



Reporting Requirements

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Agenda

- Your Resources – The Rules, the DAP, and your Assigned Industrial Investigator
- Understanding the Periodic Compliance Report (PCR) for IU Quarterly Monitoring
- And Understanding the Compliance Report (CR) resulting from excursions, yours or ours



SIU REPORTING RESPONSIBILITIES



- Quarterly Periodic Compliance Reports (PCRs)
- Compliance Reports (CRs)
- Enforcement Action Compliance Milestones (Letters of Explanation, Plans, Civil Citation Payments)
- Discharge Authorization Permit Application due dates
- Progress Reports or Requests for Extensions from Directives

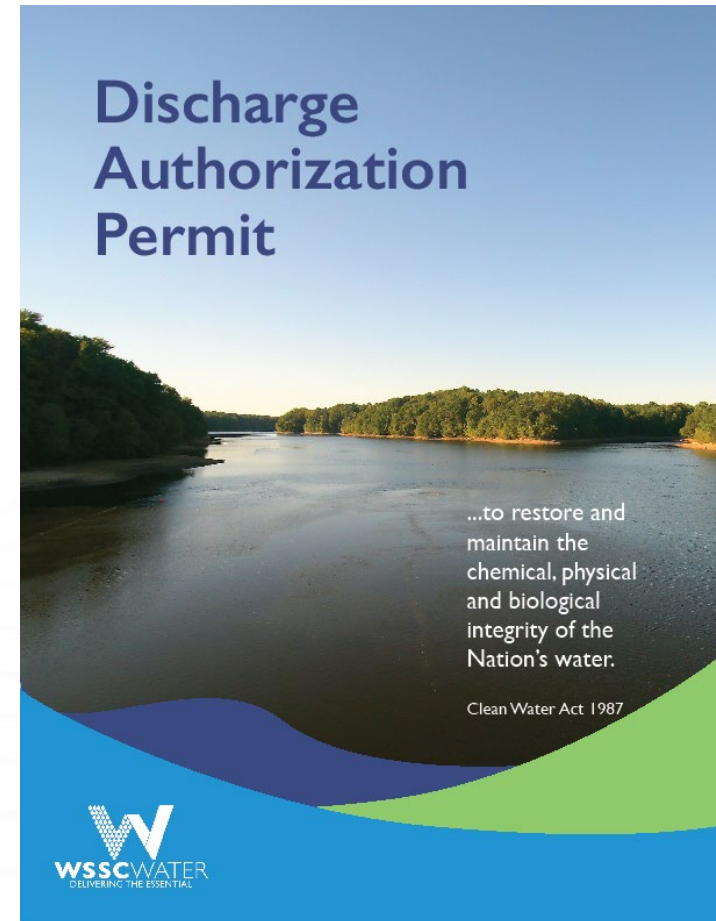
The Rules

- 40 CFR Part 403 -- General Pretreatment Regulations for Existing and New Sources of Pollution
- 40 CFR Part 136 -- Guidelines Establishing Test Procedures for the Analysis of Pollutants
- WSSC Water's 2021 Plumbing & Fuel Gas Code



The Discharge Authorization Permit

- All required parameters shall be monitored/sampled on the same day (Generally Section II.A, Footnote 1)
- pH Reporting (Generally Section II.A, Footnote 3)
- Minimum Laboratory Reporting Requirements (Generally Section II.C or D)
- Special Reporting Requirements (Generally Section II.C)



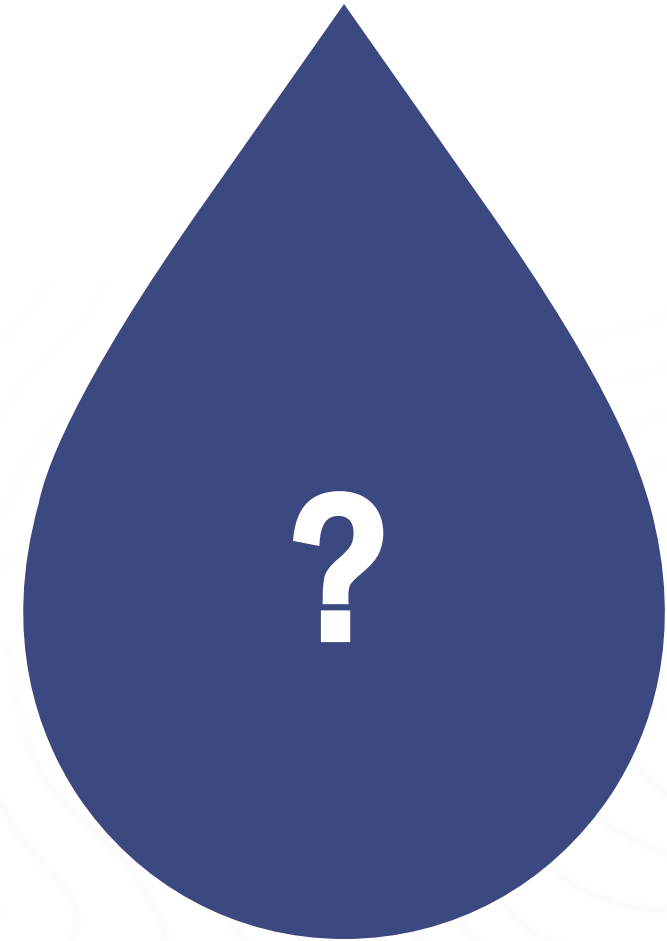


Your Assigned Industrial Investigator



Reporting Requirements - Question #1

Who is your “Partner in Compliance”?





Your Assigned Industrial Investigator



PCRs – Minimum Laboratory Reporting Requirements

(Generally Section II.C or D)

- Specific sampling location (IWMP)
- Specific parameter
- Time(s) of sample collection
- Date of sample collection
- Preservation techniques
- Analytical Method
- Completed Chain of Custody



PCR Common Problems

- Data entry
- pH Minimum and Maximum values
- Date(s)
- Signature
 - Missing
 - Not Original
 - Someone other than Authorized Representative or Designated Authorized Representative
- Problem Occurred

Compliance Reports

Compliance Report submitted as required by:	<input checked="" type="checkbox"/> NOV IDC- 6910 _____	<input type="checkbox"/> Agreement/Compliance schedule issued on: _____
	<input type="checkbox"/> Directive Issued on: _____	<input type="checkbox"/> SNC letter requiring monitoring issued on: _____
	<input type="checkbox"/> Other: _____	

- Compliance Reports certify resample results required by an enforcement action.
- Include the NOV or other Reference the results are in response to
 - For an initial notification (becoming aware of the violation), you will check the Box for OTHER and enter the date you became aware of the violation
 - Resamples required by an NOV, check the box for “NOV IDC” and write in the four digit NOV number.
 - Resamples required by Directive have an option box, again enter the date of issuance.
 - Anything else that isn’t captured, use OTHER and write in the action and date of issuance (example SNC 9/30/1921).
- Only include parameters that are in violation or that were required to be resampled



Industry Detected Parameter Violations (Section II.B)

- **Must Notify WSSC** of the violation within **24-hours** of becoming aware of the violation.
 - DO NOT Delay this Reporting
- **Within 7 days** the IU must submit a CR with the following:
 - a copy of the analytical data associated with the violation,
 - a copy of the chain of custody, and
 - an original signature and date.
- **Within 30 days** of becoming aware of the violation the IU must resample for the parameter in violation and submit a CR along with the required data.



Notification of Changed Discharge (Section I.B.17)

- Production shifts
- Chemical changes
- New processes
- Increase/decrease in wastewater flow
- Shutdowns

30 DAYS PRIOR TO IMPLEMENTATION!

Planned, predicted, or unexpected, all changes need to be provided to IDC Program, as soon as possible, as changes occur, or in general practice 30-days prior to implementation.



WSSCs Annual Compliance Effort

27%
2022

In 2022, IDC invested our resources in the enforcement of 81 total violation events. 22 of those events were for Reporting Noncompliance.





WSSCs Annual Compliance Effort

2022 BREAKDOWN

Failure to submit a complete PCR or CR:

15

Failure to submit a PCR or CR by the due date:

5

Failure to notify WSSC within 24-hours of becoming aware of a violation:

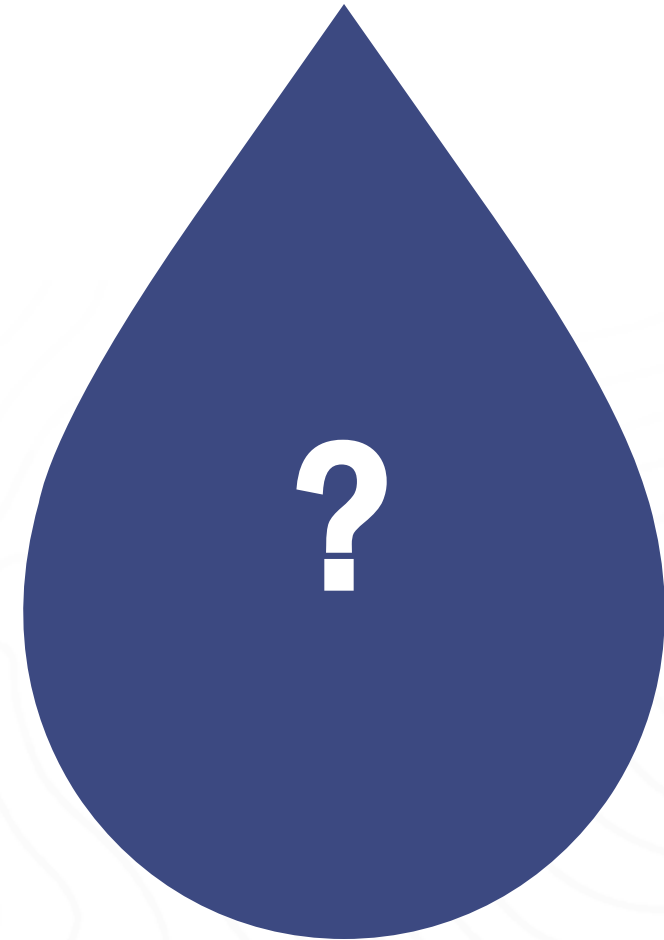
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Reporting Requirements - Question #2



How long do you have to notify WSSC when becoming aware of a violation?





Reporting Requirements - Question #2



You have 24-Hours to report violations after becoming aware.





Questions?

