



## **Reporting Requirements**

Presenter Name, Theresa Haas

March 30, 2023



## 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



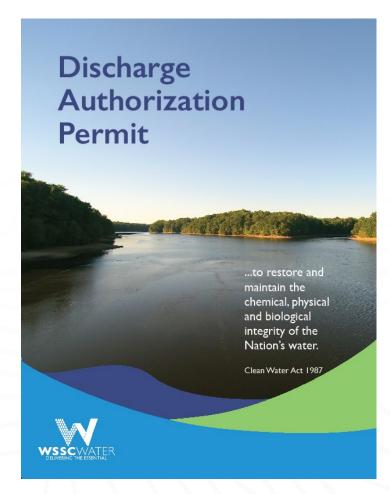
## **The Rules**

- 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 I)
- 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)









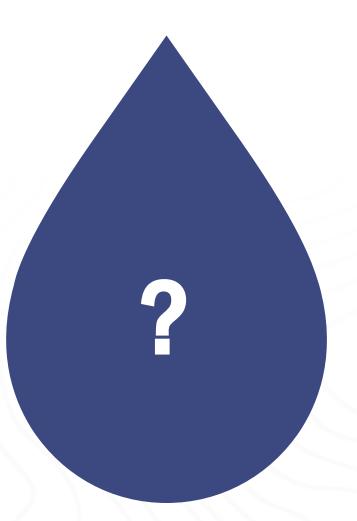
## Your Assigned Industrial Investigator

## **Reporting Requirements - Question #I**



Who is your "Partner in Compliance"?

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## Your Assigned Industrial Investigator



### Understanding Periodic Compliance Reports (PCR)

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INDUSTRIAL DISCHARGE CONTROL PROGRAM PERIODIC COMPLIANCE REPORT

Complete the following information; incomplete reports will be addressed with enforcement action. Attach laboratory data with <u>Minimum Laboratory Reporting Requirements</u> (Section II.D. of your WSSC Permit) and applicable extitisation statements.



Are all results compliant with effluent limits? Yes No

If No, are additional operation and maintenance and/or additional pretreatment required for you to meet the pretreatment standards and requirements? Yes No

Parameter	Effluent Limit (mg/l)		Analytical	No. of Results	Violations				
	Dally <sup>(1)</sup>	/	11	11	11	11	Method	Over Limit	Use Only)
Cadmium (T)	0.07								
Copper (T)	2.3								
.ead (T)	1.0								
lickel (T)	2.2		-	· II ·			• .•		. (
Silver (T)	1.3			<del>ill in</del>	app	ropi	riatio	n a	ate(
Zinc (T)	3.4								
ndustry Com	ment/Changes/N	otifications:	I	1	I	I	I	1	
lumeric value	s must be submitt	ed for all anai	,			mit, indicate	the numeric o	letection I	imit.
Report is:		On Time		or WSSC Use ( ays Late	Dniy Incomplet			Compila	
Violations reported within 24-hours of discovery?						e □ ₩/			
Violations resampled within 30 days?									
Comments:									
	rint Name):						Date:		
Reviewed by (P	in the manual sector								

				RFP	

Industrial User

Reporting Period

0.4	Permit	

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October Thru

Sample Information (Continue

Quarter: (Check One)

Parameter	Effluent Limit (mg/l) Dally <sup>(1)</sup>		Indicate Sa in mg/l	Analytical Method	No. of Results Over	Violations (WSSC			
		11	1.1	11	11	11	Method	Limit	Use Only)
pH Minimum <sup>(2)</sup>	6.0 standard units								
pH Maximum <sup>(2)</sup>	10.0 standard units								
Total Composite Volume									
Flow (gpd)									
Time: Start:									
Stop:									

Numeric values must be submitted for all analyses. If values are below detection limit, indicate the numeric detection limit.

Daily Maximum
 Report all pH standard unit readings to one decimal place

GREASE TRAP AND OIL/WATER SEPARATOR SERVICE LOG							
Building	Number Of Tanks/Volume	System Type (GT, O/W, GRD, INT)	Location	Cleaning Frequency	Cleaning/Pump Out Dates	Waste Hauler	Waste Disposal Location
	1						
LEGEND GT – Grease O/W – Oil/Wa	Trap ater Separator	GRD – Grease INT – Grease Ir		ce (i.e. RENN, GI	(&L, etc.)		
Lootity under non-tilv of two itselfair document and all attachments ware present under my disolition or superdelen in accordance with a surfam							

I cettry, under penary or aw, that this obcument and all adactments were prepared under my direction of supervision in accordance with a system designed to assure that qualified personnel property gather and evaluate the information submitted is. Such exist on my injury of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, but he sets of the injury of the aperson or persons who belieft, thus, accurate, and complete - I and aware that there are significant penalties for submitting take information, including the possibility of the and imprisonment for knowing violations. Authorized Recresentative Finited Name Date

MAIL COMPLETED REPORT TO: Washington Suburban Sanitary Commission Regulatory Services Division Industrial Discharge Control Section 14501 Sweitzer Lane, 11<sup>®</sup> Floor Lauret, MD 20707

Needs to be signed and dated



#### 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
  - o Missing
  - Not Original
  - Someone other than Authorized Representative or Designated Authorized Representative
- Problem Occurred





Compliance Report submitted as required by:	NOV IDC- <u>6910</u> Directive Issued on:      Other:	Agreement/Compliance schedule issued on:
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- 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)



- <u>Must Notify WSSC</u> of the violation within <u>24-hours</u> of becoming aware of the violation.
  - $\odot\,\text{DO}\,\,\text{NOT}$  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

15

Failure to submit a complete PCR or CR:

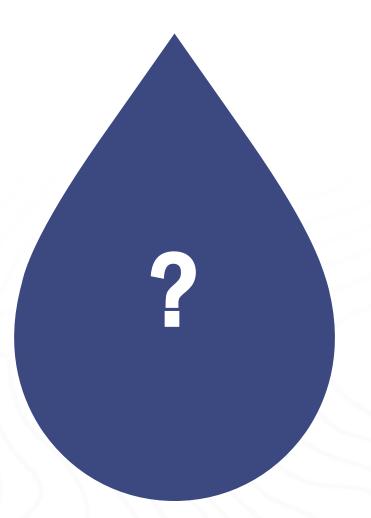
Failure to submit a PCR or CR by the due date:

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



## **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.









