

Basic IUP Guidance

BASIC IUP GUIDANCE, INCLUDING WHAT TO SUBMIT TO DWR

TABLE OF CONTENTS

SECTION I – IUP BASICS

SECTION II – SIU IUP RENEWALS, MODIFICATIONS, AND NAME CHANGES, INCLUDING WHAT TO SUBMIT TO DWQ

SECTION III – PARTS OF AN SIU IUP

SECTION IV – FEDERAL CATEGORICAL REGULATIONS

SECTION I – IUP ISSUANCE PROCESS FLOW CHART

SECTION I – IUP BASICS

- 1) IUP= Industrial User Pretreatment Permit – A Control Mechanism document issued by Publicly Owned Treatment Works (POTWs) to specify how and under what conditions an Industrial User may discharge
 - a) Purpose is to protect POTW and environment.
 - b) Issued to
 - i) SIU = Significant Industrial User
 - ii) CIU = Categorical Industrial User
 - c) Includes limits, monitoring, reporting, general and specific conditions. See Section III for more details.
 - d) Some POTWs issue some form of IUP to some of their non-SIUs = non-significant industrial users. These IUPs may have all the same parts of an IUP issued to an SIU, but often they only have some parts, like limits and/or monitoring, or just a few conditions.
- 2) Writing the “Right” Permit.
 - a) Creating a permit that protects the POTW, is environmentally sound, technically feasible, and judicially defensible.
 - b) There is a delicate balance between these goals and protecting the POTW!
 - c) IUP needs revision when:
 - i) IUP conditions not strong enough to protect WWTP including collection system and sludge, as well as the environment and public health
 - ii) IUP conditions difficult to enforce
 - iii) IUP conditions too stringent and could be relaxed and still protect POTW
- 3) IUPs - POTW Responsibility
 - a) Identify all SIUs (15A NCAC 02H .0905-.0907)
 - b) Issue IUPs to all SIUs (15A NCAC 02H .0916(a))
 - a) IUPs cannot be issued retroactively, i.e., the effective date cannot be earlier than the date the IUP is signed, and the IUP must be transmitted to the SIU on or before the effective date. (15A NCAC 2H .0916(c)(7)).
 - c) Upon issuance, submit all SIU IUPs to DWQ (15A NCAC 02H .0917(a))
 - d) If necessary, revise SIU IUPs as required by DWQ (15A NCAC 02H .0917)
 - e) If necessary, address SIU adjudication of IUP (15A NCAC 02H .0922)
 - f) IUPs cannot be issued for a period to exceed 5 years (15A NCAC 02H .0916(c)(5)(C))
 - g) IUPs are not transferable (Model SUO, Section 4.2(k) ; Generic IUP, Part II, 19). See

BASIC IUP GUIDANCE, INCLUDING WHAT TO SUBMIT TO DWR

Section II. 6 below for more details.

h) POTW must enforce all IUP requirements as outlined in your Division approved Enforcement Response Plan (ERP) (15A NCAC02H .0905)

(1) This includes enforcement of the requirement that SIUs notify POTW of changes before changes are made. The POTW must approve the change and revise IUP as necessary before changes can begin (Model SUO, Section 4.2(i), and 5.5; Generic IUP, Part II, 25)

4) IUPs - DWQ Responsibility

- a. aide POTWs in SIU/CIU determinations
- b. Approve IWS (15A NCAC 02H .0905-.0907)
- c. aide POTWs in writing IUPs
- d. Approve IUPs (15A NCAC 02H .0917)

SECTION II – SIU IUP RENEWALS, MODIFICATIONS, AND NAME CHANGES, INCLUDING WHAT TO SUBMIT TO DWQ

1) State Pretreatment Regulation 15A NCAC 15A 02H (.0917(a)) requires POTWs to submit IUPs to the Division upon issuance, meaning when the IUP cover page is signed.

a) If an IUP renewal or IUP modification is to be submitted to DWQ or to the SIU as a “draft” rather than a “final” IUP, please make this clear.

2) IUP renewals involve a new application and can start a new 5 year time period for an IUP.

a) This is sometimes called an IUP reissuance.

b) Typically done when previous IUP expires. Sometimes SIU completes new application before IUP expires, ex. major expansion, ownership change.

3) IUP modifications occur within the 5 year time period and do not involve a new application, but usually a letter from the SIU requesting a specific change, or the POTW deciding a change is necessary.

4) What to submit to DWQ for IUP renewals:

a) Copy of the letter transmitting the IUP renewal to the SIU. It must inform the SIU of their right to adjudicate the IUP. Please review Appendix 6-D of the *Comprehensive Guidance of North Carolina Pretreatment Programs* for suggested wording.

b) IUP itself

i) includes new cover page with new signature and new effective date.

ii) includes permit history entry that uses the IUP renewal effective date and the phrase “IUP renewal” or “IUP reissue” and lists all changes the IUP renewal made over the previous IUP or IUP modification. See Section III, 3, below for more on Permit Histories.

c) IUP synopsis. See Section III, 7, below for more on IUP Synopsis.

d) SIU’s application.

e) POTW’s latest inspection.

f) Updated Allocation Table.

g) The effective date cannot be earlier than the date the IUP is signed (Issuing retroactive permits is explicitly prohibited by the state pretreatment rules 15A NCAC 2H .0916(c)(7), effective April 1, 2011).

BASIC IUP GUIDANCE, INCLUDING WHAT TO SUBMIT TO DWR

- h) The IUP must be transmitted to the SIU on or before the effective date.
- i) All listings of the effective and expiration dates must be consistent throughout the IUP package.
- j) If any item is or has been submitted to the Division under separate cover, please identify this in the IUP submission.

5) What to submit to DWQ for IUP modifications:

- a) Copy of the letter transmitting the IUP modification to the SIU. It must inform the SIU of their right to adjudicate the IUP. Please review Appendix 6-D of the *Comprehensive Guidance of North Carolina Pretreatment Programs* for suggested wording.
 - i. Do not instruct the SIU to remove and discard the replaced pages. You may either tell them to move them to the end of the IUP, or mark them as “void” on the effective date of this new IUP modification. Some POTWs list the effective date at the bottom of each IUP page so there will be no confusion.
- b) **New** IUP cover page with a new effective date and new signature date.
- c) New permit history page with an entry for that modification that uses the IUP modification effective date and the phrase “IUP modification” and lists all changes the IUP modification made over the previous IUP or IUP modification. See Section III, 3, below for more on Permit Histories.
- d) Any other pages of the IUP that are modified. If the limits page itself is changed, don’t forget to change the effective date on this page.
- e) Updated Allocation Table if limits were changed.
- f) IUP synopsis, if changed. See Section III, 7, below for more on IUP Synopsis.
- g) Copy of letter from the SIU requesting the change, if applicable.
- h) The effective date cannot be earlier than the date the IUP is signed (Issuing retroactive permits is explicitly prohibited by the state pretreatment rules 15A NCAC 2H .0916(c)(7)).
- i) The IUP must be transmitted to the SIU on or before the effective date.
- j) All listings of the effective and expiration dates must be consistent throughout the IUP package.
- k) If any item is or has been submitted to the Division under separate cover, please identify this in the IUP submission.

6) **Name Change/New Owner:** IUPs are not transferable (Model SUO, Section 4.2(k); Generic IUP, Part II, 19). New SIU owners must get a new IUP with the correct name before the change becomes effective, or the new SIU is discharging without a valid IUP.

- a) This applies to a sale of the company as well as a general SIU name change where there is no ownership change.
- b) Prior to a sale/name change, the SIU must advise the POTW as to the name change and the relationship of the old and new company or division, including when the name change for the facility will actually occur at this SIU.
 - i. In some cases, the local SIU staff do not find out about the name change or sale until after it has already happened.
- c) At the POTW’s discretion, the new company/owner/name must either:
 - i. complete a new application

OR

- ii. review the “old” company’s and accept it in writing to the POTW, stating that there will be no changes, or if there will be a few production/pretreatment/discharge changes not requiring a full application, describe them. Also, state who the new contact people are, including the official with signatory authority.

BASIC IUP GUIDANCE, INCLUDING WHAT TO SUBMIT TO DWR

- d) In response, the POTW modifies the IUP, using the date of the sale/name change as the IUP modification effective date. Alternatively, if a new application is submitted, the POTW may renew the IUP, with a new 5 year effective period.
 - i) Do not delete permit history events for the previous owner.
 - ii) If the SIU notified the POTW after the sale/name change, use the date of IUP signature as the effective date.
- e) DWQ PERCS prefers that the IUP number not change. However, in some cases with extenuating circumstances, PERCS will allow issuance of a new IUP number provided the IUP permit history entry refers to the previous SIU name and IUP number. Call PERCS to discuss.

SECTION III – PARTS OF AN SIU IUP

- 1) IUPs - Dates
 - a) “IUP effective date” is date IUP or IUP modification comes into effect.
 - b) “IUP signature date” is date IUP is signed. May or may not be same as IUP effective date.
 - c) Signature date cannot be later than effective date, i.e., effective date and modification effective date cannot be retroactive (15A NCAC 02H .0916(c)(7))
 - d) “IUP expiration date” is date IUP or IUP modification expires.
 - e) These dates are listed in several places in IUP.
 - i) Cover page
 - ii) Permit History (Previously called “Modification History”)
 - iii) Limits page
- 2) IUP Cover page
 - a) IUP number
 - b) SIU name and address
 - c) POTW name and address
 - d) effective date, expiration date, and signature date.
 - e) Legal authority under which IUP is listed
 - f) categorical number, including section with limits, eg. 464.35 a, b, c, f, and i.
- 3) Permit History
 - a) A history of the IUP activity
 - b) Previously called Modification History
 - c) Each entry is identified as an IUP renewal or IUP modification
 - d) Each entry is identified by the Effective date (not date signed or date printed, etc.).
 - e) List of changes made
 - i) Can be brief: For example, “changed limits” or “Revised Part III 1, added Part III, 8.”
 - ii) Can be more detailed: For example, “raised zinc limit to 1.5 mg/l” or “added copper limit because of new copper based dyes.”
 - f) Is on-going, i.e., does not start over with IUP renewal, even for name changes
 - g) Can be inside IUP or attached to IUP

BASIC IUP GUIDANCE, INCLUDING WHAT TO SUBMIT TO DWR

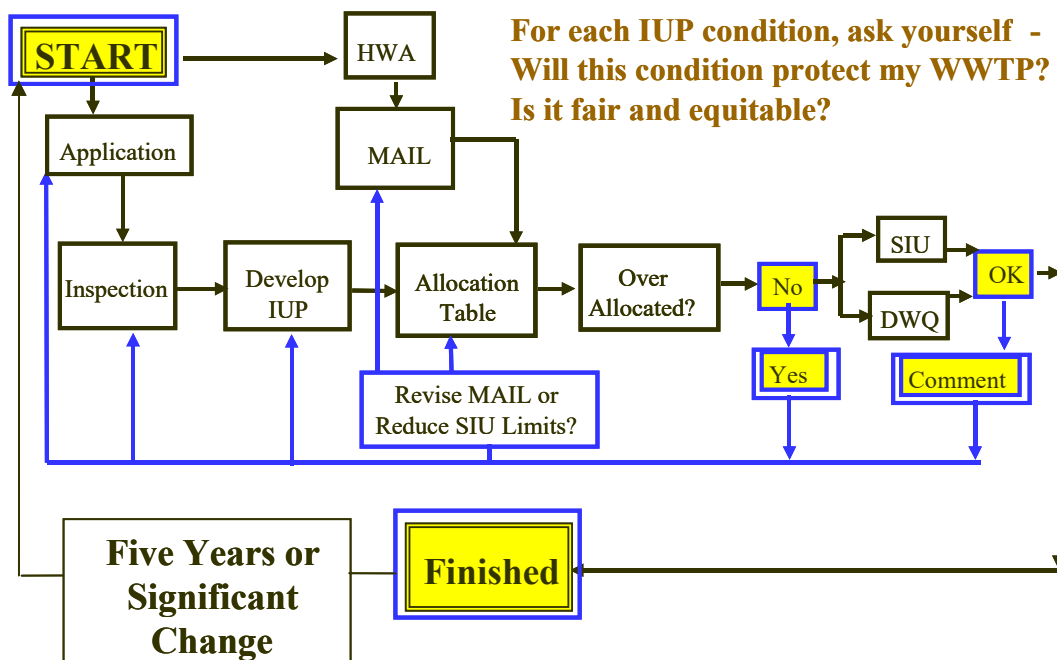
- 4) Limits Page
 - a) Effective and Expiration Date
 - b) Pipe Number
 - c) Limits
 - d) Monitoring
 - e) POTW or SIU
 - f) sample type
 - g) reference to Part II or Part III
 - h) Followed by “Definitions page”
 - i) Definitions and other explanations for terms and abbreviations on limits page
- 5) General Conditions
 - a) Very important
 - b) Many limits violation caused by underlying violation of general condition, for example:
 - i. changed process chemicals
 - ii. increased production
 - iii. slug load
 - iv. pretreatment unit failure or overload
- i) Specific Conditions
 - a) Very important
 - b) Conditions specific to one SIU
 - c) flow requirements
 - d) Categorical requirements. Also see Section IV below.
 - e) Slug/Spill Control Plan
- 7) IUP Rationale
 - a) Very important
 - b) Explains how developed IUP limits:
 - i. “Historical data and HWA”
 - ii. “pH limit from SUO”
 - iii. “Categorical limits from 40 CFR 464 Metal Molding and Casting, Subpart C – Ferrous Casting, 464.35 a, b, c, f, and i. Production based standards calculations attached.”
 - c) Explains why did not including limit/monitoring for a parameter that is listed present in the discharge in the application.
 - i. “Chromium – SIU average 0.5 mg/l, 0.1 lbs/day. 5% MAHL - .3 lbs/day”
- 8) Allocation Table (AT)
 - a) SIU IUP limits
 - b) compute pounds/day
 - c) Sum of SIU permitted load
 - d) Compare against the MAHL and MAIL
 - e) No over allocation!

BASIC IUP GUIDANCE, INCLUDING WHAT TO SUBMIT TO DWR

SECTION IV – FEDERAL CATEGORICAL REGULATIONS

- 1) Federal categorical regulations in 40 CFR
 - a) Cover a specific “category” of industries.
 - b) Contain specific limits for specific pollutants
 - c) Be familiar with general types of categorical regulations.
 - i) Some categories based on what final product is, and others based on how product is made.
 - ii) See *Comp Guide*, Appendix 3-D, and Part IV of Industrial User Wastewater Survey and Permit Application (Appendix 3-B and 6-A)
 - d) Ask for help from DWQ PERCS with determining if IU is categorical, limits calculations, IUP conditions, etc.

SECTION I – IUP ISSUANCE PROCESS FLOW CHART



<http://portal.ncdenr.org/web/wq/swp/ps/pret/permwrite>

Permit Writing Guidance

Details about the next Pretreatment Permit Writing Workshop are on the [Training](#) page.

[Basic IUP Guidance, Including What to Submit to DWQ \(updated august 05\)](#)

IUP Training Materials- New! April 2012

- [IUP Writing Steps: Workshop Outline](#)
- [Industrial User Wastewater Survey and Discharge Permit Application: Slugem Hosiery](#)
- [Guidance Document for Completing the Industrial User Wastewater Survey and Discharge Permit Application](#)
- [Slugem Hosiery SIU Inspection Form](#)
- [Slugem Hosiery Data Summary Spreadsheet](#)
- [Categorical Industry Overview Presentation](#)
- [Blank Industrial User Wastewater Survey and Discharge Permit Application \(updated April 2012\)](#)

Permit Writing Files

- [DWQ Generic Industrial User Permit \(includes Permit Synopsis\) - streamlining update changes in red. Note some changes are not related to streamlining but are still required\) \(updated September 25, 2006\) - NC POTWs are expected to incorporate all Required changes from this Generic IUP with your next IUP renewals.](#)
- [Example IUP & Synopsis: Will Plateit \(40 CFR 433\) \(updated March 2009\)](#)
- [Combined Wastestream Formula: Example IUP & Synopsis: Will Plateit \(40 CFR 433\).](#)
- [Example IUP modification: Will Plateit \(40 CFR 433\)](#)
- [Industrial User Permit \(IUP\) Application Form \(updated 1997\)](#)
- [Ammonia and Total Nitrogen IUP Limit Guidance \(July 05\)](#)
- [SIU Inspection Form](#)

April 11, 2011 - Streamlined DWQ Review of IUPs

In order to use available resources more effectively and recognizing the maturity and experience prevalent in the pretreatment program, the Division is proposing a process to streamline the Division review of Industrial User Permits (IUPs).

~~After attending the class and meeting other criteria a permit writer may be approved to participate in the~~

<http://portal.ncdenr.org/web/wq/swp/ps/pret/catuserinfo>

Pretreatment Program

Categorical User Information

This page contains information, documents, and links related to Federal Categorical Regulations. Categorical Regulations, also called Effluent Guidelines, are federal limits and requirements for specific industrial categories that apply nationwide. Industrial Users subject to Categorical Regulations with applicable Pretreatment Standards or requirements are called Categorical Industrial Users or CIUs. All CIUs are automatically considered Significant Industrial Users (SIUs). The categorical limits for each CIU are compared to their POTW's local limits (Allocation Table), and the more stringent limits are applied.

The most common Categories used in NC are:

- 40 CFR 433 - Metal Finishing
- 40 CFR 414 - Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF)
- 40 CFR 439 - Pharmaceuticals
- 40 CFR 437 - Centralized Waste Treatment

GENERAL INFORMATION ON CATEGORICAL REGULATIONS

EPA Categorical (Effluent Guidelines) Website:

- Click on "Browse Industries."
- Scroll down to Existing Regulations to find list.
- Note: Only those categories with PSES and/ or PSNS apply to Industrial Users discharging to a POTW (Indirect Dischargers).
- Click on "40 CFR Part" to get a copy of the actual regulation.
- For many categories, clicking on the name of the category will take you to the EPA's website for that specific category.
- For other categories, this will take you to a list of EPA contacts for that category.

EPA NSCEP - Online Publication Title Index :

- Website for EPA's Guidance and Technical Documents, including Development Documents.
- For the more common categories, recommend use link above to access EPA's website for that specific category, if there is one.
- This site should include all guidance and technical documents for that category, including the Development Document.

Example IUP Mod #1 for Will Plateit Effective September 1, 2011

**Raise flow limit;
Increase self-monitoring frequency;
Adds monitoring for COD.**

Item 1 – August 15, 2011 Transmittal Letter to SIU

Item 2 – July 15, 2011 Request from SIU

Item 3 – Modified IUP pages (Cover, History, Limits)

TOWN OF TYPICALVILLE, NC
"WE'RE ANYTHING BUT TYPICAL"

August 15, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Stanley Cooper, President
Will Plateit, Inc.
P. O. Box 1234
Typicalville, NC 27666

Documents when
SIU received IUP.

Subject: Will-Plateit, Inc.
Industrial User Pretreatment Permit No. 006 - Permit Modification

Dear Mr. Cooper:

Thank you for your July 15, 2011, letter notifying us of your expansion and request for an IUP modification. Congratulations on your new contract! Your Permit Modification fee of \$200 has been received and your request is granted. As we discussed during our August 12, 2011, meeting, Town policy requires SIUs with flow limits between 0.1 and 0.5 MGD to self-monitor IUP limited parameters twice per month. Also, monitoring for COD has been added due to concerns with inhibition of the Town WWTP.

Attached please find a modification of your Industrial User Pretreatment Permit No. 006. This permit is issued pursuant to the requirements of North Carolina General Statutes 143-215.1 and the Town of Typicalville Sewer Use Ordinance Section 4. Only those pages that were changed are included. The modification becomes effective September 1, 2011, and amends those pages in your previous IUP effective January 1, 2011. Please insert these pages into your IUP. Remove the old pages from your IUP and place them in a separate "historical" file for future reference.

If any parts, measurement frequencies, or sampling requirements contained in this permit are unacceptable to you, you have the right to an adjudicatory hearing upon written request within thirty (30) days following receipt of this letter. Unless such demand is made, this decision shall be final and binding.

Please take notice that this permit is not transferable (see Part II (19)).

Notify permittee of their
right to adjudicate the IUP.

Thank you for your continued cooperation with the pretreatment program requirements. If you have any questions or comments, please feel free to call me at (919) 123-4567.

How to handle new
versus old pages.

Sincerely,

Jane D. Wastewater, PE

Jane D. Wastewater, P.E

JDW/slugtrans.002
cc with attachments:

Bill Klean, WWTP ORC
Josephine Spill, Pretreatment ORC, Will Plateit, Inc.
Dana Folley, DWQ PERCS



WILL PLATEIT COMPANY
PO BOX 1234
1234 INDUSTRY DRIVE
TYPICALVILLE
NC 27666



TELEPHONE 919-555-1234 FAX 919-555-5678
WWW.WILLPLATEIT.COM

July 15, 2011

Ms. Jane D. Wastewater, PE
Director of Public Works
Town of Typicalville WWTP
PO Box 101
Typicalville, NC 27666

Dear Ms. Wastewater:

We are pleased to announce a new contract with Acme Metals that will increase our production. We plan to hire 10 new people. Of course this new contract will mean an increase in our wastewater discharge volume. Therefore, we are hereby requesting an increase in our IUP flow limit to 0.135 mgd. This new contract is for more of the same products we've been manufacturing for Acme for the last several years, so there won't be any process changes or new chemicals. As you may recall, our pretreatment system is actually designed for 0.15 mgd, so no problems there either. We anticipate our production increase will begin in mid September. We realize this request is short notice, but if there is anything we can do to help, please let me know

The \$200 IUP modification fee is attached.

Thank you for your consideration in this matter, and if you should need any additional information, please contact me or Josephine Spill at 555 - 1234.

Sincerely,
Stanley Cooper
Stanley Cooper
President

Cc: Gary Cooper, Production Manager
Josephine Spill, Wastewater Treatment

Town of Typicalville

Control Authority and/or Municipality

PERMIT

Industrial User Pretreatment Permit (IUP) To Discharge Wastewater Under the Industrial Pretreatment Program

006

IUP Number

433.17

40 CFR Category(if Applicable)

In compliance with the provisions of North Carolina General Statute 143-215.1, any applicable federal categorical pretreatment regulations, all other lawful standards and regulations promulgated and adopted by the North Carolina Environmental Management Commission, and the Control Authority and/or Municipality Sewer Use Ordinance. The following Industry, hereafter referred to by name or as the permittee:

Industry name, permittee:	Will Plateit Company
Facility Located at Street Address	1234 Industry Drive
City	Typicalville
State, Zip	NC 27666

is hereby authorized to discharge wastewater from the facility located at the above listed address into the sanitary sewer collection system and the wastewater treatment facility of the Control Authority and/or Municipality listed below:

IUP Control Authority and/or Municipality WWTP name:	Town of Typicalville WWTP
NPDES Number:	NC0012345
WWTP Address:	1234 Wastewater Drive
City, State, Zip	Typicalville, NC 27666

in accordance with effluent limitations, monitoring requirements, and all other conditions set forth in Parts I, II, and III of this Industrial User Pretreatment Permit (IUP)

New Signature Date
for this IUP Mod.

Effective date, this permit and the authorization to discharge
effective on this date:

September 1, 2011

Expiration date, this permit and the authorization to discharge
this date:

December 31, 2015

New Effective Date for this IUP Mod.
Must be on or after signature date.
Note expiration date stays same (unless
IUP mod is to extend IUP – cannot
extend past 5 years from last renewal
date.)

August 15, 2011

Date signed

Jane D. Wastewater, PE

Director of Public Works

New Signature for
this IUP Mod.

List Modification Effective Date
on each page to avoid confusion.

Renewal Effective Date: 1/1/2011

Modification Effective Date: 9/1/2011

IUP # 006, PART I, OUTLINE:

Put New
Effective
Date Here

- A.) IUP Basic Information
- B.) IUP Modification History
- C.) Authorization Statement
- D.) Description of Discharges
- E.) Schematic and Monitoring Locations
- F.) Effluent Limits & Monitoring Requirements
- G.) Definitions and Limit Page(s) notes

A. IUP Basic Information:

Control Authority, Receiving WWTP name: Town of Typicalville WWTP	POTW NPDES #: NC0012345
IUP Name: Will Plateit Company	IUP Number: 006
IUP Effective date: September 1, 2011	Pipe Numbers, list all regulated pipes: 001
IUP Expiration date: December 31, 2015	IUP 40 CFR # (if applicable), or N/A: 433.17

B. IUP History. A Complete Permit History is required:

Effective Date	Renewal or Modification	Description of changes over previous IUP.
1/1/97	Renewal	No changes over previous IUP
10/1/98	Modification	Lowered cyanide limit (historical data)
1/1/01	Renewal	Added Phosphorus limit (new NPDES limit and SIU has iron phosphate operation). Revised IUP format to follow DWQ Comp Guide (rearranged Part II, added to Part III.
7/1/03	Modification	Added mercury limit (LTMP data showed detections), and requirement to submit Slug Spill Control Plan – III, 1.
1/1/2006	Renewal	Increased flow self-monitoring to daily, also Part III, 3; changed mercury limit to “<0.0002 mg/l” due to over allocation; added pH limit and TSS monitoring.
1/1/2011	Renewal	Required mercury 1631 method, removed limit; clarified pretreatment unit operator requirements – III, 5; clarified TTO POTW sampling and SIU certification requirements - III, 7.
9/1/2011	Modification	Increased flow limit to 0.135 MGD; increased sampling frequency to twice per month for limited parameters; added monitoring for COD.

New Permit History Entry: a) List New Effective Date (not date signed or printed out);
b) List whether Mod or Renewal; c) Provide brief list/description of changes.

Do not delete previous entries. May put IUP History anywhere in IUP, or even outside of IUP.

List Modification Effective Date on each page to avoid confusion.

IUP # 006 Renewal Effective Date: 1/1/2011

Modification Effective Date: 9/1/2011

IUP, Part 1 Section F: Effluent Limits and Monitoring Requirements

The Permittee may discharge from this specific Pipe number according to these specific dates, effluent limits, and monitoring requirements

Receiving POTW name => Typicalville
Receiving POTW NPDES # => NC0012345
Effective date for these Limits => 9/1/2011
Expiration date for these Limits => 12/31/2015
IU name => Will Plateit
IUP # => 006
Pipe # => 001
40 CFR # => 433.17

New Flow Limit Here

New Effective Date Here

	Parameters	Concentration Limits			Monitoring Frequency		Sample Collection Method (C or G)	Required Practical Quantitation Level (PQL)
		Daily Max	Monthly Average	Units	By Industry	By POTW		
1	Flow	0.135		MGD	Continuous/ Daily *	Every sample *	Meter *	
2	PH	6.0-9.0		SU	Every sample	Every sample	G	0.1 SU
3	Cadmium	0.07		mg/l	2/Month	Once/6 Months	C	0.002
4	Chromium	1.71		mg/l	2/Month	Once/6 Months	C	0.005
5	COD ****			mg/l	Monthly		C	10
6	Copper	2.07		mg/l	2/Month	Once/6 Months	C	0.002
7	Cyanide	0.01		mg/l	2/Month	Once/6 Months	G	0.01
8	Lead	0.43			2/Month	Once/6 Months	C	0.01
9	Mercury **				Once/6 months	Once/6 Months	Grab**	1 ng/l **
10	Nickel	2.38		mg/l	2/Month	Once/6 Months	C	0.01
11	Phosphorous****			mg/l	2/Month	Once/6 Months	C	0.05
12	Silver	0.24		mg/l	2/Month	Once/6 Months	C	0.005
13	Zinc	1.48		mg/l	2/Month	Once/6 Months	C	0.01
14	TTO ***	2.13 ***		mg/l	Once/6 Months ***	Once/year ***	G	0.01
17								

*See Part I, G, 3 and 4, and III, 3

** See Part I, G, 7

*** See Part III, 6-8

**** Monitoring only

New Monitoring
Frequencies Here

Added COD
to List of
Parameters

List Modification Effective Date
on each page to avoid confusion.

IUP # 006 Renewal Effective Date: 1/1/2011 Modification Effective Date: 9/1/2011

Compliance Judgment

Compliance Judgment

Detection of Violations of ALL Types:

1. Limits
2. Reporting
3. Permit Conditions

References:

- PT 101 handout
- Compliance Judgment, SNC, and PARs – What Do I Do? (Handout for annual PAR workshop)
- Your own DWQ Approved Enforcement Response Plan (ERP)
- *Comprehensive Guide*, Chapter 7, Sections D and E
- *Comprehensive Guide*, Chapter 8



POTW must identify all violations in a timely fashion as outlined in your ERP, preferably monthly.



POTW must issue a Notice of Violation (NOV) for all violations.



- ◆ Significant Noncompliance (SNC) is a way of separating out the more significant violations for additional ESCALATED enforcement action.
- ◆ Significant Noncompliance is defined by 15A NCAC 2H .0903(b)(34) and Section 1.2(a)(35) of the NC Model Sewer Use Ordinance (SUO) as follows:
 - ◆ POTW must do an SNC determination, at minimum, every six months. The SNC determination must be within 30 days of receiving all the data for that period. It is strongly recommended that a preliminary SNC determination be done halfway through the six-month period, especially where there was SNC in the previous period.

Compliance Judgment (cont.)

- ◆ **SNC determination and follow-up enforcement action for January through June reporting period due September 1.**
- ◆ **For July through December reporting period due March 1 of the following year.**
- ◆ **Repeat SNCs are a serious matter.**
- ◆ **If an Industry will be in SNC for a second consecutive period for the same parameter or requirement, the Division expects the POTW make every effort to take “appropriate action” BEFORE the end of the second consecutive SNC Period.**
- ◆ **In those special cases where this is not possible, take the “appropriate action” within two months after the end of that second period. If this is not done, the Division may take enforcement action against the POTW for failure to take adequate enforcement. Call DWQ to discuss extenuating circumstances.**
- ◆ **Compliance Judgment for Limits – see rest of this handout**
- ◆ **Compliance Judgment for Reporting, Including Permit Conditions**

Compliance Judgment (cont.)

- ◆ Completed on a Six Month Basis, but really applies to each report
- ◆ Examples:
 - 1) An Industry is required by IUP to sample monthly for 10 parameters and report the results to the POTW by the 20th day of the month following the month in which the samples were collected. The results of the samples collected in July, due August 20, are not received until October 23.
 - 2) Industry fails to collect the required samples in November at all.
 - 3) Industry is required by IUP to re-apply by February 1 (180 days before IUP expires on August 1) and the application is not received until May 15.
- ◆ Call DWQ to discuss any extenuating circumstances

So your SIU has a Reporting or Permit Condition Violation- What do you do?

1. Examples of Reporting and Permit Condition Violations.
 - a. Failure to sample at all. Part I, B.
 - b. Failure to collect representative sample. Part II, 1.
 - c. Monthly report of daily flow readings due on 15th of following month, but report not received until 20th. Part II, 2.
 - d. Failure to notify POTW of violation within 24 hours of becoming aware of violation. Part II, 2b.
 - e. Failure to sample per 40 CFR 136. Part II, 3.
 - f. IUP requires one sample per month. SIU voluntarily samples two times in June, but only reports one sample. Part II, 4.
 - g. Took daily flow readings, but only kept them for one month. Part II, 11.
 - h. Application for IUP renewal due 180 days before expiration of IUP, but not received until 2 months before IUP renewal. Part II, 23.
 - i. Failure to notify POTW of change in process. Part II, 25.
 - j. One unit of the pretreatment unit is off-line or upset. Part II, 7 and 9 and possibly others including 3, 4, and 30.
 - k. Failure to submit Slug/Spill Control Plan by due date. Part III, 1.
 - l. MANY OTHERS
2. Issue NOV and penalty per ERP.

Require preliminary investigation into the cause – As with limits violations, review rest of the IUP to determine if there are related or underlying violations.

 - a. If a violation of one of these conditions is the underlying cause of limits violations or of another reporting or permit condition, consider a stronger enforcement action for this underlying cause than for the other violation.

If the SIU previously could comply with an IUP limit and now they can't, they must have changed something. For example, increased production, changed process chemicals or raw materials, changed production schedule, etc. Their IUP requires them to give you prior notification of all changes.
 - b. If violation is failure to sample, then require SIU to make up sample.
3. For failure to sample, why require sample to be made up?
 - a. Because your ERP says you will require the SIU to "conduct missed sampling" (Enforcement Chart, page 3, Self Monitoring, Expected Action from User column," Appendix 8-A, *Comprehensive Guide*).
 - b. To prevent the SIU for having an economic benefit from saving money would have spent on sampling.
4. Significant Noncompliance (SNC) is a way of separating out the more significant violations for additional ESCALATED enforcement action. As soon as practical after detecting the violation, do a preliminary SNC with Limits determination. See *Comprehensive Guide*, Chapter 7, Section D. Also see guidance regarding SNC with Reporting in the handouts for the Pretreatment Annual Report workshops.

So Your SIU has a Reporting or Permit Condition Violation- What do you do? (cont.)

5. Failures by a laboratory or other contractor do not absolve an SIU of violation of its IUP.
6. Common causes of failure to report or following permit conditions include:
 - a. New personnel lack proper training.
 - Nobody told me I had to collect samples...
 - Nobody told me I had a permit...
 - b. Lack of communication between production and waste disposal/treatment personnel.
 - Production never tells me before they dump a tank...
 - Production never tells me about production changes...
 - c. Lack of understanding of potential impacts of production changes on pretreatment or POTW. For example,
 - I got a new client which added a whole new kind of widgeit but I'm still making widgeits...
 - ...the new kind of widgeit has a different basis metal and uses completely different chemicals!
 - I just changed from one surfactant to another...
 - ...the new surfactant has a much higher BOD!
 - I just added a third shift, I'm still making the same identical product the same identical way...
 - ...the shift added more flow which overloaded the pretreatment unit which caused me to violate everything!
 - I'm just a job shop laundry. How was I to know my new client's towels were used to clean up mercury...
7. If the IUP reporting requirement or permit condition is too stringent, consider revising the IUP. Remember IUP modifications must be submitted to the Division for approval.
8. Enforceable compliance schedules can be issued for reporting or permit condition violations, especially where the violations are repeated or on-going.

IN SUMMARY:

9. Reporting and permit condition violations are very important. Violation of these conditions may cause limits violations, or unpermitted discharges, or pass-through and interference.

So your SIU has a Limits Violation- What do you do?

1. Issue NOV and penalty per ERP.
 - a. Require preliminary investigation into the cause - See the IUP for the following conditions requiring prior notification of changes, and notification of potential problems – Additional NOV's for violations of these conditions may be necessary
 - Part II, 25. Report of Changed Conditions;
 - Part II, 30. Reports of Potential Problems;
 - Part II, 6. Duty to Mitigate – Prevention of Adverse Impact;
 - Part II, 7. Facilities Operation, Bypass;
 - Part II, 8. Removed Substances;
 - Part III, 1. Slug/Spill Control Plan;
 - also, be aware of the second sentence in paragraph one of Part II, 9. Upset Conditions and Part II, 18. Need to Halt or Reduce not a Defense.
 - b. If a violation of one of these conditions is the underlying cause of the limits violation, consider a stronger enforcement action for this underlying cause than for the limits violation itself.
 - c. RESAMPLE, RESAMPLE, RESAMPLE.
2. WHY RESAMPLE?
 - a. Because your ERP says you will require the SIU to "conduct additional monitoring and return to compliance" (Enforcement Chart, page 2, Permit limits Violations, Expected Action from User column," Appendix 8-A, *Comprehensive Guide*).
 - b. If it's a limits violation from self-monitoring, the SIU is required to resample by their IUP. Per Part II, 2, b., of Division's Generic IUP, Appendix 6-B, *Comprehensive Guide*, the SIU must
 - Call the POTW within 24 hours of the SIU's becoming aware of the violation.
 - Collect a new sample and submit results to the POTW within 30 days of the SIU's becoming aware of the violation. Only one repeat sample per violation is required, but see below for discussion on how to avoid SNC.
 - c. To confirm the violations continue ... or don't continue...
 - d. If they don't continue, wouldn't it be nice for the SIU to avoid SNC with Limits? Publishing an SIU in the paper based on one bad sample puts the POTW in a difficult position.
 - e. If they do continue:
 - How bad it is?
 - Is there any pattern?
 - Is there anything the POTW can do? For example, can the POTW raise the limit - see 10. below)?
 - Are the SIU's efforts to comply working?
 - f. If they do continue: the additional data will help in developing an interim limit should an enforceable compliance schedule (see 8. below) be needed or in development of a new IUP limit (see 10. below).

So your SIU has a Limits Violation- What do you do? (cont.)

3. Significant Noncompliance (SNC) is a way of separating out the more significant violations for additional ESCALATED enforcement action. As soon as practical after detecting the violation, do a preliminary SNC with Limits determination. See *Comprehensive Guide*, Chapter 7, Section D. Also see guidance regarding SNC with Reporting in the handouts for the Pretreatment Annual Report workshops.
 - a. Remember it takes 66% regular violations (above the limit by any amount) or 33% TRC violations (equal to or above the TRC limit) to make SNC with limits.
 - FOR EVERY REGULAR VIOLATION, YOU NEED AT LEAST ONE COMPLIANT RESULT TO AVOID SNC (less if you have more than 4 samples for the six month period)
 - FOR EVERY TRC VIOLATION, YOU NEED AT LEAST THREE COMPLIANT RESULTS TO AVOID SNC (less if you have more than 4 samples for the six month period)

SO RESAMPLE, RESAMPLE, RESAMPLE

4. Consider the following in the resampling:
 - a. Have the SIU be the one to collect the repeat samples (see 2.b. above for instances where the SIU must perform the resampling). Why should you have more work when they are the ones in violation? Ensure the SIU is using proper sample collection and analysis techniques, and is collecting representative samples. Get a split of the SIU's sample if you are unsure.
 - b. If the repeat samples are collected by the POTW, have the SIU pay the costs.
 - c. Watch the sample collectors (POTW and SIU) collect the samples to confirm they are following correct procedures.
 - d. Collect splits samples to investigate if it's a sample collection and/or analytical problem.
 - e. Tell the SIU how additional self-monitoring may help them avoid SNC. They may voluntarily do more than you ask, and if they chose not to, and then complain about being in SNC, you may want to point out your earlier recommendation.
 - e. Consider laboratory analysis turn around time, especially during holiday periods.

IF THE RESAMPLE RESULTS ALSO SHOW VIOLATIONS, NOW WHAT???

5. If the POTW has capacity available, consider giving the SIU some of it by raising their IUP limit. See item 10. below. If you cannot increase the IUP limit, or do not want to yet.....
6. If the SIU's preliminary investigation has identified the problem and can correct it before the end of the six month period, do another preliminary SNC determination to see if enough compliant samples can be collected after the problem is corrected to avoid SNC.
7. If the SIU still doesn't know the cause, or needs more time to correct the problem, look at where you are in the six month period.
 - a. If the six month period isn't over yet, there may be time to get the SIU under an enforceable compliance schedule (see 8. below) or modify the IUP (see 10. below) and collect enough compliant samples before the end of the six month period, then the SIU is never in SNC. - the POTW doesn't have to issue a public notice. (The SIU must still be listed on the SNCR form.)

So your SIU has a Limits Violation- What do you do? (cont.)

7. b. If the six month period is over, and the SIU will be SNC, now what?
 - The POTW must take whatever ESCALATED enforcement actions required in its ERP (NOV, penalty, public notice).
 - In order to properly follow its ERP, the POTW must take whatever actions are necessary to ensure the SIU is not SNC for the second period.
The SIU has solved the problem and data for this second six month period no longer shows SNC.
The SIU has received an enforceable compliance schedule (see 8. below), and is in compliance with that schedule
OR
the POTW has revised the IUP to raise the limit (see 10. below), and the SIU is in compliance with the new limit
8. What is an enforceable compliance schedule? A compliance schedule with an interim limit and stipulated penalties for failure to meet the interim limit, perform required self-monitoring, or meet the compliance schedule due dates; i.e. it gives the SIU a limit they can comply with while they thoroughly investigate the cause of and solutions to the problem and then fix the problem. This schedule is issued separate from (outside of) the IUP. The schedule can be issued as a Consent Order (signed by the POTW and the SIU) or as an Administrative Order (signed only by the POTW).
9. Why issue an enforceable compliance schedule (see 8. above)? When an SIU does not know the cause, or needs more time to correct the problem.
10. Why modify the SIU's IUP?
 - a. If the POTW has capacity available, consider giving the SIU some of it.
 - b. If the SIU previously could comply and now they can't, they must have changed something. Their IUP requires them to give you prior notification of all changes. Before raising their limit, it is appropriate for them to be able to explain why their discharge increase (and for the POTW to issue an NOV for failure to tell the POTW about this change before they made it) before you grant them an increase. An enforceable compliance schedule (see 8. above) can be issued to cover the time for the SIU's investigation.
11. The sooner you get an SIU on an enforceable compliance schedule (see 8. above) or modify the IUP (see 10. below), the sooner the SIU stops being in violation, avoiding NOVs and penalties and maybe even the second public notice.
12. You can wait to issue the enforceable compliance schedule (see 8. above) or modify the IUP (see 10. below), but why?
 - a. You may not have enough data to comfortably assign an interim limit (or new IUP limit).
 - b. You don't have a firm enough schedule of activities.
 - c. It won't take very long for the SIU to complete the corrective actions.
13. Generally, as soon as the POTW and SIU feel comfortable with data enough to develop an interim limit, and have general idea of a schedule of events, go ahead and issue enforceable compliance schedule (see 8. above).

So your SIU has a Limits Violation- What do you do? (cont.)

IN SUMMARY:

14. If the sample frequency is only once per six months, collecting the sample early in the six month period will decrease the possibility of SNC with Limits by resampling. Encourage your SIUs to sample themselves...they can change their own SNC status.
15. If the SIU does get in SNC with Limits, the POTW has another six months to increase sampling and require the SIU to begin an investigation. There will be plenty of time to develop and issue an enforceable compliance schedule (see 8. above) or modify the IUP (see 10. below) by the end of the second period (or at least very soon after the end of the period). POTWs unable to do this are neglecting their pretreatment program and will be subject to enforcement by the Division.

Typicalville Enforcement Response Chart

Type of Violation	POTW Action	Timeframe	Responsible Official	Expected Action from User	Escalated Action if Needed
<i>Unpermitted Discharges</i>					
Unpermitted Discharge Unaware Of Requirement	Notice Of Violation	Within 30 Days Of Discovery Of Discharge	Pretreatment Coordinator	File Permit Application	Suspend Service Until Permit Is Issued
Unpermitted Discharge Aware Of Requirement	Notice Of Violation With Penalty Assessed	Within 30 Days Of Discovery Of Discharge	Director	File Permit Application	Suspend Service Until Permit Is Issued
Unpermitted Discharge results in NPDES or other State issued permit or State General Statute violations	Order to Cease Process Causing Violation Notice of Violation with recommended minimum of \$1,000 and up to \$25,000/day per violation Penalty	Order to Cease Immediately Notice of Violation within 7 days	Director	File Permit Application Steps Taken to avoid violation	Suspend Service Until Permit Issued
Unpermitted Discharge results in Endangerment	Suspend Service Notice of Violation with recommended minimum \$,1000 and up to \$25,000 per day per violation Penalty	Suspend Service Immediately Notice of Violation within 7 days	Director	File Permit Application Steps Taken to avoid future endangerment	

Typicalville Enforcement Response Chart cont.

Type of Violation	POTW Action	Timeframe	Responsible Official	Expected Action from User	Escalated Action if Needed
<i>Permit Limits Violations</i>					
Permit Limits Violation Single Event Minor	Notice of non-Compliance or Notice of Violation with \$0 to \$25,000 Penalty	Within 30 days of receiving data	Pretreatment Coordinator	Conduct Additional Monitoring and Return to Compliance	Notice of Violation with Penalty
Permit Limits Violation Technical Review Criteria (TRC)	Notice of Violation with 0 to \$ 25,000 Penalty	Within 30 days of receiving data	Pretreatment Coordinator	Conduct additional monitoring and return to compliance	Second Notice of Violation with Increased Penalty
Permit Limits Violation Significant non-Compliance	Notice of Violation with 0 to \$ 25,000 Penalty	Within 30 days of Receiving all Data	Pretreatment Coordinator	Report cause of Non-compliance and steps taken to prevent violation	Enforceable Schedule (AO) if not resolved by end of 2nd 6-month period
Permit Limits Violation results in NPDES or other State issued permit or State General Statute violations	Order to Cease process causing Violation Notice of Violation with recommended minimum \$ 1000 and up to \$ 25,000/ day per violation Penalty	Order to Cease Immediately Notice of Violation Within 7 days of Discovering Violation	Director	Report cause of Non-compliance and steps taken to prevent violation	Suspend Service Until resolved Enforceable Schedule (AO) if not resolved by end of 2nd 6-month period
Permit Limits Violation results in Endangerment	Suspend Service Notice of Violation with a recommended minimum \$1000 and up to \$25,000 per day per violation Penalty	Suspend Service Immediately Notice of Violation within 7 days	Director	File for Reissuance of Permit	

Typicalville Enforcement Response Chart cont.

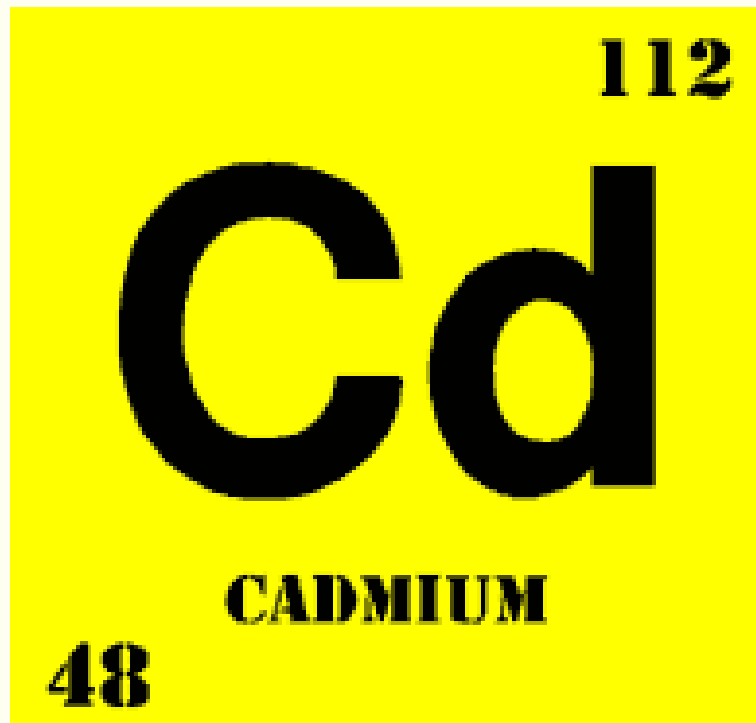
Type of Violation	POTW Action	Timeframe	Responsible Official	Expected Action from User	Escalated Action if Needed
<i>Other Violations</i>					
Self Monitoring Violations	Notice of Violation with a recommended Minimum Penalty Equal or Greater Than Cost of Missed Testing	Within 30 Days of Discovery	Pretreatment Coordinator	Conduct Missed Sampling	Second Notice of Violation with Penalty equal to Twice Cost of Missed Testing
Reporting Violations Late Report	Notice of Non-Compliance	Within 30 days of the Report Due Date	Pretreatment Coordinator	Submit Report	Notice of Violation Penalty Assessed Possible SNC if over 30 days
Reporting Violations Incomplete or Inaccurate Reports	Notice of Non-Compliance	Within 30 days of Report Submission	Pretreatment Coordinator	Submit Revised Report	Notice of Violation Penalty Assessed
Reporting Violations Intentional Falsification	Referred to District Attorney	As soon as suspected	Director		
Violation of Permit Conditions	Notice of Violation with Penalty up to \$25,000 per day per violation	Within 30 Days of Discovery	Pretreatment Coordinator or Director	Varies	Second Notice of Violation with Increased Penalty
Violation of Permit Conditions results in NPDES or other State issued permit or State General Statute violations or Endangerment	Suspend Service Notice of Violation with up to \$25, 000 per day per violation Penalty	Suspend Service Immediately Notice of Violation Within 7 days	Director	Steps taken to Avoid Reoccurrence	

Typicalville Enforcement Response Chart cont.

Type of Violation	POTW Action	Timeframe	Responsible Official	Expected Action from User	Escalated Action if Needed
<i>Other Violations (cont.)</i>					
Violations of Enforcement Order Conditions or Limits	Notice of Violation assess Stipulated Penalty and Actions listed for same violation type in ERP	Within Time frame listed in Enforcement Order or For the Same Type of Violation in ERP	Pretreatment Coordinator or Director	Additional Monitoring and Steps taken to avoid recurrence	Same as Escalated Action for Same Type of Violation Possible Revocation of Order
Failure to Meet a Milestone Date in an Enforcement Order (Does not Affect Other Dates)	Notice of Violation and Assess Penalty Stipulated in Order	Within 14 days of Discovery	Pretreatment Coordinator	Submit a schedule to complete the Requirement	Show Cause Hearing
Failure to Meet a Milestone Date in an Enforcement Order (Affects Other Dates)	Show Cause Hearing and Assess Stipulated Penalties	Within 30 days of Discovery	Director	Negotiate new Order and Abide by New Conditions	Possible Termination of Service
Failure to Meet Final Compliance Date	Notice of Violation and Assess stipulated penalties	Within 14 days of Discovery	Director	Document Compliance	Possible Termination of Service

Example 1

- WillPlateit Metal Finishers
- 1st 6-month period
- Cadmium



IUP, Part 1 Section F: Effluent Limits and Monitoring Requirements

The Permittee may discharge from this specific Pipe number according to these specific dates, effluent limits, and monitoring requirements

Receiving POTW name =>
Receiving POTW NPDES # =>
Effective date for these Limits =>
Expiration date for these Limits =>

Typicalville IU name =>
NC0012345 IUP # =>
1/1/2011 Pipe # =>
12/31/2015 40 CFR # =>

Will Plateit
006
001
433.17
if not applicable put N/A

THE LIMITS ON THIS PAGE ARE, (Check one below):

LIMITS for ENTIRE permit period =>

Yes

		Concentration Limits			Mass Limits			Monitoring Frequency		Sample Collection Method (C or G)	Required Laboratory Detection Level
		Daily Max	Monthly Average	Units	Daily Max	Monthly Average	Units	By Industry	By POTW		
1	Flow*	0.098		MGD				Continuous/Daily *	Every sample *	Meter *	
2	BOD			mg/l							
3	TSS							Monthly			2
4	Temperature										
5	PH	6.0-9.0						Every sample	Every sample	G	0.1 SU

OTHER PARAMETERS: Please List Alphabetically

6	Cadmium	0.07		mg/l				Monthly	Once/6 Months	C	0.002
7	Chromium	1.71		mg/l				Monthly	Once/6 Months	C	0.005
8	Copper	2.07		mg/l				Monthly	Once/6 Months	C	0.002
9	Cyanide	0.01		mg/l				Monthly	Once/6 Months	G	0.01
10	Lead	0.43		mg/l				Monthly	Once/6 Months	C	0.01
11	Mercury **			mg/l				Once/6 months	Once/6 Months	Grab**	1 ng/l **
12	Nickel	2.38		mg/l				Monthly	Once/6 Months	C	0.01
13	Phosphorous	30		mg/l				Monthly	Once/6 Months	C	0.05
14	Silver	0.24		mg/l				Monthly	Once/6 Months	C	0.005
15	Zinc	1.48		mg/l				Monthly	Once/6 Months	C	0.01
16	TTO ***	2.13 ***		mg/l				Once/6 Months ***	Once/year ***	G	0.01
17											
18											
19											
20											

* See Part I, G, 3 and 4, and III, 3

** See Part I, G, 7

*** See Part III, 6-8

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Cadmium</i>	Six Month SNC Determination Period: <i>1/1/2011-6/30/11</i>	

See next page for definitions

Daily Max. and Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgement not required for pH:	Circle which units apply to Limits
-------------------------------------	---	------------------------------------

Daily Maximum Limit: .07 * 1.2 or 1.4 = TRC Daily Limit: .084 mg/l or lbs/day
Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	1/7/11	.0691	.059				1	0	0
P	2/1/11	.0543	.060				1	0	0
I	2/4/11	.0783	.062				1	0	0
I	3/6/11	.0796	.096				1	1	1
I	3/22/11	.0748	.102				1	1	1
I	4/2/11	.0667	.083				1	1	0
I	4/17/11	.0612	.082				1	1	0
I	5/1/11	.0342	.078				1	1	0
I	5/16/11	.0589	.079				1	1	0
I	6/3/11	.0547	.064				1	0	0
I	6/18/11	.0693	.080				1	1	0
I	6/30/11	.0712	.076				1	1	0

List these Totals on next page =>

A = 12

B = 8

C = 2

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Cadmium</i>	Six Month SNC Determination Period: <i>1/1/2011-6/30/11</i>	

SIGNIFICANT NON-COMPLIANCE (SNC) LIMITS DETERMINATION	Calculate % and Circle Answers
---	--------------------------------

- 1) Calculate the % of Regular violations: $B/A = 8/12 = 66.7\%$
- 2) Is B/A greater than or equal to 0.66 (or 66 %) ? Chronic violator? Yes / No
- 3) Calculate the % of TRC Violations: $C/A = 2/12 = 16.7\%$
- 4) Is C/A greater than or equal to 0.33 (or 33 %) ? TRC Violator? Yes / No
- 5) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / No
- 6) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / No
- 7) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: YES NO

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: YES NO

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

- Consent Order with Enforceable schedule;
- Administrative Order with Enforceable schedule;
- Formal notice to comply issued, or
- Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Definitions:

TRC Technical Review Criteria, Multiply the actual IUP limits by the proper TRC Criteria value to get a TRC Limit:

TRC Criteria = 1.4 for BOD, TSS, oil, fat, grease

TRC Criteria = 1.2 for all other pollutants

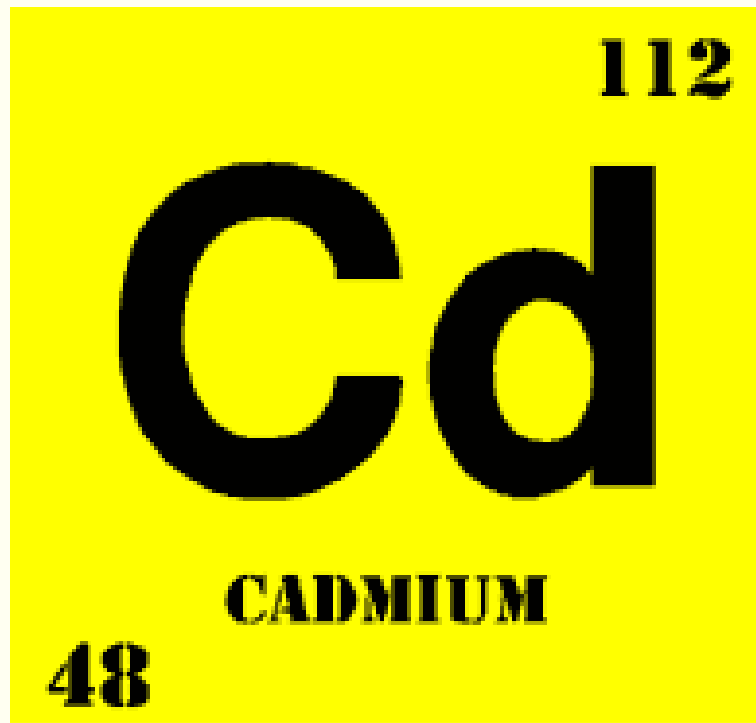
Not required to perform TRC compliance judgment for pH.

SNCR Significant Non-Compliance Report

SNC Significant Non-Compliance (formerly called Reportable Non-Compliance or RNC)

Example 2

- WillPlateit Metal Finishers
- 2nd 6-month period
- Cadmium



Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Cadmium</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
--	--	---------------------------------------

Daily Maximum Limit: _____ * 1.2 or 1.4 = TRC Daily Limit: _____ mg/l or lbs/day
 _____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
<i>I</i>	<i>7/17/11</i>	<i>.0752</i>	<i>.042</i>						
<i>P</i>	<i>7/24/11</i>	<i>.0469</i>	<i>.086</i>						
<i>I</i>	<i>8/7/11</i>	<i>.0313</i>	<i>.087</i>						
<i>I</i>	<i>8/23/11</i>	<i>.0538</i>	<i>.077</i>						
<i>I</i>	<i>9/3/11</i>	<i>.0790</i>	<i>.067</i>						
<i>I</i>	<i>10/9/11</i>	<i>.0676</i>	<i>.089</i>						
<i>I</i>	<i>10/21/11</i>	<i>.0681</i>	<i>.076</i>						
<i>I</i>	<i>11/1/11</i>	<i>.0657</i>	<i>.091</i>						
<i>I</i>	<i>11/16/11</i>	<i>.0678</i>	<i>.069</i>						
<i>I</i>	<i>12/17/11</i>	<i>.0292</i>	<i>.057</i>						

List these Totals on next page =>

A =

B =

C =

Compliance Judgment Worksheet For SNC With Limits		
Use separate sheets for each Industry	SNC determination for Flow optional, see Section 7-E	Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Cadmium</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
--	--	---------------------------------------

Daily Maximum Limit: .07 * 1.2 or 1.4 = TRC Daily Limit: .084 mg/l or lbs/day
 _____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

- Column 1: I - Industry self P-POTW A - Average
- Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.
- Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).
- Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).
- Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."
- Column 9: Compare daily and average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."
- Column 10: Compare daily and average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	7/17/11	.0752	.042				1		
P	7/24/11	.0469	.086				1		
I	8/7/11	.0313	.087				1		
I	8/23/11	.0538	.077				1		
I	9/3/11	.0790	.067				1		
I	10/9/11	.0676	.089				1		
I	10/21/11	.0681	.076				1		
I	11/1/11	.0657	.091				1		
I	11/16/11	.0678	.069				1		
I	12/17/11	.0292	.057				1		

List these Totals on next page => A = 10 B = C =

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Cadmium</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
---	--	---------------------------------------

Daily Maximum Limit: *.07* * 1.2 or 1.4 = TRC Daily Limit: *.084* mg/l or lbs/day
Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly or other) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.

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Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
<i>I</i>	<i>7/17/11</i>	<i>.0752</i>	<i>.042</i>				<i>1</i>	<i>0</i>	
<i>P</i>	<i>7/24/11</i>	<i>.0469</i>	<i>.086</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>8/7/11</i>	<i>.0313</i>	<i>.087</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>8/23/11</i>	<i>.0538</i>	<i>.077</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>9/3/11</i>	<i>.0790</i>	<i>.067</i>				<i>1</i>	<i>0</i>	
<i>I</i>	<i>10/9/11</i>	<i>.0676</i>	<i>.089</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>10/21/11</i>	<i>.0681</i>	<i>.076</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>11/1/11</i>	<i>.0657</i>	<i>.091</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>11/16/11</i>	<i>.0678</i>	<i>.069</i>				<i>1</i>	<i>0</i>	
<i>I</i>	<i>12/17/11</i>	<i>.0292</i>	<i>.057</i>				<i>1</i>	<i>0</i>	

List these Totals on next page =>

A = 10

B = 6

C =

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Cadmium</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
---	--	---------------------------------------

Daily Maximum Limit: .07 * 1.2 or 1.4 = TRC Daily Limit: .084 mg/l or lbs/day
Average Limit: * 1.2 or 1.4 = TRC Avg. Limit: mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

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Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
<i>I</i>	<i>7/17/11</i>	<i>.0752</i>	<i>.042</i>				<i>1</i>	<i>0</i>	<i>0</i>
<i>P</i>	<i>7/24/11</i>	<i>.0469</i>	<i>.086</i>				<i>1</i>	<i>1</i>	<i>1</i>
<i>I</i>	<i>8/7/11</i>	<i>.0313</i>	<i>.087</i>				<i>1</i>	<i>1</i>	<i>1</i>
<i>I</i>	<i>8/23/11</i>	<i>.0538</i>	<i>.077</i>				<i>1</i>	<i>1</i>	<i>0</i>
<i>I</i>	<i>9/3/11</i>	<i>.0790</i>	<i>.067</i>				<i>1</i>	<i>0</i>	<i>0</i>
<i>I</i>	<i>10/9/11</i>	<i>.0676</i>	<i>.089</i>				<i>1</i>	<i>1</i>	<i>1</i>
<i>I</i>	<i>10/21/11</i>	<i>.0681</i>	<i>.076</i>				<i>1</i>	<i>1</i>	<i>0</i>
<i>I</i>	<i>11/1/11</i>	<i>.0657</i>	<i>.091</i>				<i>1</i>	<i>1</i>	<i>1</i>
<i>I</i>	<i>11/16/11</i>	<i>.0678</i>	<i>.069</i>				<i>1</i>	<i>0</i>	<i>0</i>
<i>I</i>	<i>12/17/11</i>	<i>.0292</i>	<i>.057</i>				<i>1</i>	<i>0</i>	<i>0</i>

List these Totals on next page =>

A = 10

B = 6

C = 4

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*

IUP Number: *0006*

Pipe Number: *0001*

Parameter: *Cadmium*

Six Month SNC Determination Period: *7/1/2011-12/31/11*

SIGNIFICANT NON-COMPLIANCE (SNC) LIMITS DETERMINATION

Calculate % and Circle Answers

- 1) Calculate the % of Regular violations: B/A =
- 2) Is B/A greater than or equal to 0.66 (or 66 %) ? Chronic violator? Yes / No
- 3) Calculate the % of TRC Violations: C/A =
- 4) Is C/A greater than or equal to 0.33 (or 33 %) ? TRC Violator? Yes / No
- 5) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / No
- 6) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / No
- 7) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: YES NO

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: YES NO

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

Consent Order with Enforceable schedule;
Administrative Order with Enforceable schedule;
Formal notice to comply issued, or
Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Definitions:

TRC Technical Review Criteria, Multiply the actual IUP limits by the proper TRC Criteria value to get a TRC Limit:

TRC Criteria = 1.4 for BOD, TSS, oil, fat, grease

TRC Criteria = 1.2 for all other pollutants

Not required to perform TRC compliance judgment for pH.

SNCR Significant Non-Compliance Report

SNC Significant Non-Compliance (formerly called Reportable Non-Compliance or RNC)

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*

IUP Number: *0006*

Pipe Number: *0001*

Parameter: *Cadmium*

Six Month SNC Determination Period: *7/1/2011-12/31/11*

SIGNIFICANT NON-COMPLIANCE (SNC) LIMITS DETERMINATION

Calculate % and Circle Answers

- 1) Calculate the % of Regular violations: $B/A = 6/10 = 60\%$
- 2) Is B/A greater than or equal to 0.66 (or 66 %) ? Chronic violator? Yes / **No**
- 3) Calculate the % of TRC Violations: $C/A = 4/10 = 40\%$
- 4) Is C/A greater than or equal to 0.33 (or 33 %) ? TRC Violator? **Yes** / No
- 5) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / **No**
- 6) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / **No**
- 7) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: **YES** NO

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: **YES** NO

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

- Consent Order with Enforceable schedule;
- Administrative Order with Enforceable schedule;
- Formal notice to comply issued, or
- Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Definitions:

TRC Technical Review Criteria, Multiply the actual IUP limits by the proper TRC Criteria value to get a TRC Limit:

TRC Criteria = 1.4 for BOD, TSS, oil, fat, grease

TRC Criteria = 1.2 for all other pollutants

Not required to perform TRC compliance judgment for pH.

SNCR Significant Non-Compliance Report

SNC Significant Non-Compliance (formerly called Reportable Non-Compliance or RNC)

Example 3

- WillPlateit Metal Finishers
- 2nd 6-month period
- Nickel



IUP, Part 1 Section F: Effluent Limits and Monitoring Requirements

The Permittee may discharge from this specific Pipe number according to these specific dates, effluent limits, and monitoring requirements

Receiving POTW name =>
Receiving POTW NPDES # =>
Effective date for these Limits =>
Expiration date for these Limits =>

Typicalville IU name =>
NC0012345 IUP # =>
1/1/2011 Pipe # =>
12/31/2015 40 CFR # =>

Will Plateit
006
001
433.17
if not applicable put N/A

THE LIMITS ON THIS PAGE ARE, (Check one below):

LIMITS for ENTIRE permit period =>

Yes

		Concentration Limits			Mass Limits			Monitoring Frequency		Sample Collection Method (C or G)	Required Laboratory Detection Level
		Daily Max	Monthly Average	Units	Daily Max	Monthly Average	Units	By Industry	By POTW		
1	Flow*	0.098		MGD				Continuous/Daily *	Every sample *	Meter *	
2	BOD			mg/l							
3	TSS							Monthly			2
4	Temperature										
5	PH	6.0-9.0						Every sample	Every sample	G	0.1 SU

OTHER PARAMETERS: Please List Alphabetically

6	Cadmium	0.07		mg/l				Monthly	Once/6 Months	C	0.002
7	Chromium	1.71		mg/l				Monthly	Once/6 Months	C	0.005
8	Copper	2.07		mg/l				Monthly	Once/6 Months	C	0.002
9	Cyanide	0.01		mg/l				Monthly	Once/6 Months	G	0.01
10	Lead	0.43		mg/l				Monthly	Once/6 Months	C	0.01
11	Mercury **			mg/l				Once/6 months	Once/6 Months	Grab**	1 ng/l **
12	Nickel	2.38		mg/l				Monthly	Once/6 Months	C	0.01
13	Phosphorous	30		mg/l				Monthly	Once/6 Months	C	0.05
14	Silver	0.24		mg/l				Monthly	Once/6 Months	C	0.005
15	Zinc	1.48		mg/l				Monthly	Once/6 Months	C	0.01
16	TTO ***	2.13 ***		mg/l				Once/6 Months ***	Once/year ***	G	0.01
17											
18											
19											
20											

* See Part I, G, 3 and 4, and III, 3

** See Part I, G, 7

*** See Part III, 6-8

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Nickel</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
---	--	---------------------------------------

Daily Maximum Limit: _____ * 1.2 or 1.4 = TRC Daily Limit: _____ mg/l or lbs/day
 _____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	7/17/11	.0752	1.98						
P	7/24/11	.0469	1.64						
I	8/7/11	.0313	2.86						
I	8/23/11	.0538	2.02						
I	9/3/11	.0790	1.72						
I	10/9/11	.0676	3.03						
I	10/21/11	.0681	2.52						
I	11/1/11	.0657	2.38						
I	11/16/11	.0678	1.57						
I	12/17/11	.0292	1.79						

List these Totals on next page =>

A =	B =	C =
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Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Nickel</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
---	--	---------------------------------------

Daily Maximum Limit: 2.38 * 1.2 or 1.4 = TRC Daily Limit: _____ mg/l or lbs/day
Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

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Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	7/17/11	.0752	1.98				1		
P	7/24/11	.0469	1.64				1		
I	8/7/11	.0313	2.86				1		
I	8/23/11	.0538	2.02				1		
I	9/3/11	.0790	1.72				1		
I	10/9/11	.0676	3.03				1		
I	10/21/11	.0681	2.52				1		
I	11/1/11	.0657	2.38				1		
I	11/16/11	.0678	1.57				1		
I	12/17/11	.0292	1.79				1		

List these Totals on next page =>

A = 10

B =

C =

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Nickel</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
---	--	---------------------------------------

Daily Maximum Limit: 2.38 * 1.2 or 1.4 = TRC Daily Limit: 2.86 mg/l or lbs/day
Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-PCTW A - Average

Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."

Column 9: Compare daily and average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily and average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
<i>I</i>	<i>7/17/11</i>	<i>.0752</i>	<i>1.98</i>				<i>1</i>	<i>0</i>	
<i>P</i>	<i>7/24/11</i>	<i>.0469</i>	<i>1.64</i>				<i>1</i>	<i>0</i>	
<i>I</i>	<i>8/7/11</i>	<i>.0313</i>	<i>2.86</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>8/23/11</i>	<i>.0538</i>	<i>2.02</i>				<i>1</i>	<i>0</i>	
<i>I</i>	<i>9/3/11</i>	<i>.0790</i>	<i>1.72</i>				<i>1</i>	<i>0</i>	
<i>I</i>	<i>10/9/11</i>	<i>.0676</i>	<i>3.03</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>10/21/11</i>	<i>.0681</i>	<i>2.52</i>				<i>1</i>	<i>1</i>	
<i>I</i>	<i>11/1/11</i>	<i>.0657</i>	<i>2.38</i>				<i>1</i>	<i>0</i>	
<i>I</i>	<i>11/16/11</i>	<i>.0678</i>	<i>1.57</i>				<i>1</i>	<i>0</i>	
<i>I</i>	<i>12/17/11</i>	<i>.0292</i>	<i>1.79</i>				<i>1</i>	<i>0</i>	

List these Totals on next page =>

A = 10

B = 3

C =

Compliance Judgment Worksheet For SNC With Limits		
Use separate sheets for each Industry	SNC determination for Flow optional, see Section 7-E	Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Nickel</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

See next page for definitions

Daily Max. and ____ Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
--	--	---------------------------------------

Daily Maximum Limit: 2.38 * 1.2 or 1.4 = TRC Daily Limit: 2.86 mg/l or lbs/day
 _____ Average Limit: _____ * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

- Column 1: I - Industry self P-POTW A - Average
 Column 5: Use only if IUP has (monthly, or other?) average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Treat this average as another CJP. Compare this average to the appropriate average IUP limit or TRC limit.
 Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).
 Column 7: Use only if IUP has (monthly?) average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).
 Column 8: Put "1" for each daily maximum or average value, tally up at bottom as "A."
 Column 9: Compare daily and average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."
 Column 10: Compare daily and average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col. 6:	Col. 7:	Col. 8:	Col. 9:	Col. 10:
Sample or CJP Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	Avg Conc. mg/l	Daily Load lbs/day	Avg. Load lbs/day	Count	Regular Violation ?	TRC Violation ?
I	7/17/11	.0752	1.98				1	0	0
P	7/24/11	.0469	1.64				1	0	0
I	8/7/11	.0313	2.86				1	1	1
I	8/23/11	.0538	2.02				1	0	0
I	9/3/11	.0790	1.72				1	0	0
I	10/9/11	.0676	3.03				1	1	1
I	10/21/11	.0681	2.52				1	1	0
I	11/1/11	.0657	2.38				1	0	0
I	11/16/11	.0678	1.57				1	0	0
I	12/17/11	.0292	1.79				1	0	0

List these Totals on next page => A = 10 B = 3 C = 2

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: *WillPlateit Metal Finishers*

IUP Number: *0006*

Pipe Number: *0001*

Parameter: *Nickel*

Six Month SNC Determination Period: *7/1/2011-12/31/11*

SIGNIFICANT NON-COMPLIANCE (SNC) LIMITS DETERMINATION

Calculate % and Circle Answers

- 1) Calculate the % of Regular violations: B/A = _____
- 2) Is B/A greater than or equal to 0.66 (or 66 %) ? Chronic violator? Yes / No
- 3) Calculate the % of TRC Violations: C/A = _____
- 4) Is C/A greater than or equal to 0.33 (or 33 %) ? TRC Violator? Yes / No
- 5) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / No
- 6) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / No
- 7) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: YES NO

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: YES NO

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

Consent Order with Enforceable schedule;
Administrative Order with Enforceable schedule;
Formal notice to comply issued, or
Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Definitions:

CJP Compliance Judgment Point, The number of daily sample data values plus the number of average of sampling events used for checking compliance with average limits.

TRC Technical Review Criteria, Multiply the actual IUP limits by the proper TRC Criteria value to get a TRC Limit:

TRC Criteria = 1.4 for BOD, TSS, oil, fat, grease

TRC Criteria = 1.2 for all other pollutants

Not required to perform TRC compliance judgment for pH.

SNCR Significant Non-Compliance Report

SNC Significant Non-Compliance (formerly called Reportable Non-Compliance or RNC)

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>WillPlateit Metal Finishers</i>	IUP Number: <i>0006</i>	Pipe Number: <i>0001</i>
Parameter: <i>Nickel</i>	Six Month SNC Determination Period: <i>7/1/2011-12/31/11</i>	

SIGNIFICANT NON-COMPLIANCE (SNC) LIMITS DETERMINATION	Calculate % and Circle Answers
---	--------------------------------

- 1) Calculate the % of Regular violations: $B/A = \frac{3}{10} = 30\%$
- 2) Is B/A greater than or equal to 0.66 (or 66 %) ? Chronic violator? Yes / **No**
- 3) Calculate the % of TRC Violations: $C/A = \frac{2}{10} = 20\%$
- 4) Is C/A greater than or equal to 0.33 (or 33 %) ? TRC Violator? Yes / **No**
- 5) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / **No**
- 6) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / **No**
- 7) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: YES **NO**

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: YES **NO**

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

Consent Order with Enforceable schedule;
Administrative Order with Enforceable schedule;
Formal notice to comply issued, or
Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Definitions:

CJP Compliance Judgment Point, The number of daily sample data values plus the number of average of sampling events used for checking compliance with average limits.

TRC Technical Review Criteria, Multiply the actual IUP limits by the proper TRC Criteria value to get a TRC Limit:

TRC Criteria = 1.4 for BOD, TSS, oil, fat, grease

TRC Criteria = 1.2 for all other pollutants

Not required to perform TRC compliance judgment for pH.

SNCR Significant Non-Compliance Report

SNC Significant Non-Compliance (formerly called Reportable Non-Compliance or RNC)

Example 4

- Chicken Pluckers, Inc.
- 2nd 6-month period
- BOD



**IUP, Part I, Section F:
Effluent Limits and Monitoring
Requirements:**

**The permittee may discharge from this
specific pipe number according to these**

Receiving POTW name =>	Typicalville	IU name =>	Chicken
Receiving POTW NPDES # =>	NC0012345	IUP # =>	008
Effective date for these Limits =>	6/30/2011	Pipe # =>	001
Expiration date for these Limits =>	12/31/16	40 CFR # =>	N/A
		if not applicable put N/	

THE LIMITS ON THIS PAGE ARE, (Check one below):

LIMITS for ENTIRE permit period => Yes

INTERIM Limits for period # 1 => No

INTERIM Limits for period # 2 => No

FINAL Limits Page => No

CONVENTIONAL PARAMETERS	Concentration Limits			Mass-Based Limits			Monitoring Frequency		Sample	Required
	Daily	Monthly	Units	Daily	Monthly	Units	by Industry	by POTW	Collection	Laboratory
	Max	Avg.		Max	Avg				Method (C or G)	Detection Limits
1. Flow	1.000		MGD			MGD	Daily	Once/6 Months	Metered	
2. BOD	500.00	300	mg/l			lbs/day	Weekly	Once/6 Months	C	2
3. TSS	500.00	300	mg/l			lbs/day	Weekly	Once/6 Months	C	2
4. temperature			Deg. C			Deg. C				
5. pH	6 to 9		Std. Units			Std. Units	Weekly	Once/6 Months	G	

OTHER PARAMETERS, Please list alphabetically

6. Ammonia	*mo		mg/l			lbs/day	Once/6 months		C	0.01
7. Oil and Grease	75.00		mg/l			lbs/day	Monthly	Once/6 Months	C	1
8. Zinc	*mo		mg/l			lbs/day	Once/6 Months		C	0.01
9.			mg/l			lbs/day			G	
10.			mg/l			lbs/day			C	
11.			mg/l			lbs/day			C	
12.			mg/l			lbs/day			C	
13.			mg/l			lbs/day			C	
14.			mg/l			lbs/day			C	
15.			mg/l			lbs/day			C	
16.			mg/l			lbs/day			G	
17.			mg/l			lbs/day				
18.			mg/l			lbs/day				
19.			mg/l			lbs/day				
20.			mg/l			lbs/day				

*Monitoring Only

(See next section, IUP, PART I, Section G.)

for Definitions and Limit Page(s) notes:

IUP, PART I, Page: 5

Compliance Judgment Worksheet For SNC With Limits		
Use separate sheets for each Industry	SNC determination for Flow optional, see Section 7-E	Use separate sheets for each Pollutant

SIU Name: <i>Chicken Pluckers, Inc.</i>	IUP Number: <i>0008</i>	Pipe Number: <i>0001</i>
Parameter: <i>BOD</i>	Six Month SNC Determination Period: <i>7/1/11-12/31/11</i>	

Daily Limit Compliance

Daily Max. Limit from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgment not required for pH:	Circle which units apply to Limits
---------------------------	--	------------------------------------

Daily Maximum Limit: _____ * 1.2 or 1.4 = TRC Daily Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum value, tally up at bottom as "A."

Column 9: Compare daily values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l		Daily Load lbs/day		Count	Regular Violation ?	TRC Violation ?
I	7/8/11	.555	450						
I	7/15/11	.567	575						
P	7/30/11	.421	480						
	July								
I	8/13/11	.621	390						
	Aug								
I	9/2/11	.502	325						
I	9/16/11	.544	489						
I	9/23/11	.496	472						
	Sept								
I	10/7/11	.699	300						
I	10/14/11	.698	725						
I	10/21/11	.585	435						
	Oct								
I	11/25/11	.888	400						
	Nov								
I	12/2/11	.788	447						
I	12/9/11	.885	480						
	Dec								
							A =	B =	C =

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>Chicken Pluckers, Inc.</i>	IUP Number: <i>0008</i>	Pipe Number: <i>0001</i>
Parameter: <i>BOD</i>	Six Month SNC Determination Period: <i>7/1/11 –12/31/11</i>	

Daily Limit Compliance

Daily Max. Limit from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgement not required for pH:	Circle which units apply to Limits
---------------------------	---	------------------------------------

Daily Maximum Limit: 500 * 1.2 or 1.4 = TRC Daily Limit: ____ mg/l or lbs/day

Column 1: I - Industry self P - POTW A - Average

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum value, tally up at bottom as "A."

Column 9: Compare daily values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l		Daily Load lbs/day		Count	Regular Violation ?	TRC Violation ?
I	7/8/11	.555	450				1	0	
I	7/15/11	.567	575				1	1	
P	7/30/11	.421	480				1	0	
	July								
I	8/13/11	.621	390				1	0	
	Aug								
I	9/2/11	.502	325				1	0	
I	9/16/11	.544	489				1	0	
I	9/23/11	.496	472				1	0	
	Sept								
I	10/7/11	.699	300				1	0	
I	10/14/11	.698	725				1	1	
I	10/21/11	.585	435				1	0	
	Oct								
I	11/25/11	.888	400				1	0	
	Nov								
I	12/2/11	.788	447				1	0	
I	12/9/11	.885	480				1	0	
	Dec								

List these Totals on next page =>

A = 13	B = 2	C =
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Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>Chicken Pluckers, Inc.</i>	IUP Number: <i>0008</i>	Pipe Number: <i>0001</i>
Parameter: <i>BOD</i>	Six Month SNC Determination Period: <i>7/1/11-12/31/11</i>	

Daily Limit Compliance

Daily Max. and Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgement not required for pH:	Circle which units apply to Limits
-------------------------------------	---	------------------------------------

Daily Maximum Limit: 500 * 1.2 or 1.4 = TRC Daily Limit: 700 mg/l or lbs/day

Column 1: I - Industry self P POTW A - Average

Column 6: Use only if IUP has daily limits in lbs/day. Formula to use is (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each daily maximum value, tally up at bottom as "A."

Column 9: Compare daily values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare daily values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

Col. 1:	From IDMRs	From IDMRs	From IDMRs	Col. 5:	Col 6:	Col 7:	Col 8:	Col 9:	Col 10:
Sample Type	Sample Date	Daily Flow, mgd	Daily Conc. mg/l	1	Daily Load lbs/day		Count	Regular Violation ?	TRC Violation ?
I	7/8/11	.555	450				1	0	0
I	7/15/11	.567	575				1	1	0
P	7/30/11	.421	480				1	0	0
	July								
I	8/13/11	.621	390				1	0	0
	Aug								
I	9/2/11	.502	325				1	0	0
I	9/16/11	.544	489				1	0	0
I	9/23/11	.496	472				1	0	0
	Sept								
I	10/7/11	.699	300				1	0	0
I	10/14/11	.698	725				1	1	1
I	10/21/11	.585	435				1	0	0
	Oct								
I	11/25/11	.888	400				1	0	0
	Nov								
I	12/2/11	.788	447				1	0	0
I	12/9/11	.885	480				1	0	0
	Dec								

List these Totals on next page =>

A = 13

B = 2

C = 1

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>Chicken Pluckers, Inc.</i>	IUP Number: <i>0008</i>	Pipe Number: <i>0001</i>
Parameter: <i>BOD</i>	Six Month SNC Determination Period: <i>7/1/11– 12/31/11</i>	

Ave. Limits from IUP	IUP Limit * TRC criteria = TRC Limit Circle 1.4 For TRC for BOD, TSS, oil, fat, grease; Circle 1.2 for all other pollutants TRC compliance judgement not required for pH:	Circle which units apply to Limits
----------------------	--	------------------------------------

Monthly Average Limit: * 1.2 or 1.4 = TRC Avg. Limit: _____ mg/l or lbs/day

Column 1: I - Industry self P-POTW A - Average

Column 5: Use only if IUP has monthly average limit. Average values of all sampling events collected within the "average" period (for example, for a monthly average limit, use all values collected within a calendar month) and enter this average in column 5. Compare this average to the appropriate average IUP limit or TRC limit.

Column 7: Use only if IUP has monthly average limits in lbs/day. Use (mgd * mg/l * 8.34 = lbs/day).

Column 8: Put "1" for each average value, tally up at bottom as "A."

Column 9: Compare average values to IUP limits above, put "0" if at or below limit, "1" if above, tally at bottom as "B."

Column 10: Compare average values to TRC limits above, put "0" if below limit, "1" if at or above, tally at bottom as "C."

[illegible]

List these Totals on next page =>

D =

E =

F =

--

Use separate sheets for each Pollutant

F =

--	--

Use separate sheets for each Pollutant

F= 4

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>Chicken Pluckers, Inc.</i>	IUP Number: <i>0008</i>	Pipe Number: <i>0001</i>
Parameter: <i>BOD</i>	Six Month SNC Determination Period: <i>7/1/11-12/31/11</i>	

SIGNIFICANT NON-COMPLIANCE (SNC) LIMITS DETERMINATION	Calculate % and Circle Answers
---	--------------------------------

1) Chronic SNC:

Daily: Calculate the % of Regular violations:

B/A =

Daily: Is B/A greater than or equal to 0.66 (or 66 %) ?

DAILY Chronic violator?

Yes / No

Monthly: Calculate the % of Regular violations:

E/D =

Monthly: Is E/D greater than or equal to 0.66 (or 66 %) ?

MONTHLY Chronic violator?

Yes / No

2) TRC SNC:

Daily: Calculate the % of TRC Violations:

C/A =

Daily: Is C/A greater than or equal to 0.33 (or 33 %) ?

DAILY TRC Violator?

Yes / No

Monthly: Calculate the % of TRC violations:

F/D =

Monthly: Is F/D greater than or equal to 0.33 (or 33 %) ?

MONTHLY TRC violator?

Yes / No

3) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / No

4) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / No

5) Did any violations adversely affect the local Pretreatment Program? Yes / No

6) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: YES NO

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: YES NO

If YES to EITHER question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

- Consent Order with Enforceable schedule;
- Administrative Order with Enforceable schedule;
- Formal notice to comply issued, or
- Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).

Compliance Judgment Worksheet For SNC With Limits

Use separate sheets for each Industry

SNC determination for Flow optional, see Section 7-E

Use separate sheets for each Pollutant

SIU Name: <i>Chicken Pluckers, Inc.</i>	IUP Number: <i>0008</i>	Pipe Number: <i>0001</i>
Parameter: <i>BOD</i>	Six Month SNC Determination Period: <i>7/1/11-12/31/11</i>	

SIGNIFICANT NON-COMPLIANCE (SNC) LIMITS DETERMINATION	Calculate % and Circle Answers
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1) Chronic SNC:

Daily: Calculate the % of Regular violations:

$$B/A = \frac{2}{13} = 15.4 \%$$

Daily: Is B/A greater than or equal to 0.66 (or 66 %) ?

DAILY Chronic violator? Yes / **No**

Monthly: Calculate the % of Regular violations:

$$E/D = \frac{6}{6} = 100 \%$$

Monthly: Is E/D greater than or equal to 0.66 (or 66 %) ?

MONTHLY Chronic violator? **Yes** / No

2) TRC SNC:

Daily: Calculate the % of TRC Violations:

$$C/A = \frac{1}{13} = 7.7 \%$$

Daily: Is C/A greater than or equal to 0.33 (or 33 %) ?

DAILY TRC Violator? Yes / **No**

Monthly: Calculate the % of TRC violations:

$$F/D = \frac{4}{6} = 66.7 \%$$

Monthly: Is F/D greater than or equal to 0.33 (or 33 %) ?

MONTHLY TRC violator? **Yes** / No

3) Did any violation, alone or in combination with other discharges, cause pass-through or interference at the POTW, or endanger the health of POTW workers or the public? Yes / **No**

4) Did any violation cause imminent endangerment to human health / welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such discharge? Yes / **No**

5) Did any violations adversely affect the local Pretreatment Program? Yes / **No**

6) If the answer to any of these questions is yes, the SIU is in Significant Non-Compliance (SNC) for this parameter. They must be listed on the Significant Non-Compliance Report (SNCR) form in the Pretreatment Annual Report (PAR), described in the PAR narrative (including parameter, period, and POTW actions), and the POTW must take adequate enforcement as outlined in its Enforcement Response Plan (ERP).

Is the SIU in SNC for this six month period? CIRCLE ONE: **YES** NO

Was the SIU in SNC for THE SAME PARAMETER in the previous six month compliance period? CIRCLE ONE: **YES** NO

If YES to ~~EITHER~~ question, DESCRIBE IN NARRATIVE.

Please note if SIU was in SNC for the previous six month compliance period and is also in SNC for this six month compliance period, escalated enforcement actions must be taken as soon as possible, preferably before the end of the second consecutive period. Failure to take the action within 2 months after the end of the second consecutive period will subject the POTW to enforcement by the Division. The options are:

Consent Order with Enforceable schedule;

Administrative Order with Enforceable schedule;

Formal notice to comply issued, or

Permit modification.

See Chapter 9 - Pretreatment Annual Reports, Chapter 8 - Enforcement, and the POTW's Enforcement Response Plan (ERP).