



VIRTUAL INSPECTIONS: STREAMLINING DURING THE PANDEMIC

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The Pretreatment Team(PTT) is responsible for protecting the wastewater collection system (WWC) from pollutants that may interfere or pass thru the system which may be harmful to the WWC system, City of Dallas (COD) employee's or citizen's.

- ▶ PTT is currently regulating wastewater discharges from 132 Significant Industrial Users (SIU), 16 Non-Significant Industrial Users (Non-SIU) and 7 Customer Cities according to local, state and federal rules.
- ▶ The team assists the IUs with completing various forms, sampling and answering regulatory questions.
- ▶ The team assists other sections and departments with special investigations.

CHALLENGES DUE TO COVID-19

Facility inspections is a major challenge due to the COVID-19 crisis.

- ▶ On-site visits is problematic at most facilities because visitors are not allowed.
- ▶ DWU staff isn't in office fulltime.
- ▶ The staff was kept busy by completing paperwork, digitizing files, etc.
- ▶ Eventually, the staff ran out of busy work and have a legal obligation to perform inspections as a part of the permitted program.

CHALLENGES DUE TO COVID-19

- ▶ How do we do our job during these times then?
 - ▶ That was the million-dollar question, our solution was to develop a process to perform inspections while still working remote and when in office even.
 - ▶ We developed a “Virtual Inspection” process.
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DWU PRETREATMENT INSPECTIONS DURING COVID

- ▶ First step in the process was to develop a set of protocols to ensure the effectiveness of a remote inspection.
- ▶ Instructions on how to perform a remote inspection for staff.

VIRTUAL INSPECTION PROCEDURE

Use this checklist to help prepare for your IU's upcoming virtual inspection.

REMINDER: Be sure to record the inspection

SCHEDULING THE INSPECTION

- ☐ Ensure you have been trained and approved to perform virtual inspections.
- ☐ Send PALS Announcement, via email, informing IU of the change in the inspection process.
- ☐ Offer help should the IU need assistance in acquiring the Microsoft Teams app.
- ☐ Schedule the virtual inspection on Microsoft Teams giving the IU at least 3 business days to gather information and prepare.
- ☐ Email the IU the "Virtual Inspection Instructions" Packet the same day you schedule the inspection.
- ☐ Ensure you have received all the required documentation 48-hours prior to the inspection.



DOCUMENT SUBMISSION CHECKLIST

- ☐ Chemical Storage Form
- ☐ Process Tank(s) Form
- ☐ Waste Management Form
- ☐ General Facility Information Form
- ☐ Records Verification Form
- ☐ Process Description
- ☐ Process Flow Diagram
- ☐ Pretreatment Process Description (if applicable)
- ☐ Pretreatment Process Flow Diagram (if applicable)
- ☐ Facility Plumbing Blueprints (if available)
- ☐ Facility Layout
- ☐ MSDS/SDS
- ☐ Waste Manifest (if applicable)
- ☐ Meter calibration, maintenance, and testing records (if applicable)
- ☐ Pollution Prevention (P2) Stories (if available)

DOCUMENTS REVIEWED

- ☐ Current Permit (if applicable)
- ☐ Periodic Compliance Reports (PCRs) for: the last 3 years (if applicable)
- ☐ Analysis Reports for the last 3 years
- ☐ Toxic Organic Management Plan (TOMP) (if applicable)
- ☐ Slug Evaluation Form/Plan or SPCC (if applicable)

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- ▶ First step (cont.) protocols.
 - ▶ Instructions on what the SIUs would need to participate in a remote inspection.

 Virtual Inspection Instructions

Staying safe while staying compliant

Currently we are being instructed to practice social distancing to slow the spread of COVID-19. In that effort, we are improving our inspection process by incorporating a video conferencing option for inspections. Virtual inspections may feel a little different than the traditional method, but we will cover the same material and perform a "walk-thru" of your facility similar to our in-person inspection.

Microsoft Teams
Quick Steps



1. Download the free Microsoft Teams App on your tablet or mobile device.
2. Click the meeting link in the invitation email.
3. Ensure your microphone and camera are on.
4. Click JOIN.

Here's how it works

What you will need:

- A mobile device with a camera and microphone
 - Cell phone
 - Tablet
- Microsoft Teams App
- Access to the internet

To access the inspection meeting:

You will receive an email that contains a calendar invite and a link to "Join Microsoft Teams Meeting". If you are available on the proposed date and time, then accept the meeting by clicking "YES".

You will be able to access the meeting by clicking on the "Join Microsoft Teams Meeting" in the invitation email or by going to your calendar a clicking "Join".

Should you have any trouble accessing the meeting, contact your inspector immediately.

You will need your microphone and camera on during the inspection.

Sound and video "OFF"



Sound and video "ON"



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- ▶ First step (cont.) protocols.
 - ▶ List of required information needing to be submitted prior to the inspection.
 - ▶ Supporting documents and instructional videos for each of the items listed above.

How to prepare

Documents to be submitted:

These documents will need to be submitted, by email, to your inspector 48-hours prior to the inspection for review.

- Chemical Storage Form (Attachment A)
- Process Tank(s) Form (Attachment B)
- Waste Management Form (Attachment C)
- General Facility Information Form (Attachment D)
- Records Verification Form (Attachment E)
- Process Description
- Process Flow Diagram
- Pretreatment Process Description (if applicable)
- Pretreatment Process Flow Diagram (if applicable)
- Facility Plumbing Blueprints (if available)
- Facility Layout Diagram
 - Fire exit map, Tier 2 map, Site map, etc.
- All Safety Data Sheets (MSDS/SDS)
- Waste Manifest from the last 12 months (if applicable)
- Meter Calibration, maintenance, and testing records (if applicable)
- Pollution Prevention (P2) Stories (if available)
 - Waste minimization, recycling, and water conservation efforts

Documents to have available for review:

To have your inspector review these documents you will need to be able to present these documents before the camera during the inspection.

- Current Permit (if applicable)
- Periodic Compliance Reports (PCRs) for the last three (3) years (if applicable)
- Analysis Reports for the last three (3) years
- Toxic Organic Management Plan (TOMP) (if applicable)
- Slug Evaluation Form/Plan (if applicable)

Note: All inspections will be recorded, and all information is subject to open records requests.

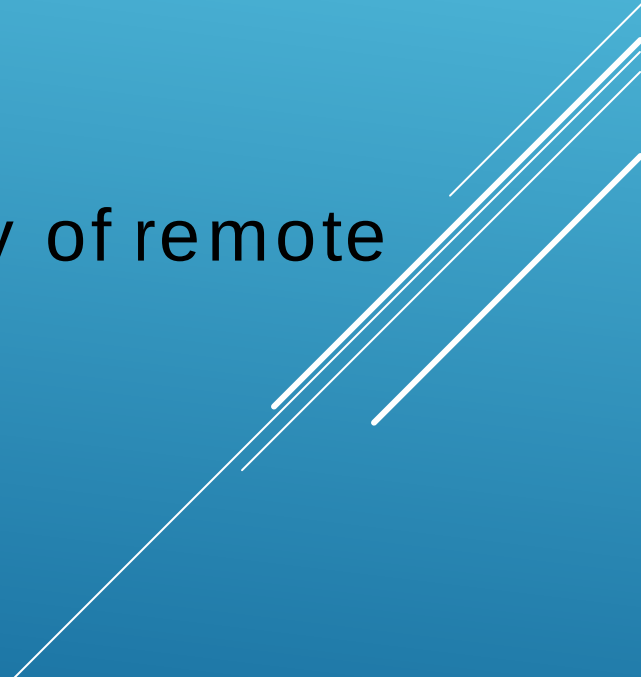
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- ▶ Second step in the process was to identify our technological needs to be able to perform the remote inspection.
 - ▶ Hardware Needs:
 - ▶ A mobile device capable of accessing some internet platform.
 - ▶ Samsung Galaxy tablets with cellular service were issued to staff.

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- ▶ Second step (Cont.) technological needs.
 - ▶ Software Needs:
 - ▶ The City of Dallas already had access to Microsoft Teams through our user agreements.
 - ▶ Familiarization with the platform was quick and easy because of this.
 - ▶ Assisting SIUs with the use of TEAMS platform on various devices.
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- ▶ Third step, which was the most important, was to get approval from the Texas Commission on Environmental Quality's Pretreatment Team (TCEQ).
 - ▶ Initial call scheduled to discuss the possibility of remote inspections with TCEQ.
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- ▶ Third step (Cont.) TCEQ approval
 - ▶ Provided TCEQ
 - ▶ SOPs & instructional videos on how DWU would perform a remote inspection.
 - ▶ Instructional videos on what the industries would need to do and could expect during a remote inspection.
 - ▶ All supporting documentation related to the remote inspection process.
 - ▶ Follow-up call with TCEQ to answer questions and further discuss this process.
 - ▶ TCEQ sent written approval for this new procedure.

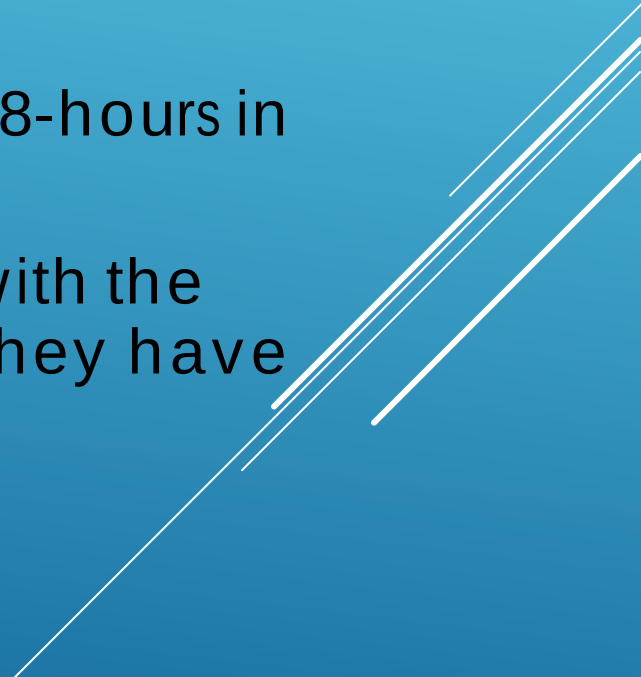
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- ▶ Fourth step was to notify the SIUs of the new procedure.
 - ▶ All inspections, where not prohibited by government regulations, are recorded as proof of inspection and for review as necessary.
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- ▶ Fourth step (Cont.) SIU notification.
- ▶ Identify the type of inspection .
 - ▶ Full remote Inspection.
 - ▶ Complete walk-thru, paperwork review, and recording.
 - ▶ Partial remote inspection.
 - ▶ Remote walk-thru and/or recording not allowed.

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- ▶ Final step was performing remote inspections.
 - ▶ Industries are scheduled in advance so that they can prepare documentation.
 - ▶ All documentation is required to be submitted 48-hours in advance.
 - ▶ Inspector will review the submitted paperwork with the facility and ask the facility to visually show that they have certain documents at the site.
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- ▶ Final step (cont). performing remote inspections.
 - ▶ Inspector will complete the inspection report during the “meeting” portion of the inspection.
 - ▶ Facility representative will then tour the facility with the camera facing out and walking the inspector through the processes and facility.

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- ▶ Final step (Cont.) performing partial remote inspections.
 - ▶ Partial remote inspections have the same requirements as the full remote inspection but is performed in two parts.
 - ▶ Documentation review is completed remotely
 - ▶ Facility walk-thru is completed on site.

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- ▶ Now that we are performing remote inspections where do we go from here?
 - ▶ We have begun a review of the inspections performed to date and are looking for weaknesses and possible areas of improvements within the process.
 - ▶ One weakness is the device and/or internet service.
 - ▶ One improvement was to perform an in-person walk-thru of the facility for our short inspection.

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- ▶ While operational levels have returned more to “normal” level we are still performing remote inspections to minimize staff contact with the public and at facilities.
- ▶ It is an evolving area of operation for us and we are looking at how we can roll this out to other areas of operations outside of the Pretreatment team.



Communication and documentation are key to
Virtual Inspections to ensure a successful
Pretreatment Program

QUESTIONS?

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