer pollutants, the inspector might recommend that the Control Authority's analyses also be cut back to match the new discharge. Similarly, a series of inspections can show a trend or a change that necessitates a modification of monitoring schedules or frequency, or even of the industry's discharge permit. In this way, inspections can be a useful tool for adjusting and refining the Control Authority's pretreatment program to allocate resources and undertake activities efficiently.

An inspection should also check the IUs' self-monitoring procedures and equipment (where applicable) to ensure that data obtained by these procedures and equipment are proper and accurate. Items to be checked in this regard during the inspection include verification and examination of the following:

- the sampling location specified in the permit is adequate for the collection of a representative sample of the wastewater;
- the user's sampling technique is adequate to ensure the collection of a representative sample;
- the user's permit sampling and monitoring requirements will yield representative samples;
- the parameters specified in the user's permit are adequate to cover all pollutants of concern that may be discharged by the user; and
- The appropriate limits are being applied at the specified sampling location(s).

Industrial inspections also serve to establish and maintain a good rapport between the Control Authority and IUs. The inspection is a good time for exchanging ideas and concerns. During industrial inspections, inspectors can inform the IU of any new or updated pretreatment regulations (Any technical suggestions on pretreatment techniques and/or pollution prevention opportunities must be given specifically as an opinion only. As inspectors we are not to be considered as consultants to the IU.)

Sampling activities are necessary to determine IU compliance with applicable regulations and wastewater discharge requirements by obtaining accurate flow measurements and representative samples of the IU's discharges. Control Authority personnel may often visit an IU only to collect samples. Many Control Authorities may even use two different teams of personnel to conduct sampling and inspection activities. Because of the importance of accurate, precise, and reproducible sampling results and the potential for significant errors in the sampling procedures and analysis, it is essential that extreme care be exercised in selecting representative sampling locations, using proper equipment, and using approved sampling and analysis protocol. If different personnel are used, the inspectors should be aware of the sampling and analysis protocols used by the sampling and analytical personnel. The inspector must carefully evaluate the sampling location(s), the designation of pollutant parameters to be measured, and sample collection methods to ensure that the collection of analytical data is representative of the industrial effluent.

Regardless whether inspections and sampling are conducted concurrently, both activities are prompted or initiated in the same way. They may be: (1) scheduled; (2) unscheduled; or (3) conducted on demand.

- Scheduled inspections and sampling are planned in advance by the Control Authority with prior notice to the industry. Depending on the size and type of industry, the date and time of the planned visit should be mutually agreed to one week to one month in advance. Objectives of scheduled and unscheduled inspections are presented in Exhibit 7-2.

- Unscheduled monitoring and inspections represent a random spot check to evaluate industry compliance. These unscheduled visits may have the same objectives as the scheduled inspections, but with no advance notice provided to the industry. The unscheduled inspection is most effective when conducted in conjunction with sampling of the industry's effluent. Most cases of noncompliance are identified during the unscheduled inspections and sampling activities. Unscheduled monitoring activities can occur as often as on a daily or weekly basis when an IU is suspected of having difficulties maintaining consistent compliance.

- Collect information and obtain samples to evaluate industry compliance with local, State, and Federal pretreatment standards and requirements.
- Identify changes in industrial processes that may affect the quality of the industrial discharge and subsequent permit limitations.
- Talk with and answer questions of industrial representatives, thus maintaining a cooperative as well as a regulatory presence with the industrial community.

Verify information in reports submitted to the Control Authority by the IU.

Exhibit 7-2, Objectives of Scheduled and Unscheduled Inspections

- Demand sampling and industrial inspections are usually performed in response to a complaint, an emergency situation, or a violation. A Control Authority may receive complaints from the public or reports from other agencies concerning discharges to the WWF by an IU. Demand sampling and inspections should also be initiated if Control Authority personnel notice changes in the influent characteristics of the treatment plant or an upset or interference of treatment plant processes. Sampling and inspections of this type should:
  - determine the nature, duration, and hazard of the discharge;
  - obtain samples to verify the source and constituents of the discharge;
  - obtain discrete samples over the entire discharge period to identify the time of the unauthorized discharge;
  - ascertain the necessary corrective actions needed to be taken to contain or halt the discharge;
  - initiate corrective actions, if needed; and
  - document information needed for follow-up compliance or enforcement activities.

When emergency situations arise in the treatment plant or collection system (upsets, blockages, fires, or explosions), industrial inspections should be initiated immediately. Sampling and laboratory staff should be notified to aid in determining the source and constituents of the discharge. Inspections and sampling of suspected IUs will generally determine the source(s) of the problem. Remedial actions to be undertaken by the responsible IU can also be determined during the industrial inspection. In addition,

Control Authority personnel performing demand inspections in response to an emergency should notify other agencies (local, State, or Federal) as appropriate; make all information on the industry available to the person or agency in charge of the response effort; stay in direct contact with the Control Authority managers in the event special equipment or remedial actions, injunctions or legal opinions, or high level decisions are needed; and collect and adequately document all information for use in enforcement or litigation procedures that may be pursued at a later date.

Control Authority personnel must determine the frequency with which industrial inspections and sampling will occur. EPA requires that SIUs be inspected and sampled, at a minimum, once a year. Overall factors to be considered in determining the frequency of sampling and inspections are presented in Exhibit 7-3.

- IU classification
- Past performance of and compliance by an IU
- Flow and constituents of the IU's discharge
- Extent and number of problems in the collection system and at the treatment plant which are the result of industrial waste discharges
- Number and significance of IUs in the Control Authority's service area
- Quality of the IU data base
- Proposed methods to update the data base
- New or additional pretreatment standards and requirements
- Seasonal production schedules at an industry

Monitoring frequency requirements contained in the Control Authority's approved pretreatment program.

Exhibit 7-3, Factors to consider when determining sampling and inspection frequencies

The inspection and sampling frequency described in a Control Authority's approved pretreatment program submission will need to be evaluated during the implementation phase of the program. Once a history has been established for each IU, the Control Authority can reallocate resources for inspections and sampling to focus on IUs that have difficulty with compliance.

Subparagraph 62-625.500(2)(a)4., F.A.C., requires that Control Authorities have the authority to carry out all inspection, surveillance, and monitoring procedures necessary to determine, independent of information supplied by the IU, compliance with applicable pretreatment standards and requirements. This authority is required to be at least as extensive as provided in Section 308 of the Clean Water Act which states:

"The EPA Administrator or his authorized representative, upon presentation of his credentials shall have a right of entry to, upon, or through any premises in which an effluent source is located or in which any records required to be maintained ... are located ... and may at reasonable times have access to copy any records, inspect any monitoring equipment or methods ... and sample any effluents which the owner or operator of such source is required to sample."

The authority to enter an industrial facility will normally be contained in the Control Authority's local regulations. It is recommended that the inspector be familiar with the Control Authority's legal authority to enter an industrial facility, so the appropriate reference can be made during any monitoring visit.

When entering an industrial facility the inspector should first identify himself/ herself and present appropriate identification (i.e., business card or badge). These credentials indicate that the holder is a lawful representative of the Control Authority who is authorized to perform pretreatment monitoring activities. The credentials should be presented whether or not identification is requested. After industrial facility officials have acknowledged the credentials, they may, if they wish, telephone the Control Authority's office for verification of personnel identification. It is important that the credentials never leave the sight of the inspector.

An interview should then be requested with the plant manager, production manager, or equivalent person in authority. The inspector should explain the purpose of the inspection. If necessary, the manager should contact additional personnel who have a more thorough knowledge of the workings of the plant to accompany the inspector and answer specific questions.

Consent to inspect and sample on the premises must be given by the owner or operator at the time of the inspection unless a search warrant has been obtained. As long as the inspector is allowed to enter, entry is considered voluntary and consensual, unless the inspector is expressly told to leave the industrial premises. Expressed consent is not necessary; absence of an express denial constitutes consent.

The receptiveness of industrial facility officials toward inspectors is likely to vary from facility to facility. Most compliance monitoring will proceed without difficulty. However, in some cases, officials may be reluctant to give entry consent because of misunderstandings of responsibilities, inconvenience to a firm's schedule, or other problems that may be resolved by diplomacy and discussion. A Control Authority should discuss potential scenarios with legal staff and determine and establish appropriate responses, preferably prior to encountering them.

If the inspector is refused entry into a facility for the purpose of authorized monitoring, certain procedures must be followed. The following procedures have been developed in accordance with the 1978 U.S. Supreme Court decision in *Marshal v. Barlow's, Inc.:*

- Make certain that all credentials and notices have been properly presented to the facility owner or agent in charge.
- If entry is not granted, ask why. Tactfully probe the reason for the denial to see if problems (such as misunderstandings) can be resolved.
- If entry is still denied, the inspector should withdraw from the premises and contact his or her supervisor. The supervisor may confer with attorneys to discuss the desirability of obtaining a search warrant.
- All observations pertaining to the denial are to be carefully noted and documented by the inspector as soon as possible. Include facility name and exact address; name and title of person(s)

approached; authority of person(s) who refused entry; date and time of denial; detailed reasons for denial; facility appearance; and any reasonable suspicions that refusal was based on a desire to cover up regulatory violations. All such information will be important should a warrant be sought.

- Under no circumstances should the inspector discuss potential penalties or do anything that may be construed as coercive or threatening.
- The inspector should use care and discretion to avoid threats of any kind, inflammatory discussions, or deepening of misunderstandings. In the event of a threatening confrontation, the inspector should document the event and report it immediately to his or her supervisor. If feasible, statements from witnesses should be obtained and included in the documentation.

Additional situations that the Control Authority may encounter include:

- Un-credentialed persons accompanying Control Authority inspector - The consent of the owner or agent in charge must be obtained for the entry of persons accompanying an inspector to a site if they do not have specific authorization. If consent is not given voluntarily, these persons may not enter the premises. If consent is given, these persons may not view confidential business information unless officially authorized for access.
- Waivers, releases, and sign-in logs - When the facility provides a blank sign-in sheet, log, or visitor register, it is acceptable for the inspector to sign it. Note however, that the inspector should not sign any type of "waiver" or "visitor release" that would relieve the industrial facility of responsibility for injury or which would limit the rights of the Control Authority to use data obtained from the industry. The inspector should not agree to any such unnecessary restrictions.

  If such a waiver or release is presented, the inspector should politely explain it cannot be signed and request a blank sign-in sheet. If the inspector is refused entry because of refusal to sign such a release, the inspector should leave and immediately report all pertinent facts to the appropriate supervisory and/or legal staff. All events surrounding the refused entry should be fully documented. Problems should be discussed cordially and professionally. Facility officials must not be subjected to intimidation by the Control Authority's right to inspect.
- Problems with entry or consent - Because monitoring may be considered an adversary proceeding by some industries, the inspector's legal authority, techniques, and competency may be challenged. Facility officials may also display antagonism towards the inspector. In all cases, the inspector must cordially explain legal authorities and objectives and the reasons for the protocols followed. If explanations are not satisfactory or disagreements are irresolvable, the inspector should leave and obtain further direction from the appropriate Control Authority supervisory or legal staff. Professionalism and politeness must prevail at all times.
- Withdrawal of consent during monitoring - If the industrial facility official asks the inspector to leave the premises after monitoring has begun, the inspector should leave as soon as possible, following the procedures for denial of entry. All activities and evidence obtained prior to the withdrawal of consent are valid. The inspector should ensure that all personal and government equipment is removed from the facility.

- Denial of access to some areas of the IU facility - If, during the course of the inspection or sampling, access to some parts of the industrial facility is denied, the inspector should document the circumstances surrounding the denial of access and of the portion of the inspection or sampling that could not be completed. The inspector should then proceed with the rest of the monitoring and after leaving the facility, contact the Control Authority supervisor to determine whether a warrant should be obtained to complete the monitoring.

  The inspector may be instructed by Control Authority attorneys, under certain circumstances, to conduct compliance monitoring under a search warrant. A warrant is a judicial authorization for appropriate persons to enter specifically described locations and to perform specific monitoring functions. It is possible that a pre-inspection warrant could be obtained where there is reason to believe that entry will be denied when the inspectors arrive at the facility or when inspectors anticipate violations that could be hidden during the time required to obtain a warrant. The inspectors should discuss various reasons and procedures for obtaining warrants with the Control Authority attorneys. This prior knowledge of when and how to obtain a warrant will save a great deal of time should such an event ever become necessary.

Inspections

With entry obtained, utilizing the industrial inspection to its fullest capabilities will depend upon the ability of the inspectors to ask the right questions and to look closely in the appropriate site locations during inspections. This will require inspectors to become thoroughly familiar with industrial production processes, wastewater sources and treatment technology, as well as with correct inspection procedures and techniques. The procedures recommended for conducting a thorough inspection are discussed in greater detail below.

In order to ensure that adequate steps are taken to prepare for the inspection and that all necessary information is collected during the onsite visit, a checklist should be developed as a guide for inspectors. The checklist should cover three areas: (1) preparing for the inspection; (2) conducting the onsite inspection; and (3) follow-up compliance activities.

Prior to going to the industrial facility, the inspector must prepare for the inspection. This includes determining the purpose and scope of inspections; reviewing the appropriate files; alerting the laboratory if sample analyses will be required; and preparing the equipment to be used. A comprehensive review of the files concerning the industry to be inspected will save much time and confusion in the field and in the office later. Prior to an inspection, it is helpful to review the following material:

- Existing files for available information about the industry. Information such as plant layouts, process flow diagrams, compliance schedules, slug discharge control plans (if applicable), and wastewater analytical data should be taken along during the inspection and verified for accuracy.
- Water and sewer records to determine water usage and verify connection to the sanitary sewer.
- Literature about unfamiliar industrial processes which may be encountered. Prepare specific questions to be asked about these industrial processes. EPA's development documents and guidance manuals contain detailed information on production processes, wastewater sources and

characteristics, and applicable wastewater treatment technologies. Review of this information will help the inspector better understand the facility during a visit and enable the inspector to ask more meaningful and pertinent questions.

- Previous enforcement actions which may indicate the industry's compliance status.
- WWF collection system and/or treatment plant problems.
- Previous Inspection findings and comments.

Once the inspector has completed the necessary preparations, the inspection process can proceed. The actual inspection is conducted in several phases beginning with a discussion with industry officials. After giving a brief explanation of the industrial pretreatment program, the inspector should obtain a verbal description of the industrial facilities and processes to gather as much information as possible pertaining to industrial waste or waste potential. Questions asked should be based on the data required to complete the industrial inspection report. Presented below is a description of the information that should be collected and documented during an onsite inspection; a sample industrial user inspection checklist is provided in Appendix 7-A.

(1) Industry name, site address, correspondence address;

(2) Contact name, title, and telephone number;

(3) Year the industry was established onsite;

(4) Number of employees per shift;

(5) Applicable North American Industrial Classification System (NAICS) codes;

(6) A schematic of the water flow through the industry and the location of all wastewater discharge lines that flow to the WWF system. The schematic should also include the layout of major plant features;

(7) A description of each discharge (including any batch discharges), including the amount, chemical nature, frequency and destination of each discharge. (Ideally, all wastewater flows should be measured. If measurements cannot be obtained, industry officials should be asked for the duration of flow to estimate how much wastewater is discharged. Pipe diameter should be noted as well as how full the pipe is. If the wastestream is uncontaminated water for air conditioners, reactor vessels, or air compressors, the size of the unit cooled should be noted. As emphasized in the initial interview, the discharge of these flows, whether to storm drains, combined sewers, sanitary sewers, or streams should be determined. All recirculating systems should be described. Where the industry has a metered waste flow, readings for a representative period of time should be recorded as well as any monitored waste parameters such as pH. An attempt should be made to account for all water uses and losses such as evaporation, loss to product, and washwater for the plant. Determine if there are batch discharges. Reactors, plating tanks, and all types of process tanks often contain chemicals that may be periodically discharged. Metal cleaning solutions are a prime example. The amounts, chemical nature, brand name, and frequency of discharge are all important. If pretreatment of these solutions is practiced (neutralization, etc.), this fact should be noted as well as the method used to determine that the waste has been pretreated to acceptable levels. How these solutions are fed into the wastestream (whether gradual or all at once) is

significant. If products are of a liquid nature, spoiled batches may be either discharged or sent out for disposal. This information should be recorded including the name and location of any disposal service employed. General plant washdown (its frequency and quantity) is also of concern; in many plants the washdown is the largest and/or most significant discharge);

(8) A description and process flow diagram of each major product line and process utilized within the industrial facility, particularly processes which may be subject to Federal categorical pretreatment standards;

(9) The size and shape of all vessels containing liquids should be noted. The proximity of floor drains and type of liquid stored should also be noted. If the vessels or containers are cleaned, the amount of discharge at the time of cleaning, the frequency of cleaning, and the methods of cleaning are all important. If vessels are not cleaned, this fact should be noted as well as reasons why cleaning is not necessary;

(10) A detailed description and appropriate sketches of existing pretreatment facilities, including operating data, if available. Note if there is no pretreatment. If the industrial facility employs pre-treatment of any kind, the process should be described in detail as well as the final disposal of any removed constituents and sludges. When oil and grease traps are present, their frequency of cleanout and the name and location of the firm employed to clean the traps should be recorded. If stone chip neutralizing units are used, the maintenance frequency should be noted. Any details pertaining to chemical pretreatment systems such as analytical data, discharge pH, and method of sludge disposal should be carefully gathered;

(11) A list of pollutants of interest at the industrial facility. The list should be divided into two categories: (1) pollutants that come in direct contact with the water that is discharged to the WWF; and (2) pollutants that do not come in direct contact, but have a potential to enter the wastewater due to spills or machinery malfunctions;

(12) Identification of appropriate sampling locations;

(13) For industries with nondomestic waste flows, the inspector should determine, during the industrial facility tour, the best points for samples to be taken. Ideally, the sampling points would be at the end of process streams and before any dilution with uncontaminated water or domestic waste occurs. The sampling point(s) should then be noted for future use by sampling personnel. If the industry itself has taken samples of wastewater for analysis, the location of the points where samples were taken should be recorded as well as relevant data concerning flow which might contribute to dilution. Also, if no suitable sampling points are available, the industry should be informed of local regulations which require the construction of suitable monitoring facilities at the industry's expense;

(14) Availability of all analytical results performed by the industry. If analyses of wastewater have been performed by the industry, results of such analyses should be obtained wherever possible;

(15) A description of sampling and analytical protocols used by industry for results submitted in required reports;

(16) Proximity of chemical storage to floor drains and whether floor drains discharge to storm or sanitary sewers. (All liquid storage areas should be examined. The volume of all hazardous chemicals encountered should be listed. Any floor drains should be noted. If chemicals stored are unknown, the brand name, use, and chemical supplier should be noted and safety data sheets obtained and/or reviewed. The supplier's address should be noted in case it becomes necessary to seek data from that source);

(17) A description of spill control practices the industry uses, or the stage of implementation of its slug discharge control plan. Information about the past spills, unusual discharges, or temporary problems with any of the process units that may affect the wastewater discharge should be included. The inspector may want to request copies of any plans or descriptions of the devices used to prevent or react to accidental spills for each hazardous substance stored onsite;

(18) A description of air pollution control equipment that may generate a wastestream, pollutants which are likely to be found in the wastestream, or if not discharged to the sewer, the disposal method and location. (Equipment installed in the industrial facility for air pollution control may use water. In some industrial facilities, the effluent from air scrubbing may be the principal waste source and may contain a wide variety of process chemicals that are not encountered in any other wastestream. Booths for spray painting sometimes use a "water curtain" for fume control. Any such devices encountered should be described as well as any pollutants that are likely to be found in the water discharge from them);

(19) A description of how waste residuals (solids) are handled, stored, and/or disposed. (Many industrial facility processes such as cleaning, degreasing, grinding, or chemical pretreatment produce sludges that must be disposed. How this occurs, how often, and the quantities involved are all important. For example, vapor degreasers are used for cleaning metal in a wide variety of industrial applications. They almost always produce sludges and solvent waste, and are usually water cooled, producing a steady stream of uncontaminated cooling water. The presence of these devices should always be noted as well as appropriate answers to questions concerning the wastes associated with them. As is the case with batch discharges, any waste disposal service should be recorded. Sludges which are put in the containers should be described);

(20) A description of proposed or recent changes to the industry's processes that would affect the discharge characteristics or sampling locations;

(21) A description of any operational problems or shutdowns of pretreatment facilities;

(22) Identification of specific hazards and establishment of procedures to ensure the safety of Control Authority personnel while at the industrial facility; and

(23) Other information as may be necessary.

A team of two inspectors may be useful. In this case, the report form could be completed by one of the inspectors while the other takes freehand notes. These will be compared later for consistency and completeness.

Occasionally, difficulties will arise with industries where process information is proprietary. In these cases it is important to reassure industry officials that the interest is in the waste flows and in possible

hazardous materials stored on hand. Details of process machinery or of proportions of product constituents used are not normally essential. However, it may be necessary to request the chemical nature of the proprietary material if it is the suspected source of a toxic compound of concern. The Control Authority shall extend confidentiality of sensitive materials where allowed.

After the initial interview, a complete tour of the industrial facility should be taken to visually examine the site. A tour should always be taken. No interview, no matter how complete, is a substitute for an actual visualization of the waste generating processes involved. Waste sources may have been overlooked simply because industrial facility officials consider them minor. Industrial facility officials simply may not recall some waste sources until they are seen when touring the operation. The tour gives an opportunity both to determine details and to reaffirm answers given earlier to significant questions asked in the interview. It is best to tour the facility in order of production, from raw materials to finished product.

Records required by the permit to be kept at the user's facility should be reviewed. The Control Authority should document which records were reviewed, and which records are incomplete and/or inconsistent with those filed at the Control Authority.

After the industrial facility tour, the inspector may need to request additional information or data. Copies of the local regulations, pretreatment program information, or RCRA information should be given to the industrial facility officials, if required. Further explanation of the local pretreatment regulations may be necessary to avoid difficulties, which can arise from a misunderstanding of the information. At this time, the inspector may summarize inspection findings.

Concerns of the inspector when inspecting an industry which is not connected to the sewer system include: (1) the possibility of connecting in the future; (2) the name of the WWF to which the industry is or will be connected; and (3) the industry's authority (NPDES permit) to discharge to a natural water-course. Along the same lines, if the industry requires the cleaning of a gas/oil separator or of a sludge pit (e.g., laundry settling pits), the name and location of the firm performing this task should be noted. The inspection report should contain all relevant information, as if the industry were connected to the sewer system.

After the inspector returns to the office, the field notes will be used as the basis for writing an inspection report. <u>This is one of the most crucial points of the whole inspection procedure, yet it is most often the greatest source of problems.</u> The need to write a clear and concise report which contains pertinent information to be used as a basis for future decisions cannot be stressed enough. Information should be presented in a neat, organized manner. Scattered thoughts, fragmented sentences, bad grammar, and spelling mistakes erode the credibility of the report. Keep in mind that the inspection report will be a permanent record on the industry and may be reviewed several times for purposes of determining compliance with permit conditions, monitoring and sampling requirements, and even litigation, if necessary. The report should be factual and contain no subjective opinions concerning the industry's representatives, employees, processes, or facilities; however, the degree of cooperation of the industry

should be noted. All reports should be completed within 5 working days after completion of the inspection.

If a standardized report form is used, all blanks on the report form should be completed for each facility inspected. If the required information cannot be obtained, an explanation should be provided in the blank or in the comments section. The data recorded must be as accurate as possible as it provides most of the basic information about the industry, including correct address and contacts for future correspondence.

Inspectors should be familiar with applicable pretreatment standards and requirements to be able to recognize and document violations during inspections. When direct violations are encountered, the inspector should document such violations. Photo documentation may be employed by the Inspector, when appropriate. If the inspector does not have the authority to determine if a particular situation is, in fact, a violation, the inspector should document the facts of the inspection, then refer the matter to the Control Authority official responsible for determining violations. The most common violations encountered that can be readily detected include caustic and acidic discharges, excessive oil and grease concentrations, high coloration, and the dumping of viscous substances or solids into the sewers.

Sampling

Sampling activities can be performed in conjunction with an inspection or as an individual activity. The purpose of sampling is to evaluate compliance with applicable effluent limits. As mentioned previously, the frequency of sampling will vary depending on a number of factors, most often on the IU compliance and potential for WWF impact[2].

WWF monitoring of SIUs must be performed annually, at a minimum, except as provided in Exhibit 7-1. The Control Authority should develop and utilize standardized forms for the reporting of measurements obtained in the field and for sample handling. These forms will help ensure compliance with Chapter 62-160, F.A.C, and 40 CFR Part 136 procedures and protocols and record keeping requirements as detailed in subsection 62-625.600(14), F.A.C. In addition, the forms will ensure that monitoring is performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions (Rule 62-625.500, F.A.C.). An example Chain of Custody Record form is included as Appendix 7-B and example Field Data Record form for sampling and field measurements are included as Appendix 7-C. *The Department of Environmental Protection Standard Operating Procedures for Field Activities* (DEP-SOP-001/01) should be consulted for specific guidance on proper sample collection, handling, and documentation. EPA's *IU Inspection and Sampling Manual for WWFs* (1994) may also be consulted for additional guidance on sampling and inspection activities

[2] For example: amount of available data (historical data); type of facility (toxic vs. conventional wastes discharger); type and concentrations of pollutants in the discharge; type of discharge (continuous vs. batch); seasonal variations in operations and wastewater flow; type of production (24-hour operation vs. 8-hour operation, seasonal vs. daily production); past performance of, and compliance by, an IU; potential for impact on WWF/receiving stream, etc.