



INDUSTRIAL WASTE FACILITY INSPECTION

John Boyd

Supervising Industrial Waste Inspector

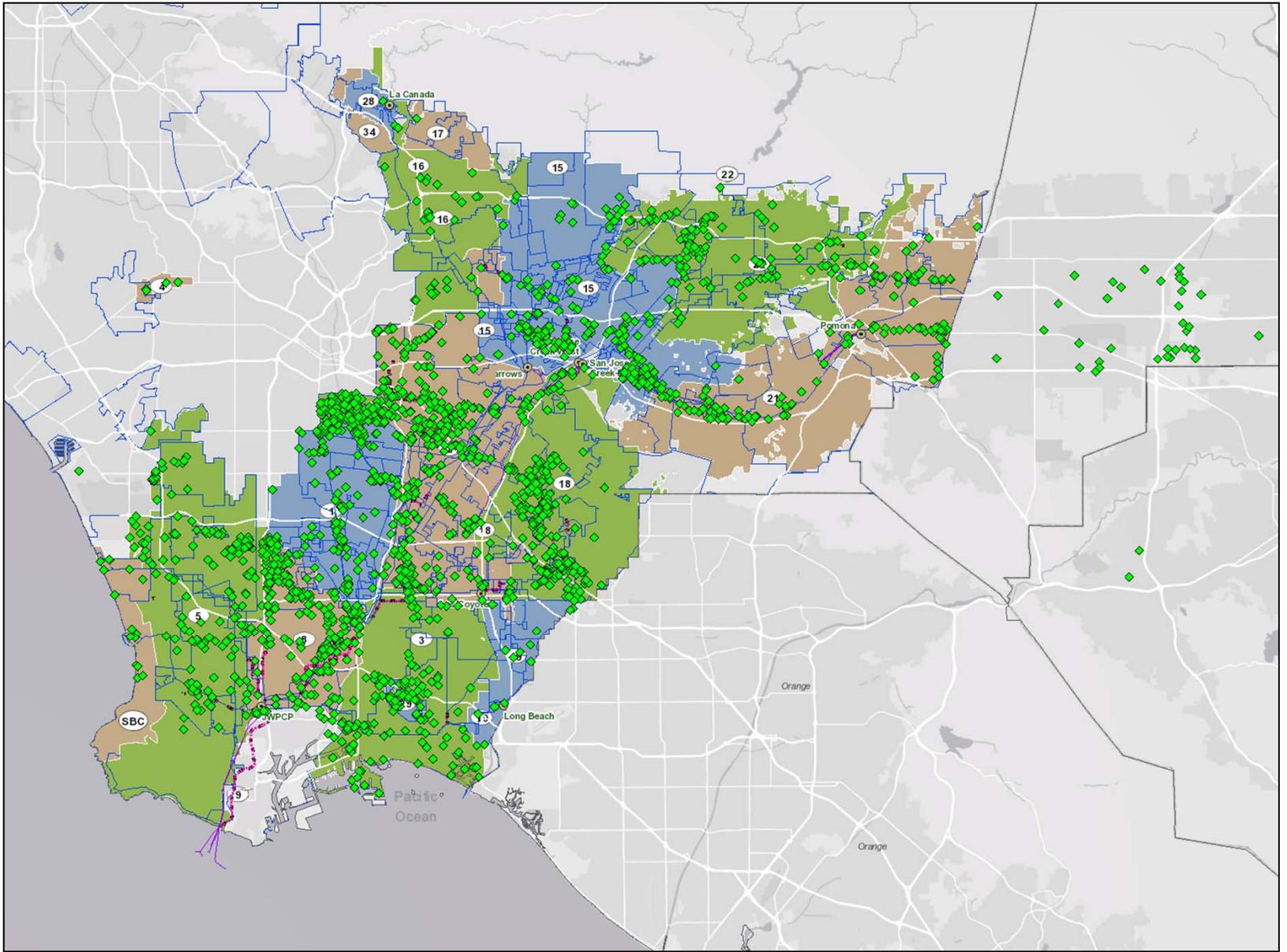
March 26, 2019





Why Do We Inspect?

- It's required!
 - EPA's General Pretreatment Regulations (40 CFR 403.2) require POTWs to permit and then inspect and sample all Significant Industrial Users (SIUs) at least once a year. The inspection must be comprehensive in nature, covering all aspects of the facility's operations that may impact wastewater discharges.
- In a more general sense, to insure that the objectives of 403.2 are met.





403.2 Objectives

- Prevent interference with POTW operations.
- Prevent pass-thru of pollutants into the environment.
- Allow reclamation and beneficial reuse of treated wastewater and bio-solids.
- Reduce the health and environmental risks associated with the discharge of toxic pollutants from POTWs.



2007 Fluorescent Green Color at the Whittier Narrows WRP



What About Non-SIU Facilities?

- Facilities that are not SIU's may be permitted and inspected at the discretion of the POTW.
 - For example, the LACSD exemption guidelines are used to determine whether or not a non-SIU facility should be permitted as a “non-significant” discharger.
- The LACSD currently requires an inspection be conducted at all permitted non-SIU facilities at least annually.



Can Exempt, “Dry”, or Non-Permitted Facilities be Inspected?

- Absolutely!
- Section 206 of the *County Sanitation Districts of Los Angeles County Wastewater Ordinance* provides authorized personnel of the Districts immediate access to inspect and monitor any facility or industrial process that is involved directly or indirectly with any discharge to the Districts’ sewerage systems.

A vertical decorative bar on the left side of the slide. It features a green recycling symbol at the top, a gradient of green and blue in the middle, and a blue water droplet at the bottom.

Access

- Must be immediate.....15 minutes or less.
- Inspector must properly identify himself.
- Only required when facility is open, discharging wastewater, or any other “reasonable” time.
- 95%+ of LACSD inspections are done “unannounced”, i.e. a surprise.
- Appointments are unusual but are occasionally made for follow-up issues.



Who does the Inspections?

- “Authorized Personnel”, as determined by the Chief Engineer of the Districts, conduct the inspections. In general these are the Districts’ IW inspectors, but others who could be included are Districts’ technicians, engineers, management and sewer/POTW operations, as well as maintenance personnel.
- LACSD inspectors generally have a Bachelor of Science degree.



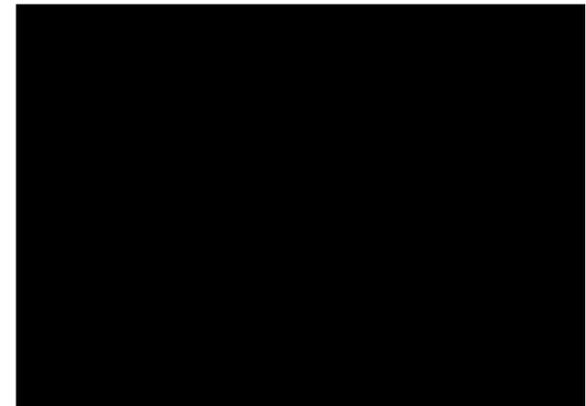
Inspections: How Often? How Long?

- SIUs: required annually, but generally more frequent since these are the facilities with the most potential to impact POTWs. Anywhere from 2-20+ times per year. Average for 2018 was about 6.0.
- Non-SIUs: required annually. Typically not done more than that, barring items requiring follow-up.
- Inspections typically range from 30 minutes to 2 hours, with a 1 hour average not counting time to write the report.



Inspections: When?

- When facility is open, discharging wastewater, or any other “reasonable” time.
- At night? Weekends? Yes and yes!
 - LACSD has a staff of 5 IW inspectors who work a swing shift.
 - Surveillance sampling





Common Access Questions

- What if I don't have time?
 - “Quick and dirty” inspection involving a quick look at production areas, pretreatment systems, and the sampling location may be allowed with a follow-inspection then scheduled for a more detailed inspection at a later time.
- What if the proper contact isn't available?
 - See above.

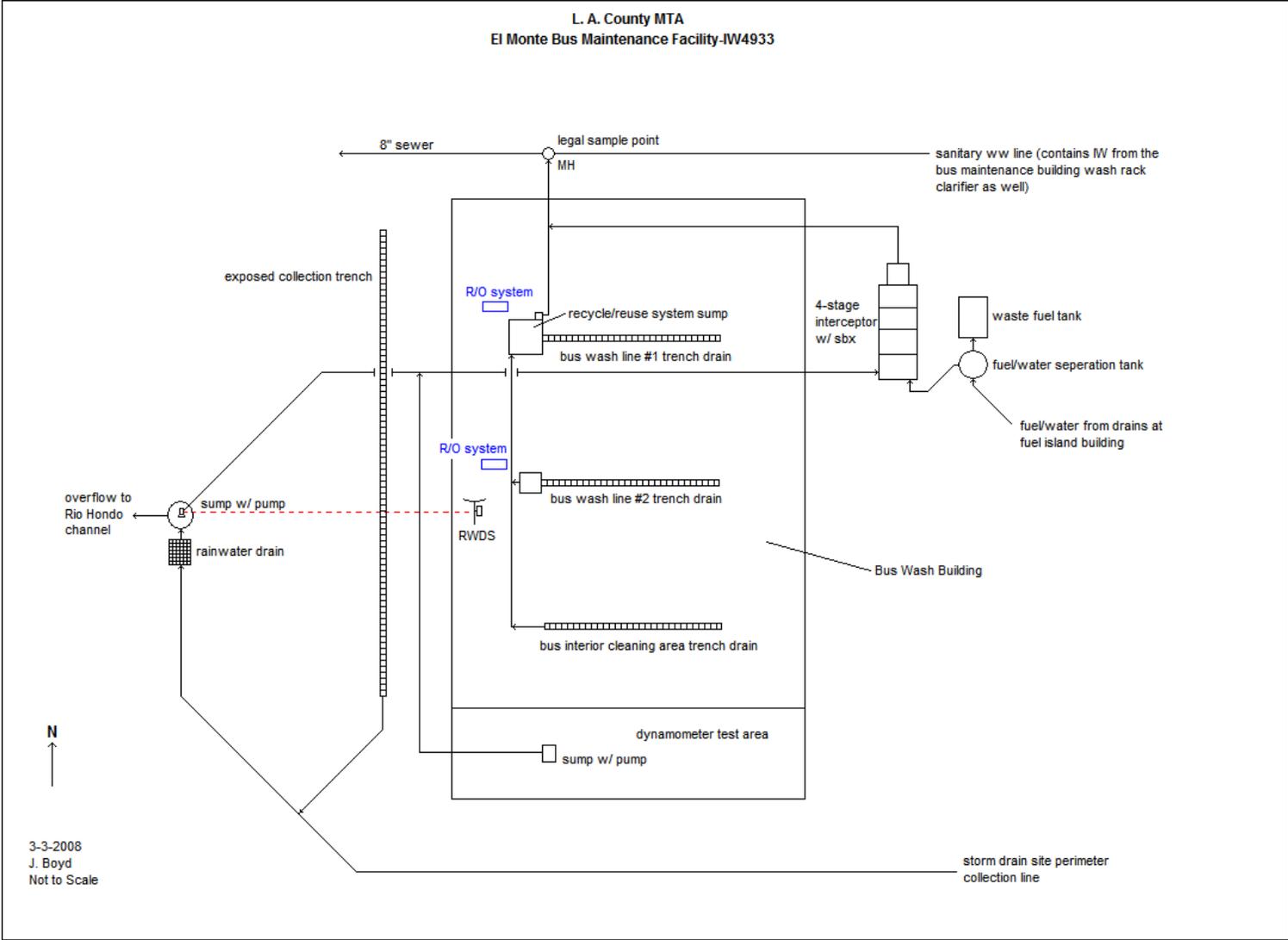


What are Inspectors Looking For?

- Ownership status
- Production/manufacturing areas
- Wastewater generating operations
- Applicability of Federal Categorical Regulations
- Pretreatment system operations
- Spill containment/rainwater intrusion
- Sampling the discharge
- Records review

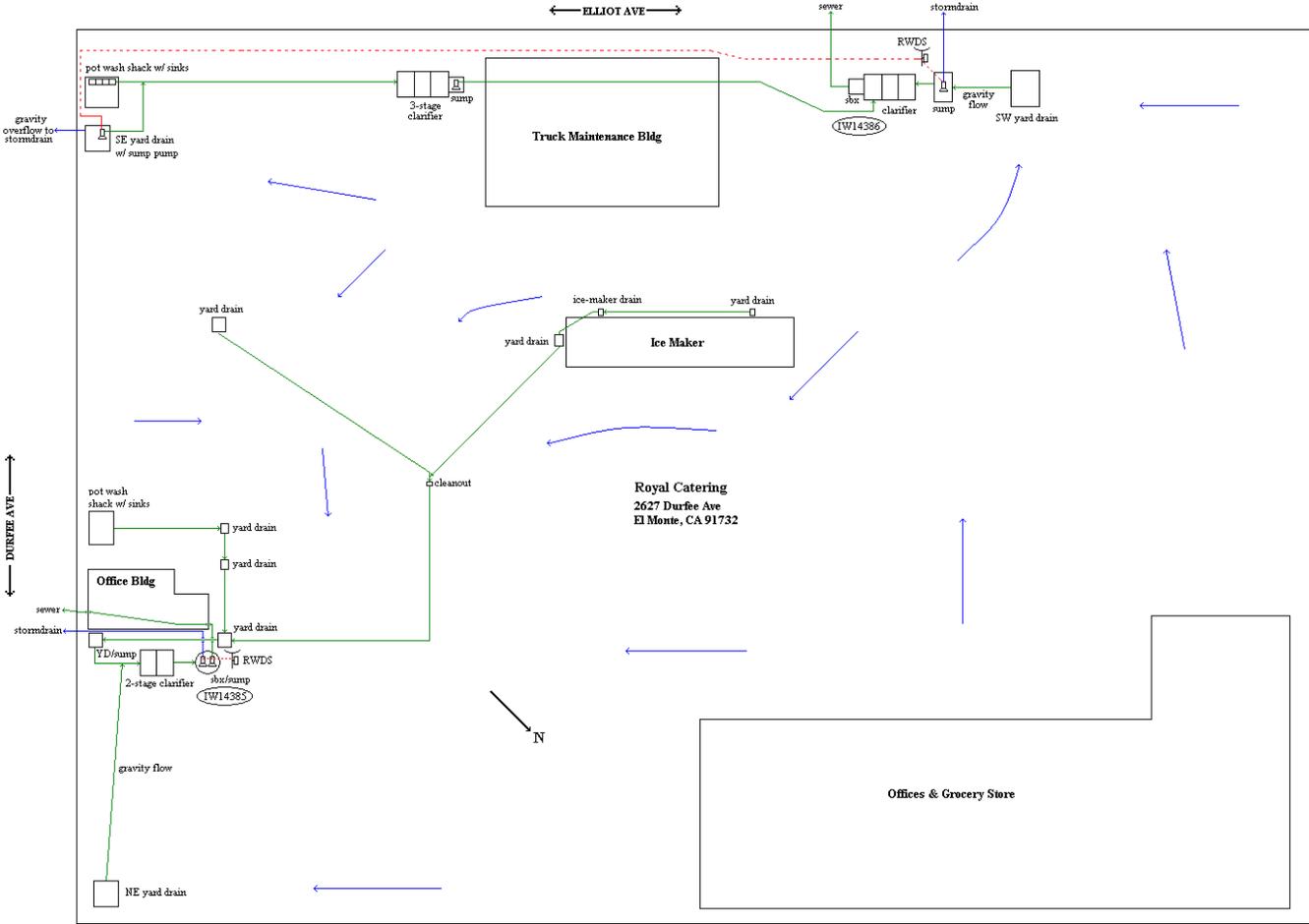


Site Diagram #1





Site Diagram #2

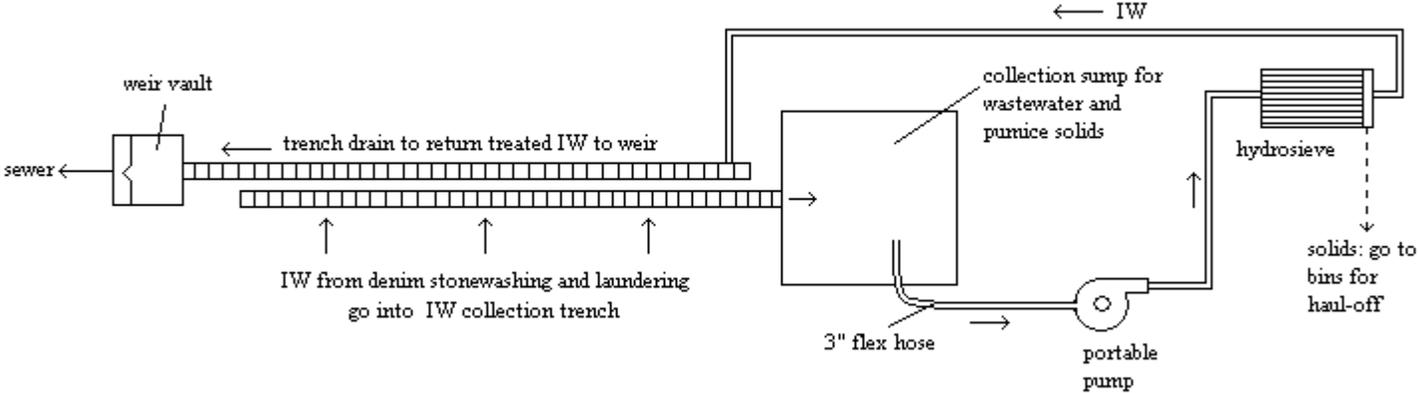


Drawn by J. Boyd
1-25-2008
Not to Scale



Pretreatment System Diagram

EARTH TEXTILE DEVELOPMENT INC
PRETREATMENT SYSTEM DIAGRAM
IW#16665





Electroplating Line





Another plating line





Same line, after the fire





Pretreatment System





Spill Containment





It's a test!
Name that plating solution





Rainwater Intrusion Prevention





Records Review

WASTE WATER CONTROL LOG						
TIME	DATE	SIGNATURE	CONTROL P.H	FINAL P.H	ALARM YES/NO	GALLONS PER MINUTE
SE. CLEANUP THE 3 PROBES AMONIA FINAL ACID						
6:30 AM	8-27-08	SE	8.8	8.6	NO	218
7:30 PM	"	SE	9.4	8.9	NO	218
8:30 PM	"	SE	8.9	8.8	NO	250
9:30 PM	"	SE	8.9	8.8	NO	250
10:30 PM	"	SE	8.6	8.7	NO	250
11:30 PM	"	SE	8.7	8.6	NO	171 → ONE PUMP
12:30 AM	"	SE	8.9	8.9	NO	171
1:30 AM	"	SE	8.6	8.7	NO	172
8/28						
3:30 AM	8/28/08	AMS	8.0	8.1	NO	170
4:30 AM		AMS	6.2	4.0	Yes	175 -
5:30 AM		AMS	8.2	8.0	NO	172 -
6:30 AM		AMS	8.1	8.3	NO	260 -
7:30 AM		AMS	8.0	8.1	NO	262 -
8:30 AM		AMS	8.0	8.3	NO	260 -
9:30 AM		AMS	7.4	7.1	NO	265
10:30 AM		AMS	7.0	6.9	NO	267
<p>Raw out OF AMONIA Joe has it on order Ramiro Rec Joe Zamora</p> <p>Ramiro</p>						
11:05						

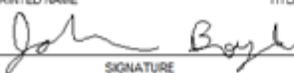


Violations

- Two Types: Written and Verbal
 - Written Notice of Violation is more serious and in addition to correction, requires formal response from the facility (letter).
 - Verbal simply requires correction on the part of the facility.
 - Verbal can escalate to a written NOV.



Written NOV

 SANITATION DISTRICTS OF LOS ANGELES COUNTY		ENFORCEMENT ACTION NO.: FAST 56342119																		
SANITATION DISTRICTS OF LOS ANGELES COUNTY ATTENTION: INDUSTRIAL WASTE SECTION 1955 WORKMAN MILL RD., P.O. BOX 4998, WHITTIER, CALIFORNIA 90607																				
<h2>NOTICE OF VIOLATION</h2>																				
1. DISCHARGER BOYD PLATING CO	2. ADDRESS OF WASTEWATER DISCHARGE 15388 OAK STREET PASADENA, CA 91104																			
3. LOCAL AGENCY CITY OF PASADENA	4. PERMIT NUMBER 025178	5. FACILITY ID 1548312																		
6. VIOLATION(S)																				
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>DATE</th> <th>VIOLATION TYPE</th> <th>WASTEWATER ORDINANCE</th> <th>SAMPLE LOCATION</th> <th>SUBSTANCE</th> <th>RESULT</th> <th>LIMIT</th> <th>UNIT</th> <th>COMMENTS</th> </tr> </thead> <tbody> <tr> <td>4/5/07</td> <td>Daily Maximum Limit</td> <td>210 Discharge of wastewater pollutants in excess of California Code of Regulations, Title 22 or Federal EPA Categorical Regulations, Title 40</td> <td>000430A</td> <td>Nickel, Total</td> <td>5.27</td> <td>4.10</td> <td>mg/L</td> <td>Composite sample SJ85259 taken on 4-5-07 had nickel=4.10 mg/L, limit=5.27 mg/L.</td> </tr> </tbody> </table>	DATE	VIOLATION TYPE	WASTEWATER ORDINANCE	SAMPLE LOCATION	SUBSTANCE	RESULT	LIMIT	UNIT	COMMENTS	4/5/07	Daily Maximum Limit	210 Discharge of wastewater pollutants in excess of California Code of Regulations, Title 22 or Federal EPA Categorical Regulations, Title 40	000430A	Nickel, Total	5.27	4.10	mg/L	Composite sample SJ85259 taken on 4-5-07 had nickel=4.10 mg/L, limit=5.27 mg/L.		
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7. IMPORTANT: VIOLATION MUST BE CORRECTED IMMEDIATELY		STEPHEN R. MAGUIN CHIEF ENGINEER AND GENERAL MANAGER																		
8. RECEIPT OF NOTICE ACKNOWLEDGED BY DISCHARGER		ISSUED BY:																		
PRINTED NAME John Boyd	OWNER Owner	NAME Flo Meter																		
 SIGNATURE	TITLE 	TITLE IW Inspector																		
		ENFORCEMENT ACTION DATE 05/25/2007																		



Violation Categories

- Numerical Violations:
 - Discharge of excessive concentrations or amounts of heavy metals or other regulated substances in the industrial wastewater flow to the sewer.
- Administrative Violations:
 - Failure to submit documents or reports or pay monies owed to the Sanitation Districts; failure to allow access to Districts' monitoring/inspection personnel.
- Equipment Violations:
 - Failure to install or properly maintain industrial wastewater pretreatment or monitoring equipment.



NOV Questions

- Do I have to sign it?
 - No. It's like a traffic ticket (no fault admitted by signing). It will be issued regardless of signature.
- How long to correct?
 - Inspector may give timeline, but in general there is no grace period. For example, the inspector can't give the ok to continue discharging wastewater with an acidic pH for the 2 hours it will take to correct the situation.
- Can it be rescinded?
 - It's possible, depends on circumstances.



Common Violations

- Failure to maintain equipment (clarifiers, recorders, rain diversion valves)
- Low pH discharge
- Failure to submit self-monitoring reports
- Spill containment problems
- Incomplete record keeping
- Excessive heavy metals in discharge
- Failure to submit permit application

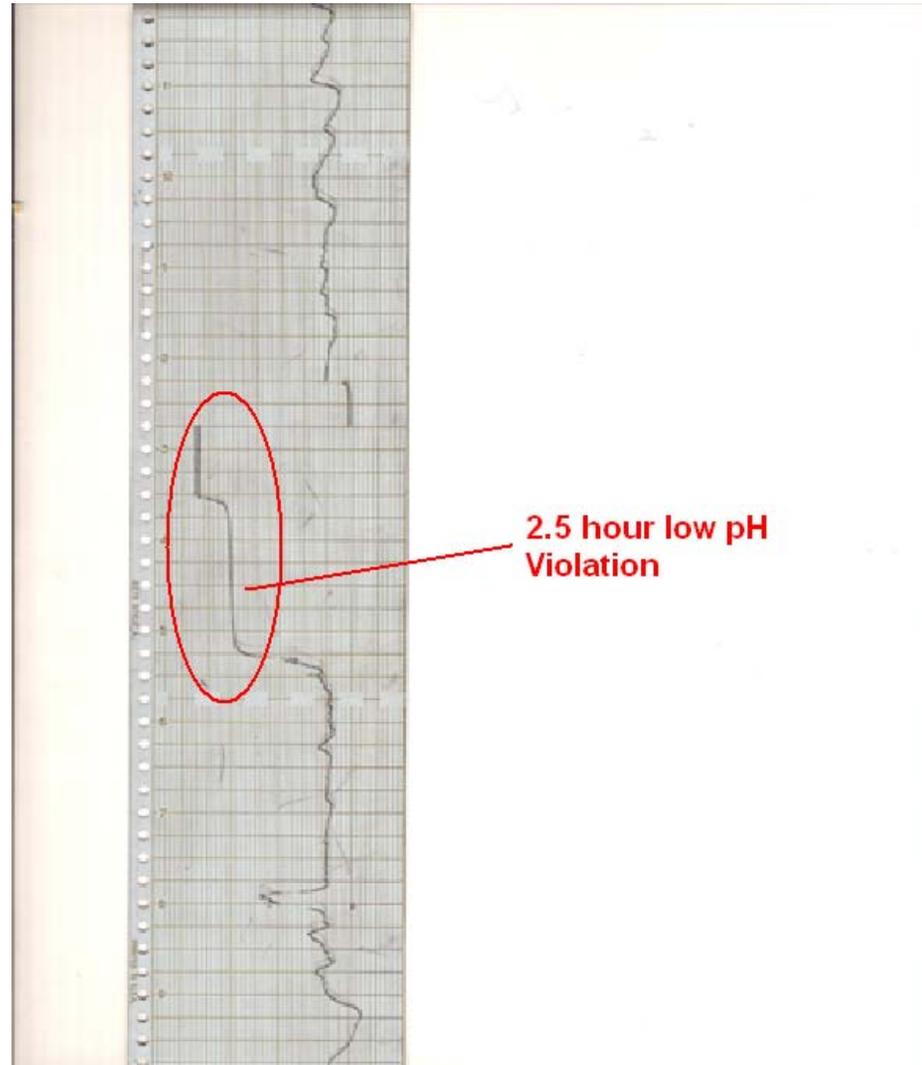


pH Chart Recorder





What does a violation look like?



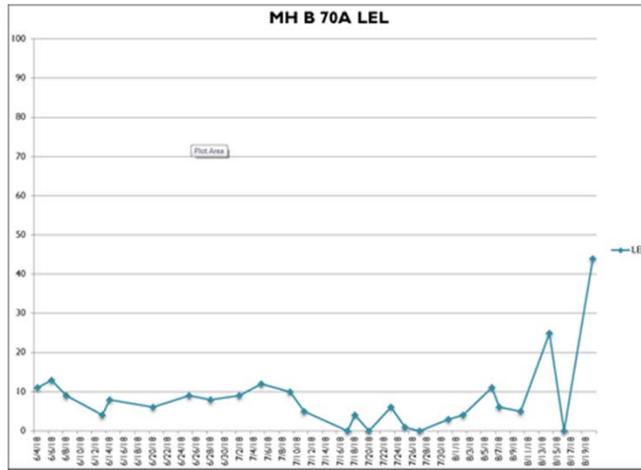


“Incident” Investigations

- IW Inspectors routinely are called to investigate potentially industrial waste caused problems that occur at Districts’ facilities (WRPs, sewers, pumping plants).
- They can also be called up to investigate citizen complaints and tips, or participate on multi-agency criminal investigations of environmental crime(s).



Incident Examples





Questions

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My Contact Information

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