



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Hancock County
City of Findlay
Pretreatment
NPDES Permit

June 23, 2011

Mr. Randy Greeno, Superintendent
Water Pollution Control Center
City of Findlay
1201 South River Road
Findlay, Ohio 45840

Dear Mr. Greeno:

This letter is to document the pretreatment compliance inspection (PCI) that was made of the City's approved pretreatment program on May 25, 2011.

The pretreatment compliance inspection followed a checklist designed to evaluate the major areas of the City's program, a file review, and an inspection of one of the City's industrial users. Our inspection findings and recommendations are summarized below.

The treatment plant does accept septage, but the haulers have to be licensed through the health department and the treatment plant. The hauler must submit a manifest and a sample is collected from each load. All industrial user inspections and sampling requirements are being carried out. Your implementation of Findlay's approved pretreatment program remains satisfactory.

Our completed inspection forms are enclosed for you review. If you have any questions, please contact me at 419-373-3019.

Yours truly,

Michelle Sharp
Environmental Specialist II
Division of Surface Water

//lr

pc: DSW-NWDO File with enclosure
Ryan Laake, CO, DSW, w/enclosure



PRETREATMENT INSPECTION REPORT

Ohio Environmental Protection Agency

FACILITY NAME City of Findlay WWTP		PERMIT NUMBER 2PD00008	FACILITY NUMBER OH0025135
INSPECTION TYPE C	INSPECTOR Sharp	FACILITY TYPE 1	DATE CONDUCTED May 25, 2011

GENERAL INFORMATION
NAME AND LOCATION OF FACILITY <i>City of Findlay WWTP 1201 South River Road Findlay, Ohio 45840</i>
MAILING ADDRESS OF FACILITY <i>City of Findlay WWTP 1201 South River Road Findlay, Ohio 45840</i>
CONTACT (NAME/TITLE/PHONE) <i>Randy Greeno / WWTP Superintendent / 419-424-7187</i>

FACILITY EVALUATION												
(S = Satisfactory, M = Marginal, U = Unsatisfactory)												
<table border="1" style="width: 100%; height: 60px;"> <tr><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td><td style="width: 50px; height: 20px;"></td><td style="width: 400px;"></td></tr> <tr><td style="height: 20px;"></td><td></td><td style="height: 20px;"></td><td></td></tr> <tr><td style="height: 20px;"></td><td></td><td style="height: 20px;"></td><td></td></tr> </table>												
* See inspection letter												

Names(s) and Signature(s) of Inspector(s) <i>Michelle Sharp</i> Michelle Sharp	Agency / Office / Telephone Ohio EPA / NWDO / 419-373-3019	Date <i>6/24/11</i>
Signature of Reviewer <i>Elizabeth Wick</i> Elizabeth Wick	Ohio EPA / NWDO / 419-373-3002	Date <i>6/17/11</i>

POTW PRETREATMENT COMPLIANCE CHECKLIST

PCI CHECKLIST CONTENTS

Cover Page and Acronym List

Section I IU File Evaluation
 Section II Supplemental Data Review/Interview
 Section III Evaluation and Summary (Optional)

Attachment A Pre-Inspection Checklist

Attachment B Pretreatment Program Profile

Attachment C Worksheets

WENDB/ RNC Worksheet

IU Site Visit Report Form (Optional)

File Review Worksheets (Optional)

Attachment D Supporting Documentation

Control Authority (CA) name and address	Date(s) of PCI
<i>City of Findlay 1201 South River Road Findlay, Ohio 45840</i>	<i>5-25-11</i>

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number
<i>Michelle Sharp</i>	<i>ESII/Ohio EPA</i>	<i>419-373-3019</i>

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
<i>Randy Greeno</i>	<i>Superintendent/Findlay WWTP</i>	<i>419-424-7187</i>
<i>David Beach</i>	<i>Assistant Superintendent/Findlay WWTP</i>	<i>419-424-7187</i>

ACRONYM LIST

Acronym	Term
AO	Administrative Order
BMP	Best Management Practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally Different Factors
FTE	Full-Time Equivalent
FWA	Flow-Weighted Average
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not Applicable
ND	Not Determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total Toxic Organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE 1 Industry name and address
Whirlpool
4901 N. Main Street
Findlay, Ohio 45840

Type of industry
Metal Finishing

IU CLASSIFICATION BY CA:
 Categorical SIU - 40 CFR 433, 15
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd) 258,681	Average process flow (gpd) 164,000
Industry visited during PCI? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

COMPLIANCE STATUS

SNC (period: _____) Noncompliance/corrected Noncompliance/continuing In compliance

EXPLANATION:
 Comments

FILE ____ Industry name and address

Type of industry

IU CLASSIFICATION BY CA:
 Categorical SIU - 40 CFR _____, _____
 Category(ies) _____
 Non-categorical SIU Non SIU

Average total flow (gpd)	Average process flow (gpd)
Industry visited during PCI? Yes <input type="checkbox"/> No <input type="checkbox"/>	

COMPLIANCE STATUS

SNC (period: _____) Noncompliance/corrected Noncompliance/continuing In compliance

EXPLANATION:
 Comments

General Comments

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDARDS	
x					1. Proper IU categorization (sig. cat., sig. non-cat, non-sig.)	403.8(f)(1)(ii)
x					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
x					a. Proper classification by category/subcategory	
x					b. Proper classification as new/existing source	
x					c. Proper application of limits for all regulated pollutants	
NA					d. Proper calculation and application of production-based standards	403.6(c)
NA					e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
x					3. Application of local limits	
x					4. Application of most stringent limits	403.8(f)(1)(ii)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
x					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
x					2. Control mechanism contents	403.8(f)(1)(iii)
x					a. Statement of duration (<5 years)	
x					b. Statement of nontransferability w/o prior notification	
x					c. Listing of applicable effluent limits (local, categorical standards)	
x					d. Selfmonitoring requirements	
x					i. Identification of pollutants to be monitored	
x					ii. Sampling frequency	
x					iii. Sampling at locations/discharge points adequately defined	
x					iv. Appropriate sample types (grab or composite)	
x					v. Reporting requirements	
x					vi. Record-keeping requirements (3 years minimum)	
x					e. Statement of applicable civil and criminal penalties	
NA					f. Compliance schedules	
x					g. Requirement to notify CA of slug loadings	
x					h. Requirement to notify CA of spills, bypasses, upsets, etc.	
x					i. Requirement to notify CA of significant change in discharge	
x					j. 24-hour notification of violation/resample requirement	

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
C. CA APPLICATION OF IU PRETREATMENT STANDARDS						
<i>x</i>					1. Proper IU categorization (sig. cat., sig. non-cat, non-sig.)	403.8(f)(1)(ii)
<i>x</i>					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
<i>x</i>					a. Proper classification by category/subcategory	
<i>x</i>					b. Proper classification as new/existing source	
<i>x</i>					c. Proper application of limits for all regulated pollutants	
<i>NA</i>					d. Proper calculation and application of production-based standards	403.6(c)
<i>NA</i>					e. Proper calculations and application of CWF or FWA	403.6(d)&(e)
<i>x</i>					3. Application of local limits	
<i>x</i>					4. Application of most stringent limits	403.8(f)(1)(ii)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File <i>1</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	403.8(f)(1)(iii)(D)
x					1. Sampled at frequency specified in approved	
x					2. Documentation of sampling activities (especially chain of custody)	3745-3-03(C)(2)(f)
x					3. Sampled all parameters for which local or categorical limits applied	
x					4. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	403.8(f)(2)(v)
x					1. Inspected at frequency specified in approved program	
x					2. Documentation of inspection activities	403.8(f)(2)(vi)
x					3. Evaluated need for slug discharge control plan at least every two years	403.8(f)(2)(v)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
E. CA ENFORCEMENT ACTIVITIES						
<i>NA</i>					1. Response to violations	403.8(f)(2)(vi)
<i>NA</i>					a. Discharge violations	
<i>NA</i>					b. Monitoring/reporting violations	
<i>NA</i>					c. Compliance schedule violations	
<i>NA</i>					2. Proper calculation of SNC	403.8(f)(2)(vii)
<i>NA</i>					a. Chronic	
<i>NA</i>					b. TRC	
<i>NA</i>					c. Pass-through/interference caused by spill or slug discharge	
<i>NA</i>					d. Reporting requirements	
<i>NA</i>					3. Publication for SNC	403.8(f)(2)(vii)
<i>NA</i>					4. Adherence to approved ERP	403.8(f)(5)
<i>NA</i>					a. Proper response to violations	
<i>NA</i>					b. Escalation of enforcement	

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File <i>I</i>	File	File	File	File	IU FILE REVIEW	Reg. Cite
F. SELF-MONITORING AND REPORTING						
<i>X</i>					1. Sampled at frequency specified in control mechanism/regulation	403.12(e)&(h)
<i>X</i>					2. TTO Requirements met	
<i>NA</i>					a. TOMP submitted and updated (if applicable)	
<i>X</i>					b. TTO sample results or certification statement submitted as required	
<i>X</i>					3. Timely self-monitoring reports in accordance with control mechanism	403.12(e)&(h)
<i>X</i>					4. Reported for all required pollutants	403.12(g)(1)&(h)
<i>X</i>					5. Signatory/certification of reports in accordance with OAC 3745-3-06 (F)	OAC 3745-3-06 (F)
<i>NA</i>					6. Met compliance schedule milestones by required dates	403.12(c)
<i>NA</i>					7. Immediate notification of slug load discharge or accidental spill to sewer	OAC 3745-3-05
<i>X</i>					8. Notified CA within 24 hours of becoming aware of discharge violations	403.12(g)(2)
<i>x</i>					9. Resampled/reported within 30 days of knowledge of violation	403.12(g)(2)
<i>NA</i>					10. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
<i>NA</i>					11. Notified CA of significant changes in operation or discharge	403.12(j)

Comments:

SECTION I: IU FILE EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments:

SECTION I COMPLETED BY: <i>Michelle Sharp</i>	DATE: <i>June 16, 2011</i>
TITLE: <i>ESII</i>	TELEPHONE: <i>419-373-3019</i>

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. Have you made any changes to the approved program since the last inspection? (Local limits, ERP, SUO, control mechanisms, SIU list, etc.)	Yes	No
	x	

If yes, discuss.
BMP as mercury limit.

2. Have you identified any needed changes? If yes, describe.	Yes	No
		x

B. IU CHARACTERIZATION [403.8(f)(2)(i)&(iii)]

1. How do you identify and characterize new IUs?
(is IWS used?)
Determination is made when the facility files applications/plans.

2. How and when do you identify changes in wastewater discharges at existing IUs
(especially to determine if they need to be classified as a SIUs)
Yearly inspections are completed. Industrial questionnaire is completed every 3 years.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

C. CONTROL MECHANISM EVALUATION [403.8(9)(1)(iii)]

1. How many SIUs are not covered by an existing, unexpired permit or other individual control mechanism? [WENB~NOCM][RNC~I] If any, explain.	0	%								
2. a. How many control mechanisms were allowed to expire prior to reissuance? If any explain.	0									
b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC~II] If any, explain.	0									
c. Do you use an up-to-date IWS or recent discharge application forms prior to permit reissuance?	<table border="1"> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td>x</td> <td></td> </tr> </table>	Yes	No	x		<table border="1"> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td></td> <td></td> </tr> </table>	Yes	No		
Yes	No									
x										
Yes	No									

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS [403.8(f)(1)(iii)]

1. a. How and when do you evaluate SIUs for the need to develop slug control discharge plans?
(check on CA's definition of slug discharge)

If any, explain.

Question in Application

b. How many SIUs were evaluated in the past two years?

All

2. a. Describe any wastes hauled to the POTW.

Leachate from landfill and septage.

b. If any Ius have their wastewater hauled to the POTW, how do you ensure all applicable standards (local and categorical) are met?

NA

c. List IUs that haul their wastewater to the POTW.

NA

E. COMPLIANCE MONITORING

1. In the past 12 months, how many, and what percentage of, SIUs were the following: [403.8(f)(2)(v)][WENDB~NOIN][RNC II]
(Define the 12 month period *May 2010 to May 2011.*)

- a. Not sampled or not inspected at least once [WENB~NOIN]
- b. Not sampled at least once
- c. Not inspected at least once (all parameters)?

0	%
0	%
0	%

If any, explain.

2. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENB~SNIN]

0

If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

I. ENFORCEMENT

1. Which of the following enforcement actions did you use during the past year?

- a. Notice or letter of violation
- b. Administrative Order
- c. Administrative fine
- d. Show cause hearing
- e. Compliance schedule
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of service
- j. Other (specify)

	Yes	No
		X
		X
		X
		X
		X
		X
		X
		X
		X
		NA

Explain if appropriate:

2. Did the treatment plant experience any following during the past year?

- a. Interference
- b. Pass through
- c. Fire or explosions (flashpoint, etc.)
- d. Corrosive structural damage
- e. Flow obstructions
- f. Excessive flow rates
- g. Excessive pollutant concentrations
- h. Heat problems
- i. Interference due to O & G
- j. Toxic fumes
- k. Illicit dumping of hauled wastes
- l. Worker health and safety concerns
- m. Other (specify)

	Yes	No	Explain
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	
		X	

If yes, how did you respond?

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

F. ENFORCEMENT (continued)

3. Were you made aware of any hazardous waste discharges to the POTW? [403.12 (j)&(p)]

Yes	No
	x

G. GENERAL OBSERVATIONS/INFORMATION ENFORCEMENT

Have you had any problems (general or specific) implementing your approved program?

Yes	No
	x

Additional Comments/Observations/Information:

SECTION I COMPLETED BY: <i>Michelle Sharp</i>	DATE: <i>June 16, 2011</i>
TITLE: <i>ESII</i>	TELEPHONE: <i>419-373-3019</i>

SECTION III: EVALUATION AND SUMMARY

Description	Recommended Action	Required Action
A. CA PRETREATMENT PROGRAM MODIFICATION		
• Status of program modifications (Ref. 403.18 /Checklist II.A.1)	<i>None</i>	<i>None</i>
B. LEGAL AUTHORITY		
• Minimum legal authority requirements (Ref. 403.8(f)(1)/Checklist II.B.2)	<i>None</i>	<i>None</i>
• Adequate multi jurisdictional agreements (Ref. 403.8(f)(1)/Checklist II.B.1)	<i>None</i>	<i>None</i>

C. IU CHARACTERIZATION

• Identify and categorize IUs (Ref. 403.8(f)(2)(ii)/Checklist II.C.2)

None

None

D. CONTROL MECHANISM

• Issuance of individual control mechanisms to all SIUs (Ref. 403.8(f)(1)(iii)/
Checklist II.D.1)

None

None

Adequate control mechanisms (Ref. 403.8(f)(1)(iii)/Checklist I.A.4)

None

None

Adequate control of trucked, railed, and dedicated pipe wastes (Ref. 403.5(b)(8)/
Checklist II.D.3&4)

None

None

Description	Recommended Action	Required Action
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> • Appropriately categorize, notify, and apply all applicable pretreatment standards (Ref. 403.8(f)(1)(ii)&(iii); 403.5 /Checklist I.A) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> • Basis and adequacy of local limits (Ref. 403.8(f)(4);122.21(j)/Checklist II.E.2&3) 	<i>None</i>	<i>None</i>
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> • Adequate sampling and inspection frequency (Ref. 403.8(f)(2)(ii)&(v)/Checklist I.B.1&2, II.F.1) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> • Adequate inspections (Ref. 403.8(f)(2)(v)&(vi)/Checklist I.B.1; II.F.1) 	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Adequate sampling protocols and analysis (Ref. 403.8(f)(2)(vi)/Checklist I.B.2;II.F.2,3&4) 	None	None
<ul style="list-style-type: none"> Adequate IU self-monitoring (Ref. 403.8(f)(2)(iv)/Checklist I.C.1.b;I.F) 	None	None
Notification of changed and hazardous waste discharges (Ref. 403.12(j)&(p)/ Checklist I.C.1.b; II.G.1.b)	None	None
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans (Ref. 403.8(f)(2)(v)/Checklist I.B.2.d; II.F.8) 	None	None

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) (Ref. 403.12(g)(1)&(2);403.8(f)(2)(vi)/Checklist I.A.4.d, C.1.b) 	<i>None</i>	<i>None</i>
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of "significant noncompliance" definition (Ref. 403.8(f)(2)(vii) /Checklist I.C.2; II.G.1; Attach B.I.1) 	<i>None</i>	<i>None</i>
Develop and implement an ERP (Ref. 403.8(f)(5)I.C.3;/Checklist II.G.2)	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC (Ref. 403.8(f)(2)(vii)/Checklist I.C.6; II.G.4) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Effective enforcement (Ref. 403.8(f)(1)(iv)(A)/Checklist I.C.1.c, 4&5;II.G.2.c&d, 5&6) 	<i>None</i>	<i>None</i>
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation (Ref. 403.5(c)(3)403.12(o); 403.14/Checklist II.H) 	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
I. RESOURCES		
• Adequate resources (Ref. 403.8(f)(3)/Checklist II.I)	<i>None</i>	<i>None</i>
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
• Understanding of pollutants from all sources (Checklist II.J.1&2)	<i>None</i>	<i>None</i>

Description	Recommended Action	Required Action
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness (Checklist II.J.1) 	<i>None</i>	<i>None</i>
<ul style="list-style-type: none"> Integration of pollution prevention (Checklist II.J.3,4&5) 	<i>None</i>	<i>None</i>
K. ADDITIONAL EVALUATIONS/INFORMATION		

Description	Recommended Action	Required Action

SECTION III COMPLETED BY:	<i>Michelle Sharp</i>	DATE:	<i>June 16, 2011</i>
TITLE:	<i>ESII</i>	TELEPHONE:	<i>419-373-3019</i>

WENDB AND RNC WORKSHEET

FACILITY INFORMATION				
Name <i>City of Findlay WWTP</i>	Date of Inspection : <i>May 25, 2011</i>			
OH Number <i>OH0025135</i>	NPDES Number <i>2PD00008</i>			
I. WENDB DATA ENTRY WORKSHEET				
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.				
	Data	Checklist Reference		PCS Code
		PCI	AUDIT	
Number of SIUs	<i>8</i>	Annual	Annual	SIUS
Number of CIUs	<i>6</i>	Annual	Annual	CIUS
Number of SIUs without Control Mechanisms	-	II.C.1	II.D.1.a	NOCM
Number of SIUs not inspected or sampled	-	II.F.1.a	II.F.1.a	NOIN
Number of SIUs in SNC with standards or reporting	-			PSNC
Number of SIUs in SNC with self-monitoring	-			MSNC
Number of SIUs in SNC with self-monitoring and not inspected or sampled	-	II.E.2	II.F.1.d	SNIN
Date NPDES Permit modified to include pretreatment requirements (Audit)	-			
Technical Evaluation of Local Limits (Y/N) (Audit)	-			
Adoption of technically-based limits (Y/N) (Audit)	-			

II. RNC/SNC WORKSHEET				
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC				
	RNC	Level	Reference	
			PCI	Audit
- Failure to enforce against pass through and/or interference	<input type="checkbox"/>	I		
- Failure to submit required reports within 30 days	<input type="checkbox"/>	I		
- Failure to meet compliance schedule milestone date within 90 days	<input type="checkbox"/>	I		
- Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	<input type="checkbox"/>	II	II.C.2.b	II.D.1.b
- Failure to inspect or sample 80% of SIUs within the last 12 months	<input type="checkbox"/>	II	II.E.1	II.F.1
- Failure to enforce pretreatment standards and reporting requirements	<input type="checkbox"/>	II		I.C.1
- Other (specify)	<input type="checkbox"/>	II		
SNC				
- Control Authority in SNC for violation of any Level I criterion	<input type="checkbox"/>			
- Control Authority in SNC for violation of two or more Level II criterion	<input type="checkbox"/>			