

must be documented on the IU Checklist form that will be attached to the report. A copy of this form will be forwarded to the Environmental Manager once the screening process is complete. Any exceedance identified from Control Authority sampling must be reported to the Environmental Manager in a timely manner, normally within five days of becoming aware of the exceedance.

Monitoring for Significant Non-Compliance:

The Environmental Division has an Excel spreadsheet (currently titled Significant noncompliance worksheet) which is used to identify any SIU that should be considered to be in significant non-compliance. Maintaining the information in this spreadsheet will be the responsibility of the Environmental Technician.

The significant non-compliance worksheet contains a page dedicated to each permitted significant industrial user. Each page contains areas to document both the number of permit exceedances and the number of results above the technical review criteria for each parameter reported, along with an area to report the total number of analyses performed for each parameter. The spreadsheet is designed to calculate the percentage of analysis results above permit limits and/or above technical review criteria over a rolling six-month period following EPA guidance. Once all information for a particular month is received and evaluated, the Environmental Technician will enter the number of results outside of permit limits, the number of results above technical review criteria, and the total number of analyses performed into the appropriate cells. This will ensure a monthly update of the spreadsheet. Screening for significant non-compliance will take place quarterly.

Each quarter the Environmental Technician will use the information in the Significant Non-compliance worksheet to evaluate the status of each SIU in relation to significant non-compliance. The Environmental Division has a Microsoft Word document to be used in this evaluation and report (currently titled SNC evaluation). Each quarter the Environmental Technician will prepare an SNC evaluation report for each significant industrial user and deliver these to the Environmental Manager for final determination of significant non-compliance. The Industrial Pretreatment Program year runs from April through March. Therefore, the quarterly significant non-compliance reports should be prepared during the months of July, October, January, and April.

Summary of Environmental Technician responsibilities regarding compliance monitoring

- Screen self-monitoring reports
- Update the Compliance Summary spreadsheet.
- Identify any permit exceedance from self-monitoring reports.
- Complete the IU Checklist and forward to the Environmental Manager
- Receive Control Authority sampling results and update the Compliance Summary spreadsheet
- Report any exceedance from Control Authority sampling to the Environmental Manager
- Update the Significant Non-compliance worksheet monthly.
- Complete a SNC evaluation form for each SIU and deliver to the Environmental Manager quarterly.
- Maintain files of all reports, industry communications, etc.