Industrial Pretreatment Program Procedures Manual

GLWA
Great Lakes Water Authority

October 6, 2022

The GLWA has developed the following procedures to identify Industrial Users which may be subject to the GLWA Pretreatment Program and comply with the requirements of the General Pretreatment Regulations (40 CFR Part 403) and Michigan Part 23 Rules (R323.2306).

Program Commitments – Source Identification and Information Management:

GLWA's Industrial Pretreatment Program makes the following commitments:

- GLWA will continue efforts to identify and locate Industrial Users that may be subject to the GLWA Pretreatment Program.
- GLWA will collect and maintain information on identified Industrial Users, that includes but is not limited to, industry name, address, survey date, wastewater volume and character, facility status, and permit status, and maintain this information as a compilation, index and inventory of these Industrial Users.
- GLWA will notify new Industrial Users of applicable Pretreatment Standards; requirements under sections 204(b) and 405 of the (Clean Water) Act; and subtitles C and D of RCRA (Resource Conservation and Recovery Act).
- Industrial Users who fail to report will be identified and addressed in accordance with the Enforcement Response Guide, See Chapter VI.

Source Identification, Information and Management Procedures

GLWA's program is based upon the work, records and information previously collected by DWSD. This work includes paper and digital records which GLWA will continue to maintain in accordance with recordkeeping requirements.

1.0 Industrial User Identification Requirements

The Industrial Users who may be *subject to the GLWA Pretreatment Program* are generally understood to include those "… ***industries identified in the Standard Industrial Classification Manual,Bureau of the Budget, 1967, as amended and supplemented, under the category of "Division D - Manufacturing" and such other classes of significant waste producers as,by regulation, the Administrator deems appropriate."*** **33 USC 1362 (18)".** The objective of the GLWA Survey Process is to classify these Industrial Users as (i) Significant Industrial Users[1], both those subject to one or more of the National

[1] "**Significant Industrial User**" means any User who discharges to the POTW and which:

(1) Has an average discharge flow of twenty-five thousand (25,000) gallons per day or more of processwastewater excluding sanitary, boiler blowdown, and noncontact cooling water; or
(2) Has discharges subject to the national categorical pretreatment standards; or

(3) Requires pretreatment to comply with the specific pollutant limitations of these Rules; or

Categorical Pretreatment Standards as well as those meeting one or more of the six (6) criteria specified in the Significant Industrial User (SIU) definition; and (ii) all other Industrial Users.

The survey process includes Industrial User who self-identify (see method 1 below) or are identified by GLWA (method 2).

Method 1: Industrial User Responsibilities

In accordance with GLWA's Rules, Industrial Users have an obligation to seek authorization from GLWA for any Sewage, Industrial Wastes, or other wastes or Wastewater discharged to the Sewerage System. Industrial Users who are subject to the National Categorical Pretreatment Standards or meet one or more of the criteria for a Significant Industrial User (SIU) are required to provide a complete Baseline Monitoring Report (BMR) or Permit Application in accordance with applicable federal regulation and/or GLWA rule. All other Industrial Users are required to provide a survey application or equivalent information so as to be authorized as a Minor Industrial User.

Method 2: GLWA Identification

Unless an Industrial User is expected to be regulated as an SIU, GLWA's survey process uses a survey application to obtain basic information about an Industrial User and determine whether the Industrial User may be subject to the GLWA Pretreatment Program. In addition to the survey application, additional information may be necessary; and obtained through other means, i.e. telephone contacts or field visits. The procedure is more fully described in section 2.0 below.

GLWA will document and maintain the basic information provided by the Industrial User, which includes the industry name, address, survey date, wastewater volume and character, facility status, and permit status and may include additional information necessary to classify an Industrial User as a ***Minor User,*** a ***Significant Industrial User***, or a ***Significant Categorical Industrial User.***

Whether self-reported or identified by GLWA, the information provided and/or collected

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(4) Has in its discharge, toxic pollutants as defined pursuant to 33 U.S.C. 1317, or other applicable federaland state laws or regulations, that are in concentrations and volumes which are subject to regulation underthese Rules as determined by the Control Authority; or

(5) Is required to obtain a permit for the treatment, storage or disposal of hazardous waste pursuant to regulations adopted by this state or adopted under the Federal Solid Waste Disposal Act, as amended by the Federal Resource Conservation and Recovery Act, as amended, and may or does contribute or allow waste or wastewater into the POTW including, but not limited to, leachate or runoff; or

(6) Is found by the GLWA to have a reasonable potential for adverse effect, either singly or in combination with other contributing industries, on the POTW operation, the quality of sludge, the POTW's effluent quality, or air emission generated by the POTW.

is maintained as an ongoing inventory of Industrial and Commercial dischargers which may be subject to the Pretreatment Program.

2.0 Preparing for the Survey Process and Initial Notice

The GLWA generally conducts the Survey Process by focusing on a specific area or community and may also organize its approach by using Zip Codes where a larger community includes multiple ZipCodes. Industrial Users within the area are identified by consulting a variety of resources that includes but is not limited to the following:

- Information from business and telephone directories.
- Information on non-residential User Accounts received from the Constituent municipalities.
- Field observations by regulatory personnel
- Business associations lists.
- **Previous** Survey and/or Permit Applications.
- Internet **and Google** searches

GLWA will develop a preliminary Survey list of Industrial Users identified by the forgoing sources and make the following evaluations and determinations.

- The preliminary Survey list is cross referenced against the existing Inventory of Users (if available), including those with and without a Wastewater Discharge Permit.
- The preliminary Survey list will note those facilities that are abandoned or closed
- Where we find a facility with an effective Wastewater Discharge Permit, no further information will be requested through the survey process.
- Where we find an active facility and the nature of operations can be determined, the list will classify the Industrial User as "not subject to the pretreatment program" (e.g., state office). A written response is sent to the facility classifying as a Minor Industrial User.
- Where we find an active facility and the nature of operations cannot be immediately determined, we need to obtain additional information to assess the business and wastewater discharge and classify the facility. A survey application will be mailed. (Note: At the discretion of the GLWA, a second mailing may be made to delinquent respondents.)

  Upon receiving the completed survey form, the responses are noted and processed. If based on the survey information, GLWA determines that the nature of the operation is as "not subject to the pretreatment program", the User is classified as a Minor User. If based on the survey information, GLWA determines that the nature of the operation may be "subject to the pretreatment program", a Permit Application is mailed. If a determination cannot be made, or where the information

is incomplete or non-responsive, plans are made to conduct field observations and follow-up (see Survey Process 2.1).

2.1 Survey Process – Field Observations

The preliminary step of the Field Observation activity involves performing an initial drive-through of the area to observe the location of businesses and Industrial User activities for comparison to the preliminary Survey Process list. Non-manufacturing facilities and facilities whose business activity(ies) are not expected to include the discharge of pollutant bearing process wastewater will be recorded and noted without further action, other than receiving a written Minor User notice.

The next step is to begin methodically visiting facilities to assess their industry and process operations and collect additional information about their wastewater discharge. The GLWA's representative will solicit information consistent with the Survey form to assess the facility. Where the GLWA believes that the Industrial User's industry and discharge activities are likely to result in a Wastewater Discharge Permit or alternate Control Mechanism, a Permit Application form is left with instructions for completion. The GLWA follows up on any such applications to ensure submittal, and upon receipt, evaluates the Permit Application.

Where the information provided by the Industrial User results in the belief that it is a Minor User, the User is classified as such, and the information is used to process a Minor Discharge Letter (See section 5.0 below). Upon completion of the field investigation, records are updated, and the survey is deemed complete.

2.2 Classification of Industrial Users

Based on the survey process the completed survey form, field investigation report or permit application is used to classify the Industrial User.

- An Industrial User is classified as a Minor User where the GLWA determines that there is no *potential* for classification as an SIU. Users receive written notice of the determination and of applicable pretreatment Standards, and requirements under RCRA.

- If an Industrial User cannot be classified as a Minor User based upon the survey application, a permit application will be mailed. Upon return, the permit application will be reviewed and GLWA will determine whether a permit is required. If yes, then the permit application is scheduled for a Baseline Inspection and permit processing. Otherwise, the Industrial User is classified as a Minor User.

  GLWA staff may consult, as appropriate, EPA development documents for industrial categories, GLWA management or senior staff or contact US EPA where guidance is deemed necessary for atypical or unfamiliar operations.

- Where a permit application had been previously mailed, the permit application will be reviewed and GLWA will determine whether a permit is required. If yes, then the

permit application is scheduled for a Baseline Inspection and permit processing. Otherwise, the Industrial User is classified as a Minor User.

- Where GLWA believes that an Industrial User is regulated under a National Categorical Pretreatment Standard, it will require the Industrial User to satisfy the Baseline Monitoring Report using either the permit application form or submission with the required information. Upon receipt of the completed BMR, GLWA will schedule a Baseline Inspection and process the permit.

3.0 Notification Requirements

The Minor User classification letter is also used to notify Industrial Users of the following:

- GLWA Rules
- General Pollutant Prohibitions (See 40 CFR 403.5(a))
- Specific Pollutant Prohibitions (See 40 CFR 403.5(b))
- Local Pollutant Discharge Limitations
- RCRA Subpart C Requirements – that "…*any person who generates, transports, or recyclesregulated wastes or who owns or operates a facility for the treatment, storage, or disposalof regulated wastes to notify the U.S. Environmental Protection Agency (EPA) of their activities, including the location and general description of the activities and the regulatedwastes handled*…"
- RCRA Subpart D Requirements – that there are nonhazardous solid waste reporting requirements.
- GLWA – IWC web page

4.0 Enforcement

Users who fail to respond to any survey, permit application or BMR request from the GLWA or who are otherwise in noncompliance with existing federal, State or local limitations and requirements, will be addressed through the Enforcement Response Plan and Enforcement Procedures.

5.0 Forms and Documents

Sample Forms and Documents are included in Appendix A, attached to these procedures. Additional forms and documents may be developed as needed, or to replace these forms as deemed necessary by the GLWA. The table below identifies the key *Forms and Documents* for this chapter.

Table 1 - Key Forms and Documents: Source Identification, Information and Management Procedures

Form or Document Name	Description	Appendix Reference/Form #
Survey Application Form	Document to collect basic facility information re: Name, Business, Raw Materials/Chemicals	CI – Form 1
Permit Application	Document to collect facility information to classify a User as a Categorical SIU, SIU or not an SIU	CI – Form 2
Field Survey Form	Document to record facility information collected during field site visit	CI – Form 3

Minor User Classification Letter	Form Document to address compliance requirements, RCRA requirements and other information	CI – Form 4
Transmittal Letter to Submit Permit Application	Form Document to request completion of application necessary for classification of User	CI – Form 5
Transmittal Letter to Submit Survey Application	Form Document to request completion of application necessary for classification of User	CI – Form 6
Notice of Violation	Form Document to notify User of (i) failure to submit, (ii) deficient submittal, or other issue	CI – Form 7

The GLWA has developed the following procedures to develop and process wastewater discharge permits or equivalent control mechanisms and comply with the requirements of the General Pretreatment Regulations (40 CFR Part 403) and Michigan Part 23 Rules (R323.2306).

Program Commitments – Permits and Control Mechanisms

GLWA's Industrial Pretreatment Program makes the following commitments:

- GLWA will use, as appropriate, the Baseline Monitoring Report, Permit application or re-application form, to develop the Significant Industrial User control mechanism.
- GLWA will authorize the discharge of Sewage, Industrial Wastes, or other wastes or Wastewater discharged to the Sewerage System from Industrial Users using the following control mechanism types:
    - Minor Users – authorization through Minor User Classification Letter and GLWA rules, as amended.
    - Significant Industrial Users – authorization through a Wastewater Discharge Permit, Administrative or Judicial Order.
- GLWA will require that Significant Industrial User control mechanisms include the following minimum components:
    - Statement of Duration (but will not exceed five years),
    - Statement of non-transferability without prior notification to GLWA and providing a copy of the control mechanism to the new owner or operator,
    - Include applicable categorical pretreatment standards, specific local pollutant discharge limits, general pretreatment requirements, or other applicable requirements of federal, State and local law,
    - Include applicable self-monitoring, sampling, reporting, notification and record-keeping requirements, identification of pollutants to be monitored, sampling location frequency and type.
    - Statement of applicable civil and criminal penalties for violating Pretreatment Standards and compliance schedules.
    - Require slug discharge controls if required.
- GLWA will enforce the terms of a final Significant Industrial User control mechanisms, in accordance with the Enforcement Response Guide. See Chapter VI.

1.0 Duty to Apply

As discussed in Chapter I, Industrial Users have an obligation to seek authorization from GLWA for any Sewage, Industrial Wastes, or other wastes or Wastewater

discharged to the Sewerage System using, as appropriate, a Baseline Monitoring Report (BMR) for Users subject to National Categorical Pretreatment Standards or Permit Application (or re-application). GLWA may independently require an Industrial User to file, as appropriate, a Baseline Monitoring Report (BMR) for Users subject to National Categorical Pretreatment Standards or Permit Application (or re-application). Information collected from these materials will be used to (i) determine whether the Industrial User is an SIU, and (ii) prepare the appropriate control mechanism (hereinafter "permit").

2.0 Wastewater Discharge Permit or Other Control Mechanism

A Wastewater Discharge Permit is issued by the GLWA to control the contributions of pollutants to the POTW and states the conditions necessary for enforceable conditions as required by 40 CFR 403.8(f)(1) (iii)(B)(1) – (6). On occasion, the GLWA may determine that an alternative Control Mechanism is preferred or otherwise warranted based on the *Totality of the Circumstances*. Such alternative is generally an Administrative Order or Judicial Order. In any event, there must be a written document intended to provide an enforceable basis to regulate the discharge of wastewater from the Significant Industrial User.

3.0 BMR or Permit Application Review and Evaluation

GLWA will use the Baseline Monitoring Report or Permit Applications or Re-application as the basis for developing a permit. The procedure for reviewing and evaluating a Baseline Monitoring Report or Permit (re-)Application is essentially the same with noted exceptions described below.

Step 1: Baseline Monitoring Reports - Users who perform one or more operations described by a federal Categorical Pretreatment Standard are required to submit a Baseline Monitoring Report (BMR)[1] meeting the requirements of 40 CFR 403.12(b). GLWA may also require a User it reasonably suspects of performing one or more operations described by a federal Categorical Pretreatment Standard are required to submit a Baseline Monitoring Report meeting the requirements of 40 CFR 403.12(b). Upon receipt of the BMR, GLWA will review it for completeness and compliance with 40 CFR 403.12(b).

Step 2: Permit Applications or Re-application – The application form will be reviewed for completeness. Where complete, the Pretreatment Engineer will schedule a Baseline Inspection. Where it is incomplete, a written notice will be sent to the Industrial User requesting the supplemental or

[1] The BMR requirements do not need to follow a specific report document format. It should be noted that use of the GLWA Permit Application can be used as long as all requirements of 40 CFR 403.12(b) are included.

missing information. A Baseline Inspection will be scheduled.

Step 3: Baseline Inspection – When a Baseline Inspection is scheduled, the Pretreatment Engineer will arrive on-site to verify information contained in the BMR or application and confirm physical attributes, location of chemicals and materials, treatment (if any) and the availability of a monitoring location. Where a proposed monitoring location is unacceptable, the Industrial User will be required to provide a suitable sampling location for the collection of representative samples. The Baseline Inspection is documented in writing and filed.

Step 4: Draft Wastewater Discharge Permit – After the Baseline Inspection, a Draft permit will be developed as follows:

a. If the User is a CSIU, they consult the National Categorical Pretreatment Standard(s) and associated sub-categories and develop a Permit Definition statement identifying applicable classification and categories and documenting stream combinations of regulated, unregulated and dilution for inclusion in determining applicable Categorical Limitations.
b. If the User is a SIU, they consult the GLWA Rules and develop a Permit Definition statement identifying applicable classification and document stream combinations of regulated, unregulated and dilution for inclusion in determining applicable limitations.
c. In combination with the User, identify a Sampling and Monitoring location(s) for obtaining representative samples, and sample collection methods using flow or time-based sampling.
d. A determination of self-monitoring frequency and reporting and requirements. [See discussion in Chapter 3]
e. Identify whether additional construction is required, eg. monitoring facilities, treatment facilities, pH continuous monitoring, etc..
f. Identify other requirements, that include slug or spill prevention plans, requirements for pH monitoring, flammability or combustion monitoring, Source Control BMPs for Mercury, PCB or PFAS, or other contaminants and pollutants. Additionally, inclusion in non-IPP programs, eg., Surcharge program and any other requirements deemed necessary to regulate the discharge of the facility.

4.0 Wastewater Discharge Permit Process

Once a User is classified as a Significant Industrial User, the GLWA will develop and prepare a Draft Wastewater Discharge Permit and denote it as a "Draft". The basis of any permit issued bythe GLWA will be based on the information provided in a permit application or re-application, or Baseline Monitoring Report; or

information obtained by GLWA through an inspection. The Draft Wastewater Discharge Permit will include applicable local Pretreatment Standards and Requirements; applicable requirements from the Categorical Pretreatment Standards; and other requirements from 40 CFR 403 or applicable state or local law; and include a brief description andclassification of the User (a.k.a. Permit Definition).

The User shall have 30 days to comment on the Draft permit document. Comments for issues suchas typographical errors or omissions will be corrected. All other comments will be addressed in writing by the GLWA either accepting or rejecting the comment(s) and providing a brief explanation of reasons thereof. After 30 days pass without receipt of comments, or upon resolutionof any comments raised, a Final Wastewater Discharge Permit will be issued based upon the disposition of the GLWA.

After the GLWA issues a Final Wastewater Discharge Permit, Users will have twenty (20) days to file a request for reconsideration or appeal in accordance with applicable law. If no appeal is filed, the permit will be considered final as issued.
A copy of the signed permit is placed in the industrial user's file. The original document along with any necessary reporting forms (SMR's, TTO certification forms, production reports, NSCIU exemption statements, etc) are sent via certified mail to the industrial user. All pertinent permit data, effective and expiration dates, parameters and limitations, and reporting requirements are entered into the Linko database.

5.0 Permit Re-application

An existing permittee shall apply for permit reissuance a minimum of 90 days before the expirationof the current permit. The existing permit for a Significant Industrial User, who timely submits an application for permit reissuance to the GLWA, shall be automatically extended until a final permitis issued. Where an application is untimely, authorization may be granted under an Administrative Order at the discretion of the GLWA.

6.0 Permit Modification

Wastewater Discharge Permits are issued for a term of one to five years and may be modified bythe GLWA based on changes provided by the User or discovered by the GLWA. No permit will be modified or changed until the change(s) are confirmed. No permit will be considered effectiveuntil issued as final. The change process will generally follow the process described in 4.0 above by issuing a revised Draft *modified* Wastewater Discharge Permit and allowing for comments prior to issuance of a final permit, and an opportunity for appeal of the modified

Wastewater Discharge Permit.

7.0 Inspection & Enforcement

The GLWA will review a final Wastewater Discharge Permit at least annually as part of any inspection conducted at the facility (See Chapter 3) for relevance and accuracy.

The permit process, review of pertinent documentation, and other steps related to the permit process, may identify noncompliance with existing federal or local limitations. Where such noncompliance is identified, the GLWA Enforcement Response Guide shall be followed.

8.0 Permit Forms and Documents

Sample Forms and Documents are included in Appendix A attached to these procedures. Additional forms and documents may be developed as needed, or to replace these forms as deemednecessary by the GLWA.

Table 2 - Key Forms and Documents: Source Identification, Information and Management Procedures

Form or Document Name	Description	Appendix Reference/Form #
Draft Wastewater Discharge Permit_Boilerplate	Document form used to describe applicable Pretreatment Standards and requirements, NCPS and/or local limits, and reporting requirements.	CII-Form 1 and 2
Draft Permit Transmittal Letter	Document used to transmit Draft Permit	CII Form 3
Final Permit Transmittal letter	Document used to transmit Final Permit	CII Form 4
Response to Draft Permit comments	Document used to transmit response to Draft Permit comments	CIII Form 5
Notice of Determination	Form to notify User of (i) deficient submittal, or (ii) other issue Preventing Issuance of Permit	CIII Form 6
Permit Cancellation Letter	Form letter cancelling permit	CIII Form 7

The GLWA has developed the following procedures to conduct monitoring, surveillance and inspection activities and comply with the requirements of the General Pretreatment Regulations (40 CFR Part 403) and Michigan Part 23 Rules (R323.2306).

Program Commitments – Monitoring, Surveillance and Inspection:

GLWA's Industrial Pretreatment Program makes the following commitments:

- GLWA's Monitoring Program includes (i) SIU self-monitoring requirements and (ii) GLWA Monitoring commitments.
    - All monitoring is required to include *representative* sampling, that includes (i) sample collection method (grab and/or composite), (ii) Flow or time-based composite sampling (where applicable), (iii) Chain of Custody documentation, (iv) chemical and temperature preservatives.
    - All analyses are to be performed in accordance with 40 CFR 136 or methods approved by US EPA or specified by State of Michigan.
- GLWA will identify self-monitoring requirements in the permit, including parameters and sampling frequency, reporting frequency.
- GLWA will operate its Monitoring Program to independently verify a SIU's self-monitoring findings and assess compliance. GLWA's minimum commitment is to conduct annual sampling at each SIU for all regulated pollutants as specified in an SIU's wastewater discharge permit. GLWA commitments will use the following frequencies:

Limit	**Minimum Annual Sampling Frequencies [a]**	
	< 25,000 GPD Discharge	> 25,000 GPD Discharge
Daily maximum	2 Samples/yr	4 Samples/yr
4-day average [a]	2 sets of Four consecutivesamples/yr	4 sets of Four consecutivesamples/yr
30-day average or monthly [a]	10 samples per 30-day/yr	2 sets of 10 samples per 30-day/yr
Batch (Episodic) [a] Discharges	1 Sample/yr	2 Samples/yr.
Instantaneous	*1 Sample/yr*	*2 Sample/yr.*
Organic Pollutant Samples [TTO, PCB, Phenolic Compounds]	*1 Sample/yr*	*1 Sample/yr*
(a) Sampling frequencies will be based on BPJ if discharges are less than daily or episodic in nature		

- GLWA will conduct an annual comprehensive facility inspection(s) as its surveillance approach to assess compliance with permit (control mechanism) requirements, facility operations and recordkeeping, verify information provided in applications, reports and notices and document inspection findings in writing. Additional inspections will be conducted as needed.

Part A: Monitoring

Introduction

GLWA operates a comprehensive monitoring program of Industrial User discharges. SIUs (as defined in 40 CFR Part 403) are monitored at a frequency to verify compliance with applicable pretreatment standards and requirements.

1.0 The GLWA Monitoring Program

The GLWA monitoring program involves the collection of representative samples of the wastewater discharged into the sewer system to assess the compliance of individual Users with daily limitations (Daily maximum); weekly limitations (4-day averages), or monthly (30-day averages); to obtain field measurements, i.e, temperature and pH; or for other purposes deemed necessary by the Control Authority. The monitoring program described herein, includes both (i) self-monitoring conducted by SIUs, and (ii) the GLWA's independent monitoring program. The GLWA's monitoring program incorporates the following monitoring methodologies:

A. Scheduled Sampling include monitoring events planned in such a manner that dischargershave knowledge of and are aware of the scheduled event. The event may be performed upon mutual agreement of both parties. Examples of where this type of monitoring methodology is used is for sampling infrequent batch discharges, i.e., those occurring onceevery 6-months; and where User notification to the GLWA is a pre-condition of discharge.

B. Unscheduled (unannounced) Sampling is conducted with no advance warning or notification to the Industrial User prior to the arrival of the sampling crew at the facility. The majority of sampling performed by the GLWA is unannounced.

   Unannounced samples may be conducted for one or more of the following purposes, (i) todetermine compliance with wastewater discharge permits; (ii) to determine an applicable Enforcement purpose; (iii) to assess the character and concentration of *Pollutants of Concern* contributed by a User; or for (iv) any other purpose including but not limited to determining the High-Strength Wastewater contributions.

   Although these are identified as "unscheduled", the GLWA does create a samplingschedule to assign work to its staff of technicians. This work includes but is not limited to:

a. Routine Sampling: These are monitoring activities performed to meet the minimum sampling frequencies necessary to determine compliance with established permit requirements.

b. Verification Sampling: These are monitoring activities beyond the *routine,* and generally prompted by surveillance or enforcement activities, e.g., administrative orders, and compliance agreements. This sampling classification would also include those monitoring events which are initiated by GLWA personnel as a result of IU inspections and any additional samples necessary to evaluate the compliance status of an IU beyond the established routine sampling.

c. Special Sampling: These less frequent monitoring activities are initiated in response to special requests, including but not limited to: (a) Hauled in Waste surveillance sampling, (b) High-strength wastewater sampling or (c) sampling of Minor Industrial Users.

d. Demand sampling is performed as needed, in response to unplanned exigent events, i.e., spills, emergency or other circumstantial events encountered during field activities.

2.0 Sampling Frequencies

In accordance with 40 CFR 403, the GLWA should monitor discharges to independently assess compliance with applicable daily limitations (Daily maximum); weekly limitations (4-day averages), and monthly (30-day averages). Although there are no specific minimums include in applicable law, GLWA has developed the following goals to meet its duty to collect a sufficient number of samples from regulated Users as described in the table below:

Limit	**Minimum Annual Sampling Frequencies [a]**	
	< 25,000 GPD Discharge	> 25,000 GPD Discharge
Daily maximum	2 Samples/yr	4 Samples/yr
4-day average [a]	2 sets of Four consecutive samples/yr	4 sets of Four consecutive samples/yr
30-day average or monthly [a]	10 samples per 30-day/yr	2 sets of 10 samples per 30-day/yr
Batch (Episodic) [a] Discharges	1 Sample/yr	2 Samples/yr.
Instantaneous	*1 Sample/yr*	*2 Sample/yr.*
Organic Pollutant Samples [TTO, PCB, Phenolic Compounds]	*1 Sample/yr*	*1 Sample/yr*
(a) Sampling frequencies will be based on BPJ if discharges are less than daily or episodic in nature		

3.0 Self-Monitoring Sampling Frequencies

The GLWA Pretreatment Program requires SIUs with Wastewater Discharge Permits to perform self-monitoring in compliance with 40 CFR 403.12(g)(3). These requirements will typically be included in the Wastewater Discharge Permit, but may also be specified in an enforcement document, i.e., Compliance Schedule or Administrative Consent Order. Unless otherwise noted, the parameters to be monitored will include all parameters regulated in an IU's permit.

GLWA has discretion in determining the frequency of self-monitoring samples and considers factors such as the volume of wastewater discharged, the User's compliance history, whether the compound is a pollutant of concern, and the variability characteristics of the waste stream. Other factors may also be considered. The selection of pollutant parameters which are to be identified in any self-monitoring event is based on the exercise of Best Professional Judgment (BPJ) to evaluate the pollutant parameters which are reasonably expected to be present.

The GLWA will, upon receipt of the self-monitoring results review the information and evaluate the results along with information collected through its own monitoring program to assess an Industrial User's compliance.

4.0 GLWA Monitoring Protocols

Where possible, the following general guidelines are followed by the GLWA when collecting samples of Industrial User discharges:

a. Collect the sample from the outlet of the sewer pipe or downstream of a flume, hydraulic jump or other type of flow disturbance. Sample wastewater at a point where the wastestream is flowing freely and well mixed.
b. Sampling and analysis shall be performed with techniques prescribed by 40CFR part 136, as amended. GLWA will use an appropriate sampling method that is representative of the SIU's discharge and for the pollutant parameters regulated in the SIU's permit and, if applicable, the SIU's approved sampling plan, which includes:
    i. For pH and temperature, measurements should be taken from instantaneous samples.
    ii. When sampling for cyanide, FOG, sulfide, total phenols and volatile organics, PFAS Compounds collect individual grab samples (in accordance with appendix E of 40 CFR403).
    iii. Flow proportional or time composite samples can be used for all remaining parameters (in accordance with appendix E of 40 CFR403).
c. GLWA sampling will use required containers, preservation techniques and holding times established by USEPA as described in 40 CFR part 136, as amended.
d. While sampling, sufficient care shall be used to collect sufficient sample volumes required for analysis, and avoid contamination
e. SIUs may request split samples from GLWA at the time of sample collection,

however the SIU must provide an appropriate container(s). When splitting samples, use sufficient care to have any composite samples well-mixed. Grab samples cannot be split and instead GLWA will collect a replicate grab sample in the SU provided container(s).

f. Field wash and rinse all elements of the sampling machine with distilled water after each use to ensure that they are clean.
g. Follow all safety protocols in accordance with good sampling practices and procedures, or as may be advised by the facility. Contact the Team Leader if an area appears unsafe or dangerous.
h. Use sufficient care to document the sampling *Chain of Custody*, including the time, date and place of sampling, persons collecting the sample(s) and lab custodian receiving samples for analysis. Log any observations and other field information to create a defensible evidentiary record addressing who, what, when, where and how the sample(s) were collected and presented for analysis.
i. Sampling personnel should also consult training references which include the following:

Handbook for Monitoring Industrial Wastewater, U.S. EPA August 1973;Principles of Environmental Sampling, Lawrence H. Keith

5.0 Findings

The results of GLWA monitoring shall be documented in writing, and records shall be maintainedin an electronic file system. The GLWA will provide copies of its results to the User and produce an annual 12-month data summary report of all self-monitoring and GLWA results on or before January 15th of each year for the paper file.

6.0 Enforcement

The information gathered during or from a monitoring event may identify noncompliance at an Industrial User facility. Where noncompliance is identified, the GLWA ERP shall be followed. Specific procedures are discussed in the Enforcement Program, Chapter__.

7.0 Forms

Sample Forms and Documents are included in Appendix A, attached to these procedures. Additional forms and documents may be developed as needed, or to replace these forms as deemed necessary by the GLWA. The table below identifies the key *Forms and Documents* for this chapter.

Table 3a – Key Forms and Documents - Monitoring		
12-month Data Summary Report (Sample)	Sample report of annual data summary for paper file	CIII Form - 1
COC Report (Sample)	Sample Chain of Custody & Reporting Forms (Composite and Grab)	CIII Form - 2

COC Signature Report (Sample)	Sample Chain of Custody Signature Form	CIII Form - 3

Part B: Surveillance and Inspection

Introduction

The term "inspection", as used throughout this chapter, refers to a non-sampling industrial visits made by the GLWA. SIUs (as defined in 40 CFR Part 403.3 (t)) receive regular Inspection of theirfacilities to verify compliance with applicable Pretreatment Standards and Requirements. Surveillance and Inspection activities are referenced solely as Inspections.

The inspection is conducted by GLWA to obtain on-site information from a User and observe theiractivities. Inspections include but are not limited to the following: independently verify and confirm compliance with permit requirements, agreements, applicable GLWA Rule provisions, Usercharges, and Pretreatment Standards and Requirements.

1.0 Types of Inspections

The general approach for an inspection includes (i) gathering data, (ii) verifying information received from the company; (iii) maintaining records of the environmental compliance history fora facility, and (iv) recording and documenting all findings and conclusions in a written report. Thefollowing inspection types are currently used:

A. Baseline Inspection – is performed upon receipt of a permit application of a potential SIU,or receipt of a Baseline Monitoring Report. It is conducted with sufficient care so that a decision of permit eligibility, classification and the identification of any additional Pretreatment Standards and Requirements can be made. A follow-up visit may be requiredto verify a proposed sampling location. A report is prepared, and a recommendation made that a Wastewater Discharge Permit is or is not required.

B. Comprehensive (Scheduled) Inspection (CI) – is performed at least once every two years to review and assess the SIUs compliance. The CI may be scheduled with the SIU, or unscheduled, and generally includes at least the following elements:

    a. Verification of logistical information (operating data, sampling considerations andlocations, and safety implications).
    b. Inspection (walkthrough) of the process, production, or manufac turingoperation(s) and waste treatment operations.
    c. Review of operation and maintenance records,
    d. Evaluation of compliance with compliance schedules and construction schedules,if applicable,
    e. Evaluation of the need for, or adequacy of, the slug control plan in accordance with40 CFR Part 403.8(f)(2)(v).

f. Inspection of monitoring location(s).
g. Other items related to a facility's compliance.

Upon completion, a report is prepared.

C. Unscheduled Inspection – Is performed at least once per year and may include one or more of the elements for the Comprehensive Inspection above, or for some other purpose. The inspection is not scheduled in advance with the SIU. Upon completion, a report is prepared.

D. Demand or IPER Inspection – Is performed in response to a complaint or to investigate an exigent matter, i.e., responding to a spill report. Upon completion, a report is prepared.

E. Survey Inspection – is performed as part of a physical (window) survey or to verify information concerning a User. The field visit is documented and recorded in the file.

2.0 Inspection Frequencies

The GLWA conducts annual inspections of User facilities (See below) to assess compliance withthe Wastewater Discharge Permit and Rules as described below:

Limit	Minimum Annual Inspection Frequencies
Baseline Inspection	As needed
Demand Inspection	As needed
Comprehensive Inspection	Once every 2-years
Unscheduled Inspection	Once per year

Notwithstanding the type of inspection, it normally includes a walk-through of the facility and inspection of the wastewater generating processes. Other activities conducted during the inspectionwill be based on the exercise of Best Professional Judgment (BPJ).

3.0 General Inspection Protocol and Procedures

The GLWA's inspection staff experience a variety of industry operations and processes. Over time, familiarity with the various types of Industrial Users develops. Nevertheless, unique or atypical Industrial Users are encountered that require an inspector to have awareness of the regulatory and compliance requirements applicable to a specific industry and derive an opinion of the facility's conduct in achieving compliance. It is desirable from the GLWA's perspective that inspections maintain a consistent approach.

Characteristics for an inspector may include the following:

- Ability to observe the activities at a facility and record these in an objective and forthrightmanner.
- Ability to assess compliance with the SIU's wastewater discharge permit, letter ofauthorization or GLWA rules.
- Verify information, including but not limited to, information contained in self-monitoringreports, BMR reports, permits or permit applications or re-applications.
- Recognize and articulate observations on process operations generating wastewaters and

  any treatment processes employed to achieve compliance.
- Identify appropriate sampling points and develop strategies for monitoring compliance.

The following general procedures are followed for all types of inspections.

Step #1	Preparing for an Inspection	Staff are to use sufficient care to prepare for the inspection activity to be undertaken, regardless of the type; and should review any available records and information concerning a facility.
Step #2	Site Access	The proper access procedure consists of the following steps: a. Make certain that all credentials have been properly presented to the facility's authorized representative or contact in charge b. If entry is not granted, ask why. Tactfully probe the reason for denial to see if obstacles (i.e., misunderstandings) can be resolved. If entry is still denied, withdraw from the premises and contact the IWC Operations Manager. c. Document any observations pertaining to the denial of access. d. Exercise care and discretion to avoid threats of any kind, inflammatory discussions, or deepening of misunderstandings.
Step #3	Site Arrival	Staff should contact the facility representative and identify themselves as a GLWA Inspector by showing their identificationcard. The Inspector will also advise the facility representative ofthe purpose of the visit.
Step #4	Perform Inspection	Immediately proceed to deal with the business at hand, and through a series of questions to assess the compliance status of the facility. The inspection may employ a pre-prepared list of questions; however staff are not limited by these. Staff shall proceed to discuss the facility, the process operations, the treatment capability and recordkeeping for the facility. A tour ofthe production and treatment facilities is normally included at this stage. The Inspector is free to ask any question related to the production or treatment processes

		which comprise the discharge from the facility and incorporate comments or remarks into the final Inspection report. Responses, and observations should be fully understood and recorded in accordance with established practices. Should a practice, or activity be identified which is not inaccordance with the wastewater discharge permit, then (i) the staff shall notify the facility contact and explain the problem andthe remedial action required, (ii) document the findings in the report, and (iii) discuss with the IWC Operations Manager. Upon completion of the site inspection, staff shall finalize the Inspection report and findings, make any appropriate file notations and records, and identify whether any permit modification or enforcement recommendations are necessary.
Step #5	Final report	Send a copy of the inspection report to the permittee inspected to assure it is complete and accurate. The permittee shall have 20 days from receipt of the report to make any comments and/or corrections and submit these in writing to the Inspector. The Inspector should review any comments received and revise the language in the report as appropriate. An inspection is completewhen the final report is issued. Deficiencies that are deemed of a serious nature will be addressed through a notice of violation or other appropriate enforcement action.

4.0 **Findings**

The results of all inspection activities are documented in writing, i.e., by memorandum, report or similar document. This document is stored in an IU's file and a copy is submitted to the User.

5.0 **Enforcement**

The information gathered during an inspection may identify noncompliance at a user facility. Where such noncompliance is identified, the GLWA's Enforcement Response Guide is to be usedto identify an appropriate response to typical noncompliance. Noncompliance shall be documentedin written reports when identified and forward their recommendations to the enforcement Section.

6.0 **Forms and Documents**

Sample formats of Inspection reports are included in the sample form book (Appendix A attached). Additional forms and documents may be developed as needed, or to replace these forms as deemed necessary by the GLWA.

Table 3b – Inspection Forms and Documents		
Baseline Inspection Report Form	Sample reporting form	CIII Form 4
Comprehensive (Scheduled Inspection Form	Sample Report Form – Comprehensive Inspections	CIII Form 5
Unscheduled Inspection Form	Sample Report Form – Unscheduled Inspections	CIII Form 6

Federal regulations require that Control Authorities evaluate whether an SIU needs a plan or other action to control Slug Discharges, that meet the requirements of 40 CFR 403.8(f)(2)(vi). Additionally, the GLWA requires that plans be develop and filed to address Accidental Discharges (i.e., Slugs and/or Spills). The Wastewater Discharge Permit is generally used to specify applicable requirements.

Program Commitments – Source Identification and Information Management:

GLWA's Industrial Pretreatment Program makes the following commitments:

- GLWA will evaluate whether any Significant Industrial User needs to develop, modify or revise a slug discharge plan at a frequency of at least once every two (2) years.
- GLWA will identify Significant Industrial Users required to develop plans to control Slug discharges, as defined by 40 CFR 403.8(f)(2)(v), and place requirements to develop, maintain and implement such plans in the User's wastewater discharge permit, or equivalent control mechanism.
- GLWA will investigate incidents including but not limited to spills, upset and bypass events, complaints and unauthorized releases.

1.0 Introduction

The GLWA will evaluate Users who are required to develop a Slug Control Plan (SCP), and/or Spill Prevention Plan (SPP). At a minimum, the GLWA will evaluate the need for a Slug Control Plan (SCP), and/or Spill Prevention Plan (SPP) during the initial Baseline Inspection and re- evaluate the requirement during a comprehensive inspection.

2.0 Slug Control Plan

Federal regulations require that the Control Authority evaluate a significant industrial user's needs for a plan or other actions to control Slug Discharges. A slug discharge includes non-routine, episodic discharges which include accidental spills or non-customary batch discharges having a reasonable potential to (i) cause POTW interference or pass-through; (ii) violate a POTW's regulations, local limitations or (iii) NPDES Permit conditions.

GLWA will perform the required evaluation during an SIU's Baseline Inspection, and on an on-going basis, through the Comprehensive Inspection. Where the GLWA concludes that a slug control plan is needed, requirements

will be specified in the Wastewater Discharge Permit. A slug control plan submitted to the GLWA will be reviewed for completeness and compliance with the requirements of 40 CFR 403.8(f)(2)(vi), which include:

- Description of discharge practices, including non-routine batch Discharges;
- Description of stored chemicals;
- Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under § 403.5(b) with procedures for follow-up written notification within five days;
- If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loadingand unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.
-

These plans shall be reviewed in accordance with the procedures for reports and plans describedin Chapter 5 Data Management. The Slug Control Plan, and/or Spill Plan will be reviewed for completeness by the GLWA, and the User will be notified in writing of its acceptability.

3.0 **Demand Inspection & Complaints**

The GLWA receives notices from a variety of sources pertaining to slug and/or spill events; sewerodors, sewer blockages, dumping, bypasses and upsets. These events will be investigated and documented through a Demand Inspection.

The GLWA's response to these events will vary from a phone call to immediate on-site action, depending upon the priority and urgency of the situation. Priorities shall be determined consideringthe following criteria (i) nature of incident, (ii) suspected impact upon the community or POTW,
(iii) occurrence of incident (past or ongoing), and (iv) the exercise of best professional engineeringjudgment. A five (5)-day report may also be required from the User.

Among other things, these Emergency Response activities may be triggered by any of the following:

A. Citizen Complaints and Referrals - Complaints and referrals of sewer odors, blockages, dumping are received and investigated by the emergency response group.

B. Spills - Notifications of chemical or waste spills are received and investigated, by the emergency response group.
C. Bypasses and Upsets - User notifications to comply with the affirmative defense provisions established in the federal regulations, 40 CFR Part 403.16 and 40 CFR Part 403.17, are received by the emergency response group and investigated.
D. Notifications - Telephone calls are received by the GLWA system control center (313-224-4775) on a 24-hour basis and forwarded to the emergency response person(s) and the Wastewater Treatment Plant.

4.0 Enforcement

Following completion of a Demand Inspection, the GLWA will (i) determine whether the User should review and update as necessary, the slug control or spill prevention plan(s); and (2) recommend additional actions or responses by the GLWA, including enforcement action.

5.0 Forms and Documents

Sample Forms and Documents are included in Appendix A, attached to these procedures. Additional forms and documents may be developed as needed, or to replace these forms as deemed necessary by the GLWA. The table below identifies the key *Forms and Documents* for this chapter.

Table 4 - Key Forms and Documents: Slug Control Plans

Form or Document Name	Description	Appendix Reference/Form #
Notice Requesting Development of Slug/Spill Plan	Form template to report materials stored on-site.	CIV Form 1
Guidelines & Form for Slug Control and Spill Prevention Plans	Optional form for developing plans for a user's facility	CIV Form 2
Transmittal Letter to Review/Modify Slug/Spill Plan	Notice to review and modify SC/SPP Plan	CIV Form 3
Transmittal Letter to Require 5-day incident report	Notice to provide 5-day report and review and modify SC/SPP Plan	CIV Form 4
Incident Investigation Form	Documentation form for incident (Demand) inspection	CIV Form 5
Notice of Violation	Form Document to notify User of (i) failure to submit, (ii) deficient submittal, or other issue	CIV Form 6

Chapter 5: Data and Information Management Procedures

A Pretreatment Program produces a large volume of data and information relative to the compliance of an SIU, and other Users. The GLWA will use sufficient care to maintain the integrity of these records and secure such records so that they may be used as evidence in an administrative or judicial hearing or related action. Records include but are not limited to reports of inspections and site visits, Permit applications and re-applications, permit documents, monitoring reports, and enforcement materials.

Program Commitments – Data and Information Management Procedures

GLWA's Industrial Pretreatment Program makes the following commitments:

- GLWA will submit substantial and non-substantial Program modifications, as required in 40 CFR Part 403.18 and 323.2309 of the Part 23 Rules and document any modifications in its annual report.
- The GLWA will maintain information on nondomestic IUs in retrievable digital and/or paper files. This information includes, but is not limited to correspondence, User applications and reports and analytical data summaries.
- The GLWA will use reasonable care to document through reports, memoranda, notations, logs, photographs or other appropriate medium its findings and activities as they relate to specific IUs. Mechanisms, forms or formats shall be prepared as necessary to facilitate the documentation of information.
- GLWA will review SIU files annually, and information more than three (3) years old shall be placed in an archive file.
- GLWA will implement confidentiality procedures in accordance with GLWA Rules and applicable law. Non-confidential information in the files shall be available to the public and follow Freedom of Information Act (FOIA) protocols.
- GLWA will provide information for staff, as necessary, concerning pretreatment standards and requirements, and modifications and changes thereto.
- Industrial Users who fail to submit required reports will be identified and addressed in accordance with the Enforcement Response Guide, See Chapter VI.

Introduction

Data and Information Management consist of two distinct procedural activities, the first being actions to review and evaluate data from User reports, and the second

being recording and retrieval of information and records through a file system. The following procedures will be observed by GLWA.

1.0 Data Review and Evaluation

The GLWA Control Authority will review and evaluate data received from Industrial Users and Significant Industrial Users as well as data obtained through its independent monitoring and inspection activities for completeness and compliance. Data examples include but not limited to the following:

- Analytical results (from GLWA and non-GLWA sources)
- BMR, permit and survey applications
- Periodic (6-month) reports
- Plans including (but not limited to) Sampling Plans, pH Monitoring Plans, Best Management Plans
- Correspondence, GLWA Inspection Reports
- Enforcement Action documents

a) General Procedures for Reviewing Analytical Data – For analytical data, the results of self-monitoring and GLWA sampling will be compared against applicable federal and or local limits stated in a Wastewater Discharge Permit or GLWA Rules.
   i. Analytical data representing a daily discharge will be evaluated against the appropriate limit set (e.g., instantaneous limit, daily maximum limit)
   ii. Analytical data representing an average will be calculated and evaluated against the appropriate limit set (e.g., 4-day average limit, monthly average limit, 30-day average limit)
   iii. Time frames for reviewing analytical data
      a) GLWA analytical data will be reviewed within ten (10) days of receipt from the laboratory and, where noncompliant, enforcement action will be taken in accordance with the Enforcement response Guide (ERG).
      b) User analytical data (other than 6-month report) will be reviewed within ten (10) days of receipt from the User and, where noncompliant, enforcement action will be taken in accordance with the Enforcement Response Guide (ERG).
   iv. Paper copies of enforcement notices will be retained in the main file.

b) General Procedures for Reviewing 6-Month Reports
   i. Six-month reports are due on or before June 30th or December 31st. Mailed documents are date stamped upon receipt. Electronic documents are stamped when submitted.

ii. Six-month reports are reviewed for completeness and compliance with an SIU's permit. The SIU analytical data submitted with a 6-month report and other data, i.e., volume of discharge, production rates, etc. that may apply to specific SIUs, is reviewed and documented using the SMR Review Form (See section 7.0 below) in accordance with the ERG timeframes.

iii. Deficiencies or deviations identified by GLWA will result in enforcement action and reviewed during the next comprehensive inspection.

c) General Procedures for Reviewing Significant Noncompliance (SNC)

i. SNC for effluent data is based on 6-month periods using *rolling quarters.* Chronic and Technical Review criteria are based using the following periods of January – June, April-September, July – December and October-March.

a) The January – June and October-March period is reviewed within 60 days after receiving the June 30th 6-month report, and

b) The July-December and April-September period is reviewed within 60 days after receiving the December 31st 6-month report.

ii. Other applicable SNC criteria are identified within 60 days of occurrence.

iii. Upon a finding of SNC (any type), a written notice is mailed that identifies the applicable SNC criteria and a copy of the proposed publication language. The user is offered an *appeal* opportunity to provide additional evidence or minor clarifications to the proposed language. GLWA will use Best Professional Judgment when considering any language changes proposed by the SIU.

iv. GLWA publishes the newspaper notice of all final SNC notices in December and a second publication in April.

d) General Procedures for Reviewing Reports and Plans include but not limited to 90-day reports, SCP and/or SPP plans, sampling plans, pH monitoring plans, etc., will be evaluated as follows:

i. Report *due dates* may be prescribed by regulation (e.g. BMR Due dates), defined in a wastewater discharge permit, or other written notice. Dates are tracked by each engineer. Documents are date stamped on receipt.

ii. Review the completeness of the submission. A preliminary review of the submittal will be made to determine whether essential components are included, such as identification, if required

analytical results, narratives to describe compliance, etc., which are expected for the particular submission. Where an essential element is missing or omitted, the submission will not be acknowledged as a valid submissionuntil complete. The Control Authority will provide notice of such deficiency and require completion of deficient elements.

iii. A submission appearing to be complete will be reviewed for compliance with applicable wastewater discharge permit requirements or GLWA Rule requirements.

iv. GLWA will document its review and provide notice of any deficiency, and violations identified to the Industrial User.

v. As a general goal, the GLWA Control Authority will seek to complete any review and evaluation within 30 days of receiving the report or plan. The timeframe may be extended where additional investigation is deemed necessary.

vi. Copies of all notices, and records documenting reviews will be included in the file-records of the Control Authority.

e) General Procedures for Reviewing Other Information and Data will be reviewed and evaluated as appropriate. The GLWA will use its BPJ and best efforts toconduct any additional investigation or verification of the information or data, necessary to assess compliance and provide Industrial Users with appropriate notification that (i) acknowledges receipt and acceptance of the information or data; (ii) identifies deficiencieswith the report contents, or (iii) identifies noncompliance or violation of any limitation or requirement contained in a Wastewater Discharge Permit, or applicable law.

2.0 **Documentation of GLWA Records**

GLWA paper records include inspection reports, enforcement action documents and correspondence, review forms, and other similar records. Copies of these will be retained in the GLWA file system. Other documentation includes telephone and email records.

Email Documentation – email received from Users or generated by GLWA that discuss compliance issues or enforcement actions are printed and included in the User's file.

Telephone Documentation – telephone calls received from Users or generated by GLWA that discuss compliance issues or enforcement actions are printed and included in the User's file.

3.0 **Recording and Retrieval of File Information**

Given the size of the GLWA service area, a large amount of information, data, records, correspondence, reports, etc. is generated and requires appropriate recording and retrieval.

The GLWA will use sufficient care to manage the data and information generated or received so that (i) it is retrievable; (ii) that it can be used as evidence in enforcement proceedings, and (iii) it is adequate for its intended purpose.

The GLWA will maintain records or information in paper form for the past three (3) years and may use electronic or other methods to supplement or support these filing and recordkeeping practices. The GLWA will employ date stamps and as available, other technologies, to maintain the integrity and security of information. The File and recordkeeping practices are generally maintained by Username and may include applicable subdivisions for (i) correspondence, (ii) Industrial User reports, (iii) WastewaterDischarge Permits, Applications and BMRs, as well as (iv) Slug and/or SPP plans.

4.0 **Other Data Management Activities**

The GLWA Control Authority will develop notifications, forms or formats, local IPP guidance for Industrial Users and maintain information or sources for information to assist both staff and Industrial Users in achieving the objectives of the Industrial Pretreatment Program. This includes but is not limited to the following examples:

i. The GLWA shall implement confidentiality procedures in accordance with applicable law. Non-confidential information in the files shall be available to the public. Information, other than information deemed "confidential" will be available for review by theIndustrial User and the public at large through the FOIA policy of the GLWA.

ii. Information on applicable RCRA requirements in compliance with 40 CFR Part 403.8(f)(2)(iii);

iii. Documentation protocols and exercise of reasonable care to document through reports, memoranda, notations, logs, photographs or other appropriate medium its findings and activities as they relate to specific IUs. Mechanisms, forms or formats shall be prepared as necessary to facilitate the documentation of information.

iv. Information on nondomestic IUs, both active and inactive, will be retained in retrievable filesfor up to 3 years. Except in the case of an ongoing enforcement action, or one-time submittals, files shall be reviewed periodically, and information more than three (3) years old

shall be archived.

5.0 **Substantial and Non-substantial Program Modifications**

The GLWA shall comply with substantial and non-substantial Program modifications, as requiredin 40 CFR Part 403.18 and 323.2309, in response to promulgation of federal regulations and applicable State requirements. The GLWA also shall report this information in its annual report.

6.0 Enforcement

As a result of the reviews, reports and/or other documentation generated or maintained in an IU'sfile, the GLWA will identify noncompliance. Where such noncompliance is identified, the GLWA's Enforcement Response Guide is to be used to identify an appropriate response to typicalnoncompliance. Noncompliance shall be documented in written reports when identified and forwarded to the enforcement Section as required.

7.0 Forms and Documents

Sample Forms and Documents are included in Appendix A, attached to these procedures. Additional forms and documents may be developed as needed, or to replace these forms as deemed necessary by the GLWA. The table below identifies the key *Forms and Documents* for this chapter.

Table 5 - Key Forms and Documents: Data and Information Management		
Form or Document Name	Description	Appendix Reference/Form #
6-Month Report Review Form	Examples of Review form for SIUs, Local and CWT facilities	CV Forms 1, 2, 3
Engineer File Review Form	Sample File review form	CV Form 4
Notice of 6-Month Report Acceptance	Sample letter for acceptance of 6-month report	CV Form 5
Notice of 6-Month Report Deficiency/Violations	Sample letter of 6-month report with deficiencies/violations	CV Form 6
Notice of Noncompliance	Failure to provide notification of self-monitoring violation	CV Form 7
Notice of Ackn_SPP	Acknowledgment of SC/SPP Plan	CV Form 8
Notice of Acknow_TOMP	Acknowledgement of TOMP	CV Form 9
Notice of Response to NOE	Acknowledgement of NOE Response	CV Form 10
Notice of Permit Cancellation	Sample permit cancellation notice (eg company oob)	CV Form 11
Notice of SNC & Publication	Notice of SNC and Publication Language	CV Form 12
Telephone Call Document Example	Form for documenting telephone calls	CV Form 13
Notice Acknowledging Self-monitoring noncompliance	Form for acknowledging IU Noncompliance	CV – Form 14
Email Document Example	Form for documenting email dialogue	CV Form 15

The General Pretreatment Regulations (40 CFR Part 403[1], as amended) require that the GLWA enforce compliance with applicable pretreatment standards and requirements. This chapter describes the GLWA Enforcement Program elements.

Program Commitments – Enforcement Procedures:

GLWA's Industrial Pretreatment Program makes the following commitments:

- GLWA will implement the Enforcement Response Plan (ERP) in accordance with 40 CFR 403.8(f)(5). The ERP includes (i) the procedures manual, and (ii) the Enforcement Response Guide (ERG).
- GLWA will enforce the requirements of its approved IPP. The GLWA, in its capacity as the control authority, shall implement and enforce the provisions of the federal regulations, 40 CFR Part 403, Michigan Part 23 Rules and GLWA Rules, as amended.
- GLWA will use sufficient care to collect samples and information to produce evidence admissible in enforcement proceedings or judicial actions.
- GLWA will use sufficient care to track Industrial User compliance with pretreatment standards and requirements.
- GLWA will comply with the public participation requirements of 40 CFR Part 403.8(f)(2)(vii).

1.0 GLWA's Enforcement Response Plan

Federal regulations require the development and implementation of an Enforcement Response Plan (ERP) in accordance with 40 CFR 403.8(f)(5). An ERP includes procedures for investigating and responding to user noncompliance, escalating enforcement responses to anticipated user violations and time periods for such responses, the titles of officials responsible for each type of response and a commitment to enforce applicable provisions detailed in 40 CFR 403.8(f)(1) and (f)(2). GLWA's ERP includes all of the following components:

- GLWA Rules, as amended
- GLWA's procedures manual, as amended
- GLWA's Enforcement Response Guide (ERG) – Appendix B

Understanding the Enforcement Response Plan as a 3-part system is imperative because the methods of investigation, procedures, and types of enforcement actions[1] taken for specific

[1] It is imperative that the reader understand that the listing of Enforcement Responses should always consider the magnitude, frequency and seriousness of the violation, rather than a fixed step-wise process. The listing of Enforcement response should be considered as minimums. GLWA reserves its right to exercise its enforcement

noncompliance examples cannot be consolidated into a single document such as the Enforcement Response Guide. Although the ERG seeks to be complete, it cannot include all acts and/or conditions which an Individual User may cause or commit, so that as a general rule: "Like infractions and conduct should require like responses". Except in the case of an emergency or flagrant violation, the GLWA will apply the enforcement actions recommended by the ERG with the objective being to eliminate or remedy such violation as soon as possible.

The GLWA has adopted rules to establish the local standards and requirements for Industrial Users to meet federal and state pretreatment standards and requirements for an Industrial Pretreatment Program. Industrial Users have an obligation to comply with these rules. Enforcement is the process by which an Industrial User's noncompliance/violations are surfaced, compliance is tracked, and mitigative actions and remedies are imposed so as to attain compliance from the Industrial User. GLWA has developed its enforcement program with the following objectives:

- To prevent potential damages to public facilities and/or natural resources.
- To provide fair and equitable treatment to all Users in the enforcement process by using consistent and rational methodology.
- To deter noncompliance so that all Users comply with IPP requirements.
- To promote swift and consistent resolution of environmental problems.
- To remove economic benefit an Industrial User may gain from not complying.
- To recover costs for damages to public facilities and/or natural resources

GLWA uses (i) Administrative Enforcement Actions, (ii) Judicial Enforcement Actions and (iii) Supplemental Enforcement Actions to enforce the terms and conditions of GLWA's rules, and applicable state and federal regulations.

The following titles are authorized with signatory authority for carrying out these enforcement actions enumerated in the ERG:

Title Authorized to Sign Enforcement Document	**Enforcement Response Types**		
Engineer	Notice of Exceedance	Notice of Noncompliance	Notice of Violation[1]
Management Professional	Notice of Violation	Notice of Conference	Compliance Agreement
Operations Manager	Notice of Violation & Citation	Administrative Order	Show Cause Order
	Cease & Desist Order	Civil Litigation Referral	Criminal Litigation Referral
		1 – Reporting Violations	

A decision to institute enforcement action is normally triggered by a user's failure to achieve or

discretion and Best Professional Judgment in arriving at any Enforcement decision.

maintain compliance with applicable pretreatment standards and requirements. This decision normally includes a review of the User's enforcement compliance history, which is the file(s) maintained by the GLWA. The level of an enforcement response will be based upon consideration of one or more of the following:

- Magnitude of noncompliance
- Duration of noncompliance
- Effect of Noncompliance on the WWTP performance
- Effect of noncompliance on receiving water quality
- Potential Effect of Noncompliance on the WWTP performance
- Potential Effect of noncompliance on receiving water quality
- History of past violations
- Good faith efforts of User
- Effectiveness of responses in the past

The GLWA reserves the discretion to select the enforcement response appropriate to the violation and may consider any economic benefit which may have been obtained through noncompliance.

2.0 General Discussion of Enforcement Responses

The monitoring and surveillance activities of the GLWA provide independent data to assess the user's compliance, and on-site evaluation of a user's facility and operations and appropriateness of a wastewater discharge permit (or other control mechanism). Based on these actions, GLWA conclude that a user is compliant or not compliant. Where a user is not compliant, additional actions are required to provide notice to the user, identify the need for corrective and/or mitigative actions, and reasonable time frames for completing these actions. The following discussion describes the types of Enforcement Responses used.

2.1 Administrative Enforcement Actions

These include notices to establish the administrative record and documentation of noncompliance. These include:

A. **Notices of Violation (NOV)** – include any written notice provided to an Industrial User that conveys a finding(s) of the GLWA to any occurrence of non-compliance/violation. GLWA uses three types of NOVs to organize its administrative actions, namely (i) Notice of Exceedance, (ii) Notice of Noncompliance, and (iii) Notice of Violation.

1) **Notice of Exceedance (NOE)** – This notice is generated from GLWA's monitoring program whenever the sample result exceeds the pollutant limitation established in a user's wastewater discharge permit. The notice may include more than one sample event and requires the user to demonstrate compliance within 30 days with two self-monitoring measurements. The notice is reviewed and authorized by the Engineer.

2) **Notice of Noncompliance (NON)** – This notice is generated for non-effluent noncompliance/violations typically observed and identified from a site inspection. The subject of this notice includes things such as facility housekeeping, record-keeping, deviations from a submitted plan, i.e., BMP, sampling plans. Corrective measures are likely to require an unscheduled inspection (See Chapter III) or a subsequent submittal by the user. The NON is reviewed with the Management Professional and authorized by the Engineer.

3) **Notice of Violation (NOV)** – This notice may be used to escalate a previously issued NOE or NON, or are produced when effluent violations demonstrate a pattern, frequency or are of an order of magnitude requiring an escalated response; or for deficiencies in required reports, i.e. 6-month reports, BMR or permit applications.
    i. When used for effluent violations, it usually requires participation in an enforcement conference (may be virtual or face-to-face). During the conference, the user is required to identify corrective measures taken and or additional corrective measures required to achieve compliance.
        a. Where corrective measures have been taken, additional documentation through self-monitoring is required and confirmation with unscheduled inspection(s).
        b. Where a plan of correction is proposed, a compliance schedule is required as well as additional self- monitoring plans to demonstrate the user's compliance. If acceptable, the schedule is incorporated into a compliance agreement. The Management Professional is authorized to approve compliance agreements and schedules
        c. Where a plan of correction is proposed, but the schedule or specifics of the plan are deemed inadequate or require a longer term, staff may recommend escalation to an Administrative Order (see below).
    ii. **Notice of Violation and Citation (COV)** – The COV is a NOV and citation ticket issued by the GLWA for an Industrial User's reporting, notification or effluent violations meeting one or more of the criteria specified by the GLWA table of penalties (See GLWA rules, Section II-1004). All COVs shall be authorized by the IWC Operations Manager.

B. **Administrative Orders (AO)** – may be issued unilaterally or by consent and directs the Industrial User to take specific action(s) to remedy violations. An AO may require a user to install and to properly operate devices, treatment facilities, or other related appurtenances, or contain such other requirements as might reasonably be necessary and appropriate to address the violation including the installation of pretreatment technology, additional self-monitoring and management practices, implementation of a waste minimization assessment to identify and implement feasible source reduction, and recycling practices to reduce the generation or release of pollutants at the facility. An AO may also be used as an interim control mechanism when circumstances warrant.

GLWA's AO typically include stipulated penalties for future effluent and/or schedule violations. All AOs are authorized by the IWC Operations Manager.

C. **Show Cause Hearings (SCH)** – may be used where a conference, compliance agreement orAdministrative Order is either ineffective or not considered an appropriate to address an Industrial User's violation(s). The GLWA may employ the SCH by ordering an Industrial User's attendance at a hearing before the GLWA's Chief Compliance Officer or their designee, to "Show Cause why a proposed enforcement action should not be taken".

   At the SCH, the GLWA presents its findings of violation, submits evidence in support of its findings, and provides a recommendation for an enforcement response to be embodied in an administrative order. The Industrial User has the opportunity to show cause why the action should (or should not) be taken and may submit its own evidence to support its position. Examples of where an SCH is appropriate is where a User has demonstrated intransigence, balked at agreeing to a schedule, or complying with a wastewater discharge permit. The SCH is authorized by the IWC Operations Manager.

D. **Emergency Suspensions & Other Orders** – are administrative actions taken to address emergencies or exigent events requiring an immediate response. Under these conditions, the User has a subsequent opportunity for a Hearing (i.e., SCH). Two typical examples are:

   1) Permit Revocation Order – is used where a user's discharge authorization is being withdrawn, for cause, or it is deemed necessary to formally terminate an active Permit where an IU terminates their operations. The IU is provided an opportunity for a hearing in accordance with the GLWA rules.

   2) Cease & Desist Order – is issued to temporarily suspend an active discharge due to exigent conditions or similar events. Where issued verbally, a written order is issued within 24-hours, and the IU is provided an opportunity to a hearing before the GLWA in accordance with the GLWA rules.

   These are authorized by the IWC Operations Manager.

2.2 Judicial Enforcement Actions

Judicial enforcement actions include referral of a case to the GLWA Office of General Counsel with a recommendation to file a civil or criminal action in a court of appropriate jurisdiction. These actions are usually taken after administrative actions have either failed or been unsuccessful to obtain user compliance. GLWA can file Judicial enforcement actions in state or federal court in accordance with applicable state and/or federal civil/criminal procedures. Cases fall underone of the two categories:

a. Civil Litigation is a filing in state or federal court for prosecution of violations or to seek to have a User enjoined from further discharge, to compel compliance, or

to enforce the provisions of a wastewater discharge permit and to seek additional penalties and/or fines, or termination of service.

b. Criminal Prosecution is a filing in state or federal court seeking prosecution of criminal charges against a User for criminal violations of the GLWA rules. This action is taken upon findings of criminal intent and evidence. The GLWA can seek fines as authorized by applicable laws and regulations.

Initiation of either action requires GLWA to document the violations and prepare a referral package to General Counsel. Although prosecuted through the Office of General Counsel, the referral is authorized by the IWC Operations Manager.

2.3 **Supplemental Enforcement Actions** – The GLWA rules allow for the development and implementation of Pollution Prevention and Best Management Plans, as supplemental enforcement actions. These plans may be developed by the user or required as part of an enforcement action taken by GLWA. Examples where these are currently being used include sources whose discharges containing PCB (Polychlorinated Bi-phenyls), Mercury (Hg), Per- and Poly fluoroalkyl substances (PFAS) or other pollutants.

3.0 General Enforcement Procedures

GLWA has developed procedures for using the ERG, the available Enforcement Response Action toolbox to identify noncompliance/violations, to track compliance and to apply enforcement in a timely manner to maintain user compliance.

3.1 **Discovering Noncompliance –** Noncompliance/Violations may be self-reported by users or discovered through GLWA's Inspection, monitoring, and data review procedures. Notwithstandingthe specific method employed, the general discovery procedure is described as follows:

Step 1:	Identification Information on what constitutes the noncompliance, when it occurred, and its scope or magnitude.
Step 2: Criteria	Recognition of the applicable criteria, e.g. limitation, standard, general or specific prohibition, compliance date or milestone, etc.
Step 3: Decision	Determine whether the noncompliance has been established, e.g. data result exceeds permit limitation. If unsure consult with the Management Professional or IWC Operations Manager. Include file notes if noncompliance is not established or warranted.
Step 4: Response	Consult the Enforcement Response Guide for recommendations on appropriate enforcement response(s)
Step 5: Action:	Place information into applicable format document (e.g., NOV forms, etc.)
Step 6: Authorization -	Direct document to authorized person(s) [or delegate] for execution and mailing/service.

Each action of the IWC will be performed with sufficient care because it may be used (i) in future enforcement actions, or (ii) in ongoing enforcement actions.

3.2 Notification & Tracking of Compliance

Some form of written notice is necessary to document and notify the User of the findings. Notwithstanding the specific noncompliance that may be the subject of the notice, the following general procedure can be used for written notice communications of noncompliance discovered by the GLWA. These notices will be prepared by the Engineer and authorized in accordancewith GLWA delegation protocols. These include:

Step1: Written Response	Place information into applicable format document (e.g., Exceedance Notice or Notice of Violation, etc.) with copy sent to file.
Step 2: Content	Written Notices should include all pertinent information necessary to communicate the discovery, nature and magnitude of an act of noncompliance, and include a date of occurrence or discovery and identify the person(s) making the discovery.
Step 3: Track Response	As indicated by the notice, the date the User responds to the notice, the nature and scope of the response should be reviewed and evaluated. Information should be recorded in the User file.
Step 4: Next Steps	Where the Users response is timely and complete and addresses the subject of the notice, the matter is either (i) closed, or (ii) recommended for escalation of enforcement. *Note: Escalation involves discussion with the IWC Operations Manager.*

3.3 Time Frames – Enforcement

The GLWA will use its best efforts and judgment to identify and address Noncompliance/violations in a timely manner. The following discussion provides additional insight into typical enforcement scenarios:

A. <u>Time Frames: Discovering Effluent Violations</u>

Step #1: The GLWA shall identify daily maximum violations (Exceedances) from its sampling and monitoring activities and reach a finding of noncompliance/violation, within ten (10) days of receiving the compliance information.
Step #2: The GLWA shall issue an enforcement response (NOE) within thirty (30) days of effluent violation identification.
Step #3: Violations which threaten health, or can be considered as an Emergency will receive an immediate response, i.e. referral for escalated enforcement action.

B. Time Frames: Discovering Effluent Violations – User Data

Step #1: The GLWA shall create a record of a User's self-monitoring violations and require resampling and a report within 10 days of receipt of notice from the User. The GLWA shall issue an enforcement response within thirty (30) days of receipt of the re-sampling report.
Step #2: The GLWA will review User's periodic (Six-month) Reports and identify effluent violations, verify whether verbal or other notice was received from the User, and whether the User performed the required re-sampling within 30 days of receipt of notice from the User, or when the User should have known. GLWA will also identify whether the User had failed to either notify and/or conduct the required re-sampling for violations.

GLWA will identify violations and reporting deficiencies within thirty (30) days of receipt and issue an enforcement response within ten (10) days of identification of any self-monitoring effluent violation.
Step#3: Violations which threaten health or can be considered as an Emergency will receive an immediate response, i.e., referral for escalated enforcement action.

C. Time Frames: Discovering Other Violations

Step #1: Where a violation is identified from inspection or surveillance findings, the GLWA will initiate an appropriate Enforcement Response (NON) within thirty (30) of such finding, unless it involves a flagrant or pattern of noncompliance. In the latter case, the case must be referred for escalated enforcement and an additional thirty (30) will be required to investigate such finding.

Step #2: A written Notice within ten (10) days of identification

3.3 **Escalation to Violation**

Other than the specific violations enumerated in the GLWA rules, analytical exceedances or subjects of the noncompliance notice may require progression and escalation of the enforcement action. The following general procedures are observed:

Step #1:	Identification	If a User's act or conduct involve one or more of the eleven criteria specified in the GLWA rule, it is a violation and proceed to step #3. If not proceed to step #2.
Step #2	Effluent Violation	Assess whether the User has a pattern of violation of any effluent limitation, i.e., daily, weekly, monthly, etc.; or the magnitude or frequency of occurrence; or performance history (18 months minimum), it is a violation and you should proceed to step #3. If not, stop.

Step #3	Emergency Action	Does the violation threaten health, or can be considered as an Emergency? If yes, go to Level 3 Enforcement Action.Otherwise, proceed to step #4.
Step #4	Prepare Notice of Violation	Identify Findings and Source, include tables or other data as deemed necessary, reach conclusion and specify required action(s). Initiate NOV within thirty (30) days ofthe finding the violation.
Step #5	Conference	Schedule Conference if applicable. Create (as needed) compliance schedule and agreement.

3.4 **Compliance Tracking During Enforcement**

While some noncompliance/violations may be resolved immediately, others require some time to implement or evaluate. The following general compliance tracking procedures are used:

Step #1	Enforcement Sampling	More frequent sampling may be performed throughout the term of a Compliance Agreement. Sampling should be scheduled (using Best Professional Judgement) to monitor theUser's compliance with the daily maximum and/or 4-day, weekly, or monthly averages (if applicable).
Step #2	Enforcement Verification Inspections	Conduct site inspections, as needed, to verify information in progress reports, and/or milestone dates established in the compliance schedule.
Step #3	Final Compliance Sampling (or Determination)	Schedule GLWA sampling to verify compliance following Final Compliance Date, and up to 180 days afterwards. If violation is non-effluent, perform compliance inspection.

4.0 Enforcement for Specific Violations (Level 1)

GLWA's rules describe acts and conduct that are to be considered as violations, these are:

a) The failure of a User to provide a Permit Application, Baseline Monitoring Report or otherapplication form for any discharge of wastewater to the sewer system prior to thecommencement of discharge, whether from a new or existing source.
b) The failure of a User to completely and/or accurately report the wastewater constituents and/or characteristics of the User's discharge.
c) The failure to report significant changes in the User's operations or wastewater

constituentsand/or characteristics within the time frames provided in Section II-706 (b) of these rules.

d) The failure or refusal to grant reasonable access to the User's premises, waste discharge, or sample location for the purpose of inspection or monitoring.
e) Restricting, locking out or preventing, directly or indirectly, access to any monitoring facilities constructed on public or private property. The locking or securing of the monitoring facility shall not constitute a violation pursuant to this subsection, provided, that upon request, reasonable access to the facility is promptly provided to the GLWA representatives.
f) Restricting, interfering, tampering with, or rendering inaccurate any of the GLWA's monitoring devices including, but not limited to, samplers.
g) Failing to obtain a wastewater discharge permit prior to discharging wastewater to the POTW.
h) Failing to comply with any condition or requirement of the User's wastewater discharge permit, or other control mechanism.
i) Failing to provide notification of any self-monitoring violation, accidental release, or othernotice required under these rules.
j) Failing to comply with any limitation, prohibition, or requirement of these rules, or orderissued hereunder. Users acting in full compliance with wastewater discharge permits issued prior to the effective date of these rules shall be deemed to be in compliance with the requirements of these rules, and such permits shall remain in effect and be enforceableunder these rules until a superseding permit is effective.
k) Users shall comply with applicable National Categorical Pretreatment Standards and requirements on the date specified in the Federal Regulations regardless of compliance schedules.

5.0 Level 2 Enforcement Action – Enforcement Review and Escalation

In addition to the general compliance tracking procedures described above, Industrial Users under enforcement, i.e., compliance agreement or administrative order, will be assessed semi-annually with the Management Professional and IWC Operations Manager on whether they are making acceptable progress or whether additional or escalated enforcement action is required. Industrial Users who are not under-enforcement but have had one or more NOV in the last 12 months will be assessed annually on whether escalation of enforcement is required.

6.0 Level 3 Enforcement – Emergency Actions

When in the opinion of the GLWA, an actual or risk to public health, or the environment or the POTW, is considered as an Emergency, the GLWA will proceed to issue orders to suspend or terminate a user’s discharge and/or any wastewater discharge permit or equivalent control mechanism in place. In addition to the issuance of such order(s), the GLWA will refer the matter to legal counsel, when appropriate

7.0 Sample Forms

The GLWA has developed a variety of forms and documents for use in the administration, implementation and enforcement of this Industrial Pretreatment Program. Samples of these forms are included in Appendix A. Additional forms and documents may be developed as needed, or to replace these forms as deemed necessary by the GLWA.

Table 6 - Key Forms and Documents: Enforcement Procedures		
Form or Document Name	Description	Appendix Reference/Form #
Notice of Exceedance	Sample of form used to notify of parameter limit exceedance from GLWA sampling	CVI – Form 1
Notice of Noncompliance	Sample of form used to notify of noncompliance from GLWA inspection or plan review	CVI – Form 2
Notice of Violation[1]	Sample of form letter used for SMR Violation	CVI – Form 3
Notice of Violation	Sample of form letter used for general violation issue(s)	CVI – Form 4
Notice of Violation & Conference	Sample letter used for violation and requirement to attend enforcement conference	CVI – Form 5
Compliance Agreement	Sample compliance agreement form	CVI – Form 6
Notice of Violation & Citation	Sample of form letter used for violation and fine citation	CVI – Form 7
Administrative Order - Unilateral	Sample of Unilateral administrative order	CVI – Form 8
Administrative Order - Consent	Sample of Administrative Consent Order	CVI – Form 9
Show Cause Order	Sample of Show Cause Order	CVI – Form 10
Cease & Desist Order	Sample of Cease & Desist Order	CVI – Form 11
Civil Litigation Referral	Sample of referral memo – civil litigation	CVI – Form 12
Criminal Litigation Referral	Sample of referral memo – criminal litigation	CVI – Form 13
	1 – Reporting Violations	

The Great Lakes Water Authority in seeking recognition as the "Control Authority" for purposes of implementation, administration and enforcement of its Industrial Pretreatment Program has allocated staffing to implement, administer and enforce the program. The Board of the GLWA hasadopted Rules to specify the legal requirements for an Industrial Pretreatment Program inaccordance with 40 CFR 403.8(f)(1).

1.0 Control Authority Responsibility

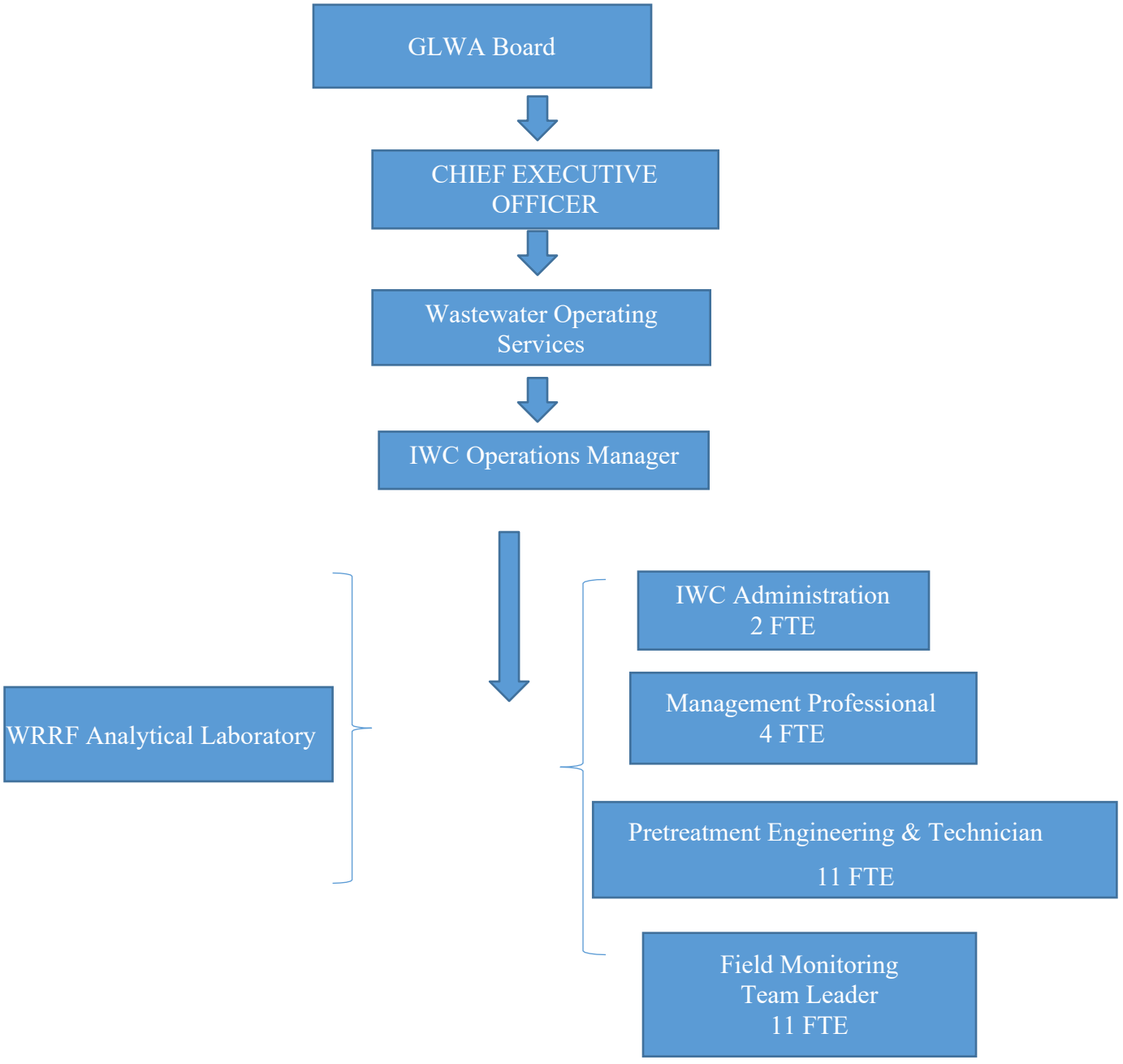
The Industrial Waste Control Group is responsible for carrying out the administration, duties, and enforcementresponsibilities as the Control Authority, consistent with the intent of the rules adopted by the GLWA Board, as amended. The Industrial Waste Control Operations Manager will direct staff, apply resources and use the legal authority granted by the GLWA's Board rules, or as may be delegated by the State of Michigan, to carry out the purpose and intent of the enforcement program described herein.

2.0 Industrial Waste Control Division Staff

The organizational structure of the Industrial Waste Control Operations is comprised of the following titles and delegated responsibilities by the Industrial Waste Control Operations Manager. The Control Authority will exercise its best efforts to maintain staffing at 90% of these levels.

Position	FTE - 29	Responsibilities & Roles	Reporting To:
IWC Operations Manager	1	Management Responsibility for Overall Program Implementation	Wastewater Operations Director
Management Professional – Industrial Waste Control	4	Senior staff with supervisory authority to support the Operations Manager in the day-to-day leadership of the group	IWC Operations Manager
IWC Engineer	10	Inspections, Report Review, Enforcement, Survey, Permit Evaluation, Program Implementation	IWC Management Professional
Engineering Technician	1	Support IWC Engineers in data collection, evaluation and processing	IWC Management Professional
Team Leader – Field Monitoring	1	Supervise Collection of Field Samples and Records	IWC Operations Manager
Investigators	10	Collect Field Sample Collection, Record Field Observations and Follow COC	Team Leader – Field Monitoring
Office Support Specialists	2	Administrative assistance, Records Maintenance and Data Processing	IWC Operations Manager

The organizational structure is presented below.



Industrial Pretreatment Program Procedures Manual Attachments - Forms & ERG

GLWA
Great Lakes Water Authority

October 6, 2022

Appendix A provides a collection of the Sample Forms and Documents used in the administration and enforcement of the Industrial Pretreatment Program. Many of these forms are presented in *Template* format inasmuch as electronic merging is used to produce the final documents.

From time to time, additional forms and documents may be developed as needed, or to replace these forms as deemed necessary by the GLWA.

Industrial Pretreatment Program

Wastewater Discharge Disclosure (Short Form)

User ID Nbr: _____ (office use)

It shall be unlawful for users to discharge into the POTW any wastewater which will cause interference or pass through, or otherwise not comply with the discharge prohibitions of Section II-203 of the GLWA Rules.

The Great Lakes Water Authority (Authority) is required to maintain a record of Industrial and Commercial users who utilizes the sewerage collection and treatment system operated by the Authority. Please complete and return this form to us within fourteen days. We will contact you if additional information is needed. Should you have questions, please contact us at (313) 297-5874 or Omran.Sherif@glwater.org.

Facility Name: _____

Mailing Address: _____

Facility Address: _____ [ ] Same as Mailing Address

City and Zip Code: _____

Facility Contact Person: _____

Title of Contact Person: _____ Phone Number: _____

Business Type: [ ] Retail/Merchandise [ ] Food Establishment

[ ] Manufacturing [ ] Light Industrial [ ] Commercial [ ] Other

Provide additional narrative description if Manufacturing, Light Industrial, Commercial or Other is checked above for activities performed on premises:

_____

_____

Water Consumption: [ ] 0 – 10,000 gallons per day [ ] 10,000 – 25,000 gallons per day

[ ] 25,000 – 50,000 gallons per day [ ] More than 50,000 gallons per day

Are any wastes other than wastewater of human origin (Sanitary) being discharged to the sewer system that is heating/cooling, cleaning, manufacturing or process waste? [ ] Yes [ ] No

If yes, describe: _____

_____

Do you: Store more than 55 gallons of: [ ] Solvents [ ] Oil [ ] Paints

[ ] Acids [ ] Caustics [ ] Other Chemicals (Describe) _____

[ ] Waste Manifests Available

Do you: Use or store PFOS, PFOA, PFAS containing substances [ ] Yes [ ] No

Print name and Title of Person Completing this Form: _____

Signature of Person Completing this Form: _____

Place Stamp Here

GREAT LAKES WATER AUTHORITY
INDUSTRIAL WASTE CONTROL
SURVEY SECTION
9300 W. JEFFERSON, SUITE 210
DETROIT, MI 48209
ATTN: Omran Sherif

Wastewater Operating Services
Industrial Waste Control
9300 W. Jefferson, Ste. 210
Detroit, MI 48209

Phone: 313-297-5850

PERMIT APPLICATION FOR SIGNIFICANT INDUSTRIAL USER

This application/questionnaire is designed to enable the Great Lakes Water Authority (GLWA) to make a determination for issuance/reissuance of Industrial Wastewater Discharge Permits. Significant Industrial User who discharge process wastewater in addition to sanitary waste into the sewerage system tributary of the GLWA Water Resource Recovery Facility are required to file this application/reapplication.

1) This application must be filed ninety (90) days prior to commencement of discharge and signed by an Authorized Representative of the industrial user.
2) This application must include all information specified in section II-701 of the GLWA Rules. A User who performs an operation covered by a National Categorical Pretreatment Standard may use this form to satisfy the federal Baseline Monitoring Report (BMR) requirements, but must include all applicable information required by 40 CFR 403.12(b)(1-7).
3) A separate application is required for each separate facility.

Section A. General Information	☐ BMR ☐ Application ☐ Reapplication Permit No. ****		
1	Company Name	****	
2	Facility Address	****	
3	Mailing Address	****	
4	Name of Authorized Representative	****	
	Title ****	Telephone Number	****
	E-mail Address	****	
5	Facility Contact Person	****	
	Title ****	Telephone Number	****
	E-mail Address	****	
6	Certification Statement		
	I certify under penalty of law that I have personally examined and I am familiar with the information in this application and all attachments and that based on my inquiry of those persons immediately responsible for obtaining the information contained in this application. I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.		
	Authorized Representative Signature	****	
	Date	****	

Section B. Business/Product/Service		
1	Do you perform any of the processes listed in Appendix A?	☐ Yes ☐ No
	If yes, please list process(es) below	
	****	
2	Give a narrative description of all processing operations or service activities taking place at the facility address.	
	****	
3	Describe your principal product or service (Please see Appendix B and answer all items pertaining to Per- and Poly-flouroalkyl Substances (PFAS).	
	****	
4	North American Industrial Classification (NAICS) Code	****
5	Standard Industrial Classification (SIC) Code	****
6	Shift and Employee Information	
	Discharge on legal holidays *	****
	Number of workdays per week	****
	Number of shifts per day	****
	Operating hours per day	****
	Number of Employees	****
7	What month and year did your operations begin?	****
8	What month and year did the facility's categorical operation(s) begin at the current location?	****
9	What month and year did the facility begin discharging wastewater to the sewer?	****

* Legal Holidays: New Year's Day, Martin Luther King Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, Christmas Day

Section C. Other Federal, State and Local Environmental Control Permits		
List any Environmental Control Permits held by or for this facility		
Regulatory Agency Name	Permit Number	Purpose of Permit
****	****	****
****	****	****
****	****	****
****	****	****

Section D. Water Consumption	Water usage for last twelve (12) months including volume purchased through water meter and volume of any water, wastewater brought into facility (truck, drum, etc.). If BMR or new Application, include copies of water bills.		
From	****	To	****
1st Quarter	****	2nd Quarter	****
3rd Quarter	****	4th Quarter	****

Please check unit below that applies to the water usage information above

☐ Cubic Feet (ft^3) ☐ 100 Cubic Feet (ccf) ☐ Gallons ☐ Other ****

Water from other sources (groundwater, truck, other) Please describe sources and quantities used

****

Section E. Wastewater / Solid – Liquid Wastes

1	Does your company have a wastewater treatment system or operation designed to reduce pollutant levels prior to discharge to the sewer? If yes, describe your specific pretreatment system below.	☐ Yes ☐ No
	****	
2	Please check all applicable methods of disposal used for wastewater and any solid/liquid waste materials from your facility.	
	Method of Disposal (Check all that apply)	
	☐ Discharged to sewer ☐ Hauled to Landfill ☐ Treated On-site ☐ Discharged to Pond or Lagoon ☐ Hauled to off-site Treatment facility (see #3) ☐ Other (Describe ☞) ****	
3	For wastes hauled off-site, are waste manifests available?	☐ Yes ☐ No
	If yes, provide copies of all waste manifests for last 12 months	
4	Does you facility have secondary containment for spill control? (Dikes, trenches, storage controls)	☐ Yes ☐ No
5	Does your facility have any floor drains in the chemical storage area?	☐ Yes ☐ No
6	Does your company submit Tier I or II information under the SARA Title III Program?	☐ Yes ☐ No
7	Please indicate if you are required to submit any of the following regulatory documents. (Check all that apply)	
	☐ Spill Prevention Countermeasure Control Plan (SPCC) ☐ Pollution Incident Prevention Plan (PIPP) ☐ Contingency Plan ☐ Materia Safety Data Sheet ☐ R Form (Toxic chemical release reporting form) ☐ Treatment, Storage and Disposal Facility Operating License ☐ I discharge substances characterized as hazardous waste under 40 CFR 261 (attach copy of 40 CFR 403.12(p) report) ☐ Other Regulatory Documents (Describe ☞) ****	

Section F. Process Descriptions/Wastestream Discharge Flows					
Process Descriptions	Wastewater Flow (Gallons/Day)		Discharge Frequency		
	Average	Maximum	Batch[1], Intermittent[2], or Continuous[3]	If Batch or Intermittent, provide the discharge frequency	Regulated[4], Non-regulated, or Dilution
****	****	****	####	****	####
****	****	****	####	****	####
****	****	****	####	****	####
****	****	****	####	****	####
****	****	****	####	****	####
****	****	****	####	****	####
****	****	****	####	****	####
****	****	****	####	****	####
Non-Contact Cooling Water	****	****	####	****	####
Sanitary	****	****			####
Total Plant Flow	****	****			

[1] Batch – wastewater discharge occurs on a periodic or episodic basis as part of a volume

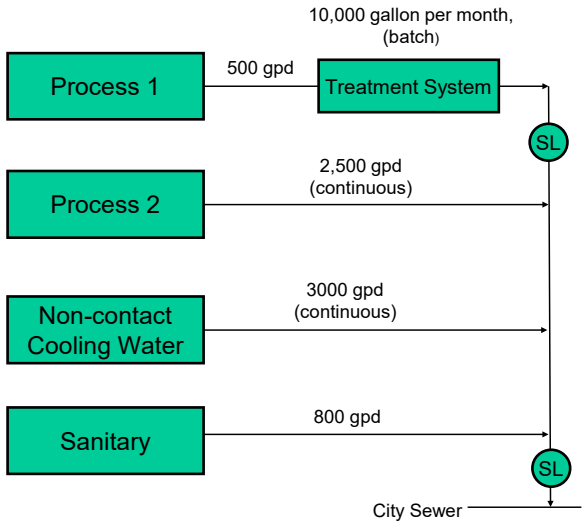
[2] Intermittent - wastewater discharge infrequently e.g., discharge occurs at intervals of 30 days or greater

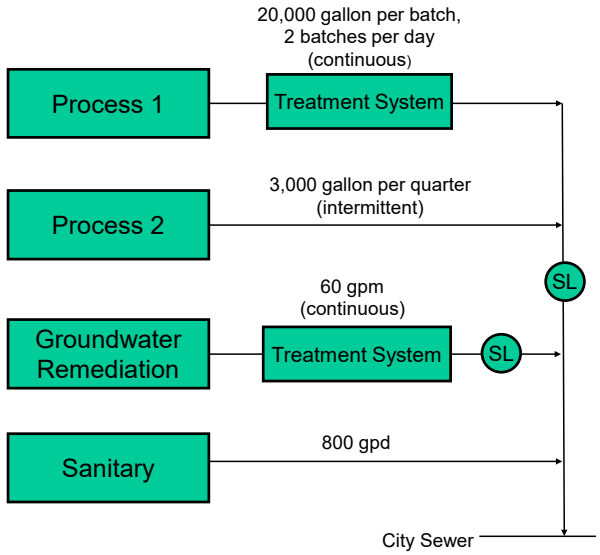
[3] Continuous - wastewater discharge occurs on a regular basis

[4] As defined by 40 CFR 403.6

Section G. Wastewater Flow Schematic

Please draw a simplified schematic showing the wastewater flows from each process as they combine to discharge into the city sewer. Refer to the drawing example shown on the left below.





Section H. Wastewater Sampling Location Description

Describe the location(s) of all sampling site(s) and reference to facility schematic (Section G)

****

Section I. Sampling Methodology

SL1	SL2	SL3	SL4	Composite Sampling Method (Elect one method only per Sampling Location)
☐	☐	☐	☐	Flow-Proportional Composite Sampling
☐	☐	☐	☐	Time-Proportional Composite Sampling (Submit demonstration that requires approval from GLWA)
☐	☐	☐	☐	Flow/Time-Proportional Composite Sampling (If undecided, submit sampling plan)

All wastewater sampling must be collected in a manner and form intended to represent the wastewater discharged. Following written notice from the Authority, a permittee shall provide an approvable sampling plan within 60 days of permit issuance. The sampling plan shall describe the sampling protocols and methods of sampling that will be used at their facility during the term of this permit.

At a minimum, the sampling plan shall describe the sampling methods to be used for each pollutant parameter identified in the permit. All composite samples shall be collected using flow-proportional sampling methods unless the Authority authorizes time-proportional sampling.

Where flow-proportional sampling methods are used, the sampling plan shall identify the flow measuring equipment available for performing such sampling, the most recent calibration records and the expected daily wastewater discharge volume, hours of discharge, sample volume and the sample aliquot volume.

Time-proportional sampling will only be authorized by the Authority where (i) the permittee can demonstrate with recorded flow data, or through equivalent methods, that their wastewater has a constant discharge rate or (ii) the volume of discharge is no greater than 10,000 gallons and the period of discharge is 4 hours or less.

If needed, a schedule for installation of flow measuring equipment. During the construction period, time-proportional sampling shall be used to collect samples until the flow measuring equipment is installed and calibrated. The time available for this schedule shall not exceed 180 days following permit issuance.

Section J: Wastewater Analytical Results and Analyses

1 Do you have any analytical results of your wastewater discharge? (Mandatory Requirement for BMR and/or Permit Application) ☐ Yes ☐ No

If yes, please record your data below and attach copies of the analytical results with this application. Where data is not available, you will be required to provide sampling results following notice of permit eligibility.

Wastestream	Arsenic	Cadmium	Chrome	Copper	Available Cyanide	Iron	Lead	Mercury	Nickel	Silver	Zinc	Total PCB	Total Phenol	pH	BOD	FOG	P	TSS
....																		
....																		

2 Based on the analytical data provided, are pretreatment standards being met on a consistent basis? ☐ Yes ☐ No

If No, what additional operational and maintenance plans are under consideration to attain compliance? Describe below.

....

3 If you respond "Yes" to any items in Appendix B, the company is required to sample and analyze the following PFAS pollutants

(Analytical Requirement: US EPA Method 537 (modified) or ASTM D7979) or other approved methods (see 40 CFR 136).

Perfluorobutanoic acid	PFBA	....	Perfluorotetradecanoic acid	PFTeDA	....	6:2 Fluorotelomer sulfonic acid	6:2 FTSA	....
Perfluoropentanoic acid	PFPeA	....	Perfluorobutane Sulfonic acid	PFBS	....	8:2 Fluorotelomer sulfonic acid	8:2 FTSA	....
Perfluorohexanoic acid	PFHxA	....	Perfluoropentane Sulfonic acid	PFPeS	....	N-Ethyl perfluorooctane sulfonamidoacetic acid	N-EtFOSAA	....
Perfluoroheptanoic acid	PFHpA	....	Perfluorohexane Sulfonic acid	PFHxS	....	N-Methyl perfluorooctane sulfonamide	N-MeFOSA	....
Perfluorooctanoic acid	PFOA	....	Perfluoroheptane Sulfonic acid	PFHpS	....	Hexafluoropropylene oxide dimer acid	HFPO-DA	....
Perfluorononanoic acid	PFNA	....	Perfluorooctane Sulfonic acid	PFOS	....	11-Chloroeiosafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUDS	....
Perfluorodecanoic acid	PFDA	....	Perfluorononane Sulfonic acid	PFNS	....	9-Chlorohexadecafluoro-3-oxanone-1-sulfonic acid	9Cl-PF3ONS	....
Perfluoroundecanoic acid	PFUnDA	....	Perfluorodecane Sulfonic acid	PFDS	....	4,8-Dioxa-3H-perfluorononanoic acid	ADONA	....
Perfluorododecanoic acid	PFDoDA	....	Perfluorooctane sulfonamide	FOSA	....			
Perfluorotridecanoic acid	PFTrDA	....	**4:2 Fluorotelomer sulfonic acid**	**4:2 FTSA**	....			

Section K: Additional Requirements for Permit Reapplication Only

1	Indicate if you intend to monitor for the Individual Phenolic Compounds or Total Phenols	☐ Elect to monitor Individual Phenolic Compounds	☐ Elect to monitor Total Phenols
2	For facilities subject to Electroplating (40 CFR 413), Metal Finishing (40 CFR 433) and/or Electrical and Electronic Components (40 CFR 469), did you include an updated Toxic Organic Management Plan (TOMP) or submitted a Total Toxic Organic (TTO) Analyses?	☐ Submit an updated TOMP	☐ Submit current TTO analyses
3	For facilities subject to Aluminum Forming (40 CFR 467), Metal Molding & Casting (40 CFR 464), Copper Forming (40 CFR 468), or Coil Coating - Subpart D Can-Making (40 CFR 465), indicate if you intend to monitor for Oil & Grease or Total Toxic Organics	☐ Elect to monitor Oil and Grease	☐ Elect to monitor Total Toxic Organics
4	For facilities subject to Transportation Equipment Cleaning (40 CFR 442), submit an updated Pollutant Management Plan.	☐ Attached submitted plan	☐ None attached

5 For facilities subject to Mass or Production Based Categorical Pretreatment Regulations, include the Mass (raw materials processed onsite), Volume (corresponding water usage) and processing period (at least last 12 months).

Raw Materials Processed	Amount Materials Processed per Unit Time*	Water Usage Volume
****	****	****
****	****	****
****	****	****

* specify the amount of materials processed per unit time (e.g. pound/year, ft^2/day, $meter^2$/week, kg/month, etc.)

Processing Period	from	****	to	****

Section L: For each sewage flow-meter installed at your facility, provide the following information
(Add additional sheets as necessary)

Flow Meter Information	
Model	
Serial Number	
Units	
Totalizer	
Pulse/Volume	
Gallons/Pulse	

Flow Meter Information	
Model	
Serial Number	
Units	
Totalizer	
Pulse/Volume	
Gallons/Pulse	

For each Water Meter installed at your facility, provide the following information
(Add additional sheets as necessary). Indicate if "Fire only", etc..

Water Meter Information	
Community	
Wholesale Provider	
Water Meter ID #	
Units	
Size:	
Comment	

Water Meter Information	
Community	
Wholesale Provider	
Water Meter ID #	
Units	
Size:	
Comment	

Appendix A **National Categorical Pretreatment Standards - Industrial Processes**

No.	PROCESSES	40 CFR Part
☐ 1	Aluminum Forming	467
☐ 2	Anodizing	413, 433
☐ 3	Asbestos Manufacturing	427
☐ 4	Battery Manufacturing	461
☐ 5	Builder's Paper & Paperboard Mills	431
☐ 6	Carbon Black Manufacturing	458
☐ 7	Canned and Preserved Fruits / Vegetables	407
☐ 8	Canned and Preserved Seafood Processing	408
☐ 9	Casting Operations	421, 464, 467, 471
☐ 10	Cement Manufacturing	411
☐ 11	Centralized Waste Treatment	437
☐ 12	Chemical Etching	413, 433
☐ 13	Coal Mining	434
☐ 14	Coating	413, 433
☐ 15	Coil Coating	465
☐ 16	Cold Rolling	420, 467, 468, 471
☐ 17	Copper Forming	468
☐ 18	Dairy Products Processing	405
☐ 19	Drawing	420, 467, 468, 471
☐ 20	Electrical & Electronic Components	469
☐ 21	Electroless Plating	413, 433
☐ 22	Electroplating	413, 433
☐ 23	Explosives Manufacturing	457
☐ 24	Extruding	420, 467, 468, 471
☐ 25	Feedlots	412
☐ 26	Ferroalloy Manufacturing	424
☐ 27	Fertilizer Manufacturing	418
☐ 28	Forging	420, 467, 468, 471
☐ 29	Foundries	420, 421, 464
☐ 30	Fruits & Vegetable Processing	407
☐ 31	Glass Manufacturing	426
☐ 32	Grain Mills Manufacturing	406
☐ 33	Gum & Wood Chemicals Manufacturing	454
☐ 34	Hospitals	460
☐ 35	Hot Rolling	420, 467, 468, 471

No.	PROCESSES	40 CFR Part
☐ 36	Ink Formulating	447
☐ 37	Inorganic Chemicals Manufacturing	415
☐ 38	Iron & Steel Manufacturing	420
☐ 39	Landfills	445
☐ 40	Leather Tanning & Finishing	425
☐ 41	Meat Processing	432
☐ 42	Metal Finishing	433
☐ 43	Metal Molding & Casting	421, 464, 467,471
☐ 44	Metal Products & Machinery	438
☐ 45	Milling	413, 433
☐ 46	Mineral Mining & Processing	436
☐ 47	Nonferrous Metals Forming & Metal Powders	471
☐ 48	Nonferrous Metals Manufacturing I and II	421
☐ 49	Oil & Gas Extraction	435
☐ 50	Ore Mining & Dressing	440
☐ 51	Organic Chemicals, Plastics, & Synthetic Fibers	446
☐ 52	Paint Formulating	446
☐ 53	Paving & Roofing Materials (Tars & Asphalt)	443
☐ 54	Pesticide Chemicals Manufacturing	455
☐ 55	Petroleum Refining	419
☐ 56	Pharmaceutical Manufacturing	439
☐ 57	Phosphate Manufacturing	422
☐ 58	Photographic Processing	459
☐ 59	Plastic Molding & Forming	463
☐ 60	Porcelain Enameling	466
☐ 61	Printed Circuit Board Manufacturing	413
☐ 62	Pulp, Paper, & Paperboard Mills	430
☐ 63	Refining	421
☐ 64	Rubber Processing	428
☐ 65	Smelting	421
☐ 66	Soap & Detergent Manufacturing	417
☐ 67	Steam Electric Power Generation	423
☐ 68	Sugar Processing	409
☐ 69	Textile Mills Manufacturing	410
☐ 70	Timber Products Manufacturing	429
☐ 71	Transportation Equipment Cleaning	442

Appendix B SOURCES of PER- and POLY-FLOUROALKYL SUBSTANCES (PFAS)

The State of Michigan, through the Michigan Department of Environment, Great Lakes and Energy (EGLE), requires the GLWA to identify and determine the possible sources of Per- and Poly-fluoroalkyl Substances (PFAS) within the Great Lakes service areas. Due to PFAS impacts on human health and impairments on fisheries, the following are incorporated in this application. Please answer all items accordingly.

1	Does your company use/store PFAS in the past?	☐ Yes ☐ No
	If Yes, indicate approximately when the company uses PFAS in the past.	☐ 1-5 years ☐ 6-10 years ☐ > 10 years
2	Does your company currently use/store PFAS?	☐ Yes ☐ No
3	Does your company plan to use PFAS in the future?	☐ Yes ☐ No
4	Does your company use AFFF fire fighting foam, or equivalent products?	☐ Yes ☐ No
5	Does your company perform coating operation (i.e. chrome plating)?	☐ Yes ☐ No
6	Does your company use textile and/or fabric protection chemicals?	☐ Yes ☐ No
7	Does your company use fume and vapor suppressants, demisters or wetting agents?	☐ Yes ☐ No
8	Does your company receive offsite waste for storage and transport?	☐ Yes ☐ No
9	Is the company a Centralized Waste Treatment facility?	☐ Yes ☐ No
10	Is the company a landfill?	☐ Yes ☐ No
11	Is the company a tannery or uses leather treatment chemicals?	☐ Yes ☐ No
12	Does your company produce paint formulations?	☐ Yes ☐ No
13	Does your company manufacture chemicals?	☐ Yes ☐ No
14	Does your company produce packaging materials using paper and/or cardboard?	☐ Yes ☐ No
15	Does your company perform petroleum processing or refining?	☐ Yes ☐ No
16	Does your company use PTFE coatings or Teflon?	☐ Yes ☐ No

If you respond "Yes" to any items above, the company is required to sample and analyze the PFAS pollutants as enumerated in Section J, 3 of this application.

GLWA
Great Lakes Water Authority

Facility ID: _____ CI – FORM 3

Physical Survey Inspection Form

Facility Name: _____

Facility Address: _____

City and Zip Code: _____

Mailing Address: _____ [ ] Same as Facility Address

Facility Contact Person: _____

Title of Contact Person: _____ Phone Number: _____

Business Type: [ ] Retail/Merchandise [ ] Food Establishment [ ] Manufacturing

[ ] Light Industrial [ ] Commercial [ ] Other _____

N**arrative description of activities performed on premises**:

_____

_____

_____

Water Consumption: _____

Are any wastes other than Sanitary being discharged to the sewer system that is heating/cooling, cleaning, manufacturing or process waste? [ ] Yes [ ] No

Wastewater Character: [ ] Sanitary [ ] Heating/Cooling [ ] Process Wastewater (describe)

If yes, describe: _____

_____

Does Facility Use/Store more than 55 gallons: [ ] Solvents [ ] Oil [ ] Paints [ ] Acids [ ] Caustics

[ ] Other Chemicals (Describe) _____ [ ] PFAS Compounds [ ] Waste Manifests Available

Status: [ ] Minor Discharger [ ] Potential SIU/CSIU – Permit Application Left

[ ] Other_____ [ ] User – Not Subject to IPP

Comments: _____

_____

Name of the Inspector:_____

Signature _____ Date: _____

[ ] Additional Pages (See attached)

CI – FORM 4

Date: DATE

Facility I.D.: SITEID

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACT CITY, STATE ZIP

Regarding: **CLASSIFICATION AS A MINOR USER**

Dear CONTACT NAME:

The Great Lakes Water Authority (GLWA) has classified your facility as a Minor User of the GLWA sewer system. This classification has been based upon one or more of the following criteria:

- Your facility's discharge is not subject to a National Categorical Pretreatment Standard (CIU), and
- Your facility's discharge does not meet the definition for a Significant Industrial User (SIU), and
- Your facility's discharge is not expected to contain toxic pollutants in quantities which would subject you to regulation.
- Your facility is required to comply with GLWA's Rules
- Your facility is notified that it may be subject to Subtitles C and/or D of the Resource Conservation and Recovery Act (RCRA) for hazardous and non-hazardous solid wastes.

As a Minor User, you are authorized to discharge to the GLWA Sewer System and are not required to maintain a wastewater discharge permit from this agency. **Please retain this letter in the event of future inspections by a state or local agency.** Should the nature of your discharge, business, or address change, please notify this office.

Please submit all correspondence to:

Great Lakes Water Authority
Industrial Waste Control Group
9300 West Jefferson, Suite 210
Detroit, MI 48209

IWC@Glwater.org

Please note that your facility may be subjected to regulation under the Surcharge Program and/or may be required to submit a Slug Control/Spill Prevention Plan (SC/SPP). We will refer your facility to the appropriate GLWA group, who will notify you separately of any applicable requirements.

Should you have any questions, please contact me at POTW PERSONNEL & PHONE, or email our agency at IWC@glwater.org . Thank you for your efforts in pursuit of a cleaner environment.

Sincerely,

POTW PERSONELL FULLNAME GOES HERE
Compliance Assistance Group
Industrial Waste Control Group

DS/POTW PERSONNEL ABBRV GOES HERE

NOTIFICATION OF RCRA SUBTITLE C AND D REQUIREMENTS

CI – FORM 4A

RCRA establishes the framework for a national system of solid waste control. Under RCRA, EPA regulates hazardous solid wastes and may authorize states to do so; while Nonhazardous solid waste is predominately regulated by state and local governments. Subtitle D of the Act is dedicated to non-hazardous solid waste requirements, and Subtitle C focuses on hazardous solid waste. Solid waste includes solids, liquids and gases and must be discarded to be considered waste. Your facility may have compliance obligations.

Notification of Subtitle D of the Resource Conservation and Recovery Act (RCRA)

RCRA Subtitle D focuses on state and local governments as the primary planning, regulating, and implementing entities for the management of nonhazardous solid waste, such as household garbage and nonhazardous industrial solid waste.

Under RCRA, EPA has promulgated regulations pertaining to nonhazardous solid waste, largely addressing how disposal facilities should be designed and operated. Nonhazardous solid waste is predominately regulated by state and local governments. The RCRA definition of a *solid waste* is any discarded material that is not excluded under § 261.4(a) or that is not excluded by a variance granted under §§ 260.30 and 260.31 or that is not excluded by a non-waste determination under §§ 260.30 and 260.34.

Additional information is available at **https://www.michigan.gov/egle/0,9429,7-135-3312---,00.html**

Notification of Subtitle C of the Resource Conservation and Recovery Act (RCRA)

Section 3010 of Subtitle C of the Resource Conservation and Recovery Act (RCRA) requires any person who generates, transports, or recycles regulated wastes or who owns or operates a facility for the treatment, storage, or disposal of regulated wastes to notify the U.S. Environmental Protection Agency (EPA) of their activities, including the location and general description of the activities and the regulated wastes handled.

Respondents must submit the information required in the Notification of Subtitle C Activities (8700-12). As required by statute, the EPA promulgated regulations to implement these notification requirements at 40 CFR Parts 260, 261, 262, 263, 264, 265, 266, 270, 273, and 279. The EPA needs this information to determine the universe of persons who generate, handle, and manage these regulated wastes; assign EPA Identification Numbers; and ensure that these regulated wastes are managed in a way that protects human health and the environment as required by RCRA. This is mandatory reporting by the respondents.

Additional information is available at https://www.epa.gov/hwgenerators.

CERTIFIED MAIL

DATE

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIPCODE

Re: Permit Application/Baseline Monitoring Report (PA/BMR)
Facility ID.: SITEID GOES HERE

Dear CONTACT NAME

Your facility discharges into the Wastewater Collection and Treatment System of the Great Lakes Water Authority (GLWA). We believe that your company may be a Significant Industrial User; therefore, in accordance with Section II-701 of the GLWA Rules you must complete and submit the enclosed Permit Application/Baseline Monitoring Report for Industrial Wastewater Discharge within thirty (30) days of the above date.

Please submit all correspondence to:

Great Lakes Water Authority
Industrial Waste Control Group
9300 West Jefferson, Suite 210
Detroit, MI 48209

Failure to submit this application form could lead to enforcement action against your facility. Should you have any questions, please contact me at POTW PERSONNEL PHONE GOES HERE.

Sincerely,

POTW NAME
Compliance Assistance Group
Industrial Waste Control Group

CERTIFIED MAIL

DATE

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Re: Survey Application
Facility ID.: SITEID

Dear CONTACT NAME

Your facility discharges into the Wastewater Collection and Treatment System of the Great Lakes Water Authority (GLWA). In order to determine whether your facility is subject to the Pretreatment Program, and in accordance with Section II-701 of the GLWA Rules you must complete and submit the enclosed Survey Application and return within thirty (30) days of the above date.

Please submit all correspondence to:

Great Lakes Water Authority
Industrial Waste Control Group
9300 West Jefferson, Suite 210
Detroit, MI 48209

Failure to submit this application form could lead to enforcement action against your facility. Should you have any questions, please contact me at POTW PERSONNEL PHONE GOES HERE.

Sincerely,

POTW NAME
Compliance Assistance Group
Industrial Waste Control Group

CERTIFIED MAIL

Date: <ENTER DATE>

Facility No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

NOTICE OF VIOLATION – FAILURE TO SUBMIT APPLICATION FORM

The Great Lakes Water Authority (GLWA) issues this notice pursuant to Section II-1003 (1)(a) of the GLWA Rules for failing to provide a required (select) [ ] Survey Application / [ ] Permit Application / [ ] Baseline Monitoring Report.

FINDINGS OF FACT

1) The GLWA is the Control Authority for implementing, administering and enforcing an Industrial Pretreatment Program as identified in NPDES Permit MI0022802;
1) Under this pretreatment program, INDUSTRY NAME, hereinafter referred to as "The Company", was [ ] required by GLWA Rules [ ] notified by GLWA to provide a [ ] Survey Application / [ ] Permit Application / [ ] Baseline Monitoring Report
2) More thirty (30 days have elapsed.
3) The discharge(s) from your facility are **NOT AUTHORIZED** and you failed to notify GLWA.

THEREFORE, THE COMPANY IS HEREBY NOTIFIED THAT:

1) The Company is in violation with the GLWA Rules.
2) The Company shall immediately abate this violation and tender the required application within ten (10) days.
4) {For a CSIU or SIU} If we do not receive your [ ] Permit Application / [ ] Baseline Monitoring Report in ten (10) days of this notice, and you fail to contact this office, your failure to comply with the requirements of this notice will result in escalation of enforcement action.

If you should have any questions or need any additional information concerning this matter, please contact me at <<phone>> and <<email>>.

<<Engineer>>
Industrial Waste Control Group
(313)297-<<phone>>

Wastewater Operating Services
Industrial Waste Control Group
9300 W. Jefferson, Suite 210
Detroit, Michigan 48209

WASTEWATER DISCHARGE PERMIT
PERMIT NO.: 004-12345-IU

SECTION A: GENERAL INFORMATION

Facility I.D. No.:	12345
Company Name:	Local Company Permit Sample
Facility Address:	10000 Water Street Detroit, MI 48209
Mailing Address:	10000 Water Street Detroit, MI 48209

The Great Lakes Water Authority ("GLWA") hereby authorizes the «ClassCode» specified above to discharge wastewater to the GLWA's sewer system, in accordance with the terms of this Wastewater Discharge Permit. The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

This permit is granted in accordance with the application filed with the GLWA, and in conformity with plans, specifications, and other substantive data submitted to the GLWA in support of the above application. This discharge authorization is granted in accordance with GLWA's Wastewater Discharge Rules, and any applicable provisions of federal or state laws or regulations.

It is the responsibility of the Permittee to submit a permit reapplication form at least ninety (90) days before the expiration date of this permit with all supporting documentation and re-certifications. Upon a timely filing, this permit will continue in effect until it is superseded by a successive final Wastewater Discharge Permit.

Effective Date:	September 2, 2022
Expiration Date:	September 1, 2026

Authorized by:

_____
Stephen J. Kuplicki, P.E., J.D.
Operations Manager
Industrial Waste Control Group

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENT (Local)

Representative Sampling Location: Manhole located in warehouse area; 25' E. of office entrance, 35' S. of N. wall

Wastewater Discharge Information: Continuous Discharge
19,845 gpd average

Authorized Composite Sampling Method (See Section I): Flow-proportional

		Applicable Discharge Limitations (Reported in mg/l unless otherwise indicated)	
PARAMETER		**Daily Max.**	**Min. Sampling Frequency**
Acidity/Alkalinity (pH)	pH	5.0 - 11.5 Units	1 / 6 Month
Arsenic	As	1.0	1 / 6 Month
Biochemical Oxygen Demand	BOD	10,000.0	1 / 6 Month
Cadmium	Cd	3.0	1 / 6 Month
Chromium	Cr	25.0	1 / 6 Month
Copper	Cu	3.0	1 / 6 Month
Cyanide (Amenable)	AMCN	1.5	1 / 6 Month
Fats, Oil or Grease	FOG	1500.0	1 / 6 Month
Lead	Pb	1.0	1 / 6 Month
Mercury	Hg	0.01	1 / 6 Month
Nickel	Ni	5.0	1 / 6 Month
Phosphorus	P	150	1 / 6 Month
Silver	Ag	1.0	1 / 6 Month
Total PCB	PCB	Non-Detect	1 / Year
Total Phenolic Compounds	PHENOL	1.0	1 / Year
Total Suspended Solids	TSS	10000.0	1 / 6 Month
Zinc	Zn	12.0	1 / 6 Month

Approved By: _____ Date: _____

SECTION C: PROHIBITION FOR DILUTION OR DILUTION IN LIEU OF TREATMENT

Except where expressly authorized to do so by an applicable pretreatment standard or requirement, no user shall increase the use of process water, or in any way dilute or attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the national categorical pretreatment standards, or in any other pollutant specific limitation or requirement imposed by the State of Michigan, or the GLWA.

SECTION D: REPRESENTATIVE SAMPLING REQUIREMENT

All wastewater sampling performed by the permittee shall be collected in a manner and form intended to represent the wastewater discharged by the permittee. The permittee has provided a sampling plan dated 08/01/2022 in accordance with Section II-603 describing the manner and form intended for representative wastewater self-monitoring. The permittee shall implement and maintain this plan to include:

1) A description of the sample collection method(s) based on grab, flow-proportional composite or time-proportional composite methods.
2) Designate applicable requirements for batch and/or continuous discharges, including the release time.
3) If applicable, the sampler settings, such as pulse, time, sample volume; and
4) If applicable, the flow-measurement equipment.

The permittee shall perform Flow-Proportional Composite sampling in accordance with the information submitted on 08/01/2022.

SECTION E: APPLICABLE LIMITS ON RATE AND TIME OF DISCHARGE & FLOW REGULATION

1) The permittee is authorized to discharge wastewater regulated under this permit which has been given treatment or equivalent treatment in accordance with the representations made by the permittee. Based upon information filed with the GLWA, the following rate and time of discharge conditions and restrictions apply.

   a) Days/Hours of Operation: 7 days/week

   b) Daily Rate Limits: The total volume discharged shall not exceed 25,000 gallons per day of process wastewater

   Type of Discharge: [ ] Batch [X] Continuous [ ] Intermittent

   Where the discharge is classified as Intermittent, no discharge may occur except in accordance with Section F (4).

2) The permittee shall maintain the following records and information in support of all types of discharge in hard-copy or electronic form and permit this information to be available to the GLWA's representative upon request. At a minimum, the permittee shall maintain a record of (i) the date of discharge, and the (ii) volume of wastewater discharged.

3) For facilities operating less than seven (7) days per week or twenty-four (24) hours per day, the permittee is prohibited from discharging any wastewater regulated under this permit outside of the stated hours or days of operation described in paragraph E.1.

4) Discharge authorization may be granted for discharges outside of the stated hours of days of operation described in Section E.1 where the permittee provides at least 72 hours notification to the Department and receives prior written authorization from the GLWA for the proposed discharge.

SECTION F: SELF-MONITORING CONDITIONS AND REQUIREMENTS

2) The sampling location(s) used for purposes of compliance sampling and reporting is identified in Section B. No alternate locations will be accepted unless approved in writing by the GLWA. Except in emergencies, all requests for an alternate sample location or change in the sampling location shall be submitted in writing at least thirty (30) days prior to the proposed date of change.

3) In accordance with 40 CFR 403.12(g)(3), the GLWA, as the authorized agent of the Control Authority, shall require the frequency of monitoring necessary to assess and assure compliance by the permittee. The minimum sampling frequency for each pollutant parameter described in Section B has been established based on (a) an evaluation of compliance history; (b) volume of process wastewater discharged to the sewer; (c) reported discharge frequency (if other than daily); and other information submitted in your permit application (or re-application), or from prior reports or inspections.

4) The specific pollutant parameters, which are to be monitored for purposes of compliance sampling and reporting, are identified in Section B and the sampling plan dated August 1, 2022, as amended..

   a) A flow-proportional composite sample shall be collected and analyzed for all parameters as specified Section B, except for Fats, Oil or Grease (FOG), Cyanide (total, available, or amenable), pH, and Total Phenols, which shall be collected by one or more grab samples, or as specified in 40 CFR 136. All samples shall be representative of the facility's discharge based on flow-proportional method.

   b) All samples shall be individually analyzed, reported and compared against the applicable limitations listed in Section B.

   c) If Section B includes limitations for 4-day, 30-day or monthly average, the appropriate average shall be calculated; compared with the appropriate Section B limitation and reported with the self-monitoring report.

5) All sampling and analyses conducted for purposes of compliance with the requirements of this Permit, as identified in Section B, must be performed in accordance with the methods and techniques specified in 40 CFR Part 136 and any amendments thereto.

SECTION G: REPORTING, RECORDKEEPING AND NOTIFICATION REQUIREMENTS

1) If sampling performed by the permittee indicates a violation of the stated permit limitations, then the permittee shall provide notice and make a demonstration of compliance, which is acceptable to the GLWA and consist of the following minimum requirements:

   a) Written notification via email to iwc@glwater.org, or notification by telephone to the GLWA's at telephone number (313) 297-5826, within twenty-four (24) hours of becoming aware of the violation.

   NOTE: For purposes of this section, when interpreting, *"within twenty-four (24) hours of becoming aware*" the GLWA shall consider the reasonable time frame which the authorized representative, or their designated authorized representative, actually or should have become aware of the exceedance or violation through due diligence.

   b) A report identifying the suspected or known causes of the violation and any corrective measures taken or planned to prevent future noncompliance.

   c) A demonstration of compliance by collecting and analyzing at least two (2) more individual daily samples.

   d) Submission of the report and two (2) additional analyses to the GLWA within thirty (30) days of becoming aware of the noncompliance.

2) Where wastewater(s) are hauled off-site in addition to or in lieu of discharge to the POTW, the permittee shall maintain and provide the following information with their six-month report:
   a) Copies of waste manifest documents,
   b) Copies of analytical reports for materials sent off-site;
   c) Flow-meter records and/or water bill records for the six-month period

3) The permittee shall maintain the following records and information in support of all types of discharge in hard-copy or electronic form and permit this information to be available to the GLWA's representative upon request. At a minimum, the permittee shall maintain a record of (i) the date of discharge, and the (ii) volume of wastewater discharged.

SECTION H: SPECIAL USER CHARGES FEES

1) Regulatory Oversight Fee – The GLWA will assess an Industrial Waste Control Meter Charge to all commercial and industrial users to recover the costs of regulatory sampling, inspections, enforcement and pretreatment administration through your local community.

2) Surcharges – In compliance with federal regulations, a User Charge Program ("Surcharge Program") has been developed and adopted to assess any additional treatment costs for the discharge of compatible pollutants in excess of domestic

strength levels. Currently, the compatible pollutants that have an applicable User Charge are: Biochemical Oxygen Demand 5-day (BOD_5), Total Suspended Solids (TSS), Fats Oil or Grease (FOG), and Phosphorous (P). (See DWSD's Surcharge Rules and Regulations).

Your facility is not currently subject to the Surcharge Program..

These charges are exclusive of any fees, fines or penalties assessed for noncompliance with the GLWA Rules or this wastewater discharge permit.

SECTION I: OTHER REQUIREMENTS

1) Unless modified by an Administrative Order or Judicial Order, the permittee is required to comply with all conditions, standards, and requirements of this permit. Failure to comply will result in enforcement action.

2) Notice of Hazardous Waste - As part of its Wastewater Discharge Permit re-application, the permittee shall submit certified notice of any discharge which would be a hazardous waste under 40 CFR §261, in accordance with 40 CFR 403.12(p), and report any additions or other changes to the hazardous wastes discharged, in accordance with 40 CFR 403.12(j).

3) Slug Control/Spill Prevention Plan – The permittee is required to develop, submit and implement a Slug Control/Spill Prevention Plan (SC/SPP) against accidental discharges to the POTW, in accordance with the GLWA Rules.
   a) The permittee shall review its SC/SPP every two (2) years or following any substantial change in operation impacting the potential for a slug discharge/spill to the sewer system or following an implementation event of its SC/SPP and modify or update the SC/SPP as necessary, submitting all changes to the GLWA.

   b) The permittee shall comply with the notification and reporting requirements (See General Terms and Conditions).

4) Periodic Compliance Report or Six-Month Report - The Six-Month Report (aka Periodic Compliance Report) must be submitted to the GLWA semi-annually on or before June 30th and December 31st of each year.
   a) GLWA has implemented an Electronic Reporting System. The permittee is required to use the LINKO System at Linko.org.
   b) The report must contain the following information:
      i. Analytical part (Self-Monitoring Requirements/Wastewater Analyses);

      ii. Descriptive part (i.e., facility information, water usage/discharge information, certified statement, certification, etc.)

      iii. This report shall be signed and dated by the authorized representative of the Permittee.

5) **Plan Development**

A. Best Management Practice Plans (BMP) – GLWA supports and encourages the permittee to develop and implement Best Management Practice Plans and Pollution prevention plan initiatives as a partial response to non-compliance. Upon development, such plans shall be submitted to GLWA. Upon review and acknowledgement, the plans will be incorporated as an enforceable part of this Wastewater discharge permit. The permittee may submit a written request to be relieved of the Best Management Practice Plans and Pollution prevention implementation requirement, upon demonstrating compliance.

B. Protection for Flammable and Combustible Substances - In accordance with Section II-302(a) of the GLWA Rules, permittee's who discharge flammable or combustible substance shall install, operate and maintain a combustible gas monitoring system acceptable to GLWA. **Based upon current operations, the permittee is not required to provide such a system**.

C. pH Monitoring Plan and Requirements **-** Permittees who process acidic and/or caustic wastes and Wastewaters; or whose pH is adjusted on-site, whether done for operational or treatment purposes; shall (i) develop an approvable pH Monitoring plan, and (ii) install appropriate pH monitoring and recording devices. **Based upon current operations, the permittee is not required to provide such a system**.

PART II: GENERAL TERMS AND CONDITIONS

SECTION A: GENERAL PROHIBITIONS

No user shall discharge or cause to be discharged into the POTW, directly or indirectly, any pollutant or wastewater which will cause interference or pass through. It shall be unlawful for a user to discharge into the POTW:

1) Any liquid, solid or gas, which by reason of its nature or quantity, is sufficient either alone or by interaction with other substances to create a fire or explosion hazard or to be injurious in any other way to persons, to the POTW, or to the operations of the POTW. Pollutants, which create a fire or explosion hazard in a POTW, include, but are not limited to, wastestreams with a closed cup flash point of less than 140°F or 60°C using the test methods specified in 40 C.F.R. § 261.21; or

2) Any solid or viscous substance in concentrations or quantities, which are sufficient to cause obstruction to the flow in a sewer or other encumbrances to the operation of the POTW, including, but not limited to, grease, animal guts or tissues, bones, hair, hides or fleshing, entrails, whole blood, feathers, ashes, cinders, sand, cement, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, strings, fibers, spent grains, spent hops, wastepaper, wood, plastics, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud or glass grinding or polishing wastes, or tumbling and deburring stones; or

3) Any wastewater containing petroleum oil, non-biodegradable cutting oil, products of mineral oil origin, or toxic pollutants in sufficient concentration or quantity either singly or by interaction with other pollutants to cause interference, or pass through, or constitute a hazard to humans or animals; or

4) Any liquid, gas, solid or form of energy, which either singly or by interaction with other waste is sufficient to create toxic gas, vapor, or fume within the POTW in quantities that may cause acute worker health and safety problems, or may cause a public nuisance or hazard to life, or are sufficient to prevent entry into the sewers for their maintenance and repair; or

5) Any noxious or malodorous liquids, gases, solids, or other Wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair; or

6) Any substance which is sufficient to cause the POTW's effluent or any other product of the POTW, such as residue, sludge, or scum to be unsuitable for reclamation processing where the POTW is pursuing a reuse and reclamation program. In no case shall a substance discharged into the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria guidelines or regulations developed under 33 U.S.C. § 1345, with any criteria, guidelines, or developed and promulgated regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Federal Clean Air Act, the Federal Toxic Substances Control Act, or with state criteria applicable to the sludge management method being used; or

7) Any trucked or hauled pollutants, except at discharge points designated by the POTW and authorized by the Control Authority; or

8) Any substance which will cause the POTW to violate the National Pollutant Discharge Elimination System permit; or

9) Any discharge having a color uncharacteristic of the wastewater being discharged; or

10) Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at the introduction into a public sewer which exceeds 150°F or which will cause the influent at the wastewater treatment plant to rise above 104°F (40°C); or

11) Any pollutant discharge which constitutes a slug; or

12) Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established in compliance with applicable federal or state regulations; or

13) Any floating fats, oil or grease which are sufficient to cause interference with or pass through the POTW; or

14) Any solid materials having a specific gravity greater than 1.2 or a cross section dimension of one-half (½) inch or greater which are sufficient to cause interference with the POTW.

15) Wastewater causing a reading on an explosion hazard meter at the point of discharge into the POTW, or at any point in the POTW, of more than 20 percent (20%) of the Lower Explosive Limit of the meter; or

16) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW.

SECTION B: <u>GENERAL TERMS AND CONDITIONS</u>

The Permittee is authorized to discharge industrial wastewater to the GLWA's sewer system in compliance with the GLWA's Rules and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

1) **PRETREATMENT FACILITIES -** The permittee is required to provide, maintain and operate any Wastewater Treatment Facilities necessary to comply with this permit, and maintain operating procedures for such facilities. The permittee shall provide copies of any plans for new, replacement or upgrade facility and/or operating procedures to GLWA for review following any required approvals from their member community.

2) **Records for monitoring activities** shall be maintained in accordance with GLWA Rules and requirements and shall include the following information for all samples:

   a) The date, time, exact place and method of sampling
   b) The names of persons taking the sample
   c) The technique or method of analysis, the date and results of analysis
   d) The names of person performing the analysis

3) **Notification and Reporting Requirements** – The following telephone contact numbers are available for providing notice to the GLWA:

   To report Spills, Upsets, Bypasses or Environmental emergencies: 24-hour

Numbers: Systems Control Center
(313) 267-6000

Water Resource Recovery Facility
(313) 297-0322 or 297-0326

Non-emergency Number: Industrial Waste Control Office
(313) 297-5857
iwc@glwater.org

a) **Sampling Violations (Self- Monitoring) -** Within twenty-four (24) hours of becoming aware of a violation, the IU shall notify GLWA by telephone at (313) 297-5826 or by email at Notice.iwc@glwater.org.

b) **Slug Loading / Accidental Discharge -** Within one (1) hour of becoming aware of a discharge entering into the sewer system which exceeds or does not conform with federal, state or GLWA Rules, regulations or the permit requirements, the Permittee shall telephone the GLWA at the Systems Control Center and inform the GLWA about the details of the discharge.

c) **Upset at the IU's Pretreatment Facility -** Within twenty-four (24) hours of becoming aware of an upset, the IU shall telephone GLWA at the System Control Center and inform the GLWA about the details of the upset and discharge.

d) **Bypass Events** – are prohibited, unless the permittee demonstrates that:

i) The bypass was unavoidable to prevent loss of life, personal injury or severe property damage;
ii) There was no feasible alternative to the bypass;
iii) The permittee notifies the GLWA of the bypass event:

(1) **Unanticipated Bypass -** Within twenty-four (24) hours of becoming aware of the bypass, IU shall telephone the GLWA at the System Control Center and inform the GLWA about the details of the discharge.

(2) **Anticipated Bypass** - If an IU anticipates the need for a bypass, prior notice shall be submitted to the GLWA at least ten (10) days before the date of bypass. The report shall be accompanied by analytical data, if available, which shows the characteristics of the material to be bypassed. Upon evaluation, the GLWA will provide the IU with its determination on the bypass.

e) **Submission of Report -** For the incidents b, c, or d, a written report shall be submitted to the GLWA within five (5) calendar days of becoming aware of the incident. This report shall contain the following information:

i) A description of the discharge and the cause of the incident;
ii) The duration of the incident including exact dates and times or, if not corrected,

the anticipated time the incident is expected to continue;

iii) Steps being taken and/or planned to reduce, eliminate and prevent future occurrences of a similar incident.

The IU may also have certain notification requirements under applicable federal regulations, including but not limited to 40 CFR Part 403.

4) **Limitations on Permit Transfer** - The wastewater discharge permit shall not be reassigned or transferred without the written approval of the GLWA and provision of a copy to the new owner or operator. The permittee shall notify the GLWA of any such changes at least thirty (30) days prior to the change.

5) **Duty to Provide Notice of Material or Substantive Change** - The permittee shall notify the GLWA of any material or substantial change to the facility, its operations, or changes in the characteristics of the Permittee's effluent, including but not limited to the method, frequency or volume of discharge, within thirty (30) days of the change.

6) **Confidential Information** - Except for data accepted as confidential under the GLWA Rules, all information and data regarding the permittee obtained from written reports, questionnaires, permit applications, permits, monitoring programs and inspections shall be available to the public or other government agencies without restriction. If a permittee submits information claimed to be Confidential Information it must be clearly marked "Confidential". The GLWA shall make a determination in accordance with Section II-902.

7) **Legal Actions**

a) Any user who violates any local provision, including the failure to pay any fees, charges, or surcharges imposed hereby, or any condition or limitation of a permit issued pursuant thereto or who knowingly makes any false statements, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to the GLWA Rules or wastewater discharge permit or who tampers with, or knowingly renders inaccurate any monitoring device required under the GLWA Rules is guilty of a misdemeanor and shall, upon conviction, be punished by a fine not to exceed $500 for each violation per day or by imprisonment for not more than ninety (90) days or by both. The GLWA is hereby authorized to seek, through its counsel, prosecution of criminal charges against any person violating any provision of the GLWA Rules.

b) If any person discharges sewage, industrial wastes, or other wastes into the POTW contrary to the provisions of the GLWA Rules, permit or order issued thereunder, the Director or Board may commence a civil action to enjoin such discharge or to enforce compliance with the GLWA Rules, permit or order issued thereunder, in the Circuit Court for the County of Wayne or other appropriate court. Upon a proper showing of a violation of this GLWA Rules, permit or order issued thereunder, a permanent or temporary injunction may be granted without bond. The GLWA or Board may also seek additional legal and/or equitable relief. Instituting suit in the Circuit Court does not constitute as exclusive election of remedies and does not prohibit the GLWA, or Board from commencing action in Federal Court for

discharges believed to be in violation of the GLWA Rules, State and Federal requirements pursuant to the Clean Water Act, the NPDES permit, or other applicable laws or requirements. The GLWA may also recover reasonable attorney fees, court costs, court reporters' fees, and other unusual expenses related to enforcement activities or litigation against the person found to have violated the GLWA Rules or the orders, and permits issued hereunder.

c) All fines, costs and penalties which are imposed by any court of competent jurisdiction shall be payable to the clerk of such court, who shall deposit the same with the GLWA, all of which fines, costs, and penalties shall be credited to the appropriate fund of the GLWA.

8) **All reports shall be addressed to:**

Great Lakes Water Authority
Industrial Waste Control Division,
9300 West Jefferson
Suite 210
Detroit, Michigan 48209

9) **Requirement to Reapply** - This permit shall expire on the expiration date identified. Existing permittees shall apply for permit reissuance a minimum of ninety (90) days prior to the expiration of existing permits on a form prescribed by the GLWA. Upon timely application for reissuance of a permit, the expired permit shall be automatically extended until modified or reissued by the GLWA. Failure to submit a timely reapplication for reissuance may result in a delayed issuance of a permit and a cessation of unpermitted discharges to the sewer system.

10) **Records Retention** - The permittee shall maintain records of all information from monitoring activities, permit requirements, or 40 CFR 403.12 for no less than three years.

11) **Operation and Maintenance of Pretreatment Facilities** - The permittee shall operate and maintain any and all pretreatment facilities in a prudent and professional manner. Records of operation and maintenance shall be provided to the GLWA for review, upon request.

12) **Right of Entry** - The GLWA's employees or authorized representative shall have ready access to the Permittee's premises to engage in inspection, sampling, compliance monitoring and/or metering activities. Each such activity shall be commenced and completed at reasonable times, and in a reasonable manner. It is the permittees' responsibility to make prompt and necessary arrangements so that upon presentation of appropriate credentials, personnel from the GLWA will be permitted to enter immediately for the purposes of performing their specific responsibilities.

Denial of access to any authorized GLWA representative shall result in enforcement action.

13) **Permit Modification** - The terms and conditions of this permit are subject to modification during the term of the permit in accordance with the Section II-706 (d).

14) **Permit Revocation** - The GLWA may revoke this permit at any time in accordance with applicable law. Actions for which a permit may be revoked include, but are not limited to, failure of a Permittee to comply with the permit, failure to comply with an administrative order, or court order, discharging wastewater which has the potential to or does threaten the POTW or the community, discharges which would cause the POTW to violate its NPDES permit.

Where such action is taken by the GLWA, the former permittee shall have an opportunity for a hearing for permit reinstatement in accordance with applicable law.

15) **Mercury and Total PCB compliance** -

a) Total PCB measurements shall be based upon U.S. EPA Method 608.3, (or other approved methods) and the quantification level shall not exceed 0.2 μg/l, unless a higher level is appropriate because of demonstrated sample matrix interference.

b) The Limitation for Mercury (Hg) shall be based on U.S. EPA Method 245.1, (or other approved methods) and the quantification level shall not exceed 0.2 μg/l, unless a higher level is appropriate because of demonstrated sample matrix interference.

16) **Test of Good Faith Effort –** GLWA will endeavor to consider the good faith of the permittee as a factor in determining the enforcement response(s) to invoke to an incident of noncompliance. The good faith of a User may be established by considering the cooperation and efforts made by a User in achieving and maintaining compliance with these rules; and in the promptness with which a User responds to resolution of an incident of noncompliance. Where a permittee is acting in good faith to comply with the rules, GLWA may choose an enforcement action on a more conciliatory level than if the permittee does not appear to be acting in good faith to comply with the rules.

SECTION C: DEFINITIONS AND REQUIREMENTS

1. **4-DAY Average Limitation** is the highest allowable mass or concentration standard of discharges over four (4) consecutive, independent daily sampling events. Compliance with this limitation is calculated as the summation of individual daily discharge, measurements for a parameter taken during four (4) consecutive daily sampling events divided by four (4). The four (4) consecutive sampling events need not occur on consecutive calendar days.

2. **30-DAY Average Limitation** is the summation of individual daily measurements for a parameter during a thirty (30) consecutive calendar day period, divided by the number of individual measurements for that parameter taken during that thirty (30) day period. The recommended minimum number of samples (1 set) required to demonstrate compliance are ten (10) independent daily samples.

3. **Authorized Representative** – means the person defined in Chapter I of GLWA's Rules, or the person designated as a duly authorized representative made in conformance with GLWA's Rules.

4. **Authority** – means the Great Lakes Water Authority, and authorized employees of the GLWA. See also Control Authority.

5. **Available Cyanide –** means the quantity of cyanide that consists of cyanide ion (AVCN); hydrogen cyanide in water (HCNaq); and the cyano-complexes of zinc, copper, cadmium, mercury, nickel, and silver, determined by EPA method OIA-1677, or other method designated as a Standard Method or approved under 40 CFR Part 136.

6. **Batch Discharge** A non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration or frequency of generation warrant periodic releases as the most efficient and effective means of discharge.

7. **Best Management Practices (BMP) –** means programs, practices, procedures or other directed efforts, initiated and implemented by a User, which can or does lead to the reduction, conservation or minimization of pollutants being introduced into the ecosystem, including but not limited to the regional sewer system. BMPs include, but are not limited to, equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control, and may include technical and economic considerations.

8. **Continuous Discharge** - means a "discharge" which occurs without interruption throughout the operating hours of the Permittee, except for infrequent shutdowns for maintenance, process changes, or other similar activities.

9. **Control Authority** - means the Detroit Water and Sewerage Department, or its agent Great Lakes Water Authority, which have been officially designated as such by the Michigan Department of Environmental Quality under the provisions of 40 CFR 403.11, 40 CFR 403.9, and 40 CFR 403.12.

10. **Daily Maximum Limitation** is the maximum allowable discharge of pollutant on a

single calendar day.

11. **Intermittent Batch Discharge** - A non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration or frequency of generation warrant periodic releases as the most efficient and effective means of discharge. Batch discharges are classified as intermittent when there is a period of more than thirty (30) days between batch discharges.

12. **Monthly Average Limitation** is the summation of individual daily measurements for a parameter during a calendar month, divided by the number of individual measurements for that parameter taken during that month. The recommended minimum number of samples (1 set) required to demonstrate compliance are ten (10) independent daily samples.

13. **Permittee** means the Company Name in Section A of this Wastewater Discharge Permit. As used within this Wastewater Discharge Permit, it also means the Industrial User, or User.

14. **PFAS Substances** means the list of perfluoroalkyl and polyfluoroalkyl substances, as amended, that the MI-EGLE has identified as emerging contaminants; which includes:

Perfluorotetradecanoic acid (PFTA)	Perfluorononanesulfonic acid (PFNS)
Perfluorotridecanoic acid (PFTrDA)	Perfluorooctanesulfonic acid (PFOS)
Perfluorododecanoic acid (PFDoA)	Perfluoroheptanesulfonic acid (PFHpS)
Perfluoroundecanoic acid (PFUnA)	Perfluorohexanesulfonic acid (PFHxS)
Perfluorodecanoic acid (PFDA)	Perfluoropentanesulfonic acid (PFPeS)
Perfluorononanoic acid (PFNA)	Perfluorobutanesulfonic acid (PFBS)
Perfluorooctanoic acid (PFOA)	Perfluorooctanesulfonamide (PFOSA)
Perfluoroheptanoic acid (PFHpA)	Fluorotelomer sulphonic acid 8:2 (FtS 8:2)
Perfluorohexanoic acid (PFHxA)	Fluorotelomer sulphonic acid 6:2 (FtS 6:2)
Perfluoropentanoic acid (PFPeA)	Fluorotelomer sulphonic acid 4:2 (FtS 4:2)
Perfluorobutanoic acid (PFBA)	2-(N-Ethylperfluorooctanesulfonamido) acetic acid (NEtFOSAA)
Perfluorodecanesulfonic acid (PFDS)	2-(N-Methylperfluorooctanesulfonamido) acetic acid (NMeFOSAA)
Hexafluoropropylene oxide dimer acid (HFPO-DA)	11-chloroeicosafluoro-3-oxaundecane-1 - sulfonic acid (11cl-pf3ouds)
9-chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9CL-PF3ONS)	4 8-dioxa-3h-perfluorononanoic acid (ADONA)

15. **Publicly Owned Treatment Works (POTW)** means a treatment works as defined by 33§ 1292(2)(A) which is owned **or operated,** by a state or municipality, as defined in 33 U.S.C. § 1362, including:

    a. Any devices and systems used in the storage, treatment, recycling, or reclamation of municipal sewage or industrial wastes of a liquid nature; or

    b. Sewers, pipes and other conveyances only if they convey wastewater to a POTW treatment plant; or

    c. The municipality, as defined in 33 U.S.C. § 1362, which has jurisdiction

over the indirect discharges to and the discharges from such a treatment works.

16. **Quantification Level –** means the measurement of the concentration of a contaminant obtained by using a specified laboratory procedure calculated at a specified concentration above the detection level. It is considered the lowest concentration at which a particular contaminant can be quantitatively measured using a specified laboratory procedure for monitoring of the contaminant.

17. **Total PCB –** means the sum of the individual analytical results for each of the PCB aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260 during any single sampling event with any aroclor result less than the quantification level being treated as zero.

18. **Total Phenolic Compounds –** means the sum of the individual analytical results for each of the phenolic compounds of 2-chlorophenol, 4-chlorophenol, 4-chloro-3-methylphenol, 2,4-dichlorophenol, 2,4-dinitrophenol, 4-methylphenol, 4-nitrophenol, and phenol during any single sampling event expressed in mg/l.

19. **Total Toxic Organics (TTO)** is the summation of all quantifiable values greater than 0.01 mg/l for the listed toxic organics. TTO requirement shall be as follows:

    a) All parameters shall be analyzed in accordance to 40 CFR Part 136 methods. Usage of approved analytical procedures is essential to the detection of parameters being analyzed. All MDLs should be reported with the sample results, and any cleanup procedures and sample interference shall be reported.

    b) In lieu of monitoring for TTO, facilities subject to either 40 CFR Part 413 or Part 433 may be allowed to make the TTO certification as a comment to the Six- M o n t h Report, provided:

        i. At least one (1) complete set of analytical results has been submitted for all the TTO pollutants of concern, and
        ii. The Permittee has submitted a Toxic Organic Management Plan (TOMP) in compliance with either 40 CFR Part 413 or 433 requirements, and
        iii. The TOMP has been approved by the GLWA.

20. **Total Metals** is the sum of the concentration of Copper (Cu), Nickel (Ni), Chromium (Cr) and Zinc (Zn).

PERMIT DEFINITION

1. FACILITY DESCRIPTION

The facility manufactures widgets. The facility operates twenty-four (24) hours a day, seven (7) days per week with thirteen (13) employees.

2. PROCESS DESCRIPTION

Widgets are washed, rinsed, dried, sorted and shipped out to customers.

The process wastewater generated from the washing operations flows to the holding pit, where solids are allowed to settle down. Then, it is pumped and discharged into the sewer system via sampling location.

3. APPLICABLE CLASSIFICATION

The facility is classified as a Significant Industrial User under the GLWA Rules and IPP Program because their process wastewater requires pretreatment prior to discharge.

4. WASTEWATER DISCHARGE FLOW INFORMATION

Process wastewater	19,845 gpd avg.
Sanitary:	260 gpd avg.
Boiler blow-down	125 gpd avg.
Average Total Plant Discharge:	20,230 gpd avg.

5. SOURCES OF INFORMATION (List all that apply)

(i) Permit Application Dated August 1, 2022
(ii) Comprehensive Inspection Dated July 15, 2022
(iii) Sampling Plan Dated August 1, 2022

Prepared by:_____ **Reviewed by:**_____

Date:_____ **Date**:_____

Wastewater Operating Services
Industrial Waste Control Group
9300 W. Jefferson, Suite 210
Detroit, Michigan 48209

WASTEWATER DISCHARGE PERMIT
PERMIT NO.: 154-34567-IU

SECTION A: GENERAL INFORMATION

Facility I.D. No.:	34567
Company Name:	NCPS Company Permit Sample
Facility Address:	10000 Blue Water Street Detroit, MI 48209
Mailing Address:	10000 Blue Water Street Detroit, MI 48209

The Great Lakes Water Authority ("GLWA") hereby authorizes the «ClassCode» specified above to discharge wastewater to the GLWA's sewer system, in accordance with the terms of this Wastewater Discharge Permit. The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

This permit is granted in accordance with the application filed with the GLWA, and in conformity with plans, specifications, and other substantive data submitted to the GLWA in support of the above application. This discharge authorization is granted in accordance with GLWA's Wastewater Discharge Rules, and any applicable provisions of federal or state laws or regulations.

It is the responsibility of the Permittee to submit a permit reapplication form at least ninety (90) days before the expiration date of this permit with all supporting documentation and re-certifications. Upon a timely filing, this permit will continue in effect until it is superseded by a successive final Wastewater Discharge Permit.

Effective Date:	September 2, 2022
Expiration Date:	September 1, 2026

Authorized by:

_____
Stephen J. Kuplicki, P.E., J.D.
Operations Manager
Industrial Waste Control Group

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENT

CATEGORICAL INDUSTRIAL USER

Classification	Metal Finishing, 40 CFR Part 433.17 (a)

Sub-Category:	Subpart A, Pretreatment Standards for New Sources (PSNS)

Representative Sampling Location: Parshall flume in NW corner of WWTP; 12' S. of N. wall, 4' E. of W. wall

Wastewater Discharge Information: Continuous Discharge

Discharge Volume: 823,064 gpd average

Maximum Volume 1,190,000 gallons per day

Authorized Composite Sampling Method (See Section I): Flow-proportional

		Applicable Discharge Limitations (reported in mg/l unless otherwise indicated)		
PARAMETER		**Daily Max.**	**Monthly Avg.**	**Min. Sampling Frequency**
Acidity/Alkalinity (pH)	pH	5.0 - 11.5 Units		1 / 3 Month
Arsenic	As	1.0		1 / 3 Month
Biochemical Oxygen Demand	BOD	10,000.0		1 / 3 Month
Cadmium	Cd	0.11	0.07	10 / 3 Month
Chromium	Cr	2.77	1.71	10 / 3 Month
Copper	Cu	2.5	2.07	10 / 3 Month
Cyanide (Amenable)	AMCN	1.5		1 / 3 Month
Cyanide (Total)	CN	1.2	0.65	10 / 3 Month
Fats, Oil or Grease	FOG	1500.0		1 / 3 Month
Lead	Pb	0.69	0.43	10 / 3 Month
Mercury	Hg	0.01		1 / 3 Month
Nickel	Ni	3.98	2.38	10 / 3 Month
Phosphorus	P	150		1 / 3 Month
Silver	Ag	0.43	0.24	10 / 3 Month
Total PCB	PCB	Non-detect		1 / Year
Total Phenolic Compounds	PHENOL	1.0		1 / Year
Total Suspended Solids	TSS	10,000.0		1 / 3 Month
Total Toxic Organics	TTO	2.13		1 / Year
Zinc	Zn	2.61	1.48	10 / 3 Month

Approved By: _____ Date: _____

SECTION C: PROHIBITION FOR DILUTION OR DILUTION IN LIEU OF TREATMENT

Except where expressly authorized to do so by an applicable pretreatment standard or requirement, no user shall increase the use of process water, or in any way dilute or attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the national categorical pretreatment standards, or in any other pollutant specific limitation or requirement imposed by the State of Michigan, or the GLWA.

SECTION D: REPRESENTATIVE SAMPLING REQUIREMENT

All wastewater sampling performed by the permittee shall be collected in a manner and form intended to represent the wastewater discharged by the permittee. The permittee has provided a sampling plan dated 08/01/2022 in accordance with Section II-603 describing the manner and form intended for representative wastewater self-monitoring. The permittee shall implement and maintain this plan to include:

1) A description of the sample collection method(s) based on grab, flow-proportional composite or time-proportional composite methods.
2) Designate applicable requirements for batch and/or continuous discharges, including the release time.
3) If applicable, the sampler settings, such as pulse, time, sample volume; and
4) If applicable, the flow-measurement equipment.

The permittee shall perform Flow-Proportional Composite sampling in accordance with the information submitted on 08/01/2022.

SECTION E: APPLICABLE LIMITS ON RATE AND TIME OF DISCHARGE & FLOW REGULATION

1) The permittee is authorized to discharge wastewater regulated under this permit which has been given treatment or equivalent treatment in accordance with the representations made by the permittee. Based upon information filed with the GLWA, the following rate and time of discharge conditions and restrictions apply.

a)	Days of Operation:	7 days/week
b)	Hours of Operation:	24 hours a day
c)	Daily Rate Limits:	The total volume discharged shall not exceed 1,190,000 gallons per day of process wastewater
d)	Type of Discharge:	[ ] Batch [**x**] Continuous [ ] Intermittent

2) The permittee shall maintain the following records and information in support of all types of discharge in hard-copy or electronic form and permit this information to be available to the GLWA's representative upon request. At a minimum, the permittee shall maintain a record of (i) the date of discharge, and the (ii) volume of wastewater discharged.

3) For facilities operating less than seven (7) days per week or twenty-four (24) hours per

day, the permittee is prohibited from discharging any wastewater regulated under this permit outside of the stated hours or days of operation described in paragraph E.1.

4) Discharge authorization may be granted for discharges outside of the stated hours of days of operation described in Section E.1 where the permittee provides at least 72 hours notification to the Department and receives prior written authorization from the GLWA for the proposed discharge.

SECTION F: SELF-MONITORING CONDITIONS AND REQUIREMENTS

1) The sampling location(s) used for purposes of compliance sampling and reporting is identified in Section B. No alternate locations will be accepted unless approved in writing by the GLWA. Except in emergencies, all requests for an alternate sample location or change in the sampling location shall be submitted in writing at least thirty (30) days prior to the proposed date of change.

2) In accordance with 40 CFR 403.12(g)(3), the GLWA, as the authorized agent of the Control Authority, shall require the frequency of monitoring necessary to assess and assure compliance by the permittee. The minimum sampling frequency for each pollutant parameter described in Section B has been established based on (a) an evaluation of compliance history; (b) volume of process wastewater discharged to the sewer; (c) reported discharge frequency (if other than daily); and other information submitted in your permit application (or re-application), or from prior reports or inspections.

3) The specific pollutant parameters, which are to be monitored for purposes of compliance sampling and reporting, are identified in Section B, and the Sampling Plan dated August 1, 2022, as amended.

   a) A flow-proportional composite sample shall be collected and analyzed for all parameters as specified Section B, except for Fats, Oil or Grease (FOG), Cyanide (total, available, or amenable), pH, Total Phenols, and the volatile organic compounds included in the TTO list, which shall be collected by one or more grab samples, or as specified in 40 CFR 136. All samples shall be representative of the facility's discharge based on flow-proportional method.

   b) All samples shall be individually analyzed, reported and compared against the applicable limitations listed in Section B.

   c) If Section B includes limitations for 4-day, 30-day or monthly average, the appropriate average shall be calculated; compared with the appropriate Section B limitation and reported with the self-monitoring report.

4) All sampling and analyses conducted for purposes of compliance with the requirements of this Permit, as identified in Section B, must be performed in accordance with the methods and techniques specified in 40 CFR Part 136 and any amendments thereto.

SECTION G: REPORTING, RECORDKEEPING AND NOTIFICATION REQUIREMENTS

1) If sampling performed by the permittee indicates a violation of the stated permit limitations, then the permittee shall provide notice and make a demonstration of compliance, which is acceptable to the GLWA and consist of the following minimum requirements:

   a) Written notification via email to iwc@glwater.org, or notification by telephone to the GLWA's at telephone number (313) 297-5826, within twenty-four (24) hours of becoming aware of the violation.

   NOTE: For purposes of this section, when interpreting, *"within twenty-four (24) hours of becoming aware*" the GLWA shall consider the reasonable time frame which the authorized representative, or their designated authorized representative, actually or should have become aware of the exceedance or violation through due diligence.

   b) A report identifying the suspected or known causes of the violation and any corrective measures taken or planned to prevent future noncompliance.

   c) A demonstration of compliance by collecting and analyzing at least two (2) more individual daily samples.

   d) Submission of the report and two (2) additional analyses to the GLWA within thirty (30) days of becoming aware of the noncompliance.

2) Where wastewater(s) are hauled off-site in addition to or in lieu of discharge to the POTW, the permittee shall maintain and provide the following information with their six-month report:
   a) Copies of waste manifest documents,
   b) Copies of analytical reports for materials sent off-site;
   c) Flow-meter records and/or water bill records for the six-month period

3) The permittee shall maintain the following records and information in support of all types of discharge in hard-copy or electronic form and permit this information to be available to the GLWA's representative upon request. At a minimum, the permittee shall maintain a record of (i) the date of discharge, and the (ii) volume of wastewater discharged.

SECTION H: SPECIAL USER CHARGES FEES

1) Regulatory Oversight Fee – The GLWA will assess an Industrial Waste Control Meter Charge to all commercial and industrial users to recover the costs of regulatory sampling, inspections, enforcement and pretreatment administration through your local community.

2) Surcharges – In compliance with federal regulations, a User Charge Program ("Surcharge Program") has been developed and adopted to assess any additional treatment costs for the discharge of compatible pollutants in excess of domestic

strength levels. Currently, the compatible pollutants that have an applicable User Charge are: Biochemical Oxygen Demand 5-day (BOD_5), Total Suspended Solids (TSS), Fats Oil or Grease (FOG), and Phosphorous (P). (See DWSD's Surcharge Rules and Regulations).

Your facility is not currently subject to the Surcharge Program..

These charges are exclusive of any fees, fines or penalties assessed for noncompliance with the GLWA Rules or this wastewater discharge permit.

SECTION I: OTHER REQUIREMENTS

1) Unless modified by an Administrative Order or Judicial Order, the permittee is required to comply with all conditions, standards, and requirements of this permit. Failure to comply will result in enforcement action.

2) Notice of Hazardous Waste - As part of its Wastewater Discharge Permit re- application, the permittee shall submit certified notice of any discharge which would be a hazardous waste under 40 CFR §261, in accordance with 40 CFR 403.12(p), and report any additions or other changes to the hazardous wastes discharged, in accordance with 40 CFR 403.12(j).

3) Slug Control/Spill Prevention Plan – The permittee is required to develop, submit and implement a Slug Control/Spill Prevention Plan (SC/SPP) against accidental discharges to the POTW, in accordance with the GLWA Rules.
   a) The permittee shall review its SC/SPP every two (2) years or following any substantial change in operation impacting the potential for a slug discharge/spill to the sewer system or following an implementation event of its SC/SPP and modify or update the SC/SPP as necessary, submitting all changes to the GLWA.

   b) The permittee shall comply with the notification and reporting requirements (See General Terms and Conditions).

4) Periodic Compliance Report or Six-Month Report - The Six-Month Report (aka Periodic Compliance Report) must be submitted to the GLWA semi-annually on or before June 30th and December 31st of each year.
   a) GLWA has implemented an Electronic Reporting System. The permittee is required to use the LINKO System at Linko.org.
   b) The report must contain the following information:
      i. Analytical part (Self-Monitoring Requirements/Wastewater Analyses);

      ii. Descriptive part (i.e., facility information, water usage/discharge information, certified statement, certification, etc.)

      iii. This report shall be signed and dated by the authorized representative of the Permittee.

5) **Plan Development**

A. Best Management Practice Plans (BMP) – GLWA supports and encourages the permittee to develop and implement Best Management Practice Plans and Pollution prevention plan initiatives as a partial response to non-compliance. Upon development, such plans shall be submitted to GLWA. Upon review and acknowledgement, the plans will be incorporated as an enforceable part of this Wastewater discharge permit. The permittee may submit a written request to be relieved of the Best Management Practice Plans and Pollution prevention implementation requirement, upon demonstrating compliance.

B. Protection for Flammable and Combustible Substances - In accordance with Section II-302(a) of the GLWA Rules, permittee's who discharge flammable or combustible substance shall install, operate and maintain a combustible gas monitoring system acceptable to GLWA. **Based upon current operations, the permittee is required to provide such a system**.

In accordance with Section II-302(a)(2), the permittee shall provide a plan and schedule to install and implement a combustible gas monitoring system meeting the requirements of Section II-302(4) within ninety (90) days of final Permit Issuance or Modification Date, and complete implementation of the plan and schedule within 6 months.

C. pH Monitoring Plan and Requirements **-** Permittees who process acidic and/or caustic wastes and Wastewaters; or whose pH is adjusted on-site, whether done for operational or treatment purposes; shall (i) develop an approvable pH Monitoring plan, and (ii) install appropriate pH monitoring and recording devices. **Based upon current operations, the permittee is required to provide such a system**.

The permittee shall provide the following submittals within 90 days of final permit issuance date:

a) An approvable pH monitoring Plan, which includes:
   i. A description of the location of the pH monitor(s)
   ii. Equipment specifications identifying the manufacturer & model of the (a) pH meter; (b) pH probe; (c) pH transmitter (if applicable); and (d) the pH recorder (chart, electronic, other)
   iii. Maintenance procedures to be used for cleaning the pH monitoring system used, including the frequency of cleaning. A step-by-step description of the calibration procedure used shall be maintained by the SIU
   iv. Calibration procedure information including (a) whether the probe can or cannot be removed for calibration; (b) whether the direct or indirect method is used for calibration; (c) whether the pH meter is capable of temperature compensation; (d) the pH buffers (reagents) used; and (e) the frequency of meter calibration, with weekly (as a minimum)
   v. All records shall be retained for a minimum of three years and shall be made available to the Control Authority's representative upon request. A summary of records shall be provided with the six-month report to demonstrate compliance during the period. This may be submitted as a hard-copy or in electronic form.

b) A Construction schedule not to exceed 6 months from the plan submission date.

c) Upon start-up of the pH monitoring equipment, the following criteria will be applicable to the permittee's discharge(s):
   i. No individual excursion from the range of pH values shall exceed 15 minutes.
   ii. Where continuous pH monitoring is used, the maximum and minimum pH readings will be reported. Regardless of the number of pH measurements recorded for each day, only one violation per day shall be determined.
   iii. A summary of pH monitoring records shall be provided with the six-month report to demonstrate compliance during the period. This may be submitted as a hard-copy or in electronic form.

PART II: GENERAL TERMS AND CONDITIONS

SECTION A: GENERAL PROHIBITIONS

No user shall discharge or cause to be discharged into the POTW, directly or indirectly, any pollutant or wastewater which will cause interference or pass through. It shall be unlawful for a user to discharge into the POTW:

1) Any liquid, solid or gas, which by reason of its nature or quantity, is sufficient either alone or by interaction with other substances to create a fire or explosion hazard or to be injurious in any other way to persons, to the POTW, or to the operations of the POTW. Pollutants, which create a fire or explosion hazard in a POTW, include, but are not limited to, wastestreams with a closed cup flash point of less than 140°F or 60°C using the test methods specified in 40 C.F.R. § 261.21; or

2) Any solid or viscous substance in concentrations or quantities, which are sufficient to cause obstruction to the flow in a sewer or other encumbrances to the operation of the POTW, including, but not limited to, grease, animal guts or tissues, bones, hair, hides or fleshing, entrails, whole blood, feathers, ashes, cinders, sand, cement, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, strings, fibers, spent grains, spent hops, wastepaper, wood, plastics, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud or glass grinding or polishing wastes, or tumbling and deburring stones; or

3) Any wastewater containing petroleum oil, non-biodegradable cutting oil, products of mineral oil origin, or toxic pollutants in sufficient concentration or quantity either singly or by interaction with other pollutants to cause interference, or pass through, or constitute a hazard to humans or animals; or

4) Any liquid, gas, solid or form of energy, which either singly or by interaction with other waste is sufficient to create toxic gas, vapor, or fume within the POTW in quantities that may cause acute worker health and safety problems, or may cause a public nuisance or hazard to life, or are sufficient to prevent entry into the sewers for their maintenance and repair; or

5) Any noxious or malodorous liquids, gases, solids, or other Wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair; or

6) Any substance which is sufficient to cause the POTW's effluent or any other product of the POTW, such as residue, sludge, or scum to be unsuitable for reclamation processing where the POTW is pursuing a reuse and reclamation program. In no case shall a substance discharged into the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria guidelines or regulations developed under 33 U.S.C. § 1345, with any criteria, guidelines, or developed and promulgated regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Federal Clean Air Act, the Federal Toxic Substances Control Act, or with state criteria applicable to the sludge management method being used; or

7) Any trucked or hauled pollutants, except at discharge points designated by the POTW and authorized by the Control Authority; or

8) Any substance which will cause the POTW to violate the National Pollutant Discharge Elimination System permit; or

9) Any discharge having a color uncharacteristic of the wastewater being discharged; or

10) Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at the introduction into a public sewer which exceeds 150°F or which will cause the influent at the wastewater treatment plant to rise above 104°F (40°C); or

11) Any pollutant discharge which constitutes a slug; or

12) Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established in compliance with applicable federal or state regulations; or

13) Any floating fats, oil or grease which are sufficient to cause interference with or pass through the POTW; or

14) Any solid materials having a specific gravity greater than 1.2 or a cross section dimension of one-half (½) inch or greater which are sufficient to cause interference with the POTW.

15) Wastewater causing a reading on an explosion hazard meter at the point of discharge into the POTW, or at any point in the POTW, of more than 20 percent (20%) of the Lower Explosive Limit of the meter; or

16) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW.

SECTION B: <u>GENERAL TERMS AND CONDITIONS</u>

The Permittee is authorized to discharge industrial wastewater to the GLWA's sewer system in compliance with the GLWA's Rules and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

1) **PRETREATMENT FACILITIES -** The permittee is required to provide, maintain and operate any Wastewater Treatment Facilities necessary to comply with this permit, and maintain operating procedures for such facilities. The permittee shall provide copies of any plans for new, replacement or upgrade facility and/or operating procedures to GLWA for review following any required approvals from their member community.

2) **Records for monitoring activities** shall be maintained in accordance with GLWA Rules and requirements and shall include the following information for all samples:

   a) The date, time, exact place and method of sampling
   b) The names of persons taking the sample
   c) The technique or method of analysis, the date and results of analysis
   d) The names of person performing the analysis

3) **Notification and Reporting Requirements** – The following telephone contact numbers are available for providing notice to the GLWA:

   To report Spills, Upsets, Bypasses or Environmental emergencies: 24-hour

Numbers: Systems Control Center
(313) 267-6000

Water Resource Recovery Facility
(313) 297-0322 or 297-0326

Non-emergency Number: Industrial Waste Control Office
(313) 297-5857
iwc@glwater.org

a) **Sampling Violations (Self- Monitoring) -** Within twenty-four (24) hours of becoming aware of a violation, the IU shall notify GLWA by telephone at (313) 297-5826 or by email at Notice.iwc@glwater.org.

b) **Slug Loading / Accidental Discharge -** Within one (1) hour of becoming aware of a discharge entering into the sewer system which exceeds or does not conform with federal, state or GLWA Rules, regulations or the permit requirements, the Permittee shall telephone the GLWA at the Systems Control Center and inform the GLWA about the details of the discharge.

c) **Upset at the IU's Pretreatment Facility -** Within twenty-four (24) hours of becoming aware of an upset, the IU shall telephone GLWA at the System Control Center and inform the GLWA about the details of the upset and discharge.

d) **Bypass Events** – are prohibited, unless the permittee demonstrates that:

i) The bypass was unavoidable to prevent loss of life, personal injury or severe property damage;
ii) There was no feasible alternative to the bypass;
iii) The permittee notifies the GLWA of the bypass event:

(1) **Unanticipated Bypass -** Within twenty-four (24) hours of becoming aware of the bypass, IU shall telephone the GLWA at the System Control Center and inform the GLWA about the details of the discharge.

(2) **Anticipated Bypass** - If an IU anticipates the need for a bypass, prior notice shall be submitted to the GLWA at least ten (10) days before the date of bypass. The report shall be accompanied by analytical data, if available, which shows the characteristics of the material to be bypassed. Upon evaluation, the GLWA will provide the IU with its determination on the bypass.

e) **Submission of Report -** For the incidents b, c, or d, a written report shall be submitted to the GLWA within five (5) calendar days of becoming aware of the incident. This report shall contain the following information:

i) A description of the discharge and the cause of the incident;
ii) The duration of the incident including exact dates and times or, if not corrected,

the anticipated time the incident is expected to continue;

iii) Steps being taken and/or planned to reduce, eliminate and prevent future occurrences of a similar incident.

The IU may also have certain notification requirements under applicable federal regulations, including but not limited to 40 CFR Part 403.

4) **Limitations on Permit Transfer** - The wastewater discharge permit shall not be reassigned or transferred without the written approval of the GLWA and provision of a copy to the new owner or operator. The permittee shall notify the GLWA of any such changes at least thirty (30) days prior to the change.

5) **Duty to Provide Notice of Material or Substantive Change** - The permittee shall notify the GLWA of any material or substantial change to the facility, its operations, or changes in the characteristics of the Permittee's effluent, including but not limited to the method, frequency or volume of discharge, within thirty (30) days of the change.

6) **Confidential Information** - Except for data accepted as confidential under the GLWA Rules, all information and data regarding the permittee obtained from written reports, questionnaires, permit applications, permits, monitoring programs and inspections shall be available to the public or other government agencies without restriction. If a permittee submits information claimed to be Confidential Information it must be clearly marked "Confidential". The GLWA shall make a determination in accordance with Section II-902.

7) **Legal Actions**

a) Any user who violates any local provision, including the failure to pay any fees, charges, or surcharges imposed hereby, or any condition or limitation of a permit issued pursuant thereto or who knowingly makes any false statements, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to the GLWA Rules or wastewater discharge permit or who tampers with, or knowingly renders inaccurate any monitoring device required under the GLWA Rules is guilty of a misdemeanor and shall, upon conviction, be punished by a fine not to exceed $500 for each violation per day or by imprisonment for not more than ninety (90) days or by both. The GLWA is hereby authorized to seek, through its counsel, prosecution of criminal charges against any person violating any provision of the GLWA Rules.

b) If any person discharges sewage, industrial wastes, or other wastes into the POTW contrary to the provisions of the GLWA Rules, permit or order issued thereunder, the Director or Board may commence a civil action to enjoin such discharge or to enforce compliance with the GLWA Rules, permit or order issued thereunder, in the Circuit Court for the County of Wayne or other appropriate court. Upon a proper showing of a violation of this GLWA Rules, permit or order issued thereunder, a permanent or temporary injunction may be granted without bond. The GLWA or Board may also seek additional legal and/or equitable relief. Instituting suit in the Circuit Court does not constitute as exclusive election of remedies and does not prohibit the GLWA, or Board from commencing action in Federal Court for

discharges believed to be in violation of the GLWA Rules, State and Federal requirements pursuant to the Clean Water Act, the NPDES permit, or other applicable laws or requirements. The GLWA may also recover reasonable attorney fees, court costs, court reporters' fees, and other unusual expenses related to enforcement activities or litigation against the person found to have violated the GLWA Rules or the orders, and permits issued hereunder.

c) All fines, costs and penalties which are imposed by any court of competent jurisdiction shall be payable to the clerk of such court, who shall deposit the same with the GLWA, all of which fines, costs, and penalties shall be credited to the appropriate fund of the GLWA.

8) **All reports shall be addressed to:**

Great Lakes Water Authority
Industrial Waste Control Division,
9300 West Jefferson
Suite 210
Detroit, Michigan 48209

9) **Requirement to Reapply** - This permit shall expire on the expiration date identified. Existing permittees shall apply for permit reissuance a minimum of ninety (90) days prior to the expiration of existing permits on a form prescribed by the GLWA. Upon timely application for reissuance of a permit, the expired permit shall be automatically extended until modified or reissued by the GLWA. Failure to submit a timely reapplication for reissuance may result in a delayed issuance of a permit and a cessation of unpermitted discharges to the sewer system.

10) **Records Retention** - The permittee shall maintain records of all information from monitoring activities, permit requirements, or 40 CFR 403.12 for no less than three years.

11) **Operation and Maintenance of Pretreatment Facilities** - The permittee shall operate and maintain any and all pretreatment facilities in a prudent and professional manner. Records of operation and maintenance shall be provided to the GLWA for review, upon request.

12) **Right of Entry** - The GLWA's employees or authorized representative shall have ready access to the Permittee's premises to engage in inspection, sampling, compliance monitoring and/or metering activities. Each such activity shall be commenced and completed at reasonable times, and in a reasonable manner. It is the permittees' responsibility to make prompt and necessary arrangements so that upon presentation of appropriate credentials, personnel from the GLWA will be permitted to enter immediately for the purposes of performing their specific responsibilities.

Denial of access to any authorized GLWA representative shall result in enforcement action.

13) **Permit Modification** - The terms and conditions of this permit are subject to modification during the term of the permit in accordance with the Section II-706 (d).

14) **Permit Revocation** - The GLWA may revoke this permit at any time in accordance with applicable law. Actions for which a permit may be revoked include, but are not limited to, failure of a Permittee to comply with the permit, failure to comply with an administrative order, or court order, discharging wastewater which has the potential to or does threaten the POTW or the community, discharges which would cause the POTW to violate its NPDES permit.

Where such action is taken by the GLWA, the former permittee shall have an opportunity for a hearing for permit reinstatement in accordance with applicable law.

15) **Mercury and Total PCB compliance** -

a) Total PCB measurements shall be based upon U.S. EPA Method 608.3, (or other approved methods) and the quantification level shall not exceed 0.2 μg/l, unless a higher level is appropriate because of demonstrated sample matrix interference.

b) The Limitation for Mercury (Hg) shall be based on U.S. EPA Method 245.1, (or other approved methods) and the quantification level shall not exceed 0.2 μg/l, unless a higher level is appropriate because of demonstrated sample matrix interference.

16) **Test of Good Faith Effort –** GLWA will endeavor to consider the good faith of the permittee as a factor in determining the enforcement response(s) to invoke to an incident of noncompliance. The good faith of a User may be established by considering the cooperation and efforts made by a User in achieving and maintaining compliance with these rules; and in the promptness with which a User responds to resolution of an incident of noncompliance. Where a permittee is acting in good faith to comply with the rules, GLWA may choose an enforcement action on a more conciliatory level than if the permittee does not appear to be acting in good faith to comply with the rules.

SECTION C: DEFINITIONS AND REQUIREMENTS

1. **4-DAY Average Limitation** is the highest allowable mass or concentration standard of discharges over four (4) consecutive, independent daily sampling events. Compliance with this limitation is calculated as the summation of individual daily discharge, measurements for a parameter taken during four (4) consecutive daily sampling events divided by four (4). The four (4) consecutive sampling events need not occur on consecutive calendar days.

2. **30-DAY Average Limitation** is the summation of individual daily measurements for a parameter during a thirty (30) consecutive calendar day period, divided by the number of individual measurements for that parameter taken during that thirty (30) day period. The recommended minimum number of samples (1 set) required to demonstrate compliance are ten (10) independent daily samples.

3. **Authorized Representative** – means the person defined in Chapter I of GLWA's Rules, or the person designated as a duly authorized representative made in conformance with GLWA's Rules.

4. **Authority** – means the Great Lakes Water Authority, and authorized employees of the GLWA. See also Control Authority.

5. **Available Cyanide –** means the quantity of cyanide that consists of cyanide ion (AVCN); hydrogen cyanide in water (HCNaq); and the cyano-complexes of zinc, copper, cadmium, mercury, nickel, and silver, determined by EPA method OIA-1677, or other method designated as a Standard Method or approved under 40 CFR Part 136.

6. **Batch Discharge** A non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration or frequency of generation warrant periodic releases as the most efficient and effective means of discharge.

7. **Best Management Practices (BMP) –** means programs, practices, procedures or other directed efforts, initiated and implemented by a User, which can or does lead to the reduction, conservation or minimization of pollutants being introduced into the ecosystem, including but not limited to the regional sewer system. BMPs include, but are not limited to, equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control, and may include technical and economic considerations.

8. **Continuous Discharge** - means a "discharge" which occurs without interruption throughout the operating hours of the Permittee, except for infrequent shutdowns for maintenance, process changes, or other similar activities.

9. **Control Authority** - means the Detroit Water and Sewerage Department, or its agent Great Lakes Water Authority, which have been officially designated as such by the Michigan Department of Environmental Quality under the provisions of 40 CFR 403.11, 40 CFR 403.9, and 40 CFR 403.12.

10. **Daily Maximum Limitation** is the maximum allowable discharge of pollutant on a

single calendar day.

11. **Intermittent Batch Discharge** - A non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration or frequency of generation warrant periodic releases as the most efficient and effective means of discharge. Batch discharges are classified as intermittent when there is a period of more than thirty (30) days between batch discharges.

12. **Monthly Average Limitation** is the summation of individual daily measurements for a parameter during a calendar month, divided by the number of individual measurements for that parameter taken during that month. The recommended minimum number of samples (1 set) required to demonstrate compliance are ten (10) independent daily samples.

13. **Permittee** means the Company Name in Section A of this Wastewater Discharge Permit. As used within this Wastewater Discharge Permit, it also means the Industrial User, or User.

14. **PFAS Substances** means the list of perfluoroalkyl and polyfluoroalkyl substances, as amended, that the MI-EGLE has identified as emerging contaminants; which includes:

Perfluorotetradecanoic acid (PFTA)	Perfluorononanesulfonic acid (PFNS)
Perfluorotridecanoic acid (PFTrDA)	Perfluorooctanesulfonic acid (PFOS)
Perfluorododecanoic acid (PFDoA)	Perfluoroheptanesulfonic acid (PFHpS)
Perfluoroundecanoic acid (PFUnA)	Perfluorohexanesulfonic acid (PFHxS)
Perfluorodecanoic acid (PFDA)	Perfluoropentanesulfonic acid (PFPeS)
Perfluorononanoic acid (PFNA)	Perfluorobutanesulfonic acid (PFBS)
Perfluorooctanoic acid (PFOA)	Perfluorooctanesulfonamide (PFOSA)
Perfluoroheptanoic acid (PFHpA)	Fluorotelomer sulphonic acid 8:2 (FtS 8:2)
Perfluorohexanoic acid (PFHxA)	Fluorotelomer sulphonic acid 6:2 (FtS 6:2)
Perfluoropentanoic acid (PFPeA)	Fluorotelomer sulphonic acid 4:2 (FtS 4:2)
Perfluorobutanoic acid (PFBA)	2-(N-Ethylperfluorooctanesulfonamido) acetic acid (NEtFOSAA)
Perfluorodecanesulfonic acid (PFDS)	2-(N-Methylperfluorooctanesulfonamido) acetic acid (NMeFOSAA)
Hexafluoropropylene oxide dimer acid (HFPO-DA)	11-chloroeicosafluoro-3-oxaundecane-1 - sulfonic acid (11cl-pf3ouds)
9-chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9CL-PF3ONS)	4 8-dioxa-3h-perfluorononanoic acid (ADONA)

15. **Publicly Owned Treatment Works (POTW)** means a treatment works as defined by 33§ 1292(2)(A) which is owned **or operated,** by a state or municipality, as defined in 33 U.S.C. § 1362, including:

    a. Any devices and systems used in the storage, treatment, recycling, or reclamation of municipal sewage or industrial wastes of a liquid nature; or

    b. Sewers, pipes and other conveyances only if they convey wastewater to a POTW treatment plant; or

    c. The municipality, as defined in 33 U.S.C. § 1362, which has jurisdiction

over the indirect discharges to and the discharges from such a treatment works.

16. **Quantification Level –** means the measurement of the concentration of a contaminant obtained by using a specified laboratory procedure calculated at a specified concentration above the detection level. It is considered the lowest concentration at which a particular contaminant can be quantitatively measured using a specified laboratory procedure for monitoring of the contaminant.

17. **Total PCB –** means the sum of the individual analytical results for each of the PCB aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260 during any single sampling event with any aroclor result less than the quantification level being treated as zero.

18. **Total Phenolic Compounds –** means the sum of the individual analytical results for each of the phenolic compounds of 2-chlorophenol, 4-chlorophenol, 4-chloro-3-methylphenol, 2,4-dichlorophenol, 2,4-dinitrophenol, 4-methylphenol, 4-nitrophenol, and phenol during any single sampling event expressed in mg/l.

19. **Total Toxic Organics (TTO)** is the summation of all quantifiable values greater than 0.01 mg/l for the listed toxic organics. TTO requirement shall be as follows:

    a) All parameters shall be analyzed in accordance to 40 CFR Part 136 methods. Usage of approved analytical procedures is essential to the detection of parameters being analyzed. All MDLs should be reported with the sample results, and any cleanup procedures and sample interference shall be reported.

    b) In lieu of monitoring for TTO, facilities subject to either 40 CFR Part 413 or Part 433 may be allowed to make the TTO certification as a comment to the Six- M o n t h Report, provided:

        i. At least one (1) complete set of analytical results has been submitted for all the TTO pollutants of concern, and
        ii. The Permittee has submitted a Toxic Organic Management Plan (TOMP) in compliance with either 40 CFR Part 413 or 433 requirements, and
        iii. The TOMP has been approved by the GLWA.

20. **Total Metals** is the sum of the concentration of Copper (Cu), Nickel (Ni), Chromium (Cr) and Zinc (Zn).

PERMIT DEFINITION

1. FACILITY DESCRIPTION

NCPS Company Permit Sample is the owner and operator of the North Assembly Plant. This plant manufactures light trucks. It has about 3,400 daily average employee population and operates as follows:

Production:	20 hours per day, 2 shifts per day, 6-7 days per week
Maintenance:	24 hours per day, 3 shifts per day, 7 days per week
Wastewater treatment:	24 hours per day, 3 shifts per day, 7 days per week.

2. PROCESS DESCRIPTION

The manufacturing process includes welding, phosphating, undercoating, and painting of automobile bodies. The painted bodies are then processed in the final assembly center. The completed vehicles get fluid-filled and then undergo final testing. Process wastewater is generated from phosphating, E-Coating, painting processes, in-line water leak testing, static water leak testing, audit water leak testing, equipment and floor cleaning.

The facility pretreats the generated wastewater from the above processes in 1-3 batches per day. This wastewater undergoes chemical treatment as necessary including pH adjustment, precipitation, flocculation, and settling before discharging into the sewer system. The filter cake is hauled offsite for disposal.

3. APPLICABLE CLASSIFICATION

The company is classified as a Significant Industrial User whose wastewater discharge is subject to the National Categorical Pretreatment Standards under the Metal Finishing Point Source Category, 40 CFR part 433.17, Pretreatment Standards for New Sources. Its categorical operations started in January 1992.

4. WASTEWATER DISCHARGE FLOW INFORMATION

Process Wastewater:	823,064 (E) gpd average (continuous)
Boiler Blowdown:	2,100 (E) gpd average (batch)
Non-Contact Cooling Water:	17,032 (E) gpd average (continuous)
Sanitary:	78,333 (E) gpd average
Total Plant Flow:	920,529 (E) gpd average

5. SOURCES OF INFORMATION (List all that apply)

i. Comprehensive Inspection conducted on August 23, 2022
ii. Wastewater Discharge Permit Reapplication received on July 24, 2022
iii. Existing Wastewater Discharge Permit expiring September 1, 2022

Prepared by:_____ **Reviewed by:**_____

Date: _____ **Date**:_____

CERTIFIED MAIL
DATE

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Re: Draft - Wastewater Discharge Permit No. xxxxxxxxxxxx

Dear CONTACT NAME

The Great Lakes Water Authority (GLWA) – Industrial Waste Control Group has reviewed your application for a wastewater discharge permit and determined that you meet the definition of a Significant Industrial User and are required to have a wastewater discharge permit.

Enclosed is the draft permit prepared for your facility at CONTACTADDR1. Please review each section of the permit for accuracy. If you wish to file a response to the draft permit, you must file a written response to the Industrial Waste Control Division within thirty (30) days from the date of mailing of the draft permit. If you concur with this permit, please let us know within the said days so that we can expedite issuance of the final permit. A final permit will be issued at the disposition of the GLWA.

Should you have any questions, please contact POTW PERSONNEL at POTW PERSONNEL PHONE.

Sincerely,

Stephen J. Kuplicki, P.E., J.D.
Operations Manager
Industrial Waste Control Group

SJK/SP
Enclosure

CERTIFIED MAIL
DATE

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Re: Wastewater Discharge Permit No. xxxxxxxxxxxxx

Dear Mr. CONTACT NAME:

Enclosed please find your Wastewater Discharge Permit as issued by the Great Lakes Water Authority (GLWA). The terms and conditions of this permit are based on applicable law, data and other related information your company has submitted to the Industrial Waste Control (IWC) Division.

This permit contains the specific discharge limitations, effective dates, self-monitoring and reporting requirements for your facility to comply. Please note that any and all penalties, pretreatment schedules, compliance agreements, and/or Administrative Orders previously imposed as a consequence of violations by the industrial user, prior to the issuance of this permit, remain in full force and effect.

In accordance with Section II-704 (e)(2) of GLWA's Rules, you have twenty (20) days from the date of mailing to file a request for reconsideration and/or appeal hearing in accordance with Chapter VIII of the GLWA Rules. During the appeal process, the SIU will comply with all uncontested terms or conditions which shall be in full force and effect. Upon disposition of any contested terms or conditions, the Wastewater discharge permit shall be issued as final.

Should you have any questions, please contact POTW PERSONNEL NAME at POTW PERSONNEL PHONE.

Sincerely,

Stephen J. Kuplicki, P.E., J.D.
Operations Manager
Industrial Waste Control Group

SJK/SP
Enclosure

CERTIFIED MAIL
DATE

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Re: Wastewater Discharge Permit No. xxxxxxxxxxxxx

Dear Mr. CONTACT NAME

Enclosed please find your Wastewater Discharge Permit as issued by the Great Lakes Water Authority (GLWA). The terms and conditions of this permit are based on applicable law, data and other related information your company has submitted to the Industrial Waste Control (IWC) Division.

GLWA received your comments dated _____ and [ADDRESS WHETHER COMMENTS HAVE BEEN ACCEPTED, REJECTED IN WHOLE OR PART AS APPROPRIATE]. This permit contains the specific discharge limitations, effective dates, self-monitoring and reporting requirements for your facility to comply. Please note that any and all penalties, pretreatment schedules, compliance agreements, and/or Administrative Orders previously imposed as a consequence of violations by the industrial user, prior to the issuance of this permit, remain in full force and effect.

In accordance with Section II-704 (e)(2) of GLWA's Rules, you have twenty (20) days from the date of mailing to file a request for reconsideration and/or appeal hearing in accordance with Chapter VIII of the GLWA Rules. During the appeal process, the SIU will comply with all uncontested terms or conditions which shall be in full force and effect. Upon disposition of any contested terms or conditions, the Wastewater discharge permit shall be issued as final.

Should you have any questions, please contact POTW PERSONNEL NAME at POTW PERSONNEL PHONE.

Sincerely,

Stephen J. Kuplicki, P.E., J.D.
Operations Manager
Industrial Waste Control Group

SJK/SP
Enclosure

CERTIFIED MAIL
Date: <ENTER DATE>
Facility No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

NOTICE OF VIOLATION: DETERMINATION – DEFICIENT PERMIT APPLICATION SUBMISSION

The Great Lakes Water Authority (GLWA) has received your [ ] Permit Application / [ ] Baseline Monitoring Report and determined that:

[ ] Your are not AUTHORIZED to discharge. GLWA has determined that you have not submitted an adequate or timely report, or permit application, to the Control Authority in accordance with the reporting requirements of 40 CFR 403.12. The failure of the Industrial User to cease discharging following notification shall be considered a violation of these rules.

[ ] Your are not AUTHORIZED to discharge. GLWA has determined that your discharge is in violation of these rules. The failure of the Industrial User to cease discharging following notification shall be considered a violation of these rules.

FINDINGS OF FACT

1) The GLWA is the Control Authority for implementing, administering and enforcing an Industrial Pretreatment Program as identified in NPDES Permit MI0022802;
2) Under this pretreatment program, INDUSTRY NAME, hereinafter referred to as "The Company", submitted a deficient [ ] Permit Application / [ ] Baseline Monitoring Report and/or supporting documentation.
3) The discharge(s) from your facility are **NOT AUTHORIZED.**

THEREFORE, THE COMPANY IS HEREBY NOTIFIED THAT:

1) The Company is in violation with the GLWA Rules.
2) The Company shall immediately Cease discharging to the regional sewer system until such time as you have resolved the deficiencies from your application
3) The Company shall immediately Cease discharging to the regional sewer system. GLWA will reconsider authorization upon receiving and approving a written and detailed compliance plan and schedule.
4) If you fail to comply with the requirements of this notice will result in escalation of enforcement action.

If you should have any questions or need any additional information concerning this matter, please contact me at <<phone>> and <<email>>.

<<Manager or Management Professional>>
Industrial Waste Control Group
(313)297-<<phone>>

CERTIFIED MAIL
Date: 9/27/2022 0:00:00
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

Re: Notice of Permit Cancellation

Dear Mr. Dein:

Effective immediately, the Wastewater Discharge Permit No.: INDUSTRY NUMBER issued to your facility at CONTACTADDR1, MI is cancelled. The said facility will no longer be discharging process wastewater into the sewer system. This permit cancellation is based << Reason/finding>>

No further discharge of process water shall be made into the sewer system without prior approval from the GLWA. Should you have any questions, please contact <EngineerName>, of the Industrial Waste Control Division, Permits Section, at (313) <EngineerPhone>.

Stephen J Kuplicki, P.E, J.D.
Operations Manager
Industrial Waste Control Group

SJK/

Great Lakes Water Authority
Industrial Pretreatment Program
Compliance Results Report - by Parameter

Report Period: 01/01/2022 to 05/26/2022

Permit: **27612**
Permittee: **Facility Name**
Location: Facility Address, FacilityCity, MI ZipCode

Acidity/Alkalinity (pH)

							CONCENTRATION					MASS		
Sample ID	Auth?	MonPoint	Collection Method	Collection Date	Units	Result	Reslt	Reporting Limit	Adjusted Result	Violations	Limit	Result (lbs/day)	Violations	Limit
IU_20220118	IU	01	G	01-18-2022	SU	9.64			9.64		5-11.5			
1849314	A	01	G	02-16-2022	SU	6.61			6.61		5-11.5			
IU_20220309	IU	01	G	03-09-2022	SU	7.85			7.85		5-11.5			
IU_20220426	IU	01	G	04-26-2022	SU	6.89			6.89		5-11.5			
1851181	A	01	G	05-02-2022	SU	7.1			7.1		5-11.5			

Total Concentration Results: 5 Avg: 7.62 Min: 6.61 Max: 9.64
Total Mass Results: 0 Avg: Min: Max:

Arsenic

							CONCENTRATION					MASS		
Sample ID	Auth?	MonPoint	Collection Method	Collection Date	Units	Result	Reslt	Reporting Limit	Adjusted Result	Violations	Limit	Result (lbs/day)	Violations	Limit
IU_20220118	IU	01	C	01-18-2022	mg/L	0.003			0.003		1			
1849314-003	A	01	C	02-17-2022	mg/L	<0.016	<	.016	0		1			
IU_20220309	IU	01	C	03-09-2022	mg/L	0.004			0.004		1			
IU_20220426	IU	01	C	04-26-2022	mg/L	0.003			0.003		1			

Total Concentration Results: 4 Avg: .00 Min: .00 Max: .00
Total Mass Results: 0 Avg: Min: Max:

Biochemical Oxygen Demand

							CONCENTRATION					MASS		
Sample ID	Auth?	MonPoint	Collection Method	Collection Date	Units	Result	Reslt	Reporting Limit	Adjusted Result	Violations	Limit	Result (lbs/day)	Violations	Limit
1849314-001	A	01	C	02-17-2022	mg/L	412		3	412		7500			
IU_20220309	IU	01	C	03-09-2022	mg/L	1750			1750		7500			
IU_20220426	IU	01	C	04-26-2022	mg/L	1070			1070		7500			

GLWA Composite Sample Work Order Summary

Work Order No: **1851181**
Permit Number: 009-xyzdr-IU
Sample Type: Composite
Sample Date: Mo/Day?Year
Field Office: 9 - Southern Oakland County
Project Type: IWCS
Special Instructions:
Sample Point Desc: 01 - Monitoring Location

Attn: Mr. Facility Contact Name
Facility Name
Facility Address
Facility City, MI ZipCode
Facility Phone Number

Split Taken: Yes

Company Representative: Representative Name
5/3/2022 9:59:40 AM

Sampler Installed: 5/2/2022 10:00:00 AM
Sampler Retrieved: 5/3/2022 10:00:00 AM

Hours Operating/Discharge:

Collector Observations: Cloudy Hose: ft. #:

IWC Collector: GLWA Investigator
5/3/2022 1:57:01 PM

Lab Custodian: GLWA Lab Custodian
5/3/2022 1:56:52 PM

Sample Comments: Discharge hrs:5am-11pm

Parameter	Result	Daily/Monthly Limits	VIO?	Lab Method	Analysis Date
Flow	79650 gpd	-na-/-na-			
FlowMeterEnd	4.50482e+07 ccf	-na-/-na-			
FlowMeterStart	4.49686e+07 ccf	-na-/-na-			
Pulse	2 Pulses	-na-/-na-			
Total PCB	.xx ug/L	-limit-			
Arsenic	xx mg/L	-limit-		EPA 200.7	
Cadmium	xx mg/L	-limit-		EPA 200.7	
Chromium	xx mg/L	-limit-		EPA 200.7	
Copper	xx mg/L	-limit-		EPA 200.7	
Iron	xx mg/L	-limit-		EPA 200.7	
Lead	xx mg/L	-limit-		EPA 200.7	
Nickel	xx mg/L	-limit-		EPA 200.7	
Silver	xx mg/L	-limit-		EPA 200.7	
Zinc	xx mg/L	-limit-		EPA 200.7	
Mercury	.xx ug/L	-limit-		EPA 245.1	
Total Suspended Solids	yyy mg/L	-limit-		SM 2540D	5/6/2022
Phosphorus	yy mg/L	-limit-		SM 4500-P A, B-5 & E -2011	5/5/2022
Biochemical Oxygen Demand	yyy mg/L	-limit-		SM 5210B	5/9/2022

Date Received from Lab: 05/31/2022

No separate FOG Split Available, only Duplicate Sample (if Split Taken=Yes)

GLWA Grab Sample Work Order Summary

Work Order No: **1851181**
Permit Number: 009-xydzr-IU
Sample Type: Grab
Sample Date: Mo/Day/Year
Field Office: 9 - Southern Oakland County
Project Type: IWCS
Special Instructions:
Sample Point Desc: 01 - Monitoring Location

Attn: Mr. Facility Contact Name
Facility Name
Facility Address
Facility City, MI ZipCode
Facility Phone Number

Split Taken: Yes

Company Representative: Representative Name
5/2/2022 10:33:49 AM

Sample Date: 5/2/2022 10:00:00 AM
pH: xx.x S.U.

Collector Observations: Cloudy #:

IWC Collector: GLWA Investigator
5/2/2022 1:30:48 PM

Lab Custodian: GLWA Lab Custodian
5/2/2022 1:32:28 PM

Sample Comments: Dhrs:5am-11pm

Parameter	Result	Daily/Monthly Limits	VIO?	Lab Method	Analysis Date
Acidity/Alkalinity (pH)	xx.x SU	5-11.5/-na-			
Temperature	30.4 Deg C	-na-/-na-			
Total Phenolic Compounds	x.xxx mg/l	1/-na-		EPA 420.1	5/15/2022
Fats, Oil or Grease	xxx mg/l	1500/-na-		EPA1664A	5/23/2022
Cyanide (Available)	xxx mg/L	1/-na-		SM 4500-CN G	5/8/2022

Date Received from Lab: 05/26/2022

No separate FOG Split Available, only Duplicate Sample (if Split Taken=Yes)

Great Lakes Water Authority
Sample Collection – Chain of Custody

WorkOrderNo: 1851181

Location: Facility Name -

Lab: GLWA

Collection Method: C

Location ID: 27612

Facility Address
Facility City, MI ZipCode

Monitoring Point: Monitoring Location description

FacilityPhone Number

Special Instructions:

Split (Y/N): Y

Company Rep:

Start Date/Time: 05/02/2022 10:00 AM

End Date/Time: 05/03/2022 10:00 AM

Discharge Duration:

Field Observations: Cloudy

Field Analysis:

Flow	79650	gpd
FlowMeterEnd	45048234	ccf
FlowMeterStart	44968584	ccf
Pulse	2	Pulses

Note/Lab Instructions: Dhrs:5am-11pm

Label Num	Container Information	Analysis Requested
1851181-001	1 1 L wide mouth glass	Total PCB
1851181-002	1 4 Deg C 1 L wide mouth glass	Biochemical Oxygen Demand, Total Suspended Solid
1851181-003	1 H2SO4 1 L wide mouth glass	Phosphorus
1851181-004	1 HNO3 1 L wide mouth glass	Arsenic, Cadmium, Chromium, Copper, Iron, Lead, Mercury, Nickel, Silver, Zinc

CIII – FORM 3

BASELINE INSPECTION REPORT

I. Industrial User Background Information

1 Facility No.:

2 Facility Name: _____

3 Facility Address: _____

4 Contact Person _____

5 Title _____

6 Telephone No. _____

II. Inspection Information

1 Inspector's Name:

2 Inspection Date: _____ 3 Inspection Time: _____

III. Recommendation

1 Facility is a Minor Discharger ☐ Yes ☐ No *(if No, start processing the facility's Wastewater Discharge Permit)*

2 Facility need a Slug Control/Spill Prevention Plan ☐ Yes ☐ No *(if Yes, refer to SC/SPP Group)*

3 Facility Should be covered under Surcharge ☐ Yes ☐ No *(if Yes, refer to Surcharge Group)*

IV. Significance Test

1 Has process wastewater discharge >25,000 gpd ☐ Yes ☐ No

2 Has discharges subject to the National Categorical Pretreatment Standards ☐ Yes ☐ No

3 Requires pretreatment to comply with the specific pollutant limitations ☐ Yes ☐ No

4 Has in its discharge toxic pollutants in concentrations and volumes subject to regulation ☐ Yes ☐ No

5 Is a treatment, storage, or disposal of hazardous waste

☐ Yes ☐ No

6 Has a reasonable potential for adverse effect, either singly or in combination with other contributing industries or POTW ☐ Yes ☐ No

V. General Industrial User Information

1 Nature of Business

2 SIC Number _____

3 Number of Employees _____

4 Schedule of Operation hours/day _____ days/week _____ shift(s)/day _____

5 Date operation started _____

6 Process Description(s)

7 Are there floor drains within the production area ☐ Yes ☐ No

If Yes, where do the floor drains discharge to? (storm, sanitary, etc.)

8 Water Supply ☐ municipal ☐ well ☐ other

9 Water usage data (last 12 month) _____ gpd From: 20 To: 20

10 Water / Wastewater Flow Rates

Type	Usage (gpd)	M	E	Discharge (gpd)	M	E	Type of Discharge	Discharge Frequency
a) Process		☐	☐		☐	☐		
b) Contact Cooling Water		☐	☐		☐	☐		

c) Non-contact Cooling		☐ ☐		☐ ☐			
d) Sanitary		☐ ☐		☐ ☐			
e) Boilder feed/blowdown		☐ ☐		☐ ☐			
f) Product		☐ ☐		☐ ☐			
g) Air Pollution Control		☐ ☐		☐ ☐			
h) Leachate		☐ ☐		☐ ☐			
i) Hauled-in Waste		☐ ☐		☐ ☐			
j) Other:		☐ ☐		☐ ☐			
Total Process Wastewater Discharge (a+b+g+h+i)				☐ ☐			
Total Plant Wastewater Discharge				☐ ☐			

11

For batch or intermittent batch discharge denoted above, indicate or explain below	**Day(s) of Discharge** *(see Section B and/or C of the Permit)*							**Average Length of Discharge**	**Maximum Volume per Discharge *(gallons)***
	Mon	Tue	Wed	Thur	Fri	Sat	Sun		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		

Comments

Batch Discharge is a non-continuous release of treated/untreated wastewater whose volume, duration or frequency of generation warrant periodic release as the most efficient and effective means of discharge.

- Intermittent Batch Discharge is the same as batch discharge; however, the period involved between batch discharges is more than 30 days. SIU with intermittent batch discharge frequency is required to:
- Sample and analyze the wastewater first prior to discharge (i.e. wastewater proposed to be discharged).
- Confirm that analytical results are in compliance with permit limitations.
- Notify the Authority at least 48 hours prior to the planned discharge at the:
  Inspector's Telephone Number (313) 297-5875
- If analytical results show noncompliance, the batch wastewater must be pretreated further or hauled off-site.
- This discharge must occur only between 9:00 AM and 1:00 PM, Monday thru Thursday, except Fridays, Saturdays, Sundays and holidays.

VI. Storage Area

1 Are there chemicals stored on site? ☐ Yes ☐ No

2 List of chemicals on site

Quantity Stored	Brand Name	Common Name	MSDS Available?
			◯ Yes ◯ No ◯ N/A
			◯ Yes ◯ No ◯ N/A
			◯ Yes ◯ No ◯ N/A
			◯ Yes ◯ No ◯ N/A
			◯ Yes ◯ No ◯ N/A

3 Description of the chemical storage area on site

4 Are there floor drains within the chemical storage area? ☐ Yes ☐ No

If Yes, where do the floor drains discharge to? (storm, sanitary, etc.)

5 Are there wastes stored on site? ☐ Yes ☐ No

6 Are there floor drains within the waste storage area? ☐ Yes ☐ No

If Yes, where do the floor drains discharge to? (storm, sanitary, etc.)

7 Does the industrial user need a Slug Control/Spill Prevention Plan pursuant to 40 CFR 403.8(f)(2)(v)? ☐ Yes ☐ No

VII. Wastewater Treatment Facility

1 Is there pretreatment at the facility? ☐ Yes ☐ No

2 Describe the pretreatment operation(s) performed at the facility.

3 Describe any other generated and/or untreated process wastewater (e.g. spent waste solution) and method of disposal, if any.

4 Type of wastewater treatment (intermittent batch, continuous, batch) ☐ intermittent batch ☐ continuous ☐ batch

5 Max. design flow of the pretreatment system. _____ gpm _____ gpd

6 Are replacement parts available on site for critical components (e.g. pumps, pH probe, etc.)? ☐ Yes ☐ No

7 Are chemicals for use in the wastewater pretreatment readily available (e.g. caustic soda, lime, etc.)? ☐ Yes ☐ No

8 Does facility have pretreatment O & M manual? ☐ Yes ☐ No

9 Does facility's waste treatment operation(s) generate sludge? ☐ Yes ☐ No

If Yes, describe the waste characterization of the generated sludge and method of disposal.

10 Describe facility's potential to bypass its pretreatment system.

11 Is there full time qualified personnel in charge of maintaining and operating the wastewater pretreatment system? ☐ Yes ☐ No

VIII. Wastestream Characteristics

1 Observe and describe the characteristic of the wastestream being discharged by the IU to the sanitary sewer (I.e. color, turbid, oil & grease, etc.).

2 Provide a list of pollutants that do come in direct contact with the water that is discharged to the POTW.

3 Provide a list of pollutants that do not come in direct contact with the water that is discharged to the POTW, but has the potential to enter the wastestream due to spills, machinery malfunctions or other similar problems.

IX. Sampling Location(s)

1 Describe the proposed sample location(s)

X. Schematic Drawing

Drawing must include but not limited to the following:

- locations of process equipment, wastewater treatment, chemical and waste storage areas
- water flow throughout the facility (include arrow to show flow direction)
- location of sampling location (e.g. manholes)
- location of floor drains
- location of discharge points
- connections receiving each national categorical process wastestream
- connections receiving storm water, sanitary water, and/or non-contact cooling water

☐ Drawing Attached ☐ Drawing Required

XI. General Comments

1 Is the facility well maintained? ☐ Good ☐ Fair ☐ Poor

2 Is any of the information in this form confidential information pursuant to 40 CFR 403.14? ☐ Yes No

3 Has the IU notified the POTW of substances discharged to the POTW that otherwise disposed of would be a hazardous waste under 40 CFR part 261 as required in 40 CFR 403.12(p)? ☐ Yes ☐ No

4 Additional comments about the inspection

Investigation Result: ◯ Pass ◯ Fail ◯ Follow-up Required Comment:

X < Click button to sign Date:	X < Click button to sign Date:
- ----------(Inspector Signature)	- ---------- (Internal Reviewer/Checker Signature)
Inspector Name (Typed)	Reviewer Name (Typed)

CIII – FORM 5

GLWA
Great Lakes Water Authority

COMPREHENSIVE INSPECTION REPORT

Inspection Type: ☐ Categorical ☐ Non-categorical ☐ Hospital ☐ Landfill ☐

I. GENERAL FACILITY INFORMATION

1 Facility Name: _____

2 Facility Address: _____

3 Mailing Address: _____

4 Permit Number:

5 Expiration Date: _____

6 Authorized Representative: _____

Title: _____

Telephone Number: _____

7 Facility Contact: _____

Title: _____

Telephone Number: _____

II. GENERAL INSPECTION INFORMATION

1 Comprehensive Inspection Date / Time Date: _____ Time: _____

2 Date of last inspection _____

3 Last inspected by: _____

4 Documents checked and discussed during the inspection

	Document	Comment
☐	Permit	
☐	Waste Manifests	
☐	Self-Monitoring Reports	
☐	Updated SC/SPP	
☐	Treatment Records	
☐	Updated Drawings	
☐	Reports from other regulatory agencies	
☐	Surcharge	
☐	Other: _____	

5 Areas checked during the Inspection

	Area	Comment
☐	Sampling Location	
☐	Production Area	
☐	Chemical Storage Area	
☐	Treatment Area	
☐	Flow Meter/Totalizer/(section v.5)	
☐	Other: _____	

III. INSPECTION PARTICIPANTS

Name	Affiliation	Phone number

IV. BUSINESS ACTIVITY

1 Nature of Business

SIC Number / NAICS Number /

3 Number of Employees

4 Schedule of Operation	Production	Maintenance	Wastewater Treatment
	hours/day	hours/day	hours/day
	days/week	days/week	days/week
	shift(s)/day	shift(s)/day	shift(s)/day

5 Process Description(s)

6 Process Wastewater Generating Operations

7 List of primary pollutants of concern that come in direct contact with the wastewater that is discharged to the POTW

8 Does the company have seasonal production? ◯ Yes ◯ No

9 Does the company have scheduled shutdown periods *(e.g. maintenance purpose)?* ◯ Yes ◯ No

10 How often are floors washed?

What chemicals are used?

11 How often are equipment washed?

What chemicals are used?

12 If hospital, what are the number of licensed beds?

Category Determination

1 ☐ **Not subject to Categorical Pretreatment Standards. (If checked, skip to next section)**

2 Category

Subcategory

Other Category

Subcategory

3 Date categorical operation(s) started

4 Is this an existing or new source?

5 Is this a job shop facility? ◯ Yes ◯ No N/A

6 Is the facility subject to any of the following?

a) Combined Wastestream Formula ◯ Yes ◯ No N/A

b) Production Based Standards ◯ Yes ◯ No N/A

c) Total Toxic Organic limit ◯ Yes ◯ No N/A

d) Toxic Organic Management Plan ◯ Yes ◯ No N/A

e) Alternative Oil & Grease limit ◯ Yes ◯ No N/A

f) Individual Phenolic Compounds ◯ Yes ◯ No N/A

g) Certification Requirement ◯ Yes ◯ No N/A

7 Are the above items 6 a) to g) described properly in the facility's permit? ◯ Yes ◯ No

If **No**, explain:

8 Product Information

Product

Production Rate

Product

Production Rate

V. WATER USAGE and DISCHARGE

☐ See Attachment AA-1 for HOSPITAL Water Flow Rates

1 Water Sources ☐ municipal ☐ well ☐ other _____

2 Water Usage Data (preferably last 12 months) From _____ To _____

_____ gallons _____ gpd

3 Water Flow Rates

Type	Usage (gpd)	M	E	Discharge (gpd)	M	E	Type of Discharge	Discharge Frequency
a) Process		☐	☐		☐	☐		
b) Contact Cooling Water		☐	☐		☐	☐		
c) Non-contact Cooling		☐	☐		☐	☐		
d) Sanitary		☐	☐		☐	☐		
e) Boiler feed/blowdown		☐	☐		☐	☐		
f) Product		☐	☐		☐	☐		
g) Air Pollution Control		☐	☐		☐	☐		
h) Leachate		☐	☐		☐	☐		
i) Hauled-in Waste		☐	☐		☐	☐		
j) Other:		☐	☐		☐	☐		
Total Process Wastewater Discharge (a+b+g+h+i)					☐	☐		
Total Plant Wastewater Discharge					☐	☐		

M = Measured, E = Estimated

4

For batch or intermittent batch discharge denoted above, indicate or explain below	Day(s) of Discharge *(see Section B and/or C of the Permit)*							Average Length of Discharge	Maximum Volume per Discharge *(gallons)*
	Mon	Tue	Wed	Thur	Fri	Sat	Sun		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		
	☐	☐	☐	☐	☐	☐	☐		

Comments _____

Batch Discharge is a non-continuous release of treated/untreated wastewater whose volume, duration or frequency of generation warrant periodic release as the most efficient and effective means of discharge.

Intermittent Batch Discharge is the same as batch discharge; however, the period involved between batch discharges is more than 30 days. SIU with intermittent batch discharge frequency is required to:

- Sample and analyze the wastewater first prior to discharge (i.e. wastewater proposed to be discharged).
- Confirm that analytical results are in compliance with permit limitations.
- Notify the Authority at least 48 hours prior to the planned discharge at (313) 297-5875 (Inspector's Telephone Number)
- If analytical results show noncompliance, the batch wastewater must be pretreated further or hauled off-site.
- This discharge must occur only between 9:00 AM and 1:00 PM, Monday thru Thursday, except Fridays, Saturdays, Sundays and holidays.

5 Denote which proportional composite sampling (PCS) method is the facility authorized / required to use. (For facility with multiple sampling locations, specify the applicable PCS to respective SL #).

SL#	PCS		Flow Meter / Totalizer Information					
	Time	Flow	Manufacturer/Model Number	Setting: Volume per pulse	Current Meter Reading (denote unit)	Frequency of meter maintenance / calibration	Date of recent meter maintenance / calibration	Is this a resettable flow meter?
								☐ Yes ☐ No
								☐ Yes ☐ No
								☐ Yes ☐ No
								☐ Yes ☐ No
								☐ Yes ☐ No

Comments _____

6 The route(s) of wastewater generated from the facility lead to:

☐ an on-site treatment system

☐ public sanitary sewer system (e.g. floor drains)

☐ storm drain

☐ ground

☐ other, specify _____

☐ not applicable; no possible discharge to any of the above routes.

If not applicable, explain the remedial action taken to prevent possibility of an unauthorized discharge.

VI. WASTE TREATMENT and DISPOSAL

1 Does the facility pretreat its wastewater prior to sewer discharge? ☐ Yes ☐ No

2 Does the facility pretreat all of its process wastewater on its pretreatment system? ☐ Yes ☐ No

If No, briefly describe the i) other generated spent waste and untreated process wastewater on site, ii) method of disposal, and provide the iii) name of transporter and iv) disposal facility.

	Untreated Waste 1	Untreated Waste 2
i		
ii		
iii		
iv		

	Untreated Waste 3	Untreated Waste 4
i		
ii		
iii		
iv		

☐ See Attachment BB-1 for additional Untreated Waste

3 Describe the pretreatment operation(s) performed at the facility.

4 Type of wastewater treatment (continuous, batch)

5 Maximum design flow of the pretreatment system _____ gpd

6 Are replacement parts available on site for critical components (e.g. pumps, pH probe, etc.)? ☐ Yes ☐ No

7 Are chemicals for use in the wastewater pretreatment readily available (e.g. caustic soda, lime, etc.)? ☐ Yes ☐ No

8 Does the facility have pretreatment Operational and Maintenance manual? ☐ Yes ☐ No

9 Is the pretreatment system operational? If No, explain below. ☐ Yes ☐ No

10 Has the pretreatment system experienced any operational upset/problem since the last inspection? ☐ Yes ☐ No

If No, proceed to 11; otherwise, describe the upset.

Did the facility notify the Authority of the said upset? If No, explain below. ☐ Yes ☐ No

11 Does the facility maintain a record of its pretreatment system? ☐ Yes ☐ No

If Yes, briefly describe the Operational and Maintenance record of its pretreatment system.

If No, explain why the facility does not need to keep any records of its waste treatment system and operation.

12 Does the facility's waste treatment operation(s) generate sludge? ☐ Yes ☐ No

If Yes, describe the i) waste characterization of the generated sludge, ii) method of disposal, and provide the iii) name o transporter and iv) disposal facility.

	Sludge 1	Sludge 2
i		
ii		
iii		
iv		

13 Describe the facility's potential to bypass its pretreatment system and remedial measures taken to prevent this occurrence.

14 Are there full time qualified personnel in charge of maintaining and operating the wastewater pretreatment system? If Yes, give the name, title, and telephone number. ☐ Yes ☐ No

Name _____

Title _____

Telephone No. _____

VII. SIGNIFICANCE TEST

_____ is a Significant Industrial User being that

- ☐ its process wastewater discharge is >= 25,000 gpd.
- ☐ its discharge is subject to the national categorical pretreatment standards.
- ☐ its wastewater discharge requires pretreatment to comply with the specific pollutant limitations.
- ☐ its wastewater discharge has toxic pollutants in concentrations and volumes subject to regulation as determined by the Authority.
- ☐ it is a treatment, storage, or disposal of hazardous waste.
- ☐ its wastewater discharge is found to have a reasonable potential for adverse effect, either singly or in combination with other contributing industries, on the POTW operation, sludge quality, POTW effluent quality or air emission generated by the POTW.

VIII. PERMIT and SAMPLING LOCATION

1 Are the Wastewater Discharge Permit conditions and requirements representative of the facility's current operations? If No, explain below. ☐ Yes ☐ No

2 Describe the sampling location(s) as listed on the facility's Wastewater Discharge Permit.

3 Does the sampling location(s) listed on the facility's Wastewater Discharge Permit provide an appropriate sampling location for collecting representative samples? ☐ Yes ☐ No

4 Are there any issues raised on the representativeness of the facility's sampling location(s) as listed on its Wastewater Discharge Permit? If Yes, explain below. ☐ Yes ☐ No

IX. SAMPLING COMPLIANCE

1

Self-Monitoring Report or Six Month Report (SMR) Evaluation			
SMR Period	Year	Evaluation	Date
January-June			
July-December			

The number of analytical results submitted by the facility on its SMR for the reporting period (mark applicable box(es) below):	
January-June	☐ is more than the number of analysis as required by its permit.
	☐ matches the number of analysis as required by its permit.
	☐ is less than the number of analysis as required by its permit.
July-December	☐ is more than the number of analysis as required by its permit.
	☐ matches the number of analysis as required by its permit.
	☐ is less than the number of analysis as required by its permit.

2 **Company Sampling Analysis**

Did the facility's analytical results for the last 2 reporting periods show any violations? If No, proceed to 3; otherwise, continue completing I and II tabulations below. ☐ Yes ☐ No

I. Daily Violation

	Sample Date	Parameter	Conc. (mg/L)	Permit Limit (mg/L)	Notified within 24-hr	24 hr Notification Date	Submitted 30-day Compliance Report	30-day Compliance Report Date
a					☐ Yes ☐ No		☐ Yes ☐ No	
b					☐ Yes ☐ No		☐ Yes ☐ No	
c					☐ Yes ☐ No		☐ Yes ☐ No	
d					☐ Yes ☐ No		☐ Yes ☐ No	
e					☐ Yes ☐ No		☐ Yes ☐ No	
f					☐ Yes ☐ No		☐ Yes ☐ No	
g					☐ Yes ☐ No		☐ Yes ☐ No	

☐ See Attachment CC-1 for additional Daily Violations

Comment/Action Taken _____

II. Monthly Average, 30-Days Average or 4-Days Average Violation (Denote the appropriate type of exceedance below)

☐ Not Applicable ☐ Monthly Average Exceedance ☐ 30-Days Average Exceedance ☐ 4-Days Average Exceedance

	Sample Period	Parameter	Conc. (mg/L)	Permit Limit (mg/L)	Notified within 24-hr	24 hr Notification Date	Submitted 30-day Compliance Report	30-day Compliance Report Date
a					☐ Yes ☐ No		☐ Yes ☐ No	
b					☐ Yes ☐ No		☐ Yes ☐ No	
c					☐ Yes ☐ No		☐ Yes ☐ No	

☐ See Attachment CC-1 for additional Monthly Average, 30-Days Average or 4-Days Average Violation

Comment/Action Taken _____

3 **GLWA Sampling Analysis**

Was the facility issued a Notice of Exceedance/Violation for the last 12 months? If No, proceed to Section X; otherwise, continue completing I and II tabulations below. ☐ Yes ☐ No

I. Daily Exceedance

	Sample Date	Parameter	Conc. (mg/L)	Permit Limit (mg/L)	NOE/NOV Date	Submitted 30-day Compliance Report	30-day Compliance Report Date	Notice of Acknowledgement Date
a						☐ Yes ☐ No		
b						☐ Yes ☐ No		
c						☐ Yes ☐ No		
d						☐ Yes ☐ No		
e						☐ Yes ☐ No		
f						☐ Yes ☐ No		
g						☐ Yes ☐ No		

☐ See Attachment CC-2 for additional Daily Exceedance

Comment/Action Taken _____

II. Monthly Average, 30-Days Average or 4-Days Average Exceedance (Denote the appropriate type of exceedance below)

☐ Not Applicable ☐ Monthly Average Exceedance ☐ 30-Days Average Exceedance ☐ 4-Days Average Exceedance

	Sample Period	Parameter	Conc. (mg/L)	Permit Limit (mg/L)	NOE/NOV Date	Submitted 30-day Compliance Report	30-day Compliance Report Date	Notice of Acknowledgment Date
a						☐ Yes ☐ No		
b						☐ Yes ☐ No		
c						☐ Yes ☐ No		

☐ See Attachment CC-2 for additional Monthly Average, 30-Days Average or 4-Days Average Exceedance

Comment/Action Taken _____

X. TECHNICAL REVIEW CRITERIA / CHRONIC VIOLATION

Based on the TRC/CV evaluation conducted on following months: April and October

Month	Year	Action Taken
April		

	☐ **The company is in compliance. No action required.**
	☐ **The company was evaluated for TRC/CV; it did not meet the significant noncompliance (SNC) criteria.**
	☐ **The company was evaluated for TRC/CV; it met the SNC criteria and will be/was referred for further action (complete the tabulation below).**

	SNC Referal Date	Parameter in Violation	Period	%	TRC	CV
a				%	☐	☐
b				%	☐	☐
c				%	☐	☐
d				%	☐	☐
e				%	☐	☐

☐ See Attachment DD-April for additional TRC/CV evaluation

Comment

Monthly Average, 30-Days Average or 4-Days Average Violation (Denote the applicable type of violation below)

☐ Not Applicable ☐ Monthly Violation (M) ☐ 30-Days Violation (30) ☐ 4-Days Violations (4)

	SNC Referal Date	Parameter in Violation	M / 30 / 4	Period	%	TRC	CV
a					%	☐	☐
b					%	☐	☐
c					%	☐	☐

☐ See Attachment DD-April for additional TRC/CV evaluation

Comment

Month	Year	Action Taken
October		☐ **The company is in compliance. No action required.**
		☐ **The company was evaluated for TRC/CV; it did not meet the significant noncompliance (SNC) criteria.**
		☐ **The company was evaluated for TRC/CV; it met the SNC criteria and will be/was referred for further action (complete the tabulation below).**

	SNC Referal Date	Parameter in Violation	Period	%	TRC	CV
a				%	☐	☐
b				%	☐	☐
c				%	☐	☐
d				%	☐	☐
e				%	☐	☐

☐ See Attachment DD-October for additional TRC/CV evaluation

Comment

Monthly Average, 30-Days Average or 4-Days Average Violation (Denote the applicable type of violation below)

☐ Not Applicable ☐ Monthly Violation (M) ☐ 30-Days Violation (30) ☐ 4-Days Violations (4)

	SNC Referal Date	Parameter in Violation	M / 30 / 4	Period	%	TRC	CV
a					%	☐	☐
b					%	☐	☐
c					%	☐	☐

☐ See Attachment DD-October for additional TRC/CV evaluation

Comment

Technical Review Criteria (TRC) violation occurs when 33% or more of all the measurements taken during a six month period equal or exceed the product of the daily maximum limit or the average limit multiplied by 1.4 for BOD, TSS, FOG, and 1.2 for all other pollutants except pH.

Chronic Violation (CV) occurs when 66% or more of all the measurements taken during a six month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter.

XI. HOUSEKEEPING

☐ See Attachment EE-1 for LANDFILL HOUSEKEEPING

1	Is the facility well organized?	☐ Yes ☐ No ☐ NA
	Are all packaged and bagged chemicals properly stored in appropriate storage areas?	☐ Yes ☐ No ☐ NA
	Are containers for chemicals, waste materials, products clearly labeled, stored in orderly fashioned and visible for inspection?	☐ Yes ☐ No ☐ NA
	Has alleviation of space constraints been considered to implement good housekeeping?	☐ Yes ☐ No ☐ NA
	Are containers for chemicals, waste materials, products clearly labeled, stored in orderly fashioned and visible for inspection?	☐ Yes ☐ No ☐ NA
	Comment	
2	Is the facility maintained in clean fashion?	☐ Yes ☐ No ☐ NA
	Is the process debris removed regularly?	☐ Yes ☐ No ☐ NA
	Is there any evidence of drippings or leaks from equipment or machinery?	☐ Yes ☐ No ☐ NA
	Is there evidence of fumes and/or dust in the air or floor resulting from industrial operations?	☐ Yes ☐ No ☐ NA
	Comment	
3	Have procedures been developed to maintain good housekeeping measures?	☐ Yes ☐ No ☐ NA
	Are all employees aware of the importance of good housekeeping through training?	☐ Yes ☐ No ☐ NA
	Are publicity posters, bulletin boards and employee publications used for good housekeeping programs?	☐ Yes ☐ No ☐ NA
	Are there regular housekeeping inspections to check for good housekeeping problems?	☐ Yes ☐ No ☐ NA
	Are good housekeeping measures employed in appropriate locations?	☐ Yes ☐ No ☐ NA
	Comment	
4	Are outside areas kept neat and clean?	☐ Yes ☐ No ☐ NA
	Is the site free from oil and/or chemical staining, spills or debris?	☐ Yes ☐ No ☐ NA
	Are loading and unloading areas free of spills and/or debris?	☐ Yes ☐ No ☐ NA
	Are unpaved outdoor areas protected from wind and water erosion?	☐ Yes ☐ No ☐ NA
	Are paved outdoor areas properly maintained and kept free of pollutants that can be transported offsite?	☐ Yes ☐ No ☐ NA
	Comment	

XII. SLUG CONTROL/SPILL PREVENTION PLAN

1	Does the facility store chemicals on site?	☐ Yes ☐ No
2	Are there floor drains within/near the chemical storage area?	☐ Yes ☐ No
3	Is there waste in liquid form stored on site?	☐ Yes ☐ No
4	Is additional chemical containment needed? If Yes, explain below.	☐ Yes ☐ No
5	At the facility's chemical storage area and/or waste storage area, an accidental spill can lead to a discharge to	
	☐ An on-site treatment system	
	☐ Public sanitary sewer system (e.g. floor drains)	
	☐ Storm drain	
	☐ Other, specify	
	☐ Not applicable; no possible discharge to any of the above routes.	
6	Did the facility have past slug discharge(s) during the last twelve (12) months? If Yes, explain below.	☐ Yes ☐ No
7	Does the facility need a Slug Control/Spill Prevention Plan (SC/SPP)? If No, explain below.	☐ Yes ☐ No
8	a) Date of latest SC/SPP submitted to the Authority	
	b) Is the SC/SPP more than two (2) years old from the date the facility submitted its latest SC/SPP? If Yes, explain below.	☐ Yes ☐ No
	c) Are there any substantial changes in the facility's operation(s) that will require it to update its SC/SPP? If Yes, describe the change in operation below.	☐ Yes ☐ No

Slug means any discharge of a non-routine episodic nature including, but not limited to, an accidental spill or a non-customary batch discharge.

XIII. SURCHARGE

1	Is the facility under surcharge program? If Yes, proceed to 2; otherwise, proceed to Section XIV.	☐ Yes ☐ No
2	Provide the date of the latest waste strength determination conducted on site. For any comments, explain below.	
3	Does the facility have a flow meter to determine the volume of its discharge? If Yes, describe below the type of the installed flow meter.	☐ Yes ☐ No
4	Does the facility need to install a flow meter to determine the volume of its discharge? If Yes, explain below the reason for the need to install a flow meter.	☐ Yes ☐ No

5

Surcharged Pollutants	Limits (mg/L)	Assigned Pollutants	Actual Conc. (mg/L)
BOD	275	☐ Yes ☐ No	
TSS	350	☐ Yes ☐ No	
P	12	☐ Yes ☐ No	
FOG	100	☐ Yes ☐ No	

6	Time of Peak Water Usage.	
7	Time of Peak Wastewater Discharge	
8	Is the facility's sampling location appropriate for collecting representative surcharge samples? If No, explain below.	☐ Yes ☐ No
9	Does the facility's sampling location represent the facility's overall wastewater discharge? If No, explain below.	☐ Yes ☐ No
10	Does the facility have any concerns raised on the representativeness of its sampling location? If Yes, explain below.	☐ Yes ☐ No
11	Is there a need to conduct another waste strength determination on site? If Yes, explain below.	☐ Yes ☐ No

XIV. DRAWINGS

1	Are drawings showing the facility layout, sewer connections, sampling location(s), and flow schematic available?	☐ Yes ☐ No
2	Are the above drawings updated?	☐ Yes ☐ No
3	If No for 1 or 2, explain below.	

XV. COMPLIANCE STATUS / OTHER COMMENTS

1	Compliance / Enforcement Status for the last twelve (12) months
2	Additional Comments

Investigation Result: Pass Fail Follow-up Required

X Date: ---------- (Inspector Signature)	X Date: ---------- (Internal Reviewer/Checker Signature)
Inspector Name (Typed)	Reviewer Name (Typed)

INSPECTION

☐ Scheduled ☐ Unscheduled

INFORMATION

Facility Name _____ Facility ID _____

Date of Inspection _____

Inspector Name _____

DETAILS

CERTIFIED MAIL

DATE

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Re: Notice to Develop a Slug Control/Spill Prevention Plan
Facility ID.: SITEID

Dear CONTACT NAME

Your facility discharges into the Wastewater Collection and Treatment System of the Great Lakes Water Authority (GLWA). We believe that your company uses and/or stores materials that can be readily carried into the regional sewer system in quantities and concentrations that could impact the system. Therefore, in accordance with Section II-303 of the GLWA Rules you required to develop a Slug Control/Spill Prevention Plan within thirty (30) days of the above date.

Please submit all correspondence to:

The Great Lakes Water Authority
Industrial Waste Control Group
9300 West Jefferson, Ste 210
Detroit, Michigan 48209

Failure to submit this application form could lead to enforcement action against your facility. Should you have any questions, please contact me at POTW PERSONNEL PHONE GOES HERE.

Sincerely,

POTW PERSONELL FULLNAME
Incident Prevention Group
Industrial Waste Control Group

GREAT LAKES WATER AUTHORITY
Industrial Waste Control Group
9300 W. Jefferson Avenue, Suite 210
Detroit, Michigan 48209

GUIDELINES FOR PREPARATION
SLUG CONTROL / SPILL PREVENTION PLAN

LEGAL AUTHORITY

The General Pretreatment Regulation 40 CFR 403,8(f)(2)(v) provides authority to the Publicly Owned Treatment Works (POTW), in this case the Water Resource Recovery Facility- Great Lakes Water Authority (GLWA), to request any Industrial User (IU) to develop a Slug Control / Spill Prevention Plan in order to protect the sewer from slug and/or accidental discharges.

Section II-303 of the GLWA Rules Require an Industrial User (IU) discharging into the GLWA sewerage collection and treatment system shall provide protection from (i) Slug Control and (ii) the accidental discharges of prohibited materials and other substances regulated by the GLWA. Further, the development and implementation of facilities and operating procedures necessary to provide protection against such accidental discharge, spill or slug discharge shall be implemented, provided, and maintained at the owner's or User's cost or expense

DEFINITIONS

SLUG DISCHARGE is any discharge of a non-routine, episodic nature including but not limited to an accidental spill or a non-customary batch discharge at a flow rate and/or concentration, which will cause interference or pass through at POTW.

UPSET means an exceptional incident in which there is unintentional and temporary noncompliance with the categorical pretreatment standards, or local pretreatment standards, because of factors beyond the reasonable control of the IU. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

An upset shall constitute an affirmative defense to an action brought for noncomp1iance with limits imposed under the permit if the following requirements are met:

1. An IU who wishes to establish the affirmative defense shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
   a) An upset occurred and IU can identify the specific cause(s) of the upset,
   b) The facility was at the time being operated in a prudent and workman-like manner and in compliance with applicable operation and maintenance procedures,
   c) The IU has submitted the information on the upset to the Authority, orally or in writing, within twenty-four (24) hours of becoming aware of the upset (if this information is provided orally, a written submission must be made within five (5) calendar days).

2. In any enforcement proceeding, the IU seeking to establish the occurrence of an upset shall have the burden of proof.

3. The IU shall control production of all discharges to the extent necessary to maintain compliance with GLWA's Rules upon reduction, Joss, or failure of its treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies in the situation where, among other things, the primary source of power of the treatment facility is reduced, lost, or fails.

BYPASS means the intentional diversion of waste streams from any portion of an IU's treatment facility.

Bypass is prohibited, and the Authority may take enforcement action against an IU for a bypass, unless:

1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage,
2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and
3. The IU submitted notices as required.

MATERIALS PROHIBITED FROM REACHING THE SEWER

GENERAL PROHIBITIONS

An IU shall not introduce into a POTW any pollutant(s) which cause pass through or interference.

A list of EPA priority pollutants and Michigan critical materials is attached for your reference/use.

SPECIFIC PROHIBITIONS

1. Pollutants which create a fire or explosion hazard in the POTW,
2. Pollutants which will cause corrosive structural damage to the POTW,
3. Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW result,
4. Any pollutant, including Biochemical Oxygen Demand (BOD) released in a discharge at a flow rate and/or pollutant concentration which will cause interference with the POTW,
5. Heat in amounts which will inhibit biological activity in the POTW resulting in interference,
6. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through,
7. Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems,
8. Any trucked or hauled pollutants, except at discharge points designated by the POTW.

CONTENTS OF THE PLAN

I. Facility Identification
II. Process description and schematic of wastewater flow
III. Inventory of materials stored, raw materials, liquid wastes, by-products/products, solvents, and/or oils
IV. Procedures for slug control / spill prevention and response
V. Method of disposal
VI. Notification requirements
VII. Slug history

VIII. Inspection procedure
IX. Employee training
X. Implementation date
XI. Certification of the plan

The nature and volume of information to be provided under each section as described in the subsequent 'Guidelines for Preparation' followed by a blank form for your use and/or reference.

GUIDELINES FOR PREPARATION

I. Facility Identification

This section contains general information and is self-explanatory

II. Process Description and Schematic of Wastewater Flow

This section should contain the following information related to the facility identified in Section I above.

1. Product or Service Operation details,
2. Description of discharges including non-routine batch discharges,
3. Number of shifts per day, shift hours, the number of employees in each shift, and number of working days per week,
4. A drawing of appropriate size showing the following details; facility layout, property boundaries, entrance and exit routes to facility, areas occupied by manufacturing service or commercial activities, storage area of hazardous or prohibited or listed materials, solvents- and oils, loading and unloading facilities, waste or wastewater handling, storage and treatment facilities, direction of drainage from storage areas, waste handling, process storage and treatment areas, floor drains, pipes and channels which lead away from potential spill areas identifying where the drains connect to sanitary sewer/holding tank, flow directions with flow rates, tank capacities, treatment system, GLWA and company sampling points and outlet connection to the street sewer.

III. Inventory of Materials Stored in the Facility

A list of hazardous / listed / prohibited materials, by-products or products, liquid wastes, solvents and oils or any other materials such as large quantities of non-contact cooling water and/or wastewater containing non-toxic organics, solids, and nutrients stored inside the facility and their approximate average and maximum quantities with concentrations stored in the facility should be provided. Also, show their respective locations on the drawing explained in Section II above. Only materials which are in a form which could readily be carried into the wastewater treatment plant and which constitute a concentration of *5%* or greater on a dry weight basis in the raw materials, chemical solutions or waste material are required to be reported.

IV. Procedures for Slug Control / Spill Prevention and Response

Details of measures and installations required to protect the sewer system from slug/spill discharges should be explained.

a) Equipment

Identify the type of equipment and structure used in slug prevention and response activities and their location in the facility (dikes, berms, sealed drains, alarms, leak detection equipment, diversionary structures, sumps, protective equipment, decontamination equipment, ventilation equipment, absorbents, etc.)

b) Procedures

Provide procedures to prevent adverse impact on the GLWA sewer system from slug discharges, including handling and transferring of materials, loading and unloading operation, a control of plant site run-off, etc.

V. Method of Disposal

Briefly describe the procedures for disposing of or treating spilled materials in your facility.

VI. Notification and Report Requirements

This section should contain a list of the federal, state, local agencies, contractors, consultants, etc., who will be informed during slug discharge. The following is the procedure required for notifying the GLWA on slug incidents:

Notification to GLWA

Slug Loading/Accidental Discharge

Within one (1) hour of becoming aware of a discharge entering into the sewer, the company shall telephone the GLWA System Control Center, within twenty-four (24) hourphone number at (313) 267-6000 and inform the Authority about the details of the discharge.

Upset at the IU's Pretreatment Facility

Within twenty-four (24) hours of becoming aware of an upset, the company shall telephone the GLWA at the System Control Center (313) 267- 6000 and inform the Authority about the details of the upset and discharge,

Unanticipated Bypass of Waste Pretreatment Facility

Within twenty-four (24) hours of becoming aware of the bypass, the company shall telephone the GLWA at the System Control Center (313) 267- 6000 inform the Authority about the details of the discharge,

All these notifications shall include the name of the caller, location, and time of discharge, type of wastewater, estimated concentration and volume.

Submission of Report

For the above mentioned three (3) incidents, a written report shall be submitted within five (5) calendar days of becoming aware of the incident This report shall contain the following:

i) A description of the discharge and the cause of the incident,

ii) The duration of the incident including exact dates and times or, if notcorrected, the anticipated time the incident is expected to continue,

iii) Steps being taken and/or planned to reduce, eliminate. and prevent similar future occurrences of the incident.

Anticipated Bypass

If an IU anticipates the need for a bypass, it shall submit a prior notice to the Authority, if possible at least ten (10) days before the date of the bypass. The report shall be accompanied by the analytical data, which shows the characteristics of the material to be bypassed. Upon evaluation, the Authority provides the IU with its determination on the bypass.

Notification and Reporting Requirements for Specific Incidents

INCIDENT	DEFINITION	NOTIFICATION	REPORT	CONTACT	TELEPHONE NO.
Spill 40 CFR 403.12f	Accidental discharge to the city sewer system	Shall call within (1) hour of becoming aware of the spill	Shall submit within (5) days of the spill	William Ware System Control	(313) 297-5857 (313) 267-6000 (24 hour number)
Upset 40 CFR 403.16	Pretreatment system upset causing noncompliance	Shall call within (24) hours of becoming aware of the upset	Shall submit within (5) days of the spill	Akshay Chauhan System Control	(313) 297-5826 (313) 267-6000 (24 hour number)
Bypass 40 CFR 403.17	Intentional diversion of waste streams from the pretreatment facility i) Anticipated Bypass ii) Unanticipated Bypass	Shall call within (24) hours of becoming aware of the bypass	i) Shall submit sample reports of material to be bypassed, 10 days prior to the bypass ii) Shall submit report within (5) days of the bypass	System Control	(313) 267-6000 (24 hour number)
Noncompliance 40 CFR 403.12g	Violation of any regulated parameters of wastewater to the sewer, identified while self-monitoring	Shall call within (24) hours of becoming aware of the violation	Shall submit within (30) days of the violation	Akshay Chauhan System Control	(313) 297-5826 (313) 267-6000 (24 hour number)

Days denotes calendar days

Details of the Reports for Specific Incidents

SPILL	Causes and details of the discharge, and measures to be taken to prevent similar future occurrences.
UPSET	A description of the discharge and cause of noncompliance; the period of noncompliance including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; steps being taken and/or planned to reduce, eliminate and prevent recurrence of the noncompliance.
BYPASS	i) Anticipated - prior notice, with the sample analysis of the material that is going to be bypassed, for the Authority's approval to bypass.
	ii) Unanticipated - description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate and prevent recurrence of the bypass.
NONCOMPLIANCE	The user shall repeat the sampling and analysis and submit the results of the repeat analysis.

All reports shall be submitted to the following address:

Emergency Response Coordinator
Great Lakes Water Authority
9300 W. Jefferson, Ste. 210
Detroit, Michigan 48209-2676

A notice shall be permanently posted on the company's bulletin board or ether prominent place(s) advising employees to contact GLWA System Control Center (24 hr. phone no.) in the event of a potential excessive discharge to the sewer system.

VII. Company Slug History

This section should contain the details of the slug discharges that occurred in the facility during the past three (3) years. It should also contain the dates, and volumes of wastewater/chemicals discharged into the sewer, names of pollutants and their respective concentrations, authorities informed and remedial measures instituted

VIII. Inspection Procedure

This section should contain details of inspection schedules established to check the conditions of the IU's facilities, equipment, tools, supplies, etc., to detect and correct the potential sources of slug discharges and related containment activities. It should also contain the skill level of the person, performing inspection periodicity of inspection, areas covered, records maintained, and the follow up procedures of inspection report

IX. Employee Training

This section should contain the skill types of the IU's employees and the number of employees who were formally instructed or trained periodically to act during the incidents of slug discharges. List the formal classroom lectures and demonstrations the operators attended. Also list the ongoing training classes conducted periodically for this purpose.

X. Implementation Date

This information is required to determine the time period from when the protection against slug discharges has been provided. List the date, month and the year on which the Slug Control / Spill Prevention Plan being submitted to the GLWA took effect.

XI. Certification of Implementation

The Slug Control/Spill Prevention Plan submitted by your company shall be signed by an authorized representative. The Certification Statement shall read as follows:

"I certify that the information provided in this Slug Control / Spill Prevention Plan is to the best of·my knowledge, accurate and true, and that the incidental slug control / spill prevention measures described in this plan will be implemented as described."

Print the name of the certifying officer, title, and the date of certification.

This Slug Control / Spill Prevention Plan shall be reviewed and immediately amended, if necessary, whenever:

- The facility permit is reviewed (only the IU with Wastewater Discharge Permit).
- The plan fails in an emergency.
- The facility changes in its design, construction, operation1 maintenance, or other circumstances in a way that materially increases the potential for slug / accidental discharges to the sewer.
- The list of emergency coordinators or facility contacts persons change.

INDUSTRIAL USER SLUG CONTROL / SPILL PREVENTION PLAN

I. Facility Notification				
Facility Name	****			
Facility Address	****			
Mailing Address	****			
Facility Contact Person	****			
Title	****	Work Phone No. / Cell No.	****	****
E-Mail Address	****			
Facility Spill Coordinator	****			
Title	****	Work Phone No. / Cell No.	****	****
E-Mail Address	****			
Other Emergency Coordinator	****			
Title	****	Work Phone No. / Cell No.	****	****
E-Mail Address	****			

II. Process Description and Schematics						
1. Type of Business / Manufacturer						
****						
2. Description of Discharges (including non-routine batch discharges)						
****						
3. Operating Schedule	****					
Number of Employees	1st Shift	****	2nd Shift	****	3rd Shift	****

4. Attach Schematics or Drawings

III. Inventory of Materials Stored in the Facility

Material Name*	Quantity** gallons (otherwise specify)	Location in the Facility	Container Type and Capacity

* Attach Material Safety Sheet (MSDS), if the chemical name is commercial

** Yearly / Daily Average

IV. Procedures for Slug Control / Spill Prevention and Response

a) Equipment
****
b) Procedures
****

V. Method of Disposal

****

VI. Notification and Reporting Procedure

****

VII. Previous Spill Events

Description of Incident	Quantity	Date	Remedial Action
****	****	****	****
****	****	****	****
****	****	****	****

VIII. Inspection Procedures

****

IX. Training Program

****

X. Implementation Date	****

XI. Certification

I certify that the information provided in this document is to the best of my knowledge, accurate and true, and that the incidental slug control / spill prevention measures described in this plan will be implemented as described.

Authorized Representative Signature	****
Date	****

Combined EPA Priority Pollutants and Michigan Critical Materials List

POLLUTANTS	
1,1,1,2-TETRACHLOROETHANE	1,5-NAPHTHALENEDIAMINE
1,1,1-TRICHLOROETHANE	1,7-ETHYNYLESTRADIOL-3-METHYL ETHER
1,1,2,2-TETRACHLOROETHANE	1-AMINO-2-METHOXY-5-METHYLBENZENE
1,1,2,2-TETRACHLOROETHYLENE	1-AMINO-2-METHOXY-5-NITROBENZENE
1,1,2-TRICHLOROETHANE	1-AMINO-2-METHYLANTHRAQUINONE
1,1,2-TRICHLOROETHYLENE	1-AZIRIDINE ETHANOL
1,1-DICHLOROETHANE	1-CHLORO-2,3-EPOXYPROPANE
1,1-DICHLOROETHYLENE	1-CHLORO-2,4-DIAMINOBENZENE
1,1-DIMETHL-4,4'-BIPYRIDINIUM	1-CHLORO-2-PROPENE
1,1-OXYBIS-2-CHLOROETHANE	1-CHLORO-4-PHENOXYBENZENE
1,1-THIOBIS-2-CHLOROETHANE	1-CHLOROPROPENE
1,2,3,4-DIEPOXYBUTANE	1H-1,2,4-TRIAZOL-3-AMINE
1,2,3,4-TETRACHLOROBENZENE	1-HYDROXY-2,4-DINITROBENZENE
1,2,3,5-TETRACHLOROBENZENE	1-METHOXY-2-AMINO-4-NITROBENZENE
1,2,3-TRICHLOROBENZENE	1-METHYL-1-NITROSOUREA
1,2,4,5-TETRACHLOROBENZENE	1-METHYL-2,3-DINITROBENZENE
1,2,4-TRICHLOROBENZENE	1-METHYL-2,4-DINITROBENZENE
1,2,5,6-DIBENZANTHRACENE	1-NAPHTHYL-N-METHYLCARBAMATE
1,2,5-TRICHLOROBENZENE	1-N-BUTYL-N-NITROSOBUTANAMINE
1,2,6-TRICHLOROBENZENE	1-NITRO-2-METHYLANTHRAQUINONE
1,2-BENZENEDICARBOXYLIC ACID, DIOCTYL ESTER	2 PROPEN-1-ONE
1,2-BUTYLENE OXIDE	2-(2-FORMYLHYDRAZINO)-4-(5-NITRO-2-FURYL) THIAZOLE
1,2-DIBROMO-2,2-DICHLOROETHYLDIMETHYLPHOSPHATE	2-(CHLOROMETHYL)OXIRANE
1,2-DIBROMOETHANE	2-(P-TERT-BUTYLPHENOXY) ISOPROPYL-2-CHLOROETHYL SULFITE
1,2-DICHLOROBENZENE	2,2-BIOXIRANE
1,2-DICHLOROETHANE	2,2-DICHLOROETYHL ETHER
1,2-DICHLOROPROPANE	2,2-DIMETHYL-4,4-METHYLENEDIANILINE
1,2-DIPHENYLDIAZENE	2,2-DIOXIDE-1,2-OXATHIOLANE
1,2-DIPHENYLHYDRAZINE	2,3,4,5-TETRACHLOROPHENOL
1,2-EPOXYBUTANE	2,3,4,6-TETRACHLOROPHENOL
1,2-EPOXYETHANE	2,3,5,6-TETRACLHOROPHENOL
1,2-TRANS-DICHLOROETHYLENE	2,3,7,8-TCDD
1,3,4-TRICHLOROBENZENE	2,3,7,8-TCDF
1,3-BUTADIENE	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN
1,3-DICHLOROBENZENE	2,3-DICHLORO-1,4-NAPHTHAQUINONE
1,3-DICHLOROPROPENE	2,4,5-T BUTOXYETHYL ESTER
1,3-DICHORO-4-HYDROXYBENZENE	2,4,5-T BUTYL ESTER
1,3-DIETHYLTHIOUREA	2,4,5-TRICHLOROPHENOL
1,3-PROPANESULTONE	2,4,5-TRICHLOROPHENOXY ACETİC ACID BUTYL ESTER
1,3-PROPIOLACTONE	2,4,5-TRICHLOROPHENOXYACETİC ACID
1,4-BENZENEDIOL	2,4,5-TRICHLOROTOLUENE
1,4-DICHLOROBENZENE	2,4,5-TRIMETHYLANILINE
1,4-DIOXACYCLOHEXANE	2,4,5-TRIMETHYLBENZENAMINE
1,4-DIOXANE	2,4,6-TRICHLOROPHENOL
1,5-DIAMINONAPTHALENE	2,4-D

2,4-DIAMINOANISOLE SULFATE	2-METHYLETHYLENIMINE
2,4-DIAMINOTOLUENE	2-METHYLPHENOL
2,4-DICHLOROPHENOL	2-METHYLPROPENENITRILE
2,4-DICHLOROPHENOXY ACETIC ACID	2-NAPHTHALENAMINE
2,4-DICHLOROPHENYL-P-NITROPHENYL ETHER	2-NAPHTHYLAMINE
2,4-DIMETHYLPHENOL	2-NITROPHENOL
2,4-DINITROPHENOL	2-NITROPROPANE
2,4-DINITROTOLUENE	2-OXETANONE
2,4-DNP	2-PROPENAL
2,6-DIHYDROXY-5-BIS(2-CHLOROETHYL) AMINOPYRIMIDINE	2-SEC-BUTYL-4,6-DINITROPHENOL
2,6-DINITROTOLUENE	3-(CHLOROMETHYL)PYRIDINE HYDROCHLORIDE
2-ACETYLAMINOFLUORENE	3-(PHENYLAZO)-2,6-PYRIDINEDIAMINE MONOHYDROCHLORIDE
2-AMINO-1-METHOXY-4-NITROBENZENE	3,3-DICHLOROBENZIDINE
2-AMINO-4-CHLOROTOLUENE	3,3-DIMETHYL-4,4-DIAMINODIPHENYLMETHANE
2-AMINO-4-NITROANISOLE	3,4-BENZOPYRENE
2-AMINOANTHRAQUINONE	3,5-DIBROMO-4-HYDROXYBENZONITRILE
2-AMINONAPHTHALENE	3,5-DINITRO-2-HYDROYXTOLUENE
2-BIPHENYLOL, SODIUM SALT	3-AMINO-4-METHOXYTOLUENE
2-CHLORO-1,3-BUTADIENE	3-AMINO-9-ETHYLCARBAZOLE
2-CHLOROALLYLDIETHYLDITHIOCARBAMATE	3-AMINO-9-ETHYLCARBAZOLE HYDROCHLORIDE
2-CHLOROBUTADIENE	3-CHLORO-1,2-DIBROMOPROPANE
2-CHLOROETHYL VINYL ETHERS	3-CHLORO-1-PROPENE
2-CHLORONAPHTHALENE	3-CHLOROALLYL CHLORIDE
2-CHLOROPHENOL	3-CHLOROPROPENYL CHLORIDE
2-CYANOPROPENE	3-CHLOROPROPYLENE
2-FAA	3-METHYLPHENOL
2-HYDROXY-2-METHYLPROPIONITRILE	3-NITRO-6-METHOXYANILINE
2-HYDROXYBIPHENYL SODIUM SALT	3-PYRIDYLMETHYL CHLORIDE HYDROCHLORIDE
2-HYDROXYPROPIONITRILE	4-(BUTYLNITROSAMINO)-1-BUTANOL
2-IMIDAZOLIDINETHIONE	4,4-BIPHENYLDIAMINE
2-METHOXY-3,4,5,6-TETRACHLOROPHENOL	4,4-DDD
2-METHOXY-5-METHYLBENZENAMINE	4,4-DDE
2-METHOXY-5-NITROANILINE	4,4-DDT
2-METHOXY-5-NITROBENZENAMINE	4,4'-DIAMINODIPHENYL ETHER
2-METHOXYANILINE HYDROCHLORIDE	4,4'-DIAMINODIPHENYL SULFIDE
2-METHOXYBENZENAMINE HYDROCHLORIDE	4,4'-METHYLENBIS(2-METHYLANILINE)
2-METHOXYBENZENEANAMINE	4,4'-METHYLENEBIS(N,N-DIMETHYL) BENZENAMINE
2-METHOXYTETRACHLOROPHENOL	4,4'-METHYLENEBIS(O-TOLUIDINE)
2-METHOYX-5-METHYLANILINE	4,4'-METHYLENEBIS-2-CHLOROBENZENAMINE
2-METHYL-1,3-DINITROBENZENE	4,4'-METHYLENEBIS-2-METHYLBENZENAMINE
2-METHYL-1-ANTHRAQUINONYLAMINE	4,4'-METHYLENEDI-O-TOLUIDINE
2-METHYL-1-NITRO-9,10-ANTHRACENEDIONE	4,4'-OXYBISBENZENAMINE
2-METHYL-1-NITROANTHRAQUINONE	4,4'-OXYDIANILINE
2-METHYL-4,6-DINITROPHENOL	4,4'-THIOBISBENZENAMINE
2-METHYL-5-CHLOROANILINE	4,4'-THIODIANILINE
2-METHYLAZIRIDINE	4,5-BENZOPYRENE
2-METHYLBENZENAMINE	4,6-DICHLOROPHENOL
2-METHYLBENZENAMINE HYDROCHLORIDE	4,6-DINITRO-O-CRESOL

4-AMINOAZOBENZENE	ABIETIC ACID
4-AMINOBIPHENYL	ACENAPHTHENE
4-AMINOPYRIDINE	ACENAPHTHYLENE
4-BROMOPHENOXYBENZENE	ACETOCYANOHYDRIN
4-BROMOPHENYL PHENYL ETHER	ACETONE CYANOHYDRIN
4-CHLORO-1,2-BENZENEDIAMINE	ACETYLENE TETRACHLORIDE
4-CHLORO-1,2-DIAMINOBENZENE	ACROLEIN
4-CHLORO-1,3-BENZENEDIAMINE	ACRYL ALDEHYDE
4-CHLORO-1,3-DIAMINOBENZENE	ACRYLIC ALDEHYDE
4-CHLORODIPHENYL ETHER	ACRYLONITRILE
4-CHLORO-M-PHENYLENEDIAMINE	ACTI-DIONE
4-CHLOROPHENOL	ACTINOMYCIN C1
4-CHLOROPHENYL PHENYL ETHER	ACTINOMYCIN D
4-CHLORO-PHENYLENEDIAMINE	AFLATOXINS
4-DIMETHYLAMINO-3,5-XYLYLMETHYLCARBAMATE	ALDICARB
4-DIMETHYLAMINOAZOBENZENE	ALDIFEN
4-HYDROXYBUTYL BUTYL NITROSAMINE	ALDRIN
4-HYDROXYCHLOROBENZENE	ALDRIN EPOXIDE
4-HYDROXYPHENOL	ALLYL ALDEHYDE
4-METHYL-1,3-BENZENEDIAMINE	ALLYL CHLORIDE
4-METHYL-M-PHENYLENEDIAMINE	ALPHA-BHC
4-METHYLPHNEOL	ALPHA-CHLOROTOLUENE
4-METYHL-2-AMINOANISOLE	ALPHA-ENDOSULFAN
4-NITROPHENOL	AMETYCINE
4-NITROSOMOAPHOLINE	AMINOBENZENE
4-NITROSO-N-PHENYLANILINE	AMINOPHEN
4-NITROSO-N-PHENYLBENZENAMINE	AMINOTRIAZOLE
4-PYRIDINAMINE	AMINOUREA HYDROCHLORIDE
4-PYRIDINE CARBOXYLIC ACID HYDAZIDE	AMITROLE
5,5-DIPHENYL-2,4-IMIDAZOLIDINEDIONE	AMİNOAZOBENZENE
5,5-DIPHENYL-2,4-IMIDAZOLIDINEDIONE MONOSODIUM SALT	ANILAZINE
5,5-DIPHENYLHYDANTOIN	ANILINE
5-BIS(2-CHLOROETHYL) AMINO URACIL	ANILINE HYDROCHLORIDE
5-CHLORO-2-METHYLANILINE	ANTHRACENE
5-CHLORO-2-METHYLBENZENAMINE	ANTIMONY
5-CHLOR-O-TOLUIDINE	ANTIMONY PENTACHLORIDE
5-METHYL-O-ANISIDINE	ANTIMONY PENTAFLUORIDE
5-NITRO-2-METHOXYANILINE	ANTIMONY POTASSIUM TARTRATE
5-NITROACENAPHTHENE	ANTIMONY TRIBROMIDE
5-NITRO-O-ANISIDINE	ANTIMONY TRICHLORIDE
5-PROPYL-1,3-BENZODIOXOLE	ANTIMONY TRIFLUORIDE
6,7-BENZOPYRENE	ANTIMONY TRIOXIDE
6-METHYL-2,4-DINITROPHENOL	ANTIMYCIN A
6-METHYL-2-MERCAPTOURACIL	ARAMITE
6-PROPYL-2-THIOURACIL	AROCHLOR
6-THIO-4-METHYLURACIL	ARSENIC
9-ETHYL-9H-CARBAZOL-3-AMINE	ARSENIC DISULFDIE
AAF	ARSENIC PENTOXIDE

ARSENIC TRICHLORIDE	BIS(2-CHLOROETHYL) METHYLAMINE
ARSENIC TRIOXIDE	BIS(2-CHLOROETHYL) PHOSPHORAMIDE CYCLIC PROPANOLAMIDE ESTER
ARSENIC TRISULFIDE	BIS(2-CHLOROETHYL) SULFIDE
ASBESTOS	BIS(2-CHLOROISOPROPYL) ETHER
ASBESTOS	BIS(2-ETHYLHEXYL)-1,2-BENZENEDICARBOXYLATE
AVADEX	BIS(2-ETHYLHEXYL) PHTHALATE
AZACYCLOPROPANE	BIS(3-CHLORO-4-AMINOPHENYL) METHANE
AZINPHOS-ETHYL	BIS(CHLOROMETHYL) ETHER
AZINPHOS-METHYL	BIS(DIMETHYLDITHIOCARBAMATO) ZINC
AZIRIDINE	BIS(DIMETHYLTHIOCARBAMOYL) DISULFIDE
AZOBENZENE	BIS(TRIBUTYLTIN) OXIDE
AZOBENZIDE	BONOFORM
AZOBENZOL	BROMOCHLOPHOS
AZODRIN	BROMOETHYLENE
BARBAN	BROMOFORM
BASALIN	BROMOMETHANE
BAYER 73	BROMOXYNIL
BAYLUSCIDE	BUTTER YELLOW
BENDIOCARB	BUTYL BENZYL PHTHALATE
BENLATE	BUTYLBUTANOLNITROSAMINE
BENOMLY	C.I. SOLVENT YELLOW 2
BENZENAMINE	C.I. BASIC GREEN 4
BENZENAMINE HYDROCHLORIDE	C.I. DISPERSE ORANGE 11
BENZENE	C.I. SOLVENT ORANGE 35
BENZENEAZOBENZENE	C.I. SOLVENT YELLOW 1
BENZENOL	C.I. SOLVENT YELLOW 3
BENZIDINE (AND SALTS)	C.I. 11020
BENZO(A) ANTHRACENE	CADMIUM
BENZO(A) PYRENE	CADMIUM ACETATE
BENZO(B) FLUORANTHENE	CADMIUM BROMIDE
BENZO(B) PHENANTHRENE	CADMIUM CHLOIRDE
BENZO(D,E,F) CHRYSENE	CADMIUM OXIDE
BENZO(GHI) PERYLENE	CADMIUM STEARATE
BENZO(K) FLUORANTHENE	CALCIUM HYPOCHLORITE
BENZOEPIN	CAPTAFOL
BENZOL	CAPTAN
BENZYL BUTYL PHTHALATE	CAPTAN SOW
BENZYLCHLORIDE	CARBAFOS
BERYLLIUM	CARBAMYL HYDRAZINE
BERYLLIUM CHLORIDE	CARBARYL
BERYLLIUM FLUORIDE	CARBAZIMIDIC ACID
BERYLLIUM NITRATE	CARBICRON
BETA-BHC	CARBOFURAN
BETA-ENDOSULFAN	CARBON TETRACHLORIDE
BETA-PROPIOLACTONE	CARBONIC DICHLORIDE
BIDRIN	CARBONYL CHLORIDE
BIS(2-CHLOROETHOXY) METHANE	CARBOPHENOTHION
BIS(2-CHLOROETHYL) ETHER	BUTTER YELLOW

CARBOPHOS	CROTOXYPHOS
CDEC	CUPFERRON
CELLON	CYANIDES
CHLORAMINES	CYANOETHYLENE
CHLORDANE	CYANOGEN
CHLORDECONE	CYANOGEN BROMIDE
CHLORFENVINPHOS	CYANOGEN CHLORIDE
CHLORINATED CAMPHENES	CYANOGEN IODIDE
CHLORINATED DIBENZOFURANS	CYCASIN
CHLORINATED DIOXINS	CYCLOHEXATRIENE
CHLORINE (INCLUDES HYPOCHLORITE SALTS)	CYCLOHEXIMIDE
CHLOROBENZENE	CYCLOPHOSPHAMIDE
CHLOROBENZILATE	CYGON
CHLORODIBROMOMETHANE	CYODRIN
CHLOROETHANE	CYTOXAN
CHLOROETHYLENE	DASANIT
CHLOROFORM	DBA
CHLOROMETHANE	DBCP
CHLOROMETHYL ETHER	DBP
CHLOROMETHYLBENZENE	DDVP
CHLOROPHENYLMETHANE	DECHLORANE
CHLOROPHOS	DEHP
CHLOROPRENE	DEHYDROABIETIC ACID
CHLOROPROPYLENE OXIDE	DEKRYSIL
CHLOROTHENE	DELNAV
CHLORPYRIFOS	DELTA-BHC
CHROMIC ACETATE	DEMETON
CHROMIC ACID	DERTIS
CHROMIC CHLORIDE	DES
CHROMIC SULFATE	DHAA
CHROMIUM	DI(ETHYLHEXYL)PHTHALATE
CHROMOUS CHLORIDE	DI(N-BUTYL)-1,2-BENZENEDICARBOXYLATE
CHRYSENE	DI(N-BUTYL) PHTHALATE
CLONITRALID	DIALLATE
COBALT	DIAZINON
COBALT CARBONYL	DIBENZO(A,H) ANTHRACENE
COBALTOUS BROMIDE	DIBROM
COBALTOUS FORMATE	DIBROMOCHLOROPROPANE
COBALTOUS SULFAMATE	DIBUTYL PHTHALATE
COPPER	DIBUTYLNITROSAMINE
COPPER CHLORIDE	DICHLONE
COPPER NITRATE	DICHLOROBROMOMETHANE
COPPER SULFATE	DICHLORODIMETHYL ETHER
CO-RAL	DICHLOROMETHANE
COSMEGEN	DICHLORVOS
COUMAPHOS	DICROTOPHOS
COUNTER	DIELDRIN
CROTOTHANE	DIETHYL DISULFIDE

DIETHYL MERCURY	DOWICIDE 2
DIETHYL PHTHALATE	DURSBAN
DIETHYLENE DIOXIDE	DYLOX
DIETHYLENE ETHER	DYRENE
DIETHYLNITROSAMINE	EDB
DIETHYLSTILBESTROL	EKTAFOS
DIHYDROQUINONE	ELDOQUIN
DIHYDROSAFROLE	EMBAFUME
DIMECRON	ENDOSULFAN
DIMETHOATE	ENDOSULFAN SULFATE
DIMETHYL DISULFIDE	ENDOXAN
DIMETHYL HYDRAZINES	ENDRIN
DIMETHYL MERCURY	ENDRIN ALDEHYDE
DIMETHYL PHTHALATE	EPICHLOROHDYRIN
DIMETHYL SULFATE	EPN
DIMETHYL(2,2,2-TRICHLORO-1-HYDROXYETHYL) PHOSPHONATE	EPOXYHEPTACHLOR
DIMETHYLBENZENE	ETHANETHIOAMIDE
DIMETHYLENE OXIDE	ETHENONE
DIMETHYLENIMINE	ETHENYLBENZENE
DIMETHYLNITROMETHANE	ETHION
DIMETHYLNITROSAMINE	ETHYL CARBAMATE
DI-N-BUTYL PHTHALATE	ETHYL CHLORIDE
DINITROPHENYLMETHANE	ETHYL GUTHION
DINITROTOLUENE (ALL ISOMERS)	ETHYL MESYLATE
DINOCAP	ETHYL METHANESULFONATE
DI-N-OCTYL PHTHALATE	ETHYL OXIRANE
DINOSEB	ETHYL PARATHION
DIOCTYL PHTHALATE	ETHYL THIOPYROPHOSPHATE
DIOXATHION	ETHYL URETHANE
DIPHENYL ETHER	ETHYL-4,4-DICHLOROBENZILATE
DIPHENYL OXIDE	ETHYLBENZENE
DIPHENYLDIAMIDE	ETHYLENE CHLORIDE
DIPHENYLHYDANTOIN SODIUM	ETHYLENE DIBROMIDE
DIPHENYLNITROSAMINE	ETHYLENE DICHLORIDE
DIPROPYLNITROSAMINE	ETHYLENE OXIDE
DIPTEREX	ETHYLENE TRICHLORIDE
DISULFOTON	ETHYLENEIMINE
DI-SYSTON	ETHYLENETHIOUREA
DITHIONE	ETHYLETHYLENE OXIDE
DITHIOPHOS	ETHYL-N-METHYLNITROSOCARBAMATE
DILANTIN	ETO
DNBP	FENOPROP
DNOC	FENSULFOTHION
DNOP	FENTHION
DOP	FICAN
DOT (INCLUDES P,P'O,P' & TECHNICAL)	FLAVATOXINS
DOWICIDE	FLUCHORALIN
DOWICIDE 1	FLUORANTHENE

FLUORENE	ISOSEMICARBAZIDE
FNT	KANECHLOR C
FORMALDEHYDE	KARATHANE
FORMALIN	KEPONE
FORMIC ALDEHYDE	KETENE
FORMOL	KURON
FUMAZONE	LACTONITRILE
FURADAN	LANNATE
FURATHIOZOLE	LASIOCARPINE
GAMMA-BHC	LEAD
GAMMA-HCH	LEAD ACETATE
GAMMA-HEXACHLOROCYCLOHEXANE	LEAD CHLORIDE
GLYCIDYL CHLORIDE	LEAD FLUORIDE
GOPHACIDE	LEAD NITRATE
GUTHION	LEAD SULFATE
HCB	LEPTOPHOS
HCE	LINDANE
HEOD	LITHIUM
HEPTACHLOR	LITHIUM CHROMATE
HEPTACHLOR CIS-OXIDE	LITHIUM HYDRIDE
HEPTACHLOR EPOXIDE	MALACHITE GREEN
HEPTACHLORONAPHTHALENE	MALATHION
HEPZIDE	MBCP
HEXACHLOROBENZENE	MBOCA
HEXACHLOROBUTADIENE	M-CRESOL
HEXACHLOROCYCLOHEXANE (ALL ISOMERS)	M-CRESYLIC ACID
HEXACHLOROCYCLOPENTADIENE	M-DICHLOROBENZENE
HEXACHLOROETHANE	MERCAPTOIMIDAZOLINE
HEXACHLOROETHYLENE	MERCAPTOMETHANE
HEXACHLORONAPTHALENE	MERCAPTOPHOS
HEXAMETHYLPHOSPHORAMIDE	MERCAPTOTHION
HEXAMETHYLPHOSPHORIC TRIAMIDE	MERCURIC ACETATE
HYDRAZINE	MERCURIC CHLORIDE
HYDRAZINECARBOXAMIDE	MERCURIC NITRATE
HYDRAZINECARBOXAMIDE HYDROCHLORIDE	MERCURIC SULFATE
HYDRAZOBENZENE	MERCUROUS NITRATE
HYDROGEN SULFIDE	MERCURY
HYDROXYBENZENE	MESTRANOL
HYPOCHLOROUS ACID	METAPHOS
IMIDAN	METASYSTOX R
INDENO (1,2,3-CD) PYRENE	METHACRYLONITRILE
ISONICOTINIC ACID HYDRAZINE	METHALDEHYDE
ISONICOTINOYL HYDRAZINE	METHANAL
ISONITROPROPANE	METHANETHIOL
ISOPHORONE	METHOMYL
ISOPROPENE CYANIDE	METHOXY-DDT
ISOPROPENYL NITRILE	METHYL ACRYLONITRILE
ISOSAFROLEOCTYL SULFOXIDE	METHYL ALDEHYDE

METHYL AZOXYMETHANOL GLUCOSIDE	N-HYDROXY-N-NITROSOBENZENAMINE AMMONIUM SALT
METHYL BENZENE	NICKEL
METHYL BROMIDE	NICKEL AMMONIUM SULFATE
METHYL CHLORIDE	NICKEL CHLORIDE
METHYL CHLOROFORM	NICKEL HYDROXIDE
METHYL DINITROBENZENE	NICKEL NITRATE
METHYL HYDRAZINE	NICKEL SULFATE
METHYL LACTONITRILE	NICLOSAMIDE ETHANOLAMINE SALT
METHYL MERCAPTAN	NICOULINE
METHYL NITROSOURETHANE	NIFURTHIAZOLE
METHYL PARATHION	NIRIDAZOLE
METHYL SULFATE	NITHIAZIDE
METHYL THIOURACIL	NITROBENZENE
METHYL VINYLNITROSAMINE	NITROGEN MUSTARD
METHYL YELLOW	NITROPENTACHLOROBENZENE
METHYLENE CHLORIDE	N-METHYL FORMAMIDE
METHYLENE DICHLORIDE	N-METHYL-2,2'-DICHLORODIETHYLAMINE
METHYLENE OXIDE	N-METHYLBIS(2-CHLOROETHYL) AMINE
METHYLENEBIS(2-CHLOROANILINE)	N-METHYL-N-(CARBOXMYETHYL)NITROSAMINE
METHYLENEBIS(N,N-DIMETHYLANILINE)	N-METHYL-N-NITROSOETHENAMINE
MEVINPHOS	N-METHYL-N-NITROSOGLYCINE
MEXACARBATE	N-METKYL-N-NITROSOMETHANAMINE
MIREX	N-NITROSODIETHYLAMINE
MITOMYCIN C	N-NITROSODIMETHYLAMINE
MOCA	N-NITROSODI-N-BUTYLAMINE
MONOCHLOROBENZENE	N-NITROSODI-N-PROPYLAMINE
MONOCHLOROETHYLENE	N-NITROSODIPHENYLAMINE
MONOCROTALINE	N-NITROSODIPROPYLAMINE
MONOCROTOPHOS	N-NITROSO-DI-N-PROPYLAMINE
MONOMETHYL FORMAMIDE	N-NITROSOMETHYLVINYLAMINE
MORBICID	N-NITROSOMORPHOLINE
MOTHOXYCHLOR	N-NITROSO-N-BUTYL-N(4-HYDROXYBUTYL) AMINE
MUSTARD GAS	N-NITROSO-N-ETHYLUREA
N-(2-HYDROXYETHYL) AZIRIDINE	N-NITROSO-N-METHYLCARBAMIDE
N-(2-HYDROXYETHYL) ETHYLENEIMINE	N-NITROSO-N-METHYLUREA
N,N'-DIETHYLTHIOCARBAMIDE	N-NITROSO-N-METHYLURETHANE
N,N'-DIETHYLTHIOUREA	N-NITROSO-N-PHENYLBENZENAMINE
N-[4-(5-NITRO-2-FURYL)-2-THIAZOLYL] ACETAMIDE	N-NITROSO-N-PHENYLHYDROXYLAMINE AMMONIUM SALT
N-2-FLUORENYL ACETAMIDE	N-NITROSO-N-PROPYL-1-PROPANAMINE
NALED	N-NITROSOSARCOSINE
NAPHTHALENE	NORQUEN
NARAMYCIN A	NOTROFEN
N-BUTYL-N-(4-HYDROXYBUTYL) NITROSAMINE	N-PHENYL-P-NITROSOANILINE
NEOABIETIC ACID	NSC 3051
N-ETHYL-N-(5-NITRO-2-THIAZOLYL) UREA	NUDRIN
N-ETHYL-N-NITROSO UREA	O-AMINOANISOLE
N-ETHYL-N-NITROSOETHANAMINE	O-AMINOAZOTOLUENE
NFTA	O-AMINOTOLUENE

O-ANISIDINE	P-CHLOROPHENYL PHENYL ETHER
O-ANISIDINE HYDROCHLORIDE	PCNB
O-BIPHENYLOL	P-CRESIDINE
O-CRESOL	P-CRESOL
O-CRESYLIC ACID	P-CRESYLIC ACID
OCTACHLORONAPHTHALENE	P-DICHLOROBENZENE
OCTACHLOROSTYRENE	P-DIHYDROXYBENZENE
OCTOIL	P-DIOXANE
O-DICHLOROBENZENE	PENTACHLORONAPHTHALENE
O-ETHYL-O-(4-NITROPHENYL) BENZENETHIONOPHOSPHONATE	PENTACHLORONITROBENZENE
O-ETHYL-O-(4-NITROPHENYL) PHENYLPHOSPHONOTHIOATE	PENTACHLOROPHENOL (AND SALTS)
O-HYDROXYDIPHENYL	PERC
OIL OF MIRBANE	PERCHLOROBENZENE
OMAL	PERCHLOROBUTADIENE
OMAL (NOTE T6)	PERCHLOROCYCLOPENTADIENE
O-METHOXYANILINE	PERCHLOROETHANE
O-METHOXYPHENYLAMINE	PERCHLOROETHYLENE
O-METHYLANILINE	PERCHLOROMETHANE
O-PHENYL PHENOL	PHENACHLOR
O-TOLUIDINE	PHENANTHRENE
O-TOLUIDINE HYDROCHLORIDE	PHENAZOPYRIDINE HYDROCHLORIDE
OVASTOL	PHENESTERIN
O-XENOL	PHENOBARBITOL
OXIRANE	PHENOL
OXYBISCHLOROMETHANE	PHENONYL
OXYDEMETON-METHYL	PHENYL CHLORIDE
P,P-BIS(DIMETHYLAMINODIPHENYL) METHANE	PHENYL ETHER
P,P'-DDD	PHENYL HYDROXIDE
P,P'-DDE	PHENYLAMINE
P,P-DICHLORODIPHENYLDICHLOROETHYLENE	PHENYLETHYLENE
P-AMINOAZOBENZENE	PHENYLETHYLMALONYL UREA
P-AMINODIPHENYLIMIDE	PHENYTOIN
PARACHLOROMETA CRESOL	PHENYTOIN SODIUM
PARAQUAT	PHORATE
PARATHION	PHOSAZETIM
PARATHION-METHYL	PHOSDRIN
P-BIPHENYLAMINE	PHOSGENE
P-BROMODIPHENYL ETHER	PHOSMET
PCB	PHOSPHAMIDON
PCB-1016 (AROCHLOR 1016)	PHOSPHORIC TRIS(DIMETHYLAMIDE)
PCB-1221 (AROCHLOR 1221)	PHOSVEL
PCB-1232 (AROCHLOR 1232)	PHYGON
PCB-1242 (AROCHLOR 1242)	PIPERONYL SULFOXIDE
PCB-1248 (AROCHLOR 1248)	P-MONOCHLOROPHENOL
PCB-1254 (AROCHLOR 1254)	P-NITROSODIPHENYLAMINE
PCB-1260 (AROCHLOR 1260)	POLYBROMINATED BIPHENYLS (PBB)
P-CHLORODIPHENYL OXIDE	POLYCHLORINATED BIPHENYLS (PCB)
P-CHLOROPHENOL	POLYCHLORINATED NAPHTHALENES

POTASSIUM PENTACHLOROPHENATE	SYSTOX
P-PHENOXYBROMOBENZENE	TBTO
P-PHENOXYPHENYL BROMIDE	TCDD
P-PHENYLAMINONITROSOBENZENE	TCDF
P-PHENYLANILINE	TCP
PROCASIL	TDE
PROCYTOX	TEMIK
PROPACIL	TEPP
PROPANOLIDE	TERBUFOS
PROPENENITRILE	TERRACLOR
PROPENYL CHLORIDE	TETRACHLOROETHYLENE
PROPYCIL	TETRACHLOROGUAIACOL
PROPYLENIMINE	TETRACHLOROMETHANE
PROPYLTHIOURACIL	TETRACHLORONAPHTHALENE
PSEUDOCUMIDINE	TETRACHLORVINPHOS
PTU	TETRAETHYL DIPHOSPHATE
PYRENE	TETRAETHYL DITHIOPYROPHOSHPATE
QUINOL	TETRAETHYL PYROPHOSHPATE
ROTENONE	TETRAMETHYLDIAMINODIPHENLYMETHANE
SELENIUM	TETRAMETHYLTHIURAM DISULFIDE
SELENIUM DIOXIDE	TETRANITROMETHANE
SELENIUM DISULFIDE	THALLIUM
SELENIUM OXIDE	THIOCARBAMIDE
SELENIUM OXYCHLORIDE	THIODAN
SEMICARBAZIDE	THIOLALLATE
SEMICARBAZIDE CHLORIDE	THIOPHOS
SEMICARBAZIDE HYDROCHLORIDE	THIOTEPP
SENDOXAN	THIOUREA
SEVIN	THIRAM
SILVER	TIMET
SILVER CHLORIDE	TOK
SILVER NITRATE	TOLUENE
SILVEX	TOLUENE-2,4-DIAMINE
SILVEX, PROPYLENE GLYCOL BUTYL ETHER ESTER	TOLYL CHLORIDE
SODIUM FLUOROACETATE	TOXAPHENE
SODIUM HYPOCHLORITE	TREFLAN
SODIUM O-PHENYLPHENATE	TRIARYL PHOSPHATE ESTERS
SODIUM PENTACHLOROPHENATE	TRIAZINE
SODIUM-O-PHENYLPHENOL	TRIBUTYLTIN (AND SALTS AND ESTERS)
STRYCHNINE	TRIBUTYLTIN ACETATE
STYRENE	TRIBUTYLTIN ACRYLATE
STYROLE	TRIBUTYLTIN FLUORIDE
SULFALLATE	TRIBUTYLTIN OXIDE
SULFOTEP	TRIBUTYLTIN SULFIDE
SULFOXIDE	TRICHLORFON
SULFUR HYDRIDE	TRICHLOROETHYLENE
SULFUR MUSTARD	TRICHLOROMETHANE
SYLVIC ACID	TRICHLOROVINYLPENTACHLOROBENZENE

TRICRESYL PHOSPHATE	VINYL CHLORIDE
TRIFLURALIN	VINYL CYANIDE
TRIMETHYL ORTHOPHOSPHATE	VINYL ETHYLENE
TRIMETHYL PHOSPHATE	VINYL TRICHLORIDE
TRIPHENYL PHOSPHATE	VINYLIDENE CHLORIDE
TRIS	WHITE TAR
TRIS (FLAME RETARDANT)	XYLENE (O, M AND P ISOMERS)
TRIS(2,3-DIBROMOPROPYL) PHOSPHATE	ZECTRAN
TRITHION	ZINC
TRIXYLENYL PHOSPHATE	ZINC AMMONIUM CHLORIDE
TUBATOXIN	ZINC BROMIDE
URACIL MUSTARD	ZINC CHLORIDE
URETHANE	ZINC DIMETHYLDITHIOCARBAMATE
VAPONA	ZINC NITRATE
VEGADEX	ZINC SULFATE
VINYL BROMIDE	ZIRAM

CERTIFIED MAIL

DATE

CONTACT NAME
INDUSTRY NAME
CONTACT ADDR1
CONTACTCITY, STATE ZIP

Re: Notice to Develop a Review and Modify Slug Control/Spill Prevention Plan
Facility ID.: SITEID GOES HERE

Dear CONTACT NAME

Your facility discharges into the Wastewater Collection and Treatment System of the Great Lakes Water Authority (GLWA) and had previously submitted a Slug Control/Spill Prevention Plan dated <Insert Date>.

[Optional Language: These plans must be reviewed periodically, and our records indicate that more than two (2) years have passed since your last submission. We therefore require you to review and modify your prior plan, and re-certify as needed, pertaining to materials you may use and/or stores materials that can be readily carried into the regional sewer system in quantities and concentrations that could impact the system.]

[Optional Language: As a result of your recent release, we are requiring you to review and modify your prior plan, and re-certify as needed, pertaining to materials you may use and/or stores materials that can be readily carried into the regional sewer system in quantities and concentrations that could impact the system.]

Therefore, in accordance with Section II-303 of the GLWA Rules you required to respond within thirty (30) days of the above date.

Please submit all correspondence to:

The Great Lakes Water Authority
Industrial Waste Control Group
9300 West Jefferson, Ste 210
Detroit, Michigan 48209

Failure to submit this application form could lead to enforcement action against your facility. Should you have any questions, please contact me at POTW PERSONNEL PHONE GOES HERE.

Sincerely,

POTW PERSONELL FULLNAME GOES HERE
Incident Prevention Group
Industrial Waste Control Group

CERTIFIED MAIL

DATE

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Re: Notice for 5-Day Incident Report
Facility ID.: SITEID

Dear CONTACT NAME:

Your facility discharges into the Wastewater Collection and Treatment System of the Great Lakes Water Authority (GLWA) and had previously submitted a Slug Control/Spill Prevention Plan dated <Insert Date>. As a result of your recent release, we are requiring you to (i) provide a 5-day incident report describing the causes and mitigative action(s) taken and (ii) review and modify your prior plan, and re-certify as needed, pertaining to materials you may use and/or stores materials that can be readily carried into the regional sewer system in quantities and concentrations that could impact the system.

Therefore, in accordance with Section II-303 of the GLWA Rules you required to respond within thirty (30) days of the above date.

Please submit all correspondence to:

The Great Lakes Water Authority
Industrial Waste Control Group
9300 West Jefferson, Ste 210
Detroit, Michigan 48209

Failure to submit this application form could lead to enforcement action against your facility. Should you have any questions, please contact me at POTW PERSONNEL PHONE GOES HERE.

Sincerely,

POTW PERSONELL FULLNAME
Incident Prevention Group
Industrial Waste Control Group

GREAT LAKES WATER AUTHORITY
INDUSTRIAL WASTE CONTROL

EMERGENCY RESPONSE REPORT

INCIDENT# YEAR - Number

_____SPILL
_____ILLEGAL DUMPING
_____ODOR COMPLAINT
_____CONTAMINATED SITE
_____SEWER BLOCKAGE
_____BYPASS
_____MISCELLANEOUS

SITE AT: <Location>

RECEIVED:
Date: <Date Received>
Time:. <Time Received>

By: <Individual Receiving Information>

REPORTED BY
Name: Complaint Source
Address: Address or Affiliation
Telephone: <Phone>

INCIDENT DETAILS:
Date: <Incident Date>
Description**:** <Incident description>
Industry: <Source or Location>
Did the material enter the sewer: <Yes, No, N/A>

Time: <Time Reported>

SITE INVESTIGATION:

Describe findings of investigation including whether additional support needed to remove or mitigate issue.

Investigation Date: <Investigation Date> **By: William Ware**
Who handled the Cleanup: <Responsible Party> **Method used: <Describe>**
Agencies notified: <If Applicable>

Follow up action(s:) IPER requested a 5-day report submission. <Add other actions or requirements>

Reporting Date: <Reporting Date> **By: William Ware**

CIV – Form 6

CERTIFIED MAIL
Date: <ENTER DATE>
Facility No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

NOTICE OF VIOLATION: SCC/SPP

The Great Lakes Water Authority (GLWA) is writing this Notice of Violation in response to an incident at <Facility or Location> and a failure of providing a timely notice of the release as required under the GLWA Rules.

FINDINGS OF FACT

1) The GLWA is the Control Authority for implementing, administering and enforcing an Industrial Pretreatment Program as identified in NPDES Permit MI0022802;
2) Under this pretreatment program, INDUSTRY NAME hereinafter referred to as "The Company", failed to provide timely notice of an incident at <Facility or Location> on <Incident Date>.
3) Under this pretreatment program, INDUSTRY NAME, hereinafter referred to as "The Company", failed to implement its SC/SPP plan at <Facility or Location> on <Incident Date>.
4) The discharge(s) from your facility are **NOT AUTHORIZED.**

THEREFORE, THE COMPANY IS HEREBY NOTIFIED THAT:

1) The Company is in violation with the GLWA Rules.
2) [Optional] The Company shall immediately initiate mitigative actions to clean-up and remediate the incident and provide a 5-day report detailing to cause of the incident and explaining why the Company failed to notify GLWA and implement its plan.
3) [Optional] The Company shall provide a 5-day report detailing to cause of the incident and explaining why the Company failed to notify GLWA and implement its plan.
4) Following receipt of the 5-day report, GLWA will determine whether additional enforcement action or an escalation of enforcement action is required.

If you should have any questions or need any additional information concerning this matter, please contact me at <<phone>> and <<email>>.

<<Manager or Management Professional>>
Industrial Waste Control Group
(313)297-<<phone>>

GLWA
Great Lakes Water Authority

SMR Review and Evaluation

Industrial Waste Control Group

☐ January – June	
☐ July – December	Year

Section A - Evaluations and Actions

Company Name		Permit No.	
Processed by / Date	/	Reviewed by / Date	/

	COMMENTS (Check the appropriate required action(s) below)				
1				Permit Expiration Date	
	☐ Yes ☐ No	Renew company's permit. (If permit expiration date is within the next 3 months.)			
2	☐	a) Issue **NOTICE of ACCEPTANCE** (NOA) to the company. (NOA is issued when SMR is timely, complete without deficiency and in compliance.)			
	☐	b) Issue **NOTICE of VIOLATION** (NOV) to the company. (i.e. if SIU commits any violations listed in Section B and/or meets conditions 4c, 4d or 4e below) Note: Nonresponsive to NOV will escalate to SNC.			
	☐	c) Issue **SMR REVIEW LETTER** (SMRRL) to the company. (i.e. if SIU meets conditions 3, 4a and/or 4b below)			
3	SMR Submission Via	☐ Linko	☐ E-Mail	☐ US Mail*	☐ Hand Delivered
	Date Submitted / *Postmarked Date				
	☐ Yes ☐ No	SMR is submitted late			

4	**NOTIFICATION REQUIREMENTS (NR) for Self-Monitoring Violation**				
	A) Notify the Authority within 24 hour of becoming aware of the self-monitoring noncompliance. (A 24-hour notification report must be in the company's main file.) and				
	B) Submit a 30-day Compliance Report to demonstrate compliance with applicable effluent limit. (The report must be submitted within 30 days of becoming aware of the noncompliance.)				
		A–Notified?	**B–Submitted?**	**Issue**	
	☐ a)	Yes	Yes	SMRRL and Notice of Acknowledgment (NOAck)	
	☐ b)	Yes	Still on the process of submitting report	SMRRL and	if B is satisfactory, issue NOAck accordingly. if B has violation, follow again **NR** process.
	☐ c)	Yes	No	NOV and Noncompliance Notice (NCN)	
	☐ d)	No	Yes	NOV and NCN	
	☐ e)	No	No	NOV and NCN	
5	☐ Yes ☐ NA	Conduct a follow-up inspection on missing or inconsistent information in company's SMR (see Section C).			
6		Number of sampling location(s) as specified in the company's discharge permit. For company with multiple sampling locations, ensure to evaluate all sampling locations (see Section D).			
7	Comment				

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

Section B – Main Requirements

Copy and attach only the applicable page(s) with violation(s) to the issued Notice of Violation.

COMMENTS (Check all that applies to the company's SMR)

1 ☐ Yes ☐ No

Specified/conducted the required Sampling Method

(If No, check the affected parameter below and denote the improper sampling method used. Note: Flow-P C =Flow-Proportional Composite, Time-P C = Time-Proportional Composite)

Parameters (Grab Sampling)	Grab	Flow-P C	Time-P C	Unknown	Parameters (Composite Sampling)	Grab	Flow-P C	Time-P C	Unknown
☐ pH (Alkalinity/Acidity)	☐	☐	☐	☐	☐ Biochemical Oxygen Demand	☐	☐	☐	☐
☐ Fats, Oil or Grease	☐	☐	☐	☐	☐ Phosphorus	☐	☐	☐	☐
☐ Available Cyanide	☐	☐	☐	☐	☐ Total Suspended Solids	☐	☐	☐	☐
☐ Total Phenolic Cmpds	☐	☐	☐	☐	☐ PCB	☐	☐	☐	☐
☐ PFAS	☐	☐	☐	☐	☐ Metals	☐	☐	☐	☐
					☐ Individual Phenolic Cmpds	☐	☐	☐	☐

Comment

2 ☐ Yes ☐ No

Identified/analyzed samples within the Maximum Holding Time

(If No, check the affected parameter(s) below.)

Parameter	Maximum Holding Time
☐ pH (Alkalinity/Acidity)	Immediately (within 15 min.; compare sampling and analysis time)
☐ Biochemical Oxygen Demand	48 hours (for planting) and 5 days (analysis time after planting)
☐ Total Suspended Solids	7 days
☐ Individual Phenolic Compounds	7 days (to extract) and 40 days (to analyze)
☐ TTO non-volatile organics	
☐ PCB	1 year (to extract) and 1 year (to analyze)
☐ Cyanide	14 days
☐ Fats, Oil or Grease	28 days
☐ Mercury	
☐ Phosphorus	
☐ Total Phenolic Compounds	
☐ Metals	6 months
☐ PFAS	14 days (to extract) and 40 days (to analyze)

Comment

3 ☐ Yes ☐ No

Identified/utilized proper Analytical Methods

(If No, denote below the affected parameter and the improper analytical method used. Note: If the company provides supporting MDEQ documentation approving the alternative method; then, it is considered acceptable method.)

SMR Review and Evaluation

Company Name	
Permit No.	

☐	January – June	
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Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used
☐ pH (Acidity/Alkalinity)		☐ Silver		**Individual Phenolic Compounds**	
☐ Cyanide (Available)		☐ Zinc		☐ 2-Chlorophenol	
☐ Arsenic		☐ Total PCB		☐ 2,4-Dichlorophenol	
☐ Cadmium		☐ Total Phenolic Compounds		☐ 2,4-Dinitrophenol	
☐ Chromium		☐ Biochemical Oxygen Demand		☐ 4-Chlorophenol	
☐ Copper		☐ Fats, Oil or Grease		☐ 4-Chloro-3-Methylphenol	
☐ Iron		☐ Phosphorus		☐ 4-Methylphenol	
☐ Lead		☐ Total Suspended Solids		☐ 4-Nitrophenol	
☐ Mercury		**Per-and Poly-Flouroalkyl Substances (PFAS)**		☐ Phenol Alcohol	
☐ Nickel		☐ PFAS			

Comment

4 ☐ Yes ☐ No ☐ Exempted — Complied with the requirement for analyzing Mercury
(If Yes, proceed to 5. If No, respond i-iii below.)

i) Analyzed Mercury utilizing a quantification level of ≤ 0.2µg/L. (If Yes proceed to 5. If No, proceed to ii.)	☐ Yes	☐ No
ii) Provided demonstration on sample matrix interference (DSMI). (If Yes, denote the date of DSMI and proceed to 5. If No, proceed to iii.)	☐ Yes	☐ No
Date of DSMI		
iii) Submitted BMP in accordance with Detroit Ordinance 08-05, 56-3-66.1(d). (If Yes, provide the date of the submitted BMP and mark "Excused from violation". If No, mark "Violation".)	☐ Yes	☐ No
Date of BMP		

☐ Excused from violation
☐ Violation

Comment

5 ☐ Yes ☐ No ☐ Exempted — Complied with the requirement for analyzing PCB
(If Yes, proceed to 6. If No, respond i-iii below.)

i) Analyzed PCB utilizing a quantification level of ≤ 0.2µg/L. (If Yes proceed to 6. If No, proceed to ii.)	☐ Yes	☐ No
ii) Provided demonstration on sample matrix interference (DSMI). (If Yes, denote the date of DSMI and proceed to 6. If No, proceed to iii.)	☐ Yes	☐ No
Date of DSMI		
iii) Submitted BMP in accordance with Detroit Ordinance 08-05, 56-3-66.1(d). (If Yes, provide the date of the submitted BMP and mark "Excused from violation". If No, mark "Violation".)	☐ Yes	☐ No
Date of BMP		

SMR Review and Evaluation

Company Name	
Permit No.	

☐ January – June	
☐ July – December	Year

		☐ Excused from violation ☐ Violation	
		Comment	
6	☐ Yes ☐ No	Indicated the Regulated and/or Non-Regulated Process Flow	
7	☐ Yes ☐ No	Indicated the Non-Regulated Cooling and/or Sanitary Flow	
8	☐ Yes ☐ No	Has sampled and analyzed the required number of samples as specified in the company's permit. (Identify below the affected parameter that is analyzed below the required self-monitoring frequency. See also Section D)	
		Parameter	# Analyses Submitted / # Analyses Required
		Comment	
9	☐ Yes ☐ No	Indicated that Pretreatment Standards are being met	
10	☐ Yes ☐ No	Are Pretreatment Standards being met? If company has self-monitoring exceedance and complied with both requirements A and B below, it meets the pretreatment standards. Then, check "Yes". If not, check "No" and identify below the affected parameter(s) that is in exceedance. Fill out also Section E regarding company's self-monitoring exceedance. A) 24-hour call notification and B) 30-day Compliance Report	
		Parameter	Sample Date
		Comment	
11	☐ Yes ☐ No	Signed and dated by the company's Authorized Representative	
12	Has submitted the required document(s) below.		
	☐ Yes ☐ No ☐ NA	a) Waste Manifests (to be submitted as per permit's reporting period requirement)	
	☐ Yes ☐ No ☐ NA	b) PFAS mass removal efficiency (to be submitted as per permit's reporting period requirement) For affected SIUs classified as potential PFAS sources	
		Comment	

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

Section C – Other Requirements

			COMMENTS (Check all that applies to the company's SMR)
1	☐ Yes	☐ No	Indicated the Reporting Period in the SMR
2	☐ Yes	☐ No	Indicated the Permit Number in the SMR
3	☐ Yes	☐ No	Identified the Sampling Location(s) (SL) in the SMR
4	☐ Yes	☐ No	SL description(s) is consistent with the SL description(s) in the Permit
5	☐ Yes	☐ No	Provided Time and Date of Sampling Events
6	☐ Yes	☐ No	Identified the Person(s) who did the Actual Sampling
7	☐ Yes	☐ No	Identified the Person(s) who did the Actual Analysis
8	☐ Yes	☐ No	Showed SMR flow inconsistencies among currently issued permit (with respect to 25,000 gpd requirement) and recent Comprehensive Inspection Report **Yes** - investigate and initiate permit modification if necessary **No** – no action required
Comment			

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

Section D – Data Evaluation (For SIU with Local Limitations only and applicable PFAS)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #															
Local Parameters and PFAS															
Parameter (Check only parameters that are **not required** for self-monitoring)		# Data		Data Analysis			Parameter (Check only parameters that are **not required** for self-monitoring)		# Data		Data Analysis				
		Submitted in SMR (**A**)	Required by permit (**B**)	A = B	A > B	A < B			Submitted in SMR (**A**)	Required by permit (**B**)	A = B	A > B	A < B		
☐	pH (Acidity/Alkalinity)			☐	☐	☐	☐	Biochemical Oxygen Demand			☐	☐	☐		
☐	Arsenic			☐	☐	☐	☐	Fats, Oil or Grease			☐	☐	☐		
☐	Cadmium			☐	☐	☐	☐	Phosphorus			☐	☐	☐		
☐	Chromium			☐	☐	☐	☐	Total Suspended Solids			☐	☐	☐		
☐	Copper			☐	☐	☐	☐	**Individual Phenolic Compounds**							
☐	Cyanide (Available)			☐	☐	☐	2-Chlorophenol				☐	☐	☐		
☐	Iron			☐	☐	☐	2,4-Dichlorophenol				☐	☐	☐		
☐	Lead			☐	☐	☐	2,4-Dinitrophenol				☐	☐	☐		
☐	Mercury			☐	☐	☐	4-Chlorophenol				☐	☐	☐		
☐	Nickel			☐	☐	☐	4-Chloro-3-methylphenol				☐	☐	☐		
☐	Silver			☐	☐	☐	4-Methylphenol				☐	☐	☐		
☐	Zinc			☐	☐	☐	4-Nitrophenol				☐	☐	☐		
☐	Total PCB			☐	☐	☐	Phenol Alcohol				☐	☐	☐		
☐	Total Phenolic Compounds			☐	☐	☐	☐	**Per- and Poly-Flouroalkyl Substances (PFAS)** (see next page)							
Comment															

Company Name	
Permit No.	

☐	January – June	
☐	July – December	

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Section D – Data Evaluation PFAS (Per- and Poly-fluoroalkyl Substances)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

PER- and POLY-FLOUROALKYL SUBSTANCES (PFAS)

Parameter	# Data		Data Analysis			Parameter	# Data		Data Analysis		
	Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B		Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B
4:2 Fluorotelomer sulfonic acid (4:2 FTSA)			☐	☐	☐	Perfluorononane Sulfonic acid (PFNS)			☐	☐	☐
6:2 Fluorotelomer sulfonic acid (6:2 FTSA)			☐	☐	☐	Perfluorononanoic acid (PFNA)			☐	☐	☐
8:2 Fluorotelomer sulfonic acid (8:2 FTSA)			☐	☐	☐	Perfluorooctane sulfonamide (FOSA)			☐	☐	☐
2-N-Ethyl perfluorooctane sulfonamidoacetic acid (NEtFOSA)			☐	☐	☐	Perfluorooctane Sulfonic acid (PFOS)			☐	☐	☐
2-N-Methyl perfluorooctane sulfonamidoacetic acid (NMeFOSA)			☐	☐	☐	Perfluorooctanoic acid (PFOA)			☐	☐	☐
Perfluorobutanoic acid (PFBA)			☐	☐	☐	Perfluoropentane Sulfonic acid (PFPeS)			☐	☐	☐
Perfluorobutane Sulfonic acid (PFBS)			☐	☐	☐	Perfluoropentanoic acid (PFPeA)			☐	☐	☐
Perfluorodecane Sulfonic acid (PFDS)			☐	☐	☐	Perfluorotetradecanoic acid (PFTeDA)			☐	☐	☐
Perfluorodecanoic acid (PFDA)			☐	☐	☐	Perfluorotridecanoic acid (PFTrDA)			☐	☐	☐
Perfluorododecanoic acid (PFDoDA)			☐	☐	☐	Perfluoroundecanoic acid (PFUnDA)			☐	☐	☐
Perfluoroheptane Sulfonic acid (PFHpS)			☐	☐	☐	Hexafluoropropylene oxide dimer acid (HFPO-DA)			☐	☐	☐
Perfluoroheptanoic acid (PFHpA)			☐	☐	☐	11-Chloroeiosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUDS)			☐	☐	☐
Perfluorohexane Sulfonic acid (PFHxS)			☐	☐	☐	9-Chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9Cl-PF3ONS)			☐	☐	☐
Perfluorohexanoic acid (PFHxA)			☐	☐	☐	4,8-Dioxa-3H-perfluorononanoic acid (ADONA)			☐	☐	☐
Comment											

SMR Review and Evaluation

Company Name	
Permit No.	

☐	January – June	
☐	July – December	

Year

Section E – Noncompliance

Copy and attach only the applicable page(s) with violation(s) to the issued Notice of Violation.

COMMENTS (Check all that applies to the company's SMR)		
1	☐ Yes ☐ No	Is the SMR Analytical Data in compliance? (If No, fill out the noncompliance table below)

Noncompliance Table

Parameter	Sample Date	Sample Concentration	Permit Limit	Valid Data		Notified within 24-hour		Submitted 30-day Compliance Report	
				Yes	No	Yes	No	Yes	No
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
				☐	☐	☐	☐	☐	☐
Comment									

GLWA
Great Lakes Water Authority

SMR Review and Evaluation

Industrial Waste Control Group

☐ January – June	
☐ July – December	Year

Section A - Evaluations and Actions

Company Name		Permit No.	
Processed by / Date	/	Reviewed by / Date	/

	COMMENTS (Check the appropriate required action(s) below)				
1				Permit Expiration Date	
	☐ Yes ☐ No	Renew company's permit. (If permit expiration date is within the next 3 months.)			
2	☐	a) Issue **NOTICE of ACCEPTANCE** (NOA) to the company. (NOA is issued when SMR is timely, complete without deficiency and in compliance.)			
	☐	b) Issue **NOTICE of VIOLATION** (NOV) to the company. (i.e. if SIU commits any violations listed in Section B and/or meets conditions 4c, 4d or 4e below) Note: Nonresponsive to NOV will escalate to SNC.			
	☐	c) Issue **SMR REVIEW LETTER** (SMRRL) to the company. (i.e. if SIU meets conditions 3, 4a and/or 4b below)			
3	SMR Submission Via	☐ Linko	☐ E-Mail	☐ US Mail*	☐ Hand Delivered
	Date Submitted / *Postmarked Date				
	☐ Yes ☐ No	SMR is submitted late			

4	**NOTIFICATION REQUIREMENTS (NR) for Self-Monitoring Violation**			
	A) Notify the Authority within 24 hour of becoming aware of the self-monitoring noncompliance. (A 24-hour notification report must be in the company's main file.) and			
	B) Submit a 30-day Compliance Report to demonstrate compliance with applicable effluent limit. (The report must be submitted within 30 days of becoming aware of the noncompliance.)			
		A–Notified?	**B–Submitted?**	**Issue**
	☐ a)	Yes	Yes	SMRRL and Notice of Acknowledgment (NOAck)
	☐ b)	Yes	Still on the process of submitting report	SMRRL and if B is satisfactory, issue NOAck accordingly. if B has violation, follow again **NR** process.
	☐ c)	Yes	No	NOV and Noncompliance Notice (NCN)
	☐ d)	No	Yes	NOV and NCN
	☐ e)	No	No	NOV and NCN
5	☐ Yes ☐ NA	Conduct a follow-up inspection on missing or inconsistent information in company's SMR (see Section C).		
6		Number of sampling location(s) as specified in the company's discharge permit. For company with multiple sampling locations, ensure to evaluate all sampling locations (see Section D).		
7	Comment			

Company Name	
Permit No.	

☐	January – June	
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Section B – Main Requirements

Copy and attach only the applicable page(s) with violation(s) to the issued Notice of Violation.

COMMENTS (Check all that applies to the company's SMR)

1 ☐ Yes ☐ No — Specified/conducted the required Sampling Method

(If No, check the affected parameter below and denote the improper sampling method used. Note: Flow-P C =Flow-Proportional Composite, Time-P C = Time-Proportional Composite)

Parameters (Grab Sampling)	Grab	Flow-P C	Time-P C	Unknown	Parameters (Composite Sampling)	Grab	Flow-P C	Time-P C	Unknown
☐ pH (Alkalinity/Acidity)	☐	☐	☐	☐	☐ Biochemical Oxygen Demand	☐	☐	☐	☐
☐ Fats, Oil or Grease	☐	☐	☐	☐	☐ Phosphorus	☐	☐	☐	☐
☐ Total Cyanide	☐	☐	☐	☐	☐ Total Suspended Solids	☐	☐	☐	☐
☐ Amenable Cyanide	☐	☐	☐	☐	☐ PCB	☐	☐	☐	☐
☐ Available Cyanide	☐	☐	☐	☐	☐ Metals	☐	☐	☐	☐
☐ Total Phenolic Cmpds	☐	☐	☐	☐	☐ Individual Phenolic Cmpds	☐	☐	☐	☐
☐ TTO volatile organics	☐	☐	☐	☐	☐ TTO non-volatile organics	☐	☐	☐	☐
☐ PFAS	☐	☐	☐	☐					

Comment

2 ☐ Yes ☐ No — Identified/analyzed samples within the Maximum Holding Time

(If No, check the affected parameter(s) below.)

Parameter	Maximum Holding Time
☐ pH (Alkalinity/Acidity)	Immediately (within 15 min.; compare sampling and analysis time)
☐ Biochemical Oxygen Demand	48 hours (for planting) and 5 days (analysis time after planting)
☐ Total Suspended Solids	7 days
☐ Individual Phenolic Compounds	7 days (to extract) and 40 days (to analyze)
☐ TTO non-volatile organics	
☐ PCB	1 year (to extract) and 1 year (to analyze)
☐ Cyanide	14 days
☐ TTO volatile organics	
☐ Fats, Oil or Grease	28 days
☐ Mercury	
☐ Phosphorus	
☐ Total Phenolic Compounds	
☐ Metals	6 months
☐ PFAS	14 days (to extract) and 40 days (to analyze)

Comment

SMR Review and Evaluation

Company Name	
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3 ☐ Yes ☐ No

Identified/utilized proper Analytical Methods

(If No, denote below the affected parameter and the improper analytical method used. Note: If the company provides supporting MDEQ documentation approving the alternative method; then, it is considered acceptable method.)

Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used
Local Pollutants		☐ Phenol Alcohol		**Total Toxic Organics Purgeables**	
☐ pH (Acidity/Alkalinity)		**Other Pollutants**		☐ 1,1,1-Trichloroethane	
☐ Cyanide (Available)		☐ Ammonia (as N)		☐ 1,1,2,2-Tetrachloroethane	
☐ Arsenic		☐ Antimony		☐ 1,1,2-Trichloroethane	
☐ Cadmium		☐ Cobalt		☐ 1,1-Dichloroethane	
☐ Chromium		☐ Cyanide (Total)		☐ 1,1-Dichloroethylene	
☐ Copper		☐ Cyanide (Amenable)		☐ 1,2-Dichlorobenzene	
☐ Iron		☐ Tin		☐ 1,2-Dichloroethane	
☐ Lead		☐ Titanium		☐ 1,2-Dichloropropane	
☐ Mercury		☐ Vanadium		☐ 1,2-Trans-Dichloroethylene (Trans-1,2-Dichloroethene)	
☐ Nickel		☐ Non-Polar Material (SGT-HEM)		☐ 1,3-Dichlorobenzene	
☐ Silver		☐ Acetone		☐ 1,3-Dichloropropylene (1,3-dichloropropene)	
☐ Zinc		☐ Bis(2-Ethylhexyl) Phthalate		☐ 1,4-Dichlorobenzene	
☐ Total PCB		☐ Carbazole		☐ 2-Chloroethyl vinyl ether (mixed)	
☐ Total Phenolic Compounds		☐ Cresol		☐ Acrolein	
☐ Biochemical Oxygen Demand		☐ Ethyl Acetate		☐ Acrylonitrile	
☐ Fats, Oil or Grease		☐ Fluoranthene		☐ Benzene	
☐ Phosphorus		☐ Isopropyl Acetate		☐ Bromoform (Tribromomethane)	
☐ Total Suspended Solids		☐ Methyl Ethyl Ketone		☐ Carbon tetrachloride (Tetrachloromethane)	
Individual Phenolic Compounds		☐ Methylene Chloride		☐ Chlorobenzene	
☐ 2-Chlorophenol		☐ m-Cresol (3-Methylphenol)		☐ Chlorodibromomethane (Dibromochloromethane)	
☐ 2,4-Dichlorophenol		☐ Naphthalene		☐ Chloroethane	
☐ 2,4-Dinitrophenol		☐ n-Decane		☐ Chloroform (Trichloromethane)	
☐ 4-Chlorophenol		☐ n-Octadecane		☐ Dichlorobromomethane (Bromodichloromethane)	
☐ 4-Chloro-3-Methylphenol		☐ o-Cresol (2-Methylphenol)		☐ Ethylbenzene	
☐ 4-Methylphenol		☐ p-Cresol (4-Methylphenol)		☐ Methyl bromide (Bromomethane)	
☐ 4-Nitrophenol		☐ n-Amyl Acetate		☐ Methyl chloride (Chloromethane)	

SMR Review and Evaluation

Company Name	
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Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used
☐ Methylene chloride (Dichloromethane)		☐ 4-Bromophenyl Phenyl Ether		☐ Delta-BHC	
☐ Tetrachloroethylene (Tetrachloroethene)		☐ 4-chloro-3-methyl phenol (p-Chloro-m-Cresol)		☐ Dibenzo(a,h)anthracene (1,2,5,6-Dibenzanthracene)	
☐ Toluene		☐ 4-Chlorophenyl Phenyl Ether		☐ Dieldrin	
☐ Trichloroethylene (Trichloroethene)		☐ 4-Nitrophenol		☐ Diethyl Phthalate	
☐ Vinyl chloride (Chloroethylene)		☐ Acenaphthene		☐ Dimethyl Phthalate	
☐ Xylene*		☐ Acenaphthylene		☐ Di-N-Butyl Phthalate	
Total Toxic Organics Extractables		☐ Aldrin		☐ Di-N-Octyl Phthalate	
		☐ Alpha-BHC		☐ Endosulfan sulfate	
☐ 1,2,4-Trichlorobenzene		☐ Alpha-Endosulfan (Endosulfan I)		☐ Endrin	
☐ 1,2-Diphenylhydrazine (Azobenzene or 1,2-DPH)		☐ Anthracene		☐ Endrin aldehyde	
☐ 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)		☐ Benzidine		☐ Fluoranthene	
☐ 2,4,6-Trichlorophenol		☐ Benzo(a)anthracene (1,2-Benzanthracene)		☐ Fluorene	
☐ 2,4-Dichlorophenol		☐ Benzo(a)pyrene (3,4-Benzopyrene)		☐ Gamma-BHC (Lindane)	
☐ 2,4-Dimethylphenol		☐ Benzo(b)fluoranthene (3,4-Benzofluoranthene)		☐ Heptachlor	
☐ 2,4-Dinitrophenol		☐ Benzo(ghi) Perylene (1,12-Benzoperylene)		☐ Heptachlor epoxide (BHC-hexachlorocyclohexane)	
☐ 2,4-Dinitrotoluene		☐ Benzo(k) Fluoranthene (11,12-Benzofluoranthene)		☐ Hexachlorobenzene	
☐ 2,6-Dinitrotoluene		☐ Beta-BHC		☐ Hexachlorobutadiene	
☐ 2-Chloronaphthalene		☐ Beta-Endosulfan (Endosulfan II)		☐ Hexachlorocyclopentadiene	
☐ 2-Chlorophenol		☐ Bis (2-Chloroethoxy) Methane		☐ Hexachloroethane	
☐ 2-Nitrophenol		☐ Bis (2-Chloroethyl) Ether		☐ Indeno(1,2,3-cd) pyrene (2,3-o-phenylene pyrene)	
☐ 3,3-Dichlorobenzidine		☐ Bis (2-Chloroisopropyl) Ether		☐ Isophorone	
☐ 4,4-DDD (p,p-TDE)		☐ Bis (2-Ethylhexyl) Phthalate		☐ Naphthalene	
☐ 4,4-DDE (p,p-DDX)		☐ Butylbenzyl Phthalate (Benzyl butyl phthalate)		☐ Nitrobenzene	
☐ 4,4-DDT		☐ Chlordane (technical mixture & metabolites)		☐ N-Nitrosodimethylamine	
☐ 4,6-Dinitro-O-Cresol (2-Methyl-4,6-Dinitrophenol)		☐ Chrysene		☐ N-Nitrosodi-N-Propylamine	

SMR Review and Evaluation

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

	Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used
☐	N-Nitrosodiphenylamine		☐ Phenanthrene		☐ Toxaphene	
☐	PCB/Arochlor - 1016, 1221, 1232, 1242, 1248, 1254, 1260		☐ Phenol		**PER- and POLY-FLOUROALKYL SUBSTANCES (PFAS)**	
☐	Pentachlorophenol		☐ Pyrene		☐ PFAS	
	Comment					

4	☐ Yes	☐ No	☐ Exempted	Complied with the requirement for analyzing Mercury (If Yes, proceed to 5. If No, respond i-iii below.)	
				i) Analyzed Mercury utilizing a quantification level of ≤ 0.2µg/L. (If Yes proceed to 5. If No, proceed to ii.)	☐ Yes ☐ No
				ii) Provided demonstration on sample matrix interference (DSMI). (If Yes, denote the date of DSMI and proceed to 5. If No, proceed to iii.)	☐ Yes ☐ No
				Date of DSMI	
				iii) Submitted BMP in accordance with Detroit Ordinance 08-05, 56-3-66.1(d). (If Yes, provide the date of the submitted BMP and mark "Excused from violation". If No, mark "Violation".)	☐ Yes ☐ No
				Date of BMP	
			☐ Excused from violation ☐ Violation		
			Comment		
5	☐ Yes	☐ No	☐ Exempted	Complied with the requirement for analyzing PCB (If Yes, proceed to 6. If No, respond i-iii below.)	
				i) Analyzed PCB utilizing a quantification level of ≤ 0.2µg/L. (If Yes proceed to 6. If No, proceed to ii.)	☐ Yes ☐ No
				ii) Provided demonstration on sample matrix interference (DSMI). (If Yes, denote the date of DSMI and proceed to 6. If No, proceed to iii.)	☐ Yes ☐ No
				Date of DSMI	
				iii) Submitted BMP in accordance with Detroit Ordinance 08-05, 56-3-66.1(d). (If Yes, provide the date of the submitted BMP and mark "Excused from violation". If No, mark "Violation".)	☐ Yes ☐ No
				Date of BMP	
			☐ Excused from violation ☐ Violation		
			Comment		
6	☐ Yes	☐ No	Indicated the Regulated and/or Non-Regulated Process Flow		
7	☐ Yes	☐ No	Indicated the Non-Regulated Cooling and/or Sanitary Flow		
8	☐ Yes	☐ No	Has sampled and analyzed the required number of samples as specified in the company's permit. (Identify below the affected parameter that is analyzed below the required self-monitoring frequency. See also Section D)		

SMR Review and Evaluation

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

				Parameter	# Analyses Submitted / # Analyses Required
			Comment		
9	☐ Yes	☐ No	Indicated that Pretreatment Standards are being met		
10	☐ Yes	☐ No	Are Pretreatment Standards being met? If company has self-monitoring exceedance and complied with both requirements A and B below, it meets the pretreatment standards. Then, check "Yes". If not, check "No" and identify below the affected parameter(s) that is in exceedance. Fill out also Section E regarding company's self-monitoring exceedance. A) 24-hour call notification and B) 30-day Compliance Report		
				Parameter	Sample Date
			Comment		
11	☐ Yes	☐ No	Signed and dated by the company's Authorized Representative		
12	Has submitted the required document(s) below.				
	☐ Yes	☐ No	☐ NA	a)	Total Toxic Organic (TTO) Analysis (to be submitted once a year, evaluate Section D - TTO) For Metal Finishing & Electroplating only
	☐ Yes	☐ No	☐ NA	b)	Toxic Organic Management Plan (TOMP) Certification Statement (to be submitted every reporting period) For Metal Finishing and Electroplating only
	☐ Yes	☐ No	☐ NA	c)	Monthly Discharge Log as required in the company's Wastewater Discharge Permit For OCPSF only
	☐ Yes	☐ No	☐ NA	d)	Certification of stand-alone Research & Development facility (to be submitted every reporting period) For affected SIU with leather finishing operation
	☐ Yes	☐ No	☐ NA	e)	Waste Manifests (to be submitted every reporting period) For affected Categorical IUs whose regulated wastewater are hauled off-site in lieu of being discharged to the POTW
	☐ Yes	☐ No	☐ NA	f)	PFAS mass removal efficiency (to be submitted every reporting period) For affected SIUs classified as potential PFAS sources
			Comment		

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

Section C – Other Requirements

			COMMENTS (Check all that applies to the company's SMR)
1	☐ Yes	☐ No	Indicated the Reporting Period in the SMR
2	☐ Yes	☐ No	Indicated the Permit Number in the SMR
3	☐ Yes	☐ No	Identified the Sampling Location(s) (SL) in the SMR
4	☐ Yes	☐ No	SL description(s) is consistent with the SL description(s) in the Permit
5	☐ Yes	☐ No	Provided Time and Date of Sampling Events
6	☐ Yes	☐ No	Identified the Person(s) who did the Actual Sampling
7	☐ Yes	☐ No	Identified the Person(s) who did the Actual Analysis
8	☐ Yes	☐ No	Showed SMR flow inconsistencies among currently issued permit (with respect to 25,000 gpd requirement) and recent Comprehensive Inspection Report **Yes** - investigate and initiate permit modification if necessary **No** – no action required
Comment			

Company Name	
Permit No.	

☐	January – June	
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Section D – Data Evaluation (For all Significant Industrial User)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #														
Local Parameters														
Parameter (Check only parameters that are **not required** for self-monitoring)	# Data		Data Analysis			Parameter (Check only parameters that are **not required** for self-monitoring)	# Data		Data Analysis		
	Submitted in SMR (**A**)	Required by permit (**B**)	A = B	A > B	A < B		Submitted in SMR (**A**)	Required by permit (**B**)	A = B	A > B	A < B
☐ pH (Acidity/Alkalinity)			☐	☐	☐	☐ Biochemical Oxygen Demand			☐	☐	☐
☐ Arsenic			☐	☐	☐	☐ Fats, Oil or Grease			☐	☐	☐
☐ Cadmium			☐	☐	☐	☐ Phosphorus			☐	☐	☐
☐ Chromium			☐	☐	☐	☐ Total Suspended Solids			☐	☐	☐
☐ Copper			☐	☐	☐	☐ **Individual Phenolic Compounds**					
☐ Cyanide (Available)			☐	☐	☐	2-Chlorophenol			☐	☐	☐
☐ Iron			☐	☐	☐	2,4-Dichlorophenol			☐	☐	☐
☐ Lead			☐	☐	☐	2,4-Dinitrophenol			☐	☐	☐
☐ Mercury			☐	☐	☐	4-Chlorophenol			☐	☐	☐
☐ Nickel			☐	☐	☐	4-Chloro-3-methylphenol			☐	☐	☐
☐ Silver			☐	☐	☐	4-Methylphenol			☐	☐	☐
☐ Zinc			☐	☐	☐	4-Nitrophenol			☐	☐	☐
☐ Total PCB			☐	☐	☐	Phenol Alcohol			☐	☐	☐
☐ Total Phenolic Compounds			☐	☐	☐	☐ PFAS	See next page				
Other Categorical Parameters (Check only parameters that are **not required** for self-monitoring)											
☐ Ammonia (as N)			☐	☐	☐	☐ Fluoranthene			☐	☐	☐
☐ Antimony			☐	☐	☐	☐ Naphthalene			☐	☐	☐
☐ Cobalt			☐	☐	☐	☐ n-Decane			☐	☐	☐
☐ Cyanide (Total)			☐	☐	☐	☐ n-Octadecane			☐	☐	☐
☐ Cyanide (Amenable)			☐	☐	☐	☐ o-Cresol (2-Methylphenol)			☐	☐	☐
☐ Tin			☐	☐	☐	☐ p-Cresol (4-Methylphenol)			☐	☐	☐
☐ Titanium			☐	☐	☐	☐ Acetone			☐	☐	☐
☐ Vanadium			☐	☐	☐	☐ Ethyl Acetate			☐	☐	☐
☐ Non-Polar Material (SGT-HEM)			☐	☐	☐	☐ Isopropyl Acetate			☐	☐	☐
☐ Total Toxic Organics	See next page					☐ Methylene Chloride			☐	☐	☐
☐ Bis(2-Ethylhexyl) Phthalate			☐	☐	☐	☐ n-Amyl Acetate			☐	☐	☐
☐ Carbazole			☐	☐	☐						
Comment											

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

Section D – Data Evaluation (TTO for Metal Finishing & Electroplating facilities)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #	

Total Toxic Organics

Parameter	# Data		Data Analysis			Parameter	# Data		Data Analysis		
	Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B		Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B
Purgeable Compounds						Methyl Bromide (Bromomethane)			☐	☐	☐
1,1,1-Trichloroethane			☐	☐	☐	Methyl Chloride (Chloromethane)			☐	☐	☐
1,1,2,2-Tetrachloroethane			☐	☐	☐	Methylene Chloride (Dichloromethane)			☐	☐	☐
1,1,2-Trichloroethane			☐	☐	☐	Tetrachloroethylene (Tetrachloroethene)			☐	☐	☐
1,1-Dichloroethane			☐	☐	☐	Toluene			☐	☐	☐
1,1-Dichloroethylene (1,1-Dichloroethene)			☐	☐	☐	Trichloroethylene (Trichloroethene)			☐	☐	☐
1,2-Dichlorobenzene			☐	☐	☐	Vinyl Chloride (Chloroethylene)			☐	☐	☐
1,2-Dichloroethane			☐	☐	☐	**Extractable Compounds**					
1,2-Dichloropropane			☐	☐	☐	1,2,4-Trichlorobenzene			☐	☐	☐
1,2-Trans-Dichloroethylene (Trans-1,2-Dichloroethene)			☐	☐	☐	1,2-Diphenylhydrazine (Azobenzene or 1,2-DPH)			☐	☐	☐
1,3-Dichlorobenzene			☐	☐	☐	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)			☐	☐	☐
1,3-Dichloropropylene (1,3-Dichloropropene)			☐	☐	☐	2,4,6-Trichlorophenol			☐	☐	☐
1,4-Dichlorobenzene			☐	☐	☐	2,4-Dichlorophenol			☐	☐	☐
2-Chloroethylvinyl Ether			☐	☐	☐	2,4-Dimethylphenol			☐	☐	☐
Acrolein			☐	☐	☐	2,4-Dinitrophenol			☐	☐	☐
Acrylonitrile			☐	☐	☐	2,4-Dinitrotoluene			☐	☐	☐
Benzene			☐	☐	☐	2,6-Dinitrotoluene			☐	☐	☐
Bromoform (Tribromomethane)			☐	☐	☐	2-Chloronaphthalene			☐	☐	☐
Carbon Tetrachloride (Tetrachloromethane)			☐	☐	☐	2-Chlorophenol			☐	☐	☐
Chlorobenzene			☐	☐	☐	2-Nitrophenol			☐	☐	☐
Chlorodibromomethane (Dibromochloromethane)			☐	☐	☐	3,3-Dichlorobenzidine			☐	☐	☐
Chloroethane			☐	☐	☐	4,4-DDD (p,p-TDE)			☐	☐	☐
Chloroform (Trichloromethane)			☐	☐	☐	4,4-DDE (p,p-DDX)			☐	☐	☐
Dichlorobromomethane (Bromodichloromethane)			☐	☐	☐	4,4-DDT			☐	☐	☐
Ethylbenzene			☐	☐	☐	4,6-Dinitro-O-Cresol (2-Methyl-4,6-Dinitrophenol)			☐	☐	☐

SMR Review and Evaluation

Company Name	
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☐	January – June	
☐	July – December	Year

4-Bromophenyl Phenyl Ether			☐	☐	☐	Endosulfan sulfate			☐	☐	☐
4-chloro-3-methyl phenol (p-Chloro-m-Cresol)			☐	☐	☐	Endrin			☐	☐	☐
4-Chlorophenyl Phenyl Ether			☐	☐	☐	Endrin aldehyde			☐	☐	☐
4-Nitrophenol			☐	☐	☐	Fluoranthene			☐	☐	☐
Acenaphthene			☐	☐	☐	Fluorene			☐	☐	☐
Acenaphthylene			☐	☐	☐	Gamma-BHC (Lindane)			☐	☐	☐
Aldrin			☐	☐	☐	Heptachlor			☐	☐	☐
Alpha-BHC			☐	☐	☐	Heptachlor epoxide (BHC-hexachlorocyclohexane)			☐	☐	☐
Alpha-Endosulfan (Endosulfan I)			☐	☐	☐	Hexachlorobenzene			☐	☐	☐
Anthracene			☐	☐	☐	Hexachlorobutadiene			☐	☐	☐
Benzidine			☐	☐	☐	Hexachlorocyclopentadiene			☐	☐	☐
Benzo(a)anthracene (1,2-Benzanthracene)			☐	☐	☐	Hexachloroethane			☐	☐	☐
Benzo(a)pyrene (3,4-Benzopyrene)			☐	☐	☐	Indeno(1,2,3-cd) pyrene (2,3-o-phenylene pyrene)			☐	☐	☐
Benzo(b)fluoranthene (3,4-Benzofluoranthene)			☐	☐	☐	Isophorone			☐	☐	☐
Benzo(ghi) Perylene (1,12-Benzoperylene)			☐	☐	☐	Naphthalene			☐	☐	☐
Benzo(k) Fluoranthene (11,12-Benzofluoranthene)			☐	☐	☐	Nitrobenzene			☐	☐	☐
Beta-BHC			☐	☐	☐	N-Nitrosodimethylamine			☐	☐	☐
Beta-Endosulfan (Endosulfan II)			☐	☐	☐	N-Nitrosodi-N-Propylamine			☐	☐	☐
Bis (2-Chloroethoxy) Methane			☐	☐	☐	N-Nitrosodiphenylamine			☐	☐	☐
Bis (2-Chloroethyl) Ether			☐	☐	☐	PCB-1016 (Arochlor 1016)			☐	☐	☐
Bis (2-Chloroisopropyl) Ether			☐	☐	☐	PCB-1221 (Arochlor 1221)			☐	☐	☐
Bis (2-Ethylhexyl) Phthalate			☐	☐	☐	PCB-1232 (Arochlor 1232)			☐	☐	☐
Butylbenzyl Phthalate (Benzyl butyl phthalate)			☐	☐	☐	PCB-1242 (Arochlor 1242)			☐	☐	☐
Chlordane (technical mixture and metabolites)			☐	☐	☐	PCB-1248 (Arochlor 1248)			☐	☐	☐
Chrysene			☐	☐	☐	PCB-1254 (Arochlor 1254)			☐	☐	☐
Delta-BHC			☐	☐	☐	PCB-1260 (Arochlor 1260)			☐	☐	☐
Dibenzo(a,h)anthracene (1,2,5,6-Dibenzanthracene)			☐	☐	☐	Pentachlorophenol			☐	☐	☐
Dieldrin			☐	☐	☐	Phenanthrene			☐	☐	☐
Diethyl Phthalate			☐	☐	☐	Phenol			☐	☐	☐
Dimethyl Phthalate			☐	☐	☐	Pyrene			☐	☐	☐
Di-N-Butyl Phthalate			☐	☐	☐	Toxaphene			☐	☐	☐
Di-N-Octyl Phthalate			☐	☐	☐						
Comment											

Company Name	
Permit No.	

☐	January – June	
☐	July – December	
		Year

Section D – Data Evaluation (TTO for Groundwater Remediation)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #	

Total Toxic Organics

Parameter	# Data		Data Analysis			Parameter	# Data		Data Analysis		
	Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B		Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B
Purgeable Compounds						Methyl Bromide (Bromomethane)			☐	☐	☐
1,1,1-Trichloroethane			☐	☐	☐	Methyl Chloride (Chloromethane)			☐	☐	☐
1,1,2,2-Tetrachloroethane			☐	☐	☐	Methylene Chloride (Dichloromethane)			☐	☐	☐
1,1,2-Trichloroethane			☐	☐	☐	Tetrachloroethylene (Tetrachloroethene)			☐	☐	☐
1,1-Dichloroethane			☐	☐	☐	Toluene			☐	☐	☐
1,1-Dichloroethylene (1,1-Dichloroethene)			☐	☐	☐	Trichloroethylene (Trichloroethene)			☐	☐	☐
1,2-Dichlorobenzene			☐	☐	☐	Vinyl Chloride (Chloroethylene)			☐	☐	☐
1,2-Dichloroethane			☐	☐	☐	Xylene			☐	☐	☐
1,2-Dichloropropane			☐	☐	☐	**Extractable Compounds**					
1,2-Trans-Dichloroethylene (Trans-1,2-Dichloroethene)			☐	☐	☐	1,2,4-Trichlorobenzene			☐	☐	☐
1,3-Dichlorobenzene			☐	☐	☐	1,2-Diphenylhydrazine (Azobenzene or 1,2-DPH)			☐	☐	☐
1,3-Dichloropropylene (1,3-Dichloropropene)			☐	☐	☐	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)			☐	☐	☐
1,4-Dichlorobenzene			☐	☐	☐	2,4,6-Trichlorophenol			☐	☐	☐
2-Chloroethylvinyl Ether			☐	☐	☐	2,4-Dichlorophenol			☐	☐	☐
Acrolein			☐	☐	☐	2,4-Dimethylphenol			☐	☐	☐
Acrylonitrile			☐	☐	☐	2,4-Dinitrophenol			☐	☐	☐
Benzene			☐	☐	☐	2,4-Dinitrotoluene			☐	☐	☐
Bromoform (Tribromomethane)			☐	☐	☐	2,6-Dinitrotoluene			☐	☐	☐
Carbon Tetrachloride (Tetrachloromethane)			☐	☐	☐	2-Chloronaphthalene			☐	☐	☐
Chlorobenzene			☐	☐	☐	2-Chlorophenol			☐	☐	☐
Chlorodibromomethane (Dibromochloromethane)			☐	☐	☐	2-Nitrophenol			☐	☐	☐
Chloroethane			☐	☐	☐	3,3-Dichlorobenzidine			☐	☐	☐
Chloroform (Trichloromethane)			☐	☐	☐	4,4-DDD (p,p-TDE)			☐	☐	☐
Dichlorobromomethane (Bromodichloromethane)			☐	☐	☐	4,4-DDE (p,p-DDX)			☐	☐	☐
Ethylbenzene			☐	☐	☐	4,4-DDT			☐	☐	☐

SMR Review and Evaluation

Company Name	
Permit No.	

☐	January – June	
☐	July – December	Year

4,6-Dinitro-O-Cresol (2-Methyl-4,6-Dinitrophenol)			☐	☐	☐	Di-N-Octyl Phthalate			☐	☐	☐
4-Bromophenyl Phenyl Ether			☐	☐	☐	Endosulfan sulfate			☐	☐	☐
4-chloro-3-methyl phenol (p-Chloro-m-Cresol)			☐	☐	☐	Endrin			☐	☐	☐
4-Chlorophenyl Phenyl Ether			☐	☐	☐	Endrin aldehyde			☐	☐	☐
4-Nitrophenol			☐	☐	☐	Fluoranthene			☐	☐	☐
Acenaphthene			☐	☐	☐	Fluorene			☐	☐	☐
Acenaphthylene			☐	☐	☐	Gamma-BHC (Lindane)			☐	☐	☐
Aldrin			☐	☐	☐	Heptachlor			☐	☐	☐
Alpha-BHC			☐	☐	☐	Heptachlor epoxide (BHC-hexachlorocyclohexane)			☐	☐	☐
Alpha-Endosulfan (Endosulfan I)			☐	☐	☐	Hexachlorobenzene			☐	☐	☐
Anthracene			☐	☐	☐	Hexachlorobutadiene			☐	☐	☐
Benzidine			☐	☐	☐	Hexachlorocyclopentadiene			☐	☐	☐
Benzo(a)anthracene (1,2-Benzanthracene)			☐	☐	☐	Hexachloroethane			☐	☐	☐
Benzo(a)pyrene (3,4-Benzopyrene)			☐	☐	☐	Indeno(1,2,3-cd) pyrene (2,3-o-phenylene pyrene)			☐	☐	☐
Benzo(b)fluoranthene (3,4-Benzofluoranthene)			☐	☐	☐	Isophorone			☐	☐	☐
Benzo(ghi) Perylene (1,12-Benzoperylene)			☐	☐	☐	Naphthalene			☐	☐	☐
Benzo(k) Fluoranthene (11,12-Benzofluoranthene)			☐	☐	☐	Nitrobenzene			☐	☐	☐
Beta-BHC			☐	☐	☐	N-Nitrosodimethylamine			☐	☐	☐
Beta-Endosulfan (Endosulfan II)			☐	☐	☐	N-Nitrosodi-N-Propylamine			☐	☐	☐
Bis (2-Chloroethoxy) Methane			☐	☐	☐	N-Nitrosodiphenylamine			☐	☐	☐
Bis (2-Chloroethyl) Ether			☐	☐	☐	PCB-1016 (Arochlor 1016)			☐	☐	☐
Bis (2-Chloroisopropyl) Ether			☐	☐	☐	PCB-1221 (Arochlor 1221)			☐	☐	☐
Bis (2-Ethylhexyl) Phthalate			☐	☐	☐	PCB-1232 (Arochlor 1232)			☐	☐	☐
Butylbenzyl Phthalate (Benzyl butyl phthalate)			☐	☐	☐	PCB-1242 (Arochlor 1242)			☐	☐	☐
Chlordane (technical mixture and metabolites)			☐	☐	☐	PCB-1248 (Arochlor 1248)			☐	☐	☐
Chrysene			☐	☐	☐	PCB-1254 (Arochlor 1254)			☐	☐	☐
Delta-BHC			☐	☐	☐	PCB-1260 (Arochlor 1260)			☐	☐	☐
Dibenzo(a,h)anthracene (1,2,5,6-Dibenzanthracene)			☐	☐	☐	Pentachlorophenol			☐	☐	☐
Dieldrin			☐	☐	☐	Phenanthrene			☐	☐	☐
Diethyl Phthalate			☐	☐	☐	Phenol			☐	☐	☐
Dimethyl Phthalate			☐	☐	☐	Pyrene			☐	☐	☐
Di-N-Butyl Phthalate			☐	☐	☐	Toxaphene			☐	☐	☐
Comment											

Company Name	
Permit No.	

☐	January – June	
☐	July – December	

Year

Section D – Data Evaluation (Landfill)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #	

Landfill Organics

Parameter	# Data		Data Analysis			Parameter	# Data		Data Analysis		
	Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B		Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B
1,1-Dichloroethylene			☐	☐	☐	Heptachlor			☐	☐	☐
1,2-Dichloroethane			☐	☐	☐	Hexachlorobenzene			☐	☐	☐
1,4-Dichlorobenzene			☐	☐	☐	Hexachlorobutadiene			☐	☐	☐
2,4,5-TP (Silvex)			☐	☐	☐	Hexachloroethane			☐	☐	☐
2,4,5-Trichlorophenol			☐	☐	☐	Lindane (Gamma-BHC)			☐	☐	☐
2,4,6-Trichlorophenol			☐	☐	☐	m-Cresol (3-Methylphenol)			☐	☐	☐
2,4 -D			☐	☐	☐	Methoxychlor			☐	☐	☐
2,4 -Dinitrotoluene			☐	☐	☐	Methyl Ethyl Ketone			☐	☐	☐
Benzene			☐	☐	☐	Nitrobenzene			☐	☐	☐
Carbon Tetrachloride (Tetrachloromethane)			☐	☐	☐	o-Cresol (2-Methylphenol)			☐	☐	☐
Chlordane			☐	☐	☐	p-Cresol (4-Methylphenol)			☐	☐	☐
Chlorobenzene			☐	☐	☐	Pentachlorophenol			☐	☐	☐
Chloroform (Trichloromethane)			☐	☐	☐	Pyridine			☐	☐	☐
Cresol			☐	☐	☐	Tetrachloroethylene (Tetrachloroethene)			☐	☐	☐
Endrin			☐	☐	☐	Vinyl Chloride			☐	☐	☐
Comment											

Company Name	
Permit No.	

☐	January – June	
☐	July – December	
		Year

Section D – Data Evaluation PFAS (Per- and Poly-fluoroalkyl Substances)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #	

PER- and POLY-FLOUROALKYL SUBSTANCES (PFAS)

Parameter	# Data		Data Analysis			Parameter	# Data		Data Analysis		
	Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B		Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B
4:2 Fluorotelomer sulfonic acid (4:2 FTSA)			☐	☐	☐	Perfluorononane Sulfonic acid (PFNS)			☐	☐	☐
6:2 Fluorotelomer sulfonic acid (6:2 FTSA)			☐	☐	☐	Perfluorononanoic acid (PFNA)			☐	☐	☐
8:2 Fluorotelomer sulfonic acid (8:2 FTSA)			☐	☐	☐	Perfluorooctane sulfonamide (FOSA)			☐	☐	☐
2-N-Ethyl perfluorooctane sulfonamidoacetic acid (NEtFOSA)			☐	☐	☐	Perfluorooctane Sulfonic acid (PFOS)			☐	☐	☐
2-N-Methyl perfluorooctane sulfonamidoacetic acid (NMeFOSA)			☐	☐	☐	Perfluorooctanoic acid (PFOA)			☐	☐	☐
Perfluorobutanoic acid (PFBA)			☐	☐	☐	Perfluoropentane Sulfonic acid (PFPeS)			☐	☐	☐
Perfluorobutane Sulfonic acid (PFBS)			☐	☐	☐	Perfluoropentanoic acid (PFPeA)			☐	☐	☐
Perfluorodecane Sulfonic acid (PFDS)			☐	☐	☐	Perfluorotetradecanoic acid (PFTeDA)			☐	☐	☐
Perfluorodecanoic acid (PFDA)			☐	☐	☐	Perfluorotridecanoic acid (PFTrDA)			☐	☐	☐
Perfluorododecanoic acid (PFDoDA)			☐	☐	☐	Perfluoroundecanoic acid (PFUnDA)			☐	☐	☐
Perfluoroheptane Sulfonic acid (PFHpS)			☐	☐	☐	Hexafluoropropylene oxide dimer acid (HFPO-DA)			☐	☐	☐
Perfluoroheptanoic acid (PFHpA)			☐	☐	☐	11-Chloroeiosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUDS)			☐	☐	☐
Perfluorohexane Sulfonic acid (PFHxS)			☐	☐	☐	9-Chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9Cl-PF3ONS)			☐	☐	☐
Perfluorohexanoic acid (PFHxA)			☐	☐	☐	4,8-Dioxa-3H-perfluorononanoic acid (ADONA)			☐	☐	☐
Comment											

SMR Review and Evaluation

Company Name	
Permit No.	

☐	January – June	
☐	July – December	

Year

Section E – Noncompliance

Copy and attach only the applicable page(s) with violation(s) to the issued Notice of Violation.

COMMENTS (Check all that applies to the company's SMR)				
1	☐ Yes ☐ No	Is the SMR Analytical Data in compliance? (If No, fill out the noncompliance table below)		
2	Has submitted the required applicable data listed below. (If data is not in compliance, fill out the Noncompliance Table below and specify the period when the company is in noncompliance.)			
	☐ Yes ☐ No ☐ NA	Is the 4-Day Average Data in compliance?	(4)	
	☐ Yes ☐ No ☐ NA	Is the 30-Day Average Data in compliance?	(30)	
	☐ Yes ☐ No ☐ NA	Is the Monthly Average Data in compliance?	(M)	

Noncompliance Table

Parameter	Sample Date or 4/30/M Period	Sample Concentration		Permit Limit		Valid Data		Notified within 24-hour		Submitted 30-day Compliance Report	
		Daily	4/30/M	Daily	4/30/M	Yes	No	Yes	No	Yes	No
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
Comment											

GLWA
Great Lakes Water Authority

SMR Review and Evaluation

Industrial Waste Control Group

☐ January – June	
☐ July – December	Year

Section A - Evaluations and Actions

Company Name		Permit No.	
Processed by / Date	/	Reviewed by / Date	/

	COMMENTS (Check the appropriate required action(s) below)				
1				Permit Expiration Date	
	☐ Yes ☐ No	Renew company's permit. (If permit expiration date is within the next 3 months.)			
2	☐	a) Issue **NOTICE of ACCEPTANCE** (NOA) to the company. (NOA is issued when SMR is timely, complete without deficiency and in compliance.)			
	☐	b) Issue **NOTICE of VIOLATION** (NOV) to the company. (i.e. if SIU commits any violations listed in Section B and/or meets conditions 4c, 4d or 4e below) Note: Nonresponsive to NOV will escalate to SNC.			
	☐	c) Issue **SMR REVIEW LETTER** (SMRRL) to the company. (i.e. if SIU meets conditions 3, 4a and/or 4b below)			
3	SMR Submission Via	☐ Linko	☐ E-Mail	☐ US Mail*	☐ Hand Delivered
	Date Submitted / *Postmarked Date				
	☐ Yes ☐ No	SMR is submitted late			

4	**NOTIFICATION REQUIREMENTS (NR) for Self-Monitoring Violation**				
	A) Notify the Authority within 24 hour of becoming aware of the self-monitoring noncompliance. (A 24-hour notification report must be in the company's main file.) and				
	B) Submit a 30-day Compliance Report to demonstrate compliance with applicable effluent limit. (The report must be submitted within 30 days of becoming aware of the noncompliance.)				
		A–Notified?	**B–Submitted?**	**Issue**	
	☐ a)	Yes	Yes	SMRRL and Notice of Acknowledgment (NOAck)	
	☐ b)	Yes	Still on the process of submitting report	SMRRL and	if B is satisfactory, issue NOAck accordingly. if B has violation, follow again **NR** process.
	☐ c)	Yes	No	NOV and Noncompliance Notice (NCN)	
	☐ d)	No	Yes	NOV and NCN	
	☐ e)	No	No	NOV and NCN	
5	☐ Yes ☐ NA	Conduct a follow-up inspection on missing or inconsistent information in company's SMR (see Section C).			
6		Number of sampling location(s) as specified in the company's discharge permit. For company with multiple sampling locations, ensure to evaluate all sampling locations (see Section D).			
7	Comment				

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Section B – Main Requirements

Copy and attach only the applicable page(s) with violation(s) to the issued Notice of Violation.

COMMENTS (Check all that applies to the company's SMR)

1 ☐ Yes ☐ No — Specified/conducted the required Sampling Method

(If No, check the affected parameter below and denote the improper sampling method used. Note: Flow-P C =Flow-Proportional Composite, Time-P C = Time-Proportional Composite)

Parameters (Grab Sampling)	Grab	Flow-P C	Time-P C	Unknown	Parameters (Composite Sampling)	Grab	Flow-P C	Time-P C	Unknown
☐ pH (Alkalinity/Acidity)	☐	☐	☐	☐	☐ Biochemical Oxygen Demand	☐	☐	☐	☐
☐ Fats, Oil or Grease	☐	☐	☐	☐	☐ Phosphorus	☐	☐	☐	☐
☐ Available Cyanide	☐	☐	☐	☐	☐ Total Suspended Solids	☐	☐	☐	☐
☐ Total Phenolic Cmpds	☐	☐	☐	☐	☐ PCB	☐	☐	☐	☐
☐ TTO volatile organics	☐	☐	☐	☐	☐ Metals	☐	☐	☐	☐
☐ PFAS	☐	☐	☐	☐	☐ Individual Phenolic Cmpds	☐	☐	☐	☐
					☐ TTO non-volatile organics	☐	☐	☐	☐

Comment

2 ☐ Yes ☐ No — Identified/analyzed samples within the Maximum Holding Time

(If No, check the affected parameter(s) below.)

Parameter	Maximum Holding Time
☐ pH (Alkalinity/Acidity)	Immediately (within 15 min.; compare sampling and analysis time)
☐ Biochemical Oxygen Demand	48 hours (for planting) and 5 days (analysis time after planting)
☐ Total Suspended Solids	7 days
☐ Individual Phenolic Compounds	7 days (to extract) and 40 days (to analyze)
☐ TTO non-volatile organics	
☐ PCB	1 year (to extract) and 1 year (to analyze)
☐ Cyanide	14 days
☐ TTO volatile organics	
☐ Fats, Oil or Grease	28 days
☐ Mercury	
☐ Phosphorus	
☐ Total Phenolic Compounds	
☐ Metals	6 months
☐ PFAS	14 days (to extract) and 40 days (to analyze)

Comment

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3 ☐ Yes ☐ No — Identified/utilized proper Analytical Methods

(If No, denote below the affected parameter and the improper analytical method used. Note: If the company provides supporting MDEQ documentation approving the alternative method; then, it is considered acceptable method.)

Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used	Parameter	Improper Analytical Method Used
Local Pollutants		☐ 4-Nitrophenol		☐ 1,3-Dichlorobenzene	
☐ pH (Acidity/Alkalinity)		☐ Phenol Alcohol		☐ 1,3-Dichloropropylene (1,3-dichloropropene)	
☐ Cyanide (Available)		**Other Categorical Pollutants**		☐ 1,4-Dichlorobenzene	
☐ Arsenic		☐ Antimony		☐ 2-Chloroethyl vinyl ether (mixed)	
☐ Cadmium		☐ Cobalt		☐ Acrolein	
☐ Chromium		☐ Selenium		☐ Acrylonitrile	
☐ Copper		☐ Tin		☐ Benzene	
☐ Iron		☐ Titanium		☐ Bromoform (Tribromomethane)	
☐ Lead		☐ Vanadium		☐ Carbon tetrachloride (Tetrachloromethane)	
☐ Mercury		☐ Bis(2-Ethylhexyl) Phthalate		☐ Chlorobenzene	
☐ Nickel		☐ Carbazole		☐ Chlorodibromomethane (Dibromochloromethane)	
☐ Silver		☐ Fluoranthene		☐ Chloroethane	
☐ Zinc		☐ Naphthalene		☐ Chloroform (Trichloromethane)	
☐ Total PCB		☐ n-Decane		☐ Dichlorobromomethane (Bromodichloromethane)	
☐ Total Phenolic Compounds		☐ n-Octadecane		☐ Ethylbenzene	
☐ Biochemical Oxygen Demand		☐ o-Cresol (2-Methylphenol)		☐ Methyl bromide (Bromomethane)	
☐ Fats, Oil or Grease		☐ p-Cresol (4-Methylphenol)		☐ Methyl chloride (Chloromethane)	
☐ Phosphorus		**TTO Purgeables**		☐ Methylene chloride (Dichloromethane)	
☐ Total Suspended Solids		☐ 1,1,1-Trichloroethane		☐ Tetrachloroethylene (Tetrachloroethene)	
Individual Phenolic Compounds		☐ 1,1,2,2-Tetrachloroethane		☐ Toluene	
☐ 2-Chlorophenol		☐ 1,1,2-Trichloroethane		☐ Trichloroethylene (Trichloroethene)	
☐ 2,4-Dichlorophenol		☐ 1,1-Dichloroethane		☐ Vinyl chloride (Chloroethylene)	
☐ 2,4-Dinitrophenol		☐ 1,1-Dichloroethylene		☐ Xylene	
☐ 4-Chlorophenol		☐ 1,2-Dichlorobenzene		**TTO Extractables**	
☐ 4-Chloro-3-Methylphenol		☐ 1,2-Dichloroethane		☐ 1,2,4-Trichlorobenzene	
☐ 4-Methylphenol		☐ 1,2-Dichloropropane		☐ 1,2-Diphenylhydrazine (Azobenzene or 1,2-DPH)	
☐ 4-Nitrophenol		☐ 1,2-Trans-Dichloroethylene (Trans-1,2-Dichloroethene)		☐ 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)	

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	Parameter	Improper Analytical Method Used		Parameter	Improper Analytical Method Used		Parameter	Improper Analytical Method Used
☐	2,4,6-Trichlorophenol		☐	Benzo(a)anthracene (1,2-Benzanthracene)		☐	Fluorene	
☐	2,4-Dichlorophenol		☐	Benzo(a)pyrene (3,4-Benzopyrene)		☐	Gamma-BHC (Lindane)	
☐	2,4-Dimethylphenol		☐	Benzo(b)fluoranthene (3,4-Benzofluoranthene)		☐	Heptachlor	
☐	2,4-Dinitrophenol		☐	Benzo(ghi) Perylene (1,12-Benzoperylene)		☐	Heptachlor epoxide (BHC-hexachlorocyclohexane)	
☐	2,4-Dinitrotoluene		☐	Benzo(k) Fluoranthene (11,12-Benzofluoranthene)		☐	Hexachlorobenzene	
☐	2,6-Dinitrotoluene		☐	Beta-BHC		☐	Hexachlorobutadiene	
☐	2-Chloronaphthalene		☐	Beta-Endosulfan (Endosulfan II)		☐	Hexachlorocyclopentadiene	
☐	2-Chlorophenol		☐	Bis (2-Chloroethoxy) Methane		☐	Hexachloroethane	
☐	2-Nitrophenol		☐	Bis (2-Chloroethyl) Ether		☐	Indeno(1,2,3-cd) pyrene (2,3-o-phenylene pyrene)	
☐	3,3-Dichlorobenzidine		☐	Bis (2-Chloroisopropyl) Ether		☐	Isophorone	
☐	4,4-DDD (p,p-TDE)		☐	Bis (2-Ethylhexyl) Phthalate		☐	Naphthalene	
☐	4,4-DDE (p,p-DDX)		☐	Butylbenzyl Phthalate (Benzyl butyl phthalate)		☐	Nitrobenzene	
☐	4,4-DDT		☐	Chlordane (technical mixture & metabolites)		☐	N-Nitrosodimethylamine	
☐	4,6-Dinitro-O-Cresol (2-Methyl-4,6-Dinitrophenol)		☐	Chrysene		☐	N-Nitrosodi-N-Propylamine	
☐	4-Bromophenyl Phenyl Ether		☐	Delta-BHC		☐	N-Nitrosodiphenylamine	
☐	4-chloro-3-methyl phenol (p-Chloro-m-Cresol)		☐	Dibenzo(a,h)anthracene (1,2,5,6-Dibenzanthracene)		☐	PCB/Arochlor - 1016, 1221, 1232, 1242, 1248, 1254, 1260	
☐	4-Chlorophenyl Phenyl Ether		☐	Dieldrin		☐	Pentachlorophenol	
☐	4-Nitrophenol		☐	Diethyl Phthalate		☐	Phenanthrene	
☐	Acenaphthene		☐	Dimethyl Phthalate		☐	Phenol	
☐	Acenaphthylene		☐	Di-N-Butyl Phthalate		☐	Pyrene	
☐	Aldrin		☐	Di-N-Octyl Phthalate		☐	Toxaphene	
☐	Alpha-BHC		☐	Endosulfan sulfate		**PER- and POLY-FLOUROALKYL SUBSTANCES (PFAS)**		
☐	Alpha-Endosulfan (Endosulfan I)		☐	Endrin		☐	PFAS	
☐	Anthracene		☐	Endrin aldehyde				
☐	Benzidine		☐	Fluoranthene				
	Comment							

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4	☐ Yes ☐ No ☐ Exempted	Complied with the requirement for analyzing Mercury (If Yes, proceed to 5. If No, respond i-iii below.)	
		i) Analyzed Mercury utilizing a quantification level of ≤ 0.2µg/L. (If Yes proceed to 5. If No, proceed to ii.)	☐ Yes ☐ No
		ii) Provided demonstration on sample matrix interference (DSMI). (If Yes, denote the date of DSMI and proceed to 5. If No, proceed to iii.)	☐ Yes ☐ No
		Date of DSMI	
		iii) Submitted BMP in accordance with Detroit Ordinance 08-05, 56-3-66.1(d). (If Yes, provide the date of the submitted BMP and mark "Excused from violation". If No, mark "Violation".)	☐ Yes ☐ No
		Date of BMP	
	☐ Excused from violation ☐ Violation		
	Comment		
5	☐ Yes ☐ No ☐ Exempted	Complied with the requirement for analyzing PCB (If Yes, proceed to 6. If No, respond i-iii below.)	
		i) Analyzed PCB utilizing a quantification level of ≤ 0.2µg/L. (If Yes proceed to 6. If No, proceed to ii.)	☐ Yes ☐ No
		ii) Provided demonstration on sample matrix interference (DSMI). (If Yes, denote the date of DSMI and proceed to 6. If No, proceed to iii.)	☐ Yes ☐ No
		Date of DSMI	
		iii) Submitted BMP in accordance with Detroit Ordinance 08-05, 56-3-66.1(d). (If Yes, provide the date of the submitted BMP and mark "Excused from violation". If No, mark "Violation".)	☐ Yes ☐ No
		Date of BMP	
	☐ Excused from violation ☐ Violation		
	Comment		
6	☐ Yes ☐ No	Indicated the Regulated and/or Non-Regulated Process Flow	
7	☐ Yes ☐ No	Indicated the Non-Regulated Cooling and/or Sanitary Flow	
8	☐ Yes ☐ No	Has sampled and analyzed the required number of samples as specified in the company's permit. (Identify below the affected parameter that is analyzed below the required self-monitoring frequency. See also Section D)	

Parameter	# Analyses Submitted	# Analyses Required

Comment	
9 ☐ Yes ☐ No	Indicated that Pretreatment Standards are being met
10 ☐ Yes ☐ No	Are Pretreatment Standards being met? If company has self-monitoring exceedance and complied with both requirements A and B below, it meets the pretreatment standards. Then, check "Yes".

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			If not, check "No" and identify below the affected parameter(s) that is in exceedance. Fill out also Section E regarding company's self-monitoring exceedance. A) 24-hour call notification and B) 30-day Compliance Report	
			Parameter	Sample Date
		Comment		
11	☐ Yes	☐ No	Signed and dated by the company's Authorized Representative	
12	Has submitted the required document(s) below.			
	☐ Yes	☐ No ☐ NA	a) Operating Day Logs as required in the company's Wastewater Discharge Permit For CWT only	
	☐ Yes	☐ No ☐ NA	b) Waste Manifests (to be submitted every reporting period) For affected Categorical IUs whose regulated wastewater are hauled off-site in lieu of being discharged to the POTW	
	☐ Yes	☐ No ☐ NA	c) PFAS mass removal efficiency (to be submitted every reporting period) For affected SIUs classified as potential PFAS sources	
		Comment		

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Section C – Other Requirements

			COMMENTS (Check all that applies to the company's SMR)
1	☐ Yes	☐ No	Indicated the Reporting Period in the SMR
2	☐ Yes	☐ No	Indicated the Permit Number in the SMR
3	☐ Yes	☐ No	Identified the Sampling Location(s) (SL) in the SMR
4	☐ Yes	☐ No	SL description(s) is consistent with the SL description(s) in the Permit
5	☐ Yes	☐ No	Provided Time and Date of Sampling Events
6	☐ Yes	☐ No	Identified the Person(s) who did the Actual Sampling
7	☐ Yes	☐ No	Identified the Person(s) who did the Actual Analysis
8	☐ Yes	☐ No	Showed SMR flow inconsistencies among currently issued permit (with respect to 25,000 gpd requirement) and recent Comprehensive Inspection Report **Yes** - investigate and initiate permit modification if necessary **No** – no action required
Comment			

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Section D – Data Evaluation (For all Significant Industrial User)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #														
Local Parameters														
Parameter (Check only parameters that are **not required** for self-monitoring)	# Data		Data Analysis			Parameter (Check only parameters that are **not required** for self-monitoring)	# Data		Data Analysis		
	Submitted in SMR (**A**)	Required by permit (**B**)	A = B	A > B	A < B		Submitted in SMR (**A**)	Required by permit (**B**)	A = B	A > B	A < B
☐ pH (Acidity/Alkalinity)			☐	☐	☐	☐ Biochemical Oxygen Demand			☐	☐	☐
☐ Arsenic			☐	☐	☐	☐ Fats, Oil or Grease			☐	☐	☐
☐ Cadmium			☐	☐	☐	☐ Phosphorus			☐	☐	☐
☐ Chromium			☐	☐	☐	☐ Total Suspended Solids			☐	☐	☐
☐ Copper			☐	☐	☐	☐ **Individual Phenolic Compounds**					
☐ Cyanide (Available)			☐	☐	☐	2-Chlorophenol			☐	☐	☐
☐ Iron			☐	☐	☐	2,4-Dichlorophenol			☐	☐	☐
☐ Lead			☐	☐	☐	2,4-Dinitrophenol			☐	☐	☐
☐ Mercury			☐	☐	☐	4-Chlorophenol			☐	☐	☐
☐ Nickel			☐	☐	☐	4-Chloro-3-methylphenol			☐	☐	☐
☐ Silver			☐	☐	☐	4-Methylphenol			☐	☐	☐
☐ Zinc			☐	☐	☐	4-Nitrophenol			☐	☐	☐
☐ Total PCB			☐	☐	☐	Phenol Alcohol			☐	☐	☐
☐ Total Phenolic Compounds			☐	☐	☐	☐ PFAS	See next page				
Other Categorical Parameters (Check only parameters that are **not required** for self-monitoring)											
☐ Antimony			☐	☐	☐	☐ Fluoranthene			☐	☐	☐
☐ Cobalt			☐	☐	☐	☐ Naphthalene			☐	☐	☐
☐ Selenium			☐	☐	☐	☐ n-Decane			☐	☐	☐
☐ Tin			☐	☐	☐	☐ n-Octadecane			☐	☐	☐
☐ Titanium			☐	☐	☐	☐ o-Cresol (2-Methylphenol)			☐	☐	☐
☐ Vanadium			☐	☐	☐	☐ p-Cresol (4-Methylphenol)			☐	☐	☐
☐ Bis(2-Ethylhexyl) Phthalate			☐	☐	☐	☐ TTO - Groundwater Remediation	See next page				
☐ Carbazole			☐	☐	☐						
Comment											

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Section D – Data Evaluation (TTO for Groundwater Remediation)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #	

Total Toxic Organics

Parameter	# Data		Data Analysis			Parameter	# Data		Data Analysis		
	Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B		Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B
Purgeable Compounds						Methyl Bromide (Bromomethane)			☐	☐	☐
1,1,1-Trichloroethane			☐	☐	☐	Methyl Chloride (Chloromethane)			☐	☐	☐
1,1,2,2-Tetrachloroethane			☐	☐	☐	Methylene Chloride (Dichloromethane)			☐	☐	☐
1,1,2-Trichloroethane			☐	☐	☐	Tetrachloroethylene (Tetrachloroethene)			☐	☐	☐
1,1-Dichloroethane			☐	☐	☐	Toluene			☐	☐	☐
1,1-Dichloroethylene (1,1-Dichloroethene)			☐	☐	☐	Trichloroethylene (Trichloroethene)			☐	☐	☐
1,2-Dichlorobenzene			☐	☐	☐	Vinyl Chloride (Chloroethylene)			☐	☐	☐
1,2-Dichloroethane			☐	☐	☐	Xylene			☐	☐	☐
1,2-Dichloropropane			☐	☐	☐	**Extractable Compounds**					
1,2-Trans-Dichloroethylene (Trans-1,2-Dichloroethene)			☐	☐	☐	1,2,4-Trichlorobenzene			☐	☐	☐
1,3-Dichlorobenzene			☐	☐	☐	1,2-Diphenylhydrazine (Azobenzene or 1,2-DPH)			☐	☐	☐
1,3-Dichloropropylene (1,3-Dichloropropene)			☐	☐	☐	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)			☐	☐	☐
1,4-Dichlorobenzene			☐	☐	☐	2,4,6-Trichlorophenol			☐	☐	☐
2-Chloroethylvinyl Ether			☐	☐	☐	2,4-Dichlorophenol			☐	☐	☐
Acrolein			☐	☐	☐	2,4-Dimethylphenol			☐	☐	☐
Acrylonitrile			☐	☐	☐	2,4-Dinitrophenol			☐	☐	☐
Benzene			☐	☐	☐	2,4-Dinitrotoluene			☐	☐	☐
Bromoform (Tribromomethane)			☐	☐	☐	2,6-Dinitrotoluene			☐	☐	☐
Carbon Tetrachloride (Tetrachloromethane)			☐	☐	☐	2-Chloronaphthalene			☐	☐	☐
Chlorobenzene			☐	☐	☐	2-Chlorophenol			☐	☐	☐
Chlorodibromomethane (Dibromochloromethane)			☐	☐	☐	2-Nitrophenol			☐	☐	☐
Chloroethane			☐	☐	☐	3,3-Dichlorobenzidine			☐	☐	☐
Chloroform (Trichloromethane)			☐	☐	☐	4,4-DDD (p,p-TDE)			☐	☐	☐
Dichlorobromomethane (Bromodichloromethane)			☐	☐	☐	4,4-DDE (p,p-DDX)			☐	☐	☐
Ethylbenzene			☐	☐	☐	4,4-DDT			☐	☐	☐

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4,6-Dinitro-O-Cresol (2-Methyl-4,6-Dinitrophenol)			☐	☐	☐	Di-N-Octyl Phthalate			☐	☐	☐
4-Bromophenyl Phenyl Ether			☐	☐	☐	Endosulfan sulfate			☐	☐	☐
4-chloro-3-methyl phenol (p-Chloro-m-Cresol)			☐	☐	☐	Endrin			☐	☐	☐
4-Chlorophenyl Phenyl Ether			☐	☐	☐	Endrin aldehyde			☐	☐	☐
4-Nitrophenol			☐	☐	☐	Fluoranthene			☐	☐	☐
Acenaphthene			☐	☐	☐	Fluorene			☐	☐	☐
Acenaphthylene			☐	☐	☐	Gamma-BHC (Lindane)			☐	☐	☐
Aldrin			☐	☐	☐	Heptachlor			☐	☐	☐
Alpha-BHC			☐	☐	☐	Heptachlor epoxide (BHC-hexachlorocyclohexane)			☐	☐	☐
Alpha-Endosulfan (Endosulfan I)			☐	☐	☐	Hexachlorobenzene			☐	☐	☐
Anthracene			☐	☐	☐	Hexachlorobutadiene			☐	☐	☐
Benzidine			☐	☐	☐	Hexachlorocyclopentadiene			☐	☐	☐
Benzo(a)anthracene (1,2-Benzanthracene)			☐	☐	☐	Hexachloroethane			☐	☐	☐
Benzo(a)pyrene (3,4-Benzopyrene)			☐	☐	☐	Indeno(1,2,3-cd) pyrene (2,3-o-phenylene pyrene)			☐	☐	☐
Benzo(b)fluoranthene (3,4-Benzofluoranthene)			☐	☐	☐	Isophorone			☐	☐	☐
Benzo(ghi) Perylene (1,12-Benzoperylene)			☐	☐	☐	Naphthalene			☐	☐	☐
Benzo(k) Fluoranthene (11,12-Benzofluoranthene)			☐	☐	☐	Nitrobenzene			☐	☐	☐
Beta-BHC			☐	☐	☐	N-Nitrosodimethylamine			☐	☐	☐
Beta-Endosulfan (Endosulfan II)			☐	☐	☐	N-Nitrosodi-N-Propylamine			☐	☐	☐
Bis (2-Chloroethoxy) Methane			☐	☐	☐	N-Nitrosodiphenylamine			☐	☐	☐
Bis (2-Chloroethyl) Ether			☐	☐	☐	PCB-1016 (Arochlor 1016)			☐	☐	☐
Bis (2-Chloroisopropyl) Ether			☐	☐	☐	PCB-1221 (Arochlor 1221)			☐	☐	☐
Bis (2-Ethylhexyl) Phthalate			☐	☐	☐	PCB-1232 (Arochlor 1232)			☐	☐	☐
Butylbenzyl Phthalate (Benzyl butyl phthalate)			☐	☐	☐	PCB-1242 (Arochlor 1242)			☐	☐	☐
Chlordane (technical mixture and metabolites)			☐	☐	☐	PCB-1248 (Arochlor 1248)			☐	☐	☐
Chrysene			☐	☐	☐	PCB-1254 (Arochlor 1254)			☐	☐	☐
Delta-BHC			☐	☐	☐	PCB-1260 (Arochlor 1260)			☐	☐	☐
Dibenzo(a,h)anthracene (1,2,5,6-Dibenzanthracene)			☐	☐	☐	Pentachlorophenol			☐	☐	☐
Dieldrin			☐	☐	☐	Phenanthrene			☐	☐	☐
Diethyl Phthalate			☐	☐	☐	Phenol			☐	☐	☐
Dimethyl Phthalate			☐	☐	☐	Pyrene			☐	☐	☐
Di-N-Butyl Phthalate			☐	☐	☐	Toxaphene			☐	☐	☐
Comment											

Company Name	
Permit No.	

☐	January – June	
☐	July – December	
		Year

Section D – Data Evaluation PFAS (Per- and Poly-fluoroalkyl Substances)

This section summarizes and compares the actual number of samples submitted by the company and the required number of samples as per company's permit (see also Section B8).

Sampling Location #	

PER- and POLY-FLOUROALKYL SUBSTANCES (PFAS)

Parameter	# Data		Data Analysis			Parameter	# Data		Data Analysis		
	Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B		Submitted in SMR (A)	Required by permit (B)	A = B	A > B	A < B
4:2 Fluorotelomer sulfonic acid (4:2 FTSA)			☐	☐	☐	Perfluorononane Sulfonic acid (PFNS)			☐	☐	☐
6:2 Fluorotelomer sulfonic acid (6:2 FTSA)			☐	☐	☐	Perfluorononanoic acid (PFNA)			☐	☐	☐
8:2 Fluorotelomer sulfonic acid (8:2 FTSA)			☐	☐	☐	Perfluorooctane sulfonamide (FOSA)			☐	☐	☐
2-N-Ethyl perfluorooctane sulfonamido acetic acid (NEtFOSA)			☐	☐	☐	Perfluorooctane Sulfonic acid (PFOS)			☐	☐	☐
2-N-Methyl perfluorooctane sulfonamido acetic acid (NMeFOSA)			☐	☐	☐	Perfluorooctanoic acid (PFOA)			☐	☐	☐
Perfluorobutanoic acid (PFBA)			☐	☐	☐	Perfluoropentane Sulfonic acid (PFPeS)			☐	☐	☐
Perfluorobutane Sulfonic acid (PFBS)			☐	☐	☐	Perfluoropentanoic acid (PFPeA)			☐	☐	☐
Perfluorodecane Sulfonic acid (PFDS)			☐	☐	☐	Perfluorotetradecanoic acid (PFTeDA)			☐	☐	☐
Perfluorodecanoic acid (PFDA)			☐	☐	☐	Perfluorotridecanoic acid (PFTrDA)			☐	☐	☐
Perfluorododecanoic acid (PFDoDA)			☐	☐	☐	Perfluoroundecanoic acid (PFUnDA)			☐	☐	☐
Perfluoroheptane Sulfonic acid (PFHpS)			☐	☐	☐	Hexafluoropropylene oxide dimer acid (HFPO-DA)			☐	☐	☐
Perfluoroheptanoic acid (PFHpA)			☐	☐	☐	11-Chloroeiosafluoro-3-oxaundecane-1-sulfonic acid (11Cl-PF3OUDS)			☐	☐	☐
Perfluorohexane Sulfonic acid (PFHxS)			☐	☐	☐	9-Chlorohexadecafluoro-3-oxanone-1-sulfonic acid (9Cl-PF3ONS)			☐	☐	☐
Perfluorohexanoic acid (PFHxA)			☐	☐	☐	4,8-Dioxa-3H-perfluorononanoic acid (ADONA)			☐	☐	☐
Comment											

SMR Review and Evaluation

Company Name	
Permit No.	

☐	January – June	
☐	July – December	

Year

Section E – Noncompliance

Copy and attach only the applicable page(s) with violation(s) to the issued Notice of Violation.

COMMENTS (Check all that applies to the company's SMR)		
1	☐ Yes ☐ No	Is the SMR Analytical Data in compliance? (If No, fill out the noncompliance table below)
2	Has submitted the required applicable data listed below. (If data is not in compliance, fill out the Noncompliance Table below and specify the period when the company is in noncompliance.)	
	☐ Yes ☐ No ☐ NA	Is the Monthly Average Data in compliance?

Noncompliance Table

Parameter	Sample Date or Monthly Period	Sample Concentration		Permit Limit		Valid Data		Notified within 24-hour		Submitted 30-day Compliance Report	
		Daily	Monthly	Daily	Monthly	Yes	No	Yes	No	Yes	No
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
						☐	☐	☐	☐	☐	☐
Comment											

CV – Form 4

GLWA Great Lakes Water Authority

20xx INDUSTRIAL USER FILE REVIEW

Year

Company		Copy to	File,
Permit No.		Prepared by / Date Prepared	/

File Review Period from		to	

File Review Period starts from the date after the end date of the previous file review period and concludes on the preceding date of the Comprehensive Inspection date

REVIEWER'S EVALUATION			
Comments/Action Needed	**Concerns**		
	I	Previous Year's File Review	☐ Yes ☐ No
	II	Permit	☐ Yes ☐ No
	III	Linko	☐ Yes ☐ No
	IV	Sampling Location	☐ Yes ☐ No
	V	Compliance	☐ Yes ☐ No
	VI	Surcharge	☐ Yes ☐ No
	VII	SC/SPP	☐ Yes ☐ No
	VIII	GLWA Monitoring	☐ Yes ☐ No
	Reviewed by / Date Reviewed		/

I.	**PREVIOUS YEAR'S FILE REVIEW**	
1.	Are there still any issues or concerns raised in the previous year's file review that require resolution during this review period? If Yes, explain below.	☐ Yes ☐ No

II.	**PERMIT**		
1.	Permit Expiration Date		
	Is there a copy of the facility's final permit in the main file? If No, explain below.		☐ Yes ☐ No
2.	Specific Discharge Limitation (identify all limits that apply)		
	☐ Local Limits	☐ Categorical Limits	☐ Groundwater Limits
	Is the above limitation(s) applied properly to the company's classification? If No, explain below.		☐ Yes ☐ No
3.	Are there any permit issues or concerns raised in the file or resulting from any GLWA activities that require permit modification during this review period? If Yes, explain below.		☐ Yes ☐ No

III.	**LINKO**

1.	Is the previous year's CIR attached in Linko-Industry Event module? If No, explain below.	☐ Yes	☐ No
	Is the previous year's File Review attached in Linko-Industry Event module? If No, explain below.	☐ Yes	☐ No
2.	Is the company's current Wastewater Discharge Permit attached in Linko-Industry Event module? If No, explain below.	☐ Yes	☐ No

3.	Provide the status of the following Linko entries:			
	a)	Inspector (under Industry-Account Info module)	Choose an item.	
	b)	Authorized Representative (under Industry-Contact module)	Choose an item.	
	c)	Facility Contact Person (under Industry-Contact module)	Choose an item.	
	d)	Mailing Address (under Industry-Contact module)	Choose an item.	
	e)	Facility Address (under Industry-Contact module)	Choose an item.	
	f)	GLWA Sampling Frequency (under Industry-Monitoring Point module):	Frequency	
		Acidity/Alkalinity (pH)	Choose an item.	
		Compatible Pollutants	Choose an item.	
		Metals	Choose an item.	
		Total Phenolic Compounds	Choose an item.	☐ NA
		8 Individual Phenolic Compounds	Choose an item.	☐ NA
		Total PCB	Choose an item.	
		Organics (i.e. for landfill, metal finisher, groundwater remediation, cwt, etc.)	Choose an item.	☐ NA
		PFAS	Choose an item.	☐ NA
		Other Applicable Categorical Parameters	Choose an item.	☐ NA

IV.	**SAMPLING LOCATION**		
1.	Is the sampling location representative of the facility's wastewater discharge? If No, explain below.	☐ Yes	☐ No
2.	Are drawings/schematic diagrams for each sampling location available in the main file? If No, explain below.	☐ Yes	☐ No
3.	Are there any sampling location issues or concerns raised in the file or resulting from any GLWA activities that require resolution during the Comprehensive Inspection? If Yes, explain below.	☐ Yes	☐ No

V.	**COMPLIANCE**		
1.	Was the company under enforcement action during this file review period or is the company currently under enforcement action (i.e. resulting from monitoring exceedance(s))?	☐ Yes	☐ No
2.	Was the company issued a Notice of Exceedance during this file review period?	☐ Yes	☐ No
3.	Was the company issued a SMR Review letter or a Notice of Violation resulting from monitoring exceedance(s) during the last two (2) self-monitoring periods?	☐ Yes	☐ No

4.	Complete the tabulation below for the company's CV/TRC evaluation during the last two (2) evaluation periods.			
	CV/TRC period / Year	Date CV/TRC conducted	Outcome	SNC Referral Date
	April		Choose an item.	
	October		Choose an item.	

Outcome:

A – Based on the CV/TRC evaluation, the company did not meet the SNC criteria. No further action is required.

B – Based on the CV/TRC evaluation, the company met the SNC criteria and referred for further action.

VI	**SURCHARGE**				
1.	Is the company under surcharge program? If Yes, proceed below. If No, proceed to Section VIII.				☐ Yes ☐ No
2.	Provide the date of the latest waste strength determination conducted on-site. Any comments, explain below.				
3.	Denote all applicable parameter and actual concentration that the company is surcharged for.				
	☐ TSS, mg/L	☐ BOD, mg/L	☐ FOG, mg/L	☐ P, mg/L	
4.	Does the company have any concern or issue raised on surcharge that require resolution during the Comprehensive Inspection? If Yes, explain below.				☐ Yes ☐ No

VII.	**INCIDENCE and SLUG CONTROL/SPILL PREVENTION PLAN**			
1.	Does the file indicate any incidents: spill, upset, bypass and/or slug discharge experienced by the company during this file review period? If Yes, denote the incident(s) below and proceed to 2. If No, proceed to 3.			☐ Yes ☐ No
	☐ Spill	☐ Upset	☐ Bypass	☐ Slug Discharge
2.	Explain what action(s) was taken by the company to ensure that this incident(s) will not occur again.			
3.	Does the company need to have a Slug Control/Spill Prevention Plan (SC/SPP)?			☐ Yes ☐ No
	If Yes, denote the date of the company's latest submitted SC/SPP to the Authority.			
4.	Is there a need to update the company's SC/SPP? If Yes, explain below.			☐ Yes ☐ No

VIII.	GLWA MONITORING	
1.	Number of representative sampling location(s) specified on its permit	

2. Based on the number of sampling location(s) noted above, determine whether the Authority has sampled and analyzed the required (R) parameters during the last six (6) months of this review period (i.e. denote R if required in company's permit). For SIU with other requirements, utilize following applicable sections.

Parameter	SL#1			SL#2		
	R	Sample Date	Status	R	Sample Date	Status
Acidity/Alkalinity (pH)	☑		Choose an item.	☐		Choose an item.
Arsenic	☑		Choose an item.	☐		Choose an item.
Biochemical Oxygen Demand	☑		Choose an item.	☐		Choose an item.
Cadmium	☑		Choose an item.	☐		Choose an item.
Chromium	☑		Choose an item.	☐		Choose an item.
Copper	☑		Choose an item.	☐		Choose an item.
Cyanide (Available)	☑		Choose an item.	☐		Choose an item.
Fats, Oil or Grease	☑		Choose an item.	☐		Choose an item.
Iron	☑		Choose an item.	☐		Choose an item.
Lead	☑		Choose an item.	☐		Choose an item.
Mercury	☑		Choose an item.	☐		Choose an item.
Nickel	☑		Choose an item.	☐		Choose an item.
Phosphorus	☑		Choose an item.	☐		Choose an item.
Silver	☑		Choose an item.	☐		Choose an item.
Total PCB	☑		Choose an item.	☐		Choose an item.
Total Phenolic Compounds	☑		Choose an item.	☐		Choose an item.
Total Suspended Solids	☑		Choose an item.	☐		Choose an item.
Zinc	☑		Choose an item.	☐		Choose an item.
Individual Phenolic Cpds	☐	(Compounds listed below)		☐	(Compounds listed below)	
2-Chlorophenol			Choose an item.			Choose an item.
4-Chlorophenol			Choose an item.			Choose an item.
4-Chloro-3-Methylphenol			Choose an item.			Choose an item.
2,4-Dichlorophenol			Choose an item.			Choose an item.
2,4-Dinitrophenol			Choose an item.			Choose an item.
4-Methylphenol (p-cresol)			Choose an item.			Choose an item.
4-Nitrophenol			Choose an item.			Choose an item.
Phenol Alcohol			Choose an item.			Choose an item.
Total Toxic Organics	☐	See TTO List		☐	See TTO List	
PFAS	☐	See PFAS List		☐	See PFAS List	
Comments						

R - required parameter to be sampled and analyzed (as per discharge permit)
S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but shows no available data yet

3.	Is the company subjected only to local limits? If Yes proceed to 4 unless the SIU has more than two (2) SLs. Complete applicable Section IX. If No, indicate below the applicable category. Complete applicable Section IX.			☐ Yes ☐ No
	Category			
	☐	Aluminum Forming	☐	Leather Tanning
	☐	Battery Manufacturing	☐	Metal Finishing
	☐	Centralized Waste Treatment	☐	Nonferrous Metals Manufacturing
	☐	Electroplating	☐	Organic Chemicals, Plastics and Synthetic Fibers
	☐	Groundwater Remediation	☐	Petroleum Refining
	☐	Iron & Steel Manufacturing	☐	Pharmaceutical
	☐	Landfill	☐	Transportation Equipment Cleaning
4.	Are there any sampling and monitoring issues or concerns raised in the company's file and/or resulting from any GLWA activities that require resolution during the Comprehensive Inspection? If Yes, explain below.			☐ Yes ☐ No

Continuation of Sec. VIII, 2 - For additional sampling locations **SL#3** and **SL#4** with local limitations

VIII. GLWA MONITORING (i.e. denote R if required in company's permit)

Parameter	SL# 3			SL# 4		
	R	Sample Date	Status	R	Sample Date	Status
Acidity/Alkalinity (pH)	☐		Choose an item.	☐		Choose an item.
Arsenic	☐		Choose an item.	☐		Choose an item.
Biochemical Oxygen Demand	☐		Choose an item.	☐		Choose an item.
Cadmium	☐		Choose an item.	☐		Choose an item.
Chromium	☐		Choose an item.	☐		Choose an item.
Copper	☐		Choose an item.	☐		Choose an item.
Cyanide (Available)	☐		Choose an item.	☐		Choose an item.
Fats, Oil or Grease	☐		Choose an item.	☐		Choose an item.
Iron	☐		Choose an item.	☐		Choose an item.
Lead	☐		Choose an item.	☐		Choose an item.
Mercury	☐		Choose an item.	☐		Choose an item.
Nickel	☐		Choose an item.	☐		Choose an item.
Phosphorus	☐		Choose an item.	☐		Choose an item.
Silver	☐		Choose an item.	☐		Choose an item.
Total PCB	☐		Choose an item.	☐		Choose an item.
Total Phenolic Compounds	☐		Choose an item.	☐		Choose an item.
Total Suspended Solids	☐		Choose an item.	☐		Choose an item.
Zinc	☐		Choose an item.	☐		Choose an item.
Individual Phenolic Cpds	☐	(Compounds listed below)		☐	(Compounds listed below)	
2-Chlorophenol			Choose an item.			Choose an item.
4-Chlorophenol			Choose an item.			Choose an item.
4-Chloro-3-Methylphenol			Choose an item.			Choose an item.
2,4-Dichlorophenol			Choose an item.			Choose an item.
2,4-Dinitrophenol			Choose an item.			Choose an item.
4-Methylphenol (p-cresol)			Choose an item.			Choose an item.
4-Nitrophenol			Choose an item.			Choose an item.
Phenol Alcohol			Choose an item.			Choose an item.
Comments						

R - required parameter to be sampled and analyzed (as per discharge permit)
S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet

Continuation of Sec. VIII, 2 - For **Aluminum Forming, Battery Manufacturing, Electroplating, Iron & Steel Manufacturing, Leather Tanning, Metal Finishing, Non-Ferrous Metals Manufacturing, Petroleum Refining, or Transportation Equipment Cleaning** categories

VIII.	**GLWA MONITORING** (i.e. denote R if required in company's permit)

Parameter	SL#			SL#		
	R	Sample Date	Status	R	Sample Date	Status
Acidity/Alkalinity (pH)	☐		Choose an item.	☐		Choose an item.
Ammonia	☐		Choose an item.	☐		Choose an item.
Cadmium	☐		Choose an item.	☐		Choose an item.
Chromium	☐		Choose an item.	☐		Choose an item.
Cobalt	☐		Choose an item.	☐		Choose an item.
Copper	☐		Choose an item.	☐		Choose an item.
Cyanide (Total)	☐		Choose an item.	☐		Choose an item.
Lead	☐		Choose an item.	☐		Choose an item.
Naphthalene	☐		Choose an item.	☐		Choose an item.
Nickel	☐		Choose an item.	☐		Choose an item.
Non-Polar Material (SGT-HEM)	☐		Choose an item.	☐		Choose an item.
Oil and Grease	☐		Choose an item.	☐		Choose an item.
Phenols (4AAP)	☐		Choose an item.	☐		Choose an item.
Silver	☐		Choose an item.	☐		Choose an item.
Total Metals	☐		Choose an item.	☐		Choose an item.
Total Toxic Organics / Organics	☐	See Organics list		☐	See Organics list	
Zinc	☐		Choose an item.	☐		Choose an item.
Comments						

R - required parameter to be sampled and analyzed (as per discharge permit)
S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet

Continuation of Sec. VIII, 2 - **Total Toxic Organics (TTO)**

VIII.	GLWA MONITORING

Parameter	SL#		SL#	
	Sample Date	Status	Sample Date	Status
1,1,1-Trichloroethane		Choose an item.		Choose an item.
1,1,2,2-Tetrachloroethane		Choose an item.		Choose an item.
1,1,2-Trichloroethane		Choose an item.		Choose an item.
1,1-Dichloroethane		Choose an item.		Choose an item.
1,1-Dichloroethylene		Choose an item.		Choose an item.
1,2-Dichlorobenzene		Choose an item.		Choose an item.
1,2-Dichloroethane		Choose an item.		Choose an item.
1,2-Dichloropropane		Choose an item.		Choose an item.
1,2-Trans-Dichloroethylene (Trans-1,2-Dichloroethene)		Choose an item.		Choose an item.
1,3-Dichlorobenzene		Choose an item.		Choose an item.
1,3-Dichloropropylene (1,3-Dichloropropene)		Choose an item.		Choose an item.
1,4-Dichlorobenzene		Choose an item.		Choose an item.
2-Chloroethyl vinyl ether (mixed)		Choose an item.		Choose an item.
Acrolein		Choose an item.		Choose an item.
Acrylonitrile		Choose an item.		Choose an item.
Benzene		Choose an item.		Choose an item.
Bromoform (Tribromomethane)		Choose an item.		Choose an item.
Carbon Tetrachloride (Tetrachloromethane)		Choose an item.		Choose an item.
Chlorobenzene		Choose an item.		Choose an item.
Chlorodibromomethane (Dibromochloromethane)		Choose an item.		Choose an item.
Chloroethane		Choose an item.		Choose an item.
Chloroform (Trichloromethane)		Choose an item.		Choose an item.
Dichlorobromomethane (Bromodichloromethane)		Choose an item.		Choose an item.
Ethylbenzene		Choose an item.		Choose an item.
Methyl Bromide (Bromomethane)		Choose an item.		Choose an item.
Methyl Chloride (Chloromethane)		Choose an item.		Choose an item.
Methylene Chloride (Dichloromethane)		Choose an item.		Choose an item.
Tetrachloroethylene (Tetrachloroethene)		Choose an item.		Choose an item.
Toluene		Choose an item.		Choose an item.
Trichloroethylene (Trichloroethene)		Choose an item.		Choose an item.
Vinyl Chloride (Chloroethylene)		Choose an item.		Choose an item.
Xylene *		Choose an item.		Choose an item.

1,2,4-Trichlorobenzene		Choose an item.		Choose an item.
1,2-Diphenylhydrazine		Choose an item.		Choose an item.
2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)		Choose an item.		Choose an item.
2,4,6-Trichlorophenol		Choose an item.		Choose an item.
2,4-Dichlorophenol		Choose an item.		Choose an item.
2,4-Dimethylphenol		Choose an item.		Choose an item.
2,4-Dinitrophenol		Choose an item.		Choose an item.
2,4-Dinitrotoluene		Choose an item.		Choose an item.
2,6-Dinitrotoluene		Choose an item.		Choose an item.
2-Chloronaphthalene		Choose an item.		Choose an item.
2-Chlorophenol		Choose an item.		Choose an item.
2-Nitrophenol		Choose an item.		Choose an item.
3,3-Dichlorobenzidine		Choose an item.		Choose an item.
4,4-DDD (p,p-TDE)		Choose an item.		Choose an item.
4,4-DDE (p,p-DDX)		Choose an item.		Choose an item.
4,4-DDT		Choose an item.		Choose an item.
4,6-Dinitro-o-cresol		Choose an item.		Choose an item.
4-Bromophenyl phenyl ether		Choose an item.		Choose an item.
4-chloro-3-methyl phenol (p-Chloro-m-Cresol)		Choose an item.		Choose an item.
4-Chlorophenyl phenyl ether		Choose an item.		Choose an item.
4-Nitrophenol		Choose an item.		Choose an item.
Acenaphthene		Choose an item.		Choose an item.
Acenaphthylene		Choose an item.		Choose an item.
Aldrin		Choose an item.		Choose an item.
Alpha-BHC		Choose an item.		Choose an item.
Alpha-endosulfan		Choose an item.		Choose an item.
Anthracene		Choose an item.		Choose an item.
Benzidine		Choose an item.		Choose an item.
Benzo(a)anthracene (1,2-Benzanthracene)		Choose an item.		Choose an item.
Benzo(a)pyrene (3,4-Benzopyrene)		Choose an item.		Choose an item.
Benzo(b)fluoranthene (3,4-Benzofluoranthene)		Choose an item.		Choose an item.
Benzo(ghi) Perylene (1,12-Benzoperylene)		Choose an item.		Choose an item.
Benzo(k) Fluoranthene (11,12-Benzofluoranthene)		Choose an item.		Choose an item.
Beta-BHC		Choose an item.		Choose an item.
Beta-endosulfan		Choose an item.		Choose an item.
Bis (2-Chloroethoxy) Methane		Choose an item.		Choose an item.
Bis (2-Chloroethyl) Ether		Choose an item.		Choose an item.

Bis (2-Chloroisopropyl) Ether		Choose an item.		Choose an item.
Bis (2-Ethylhexyl) Phthalate		Choose an item.		Choose an item.
Butyl Benzyl Phthalate		Choose an item.		Choose an item.
Chlordane (technical mixture and metabolites)		Choose an item.		Choose an item.
Chrysene		Choose an item.		Choose an item.
Delta-BHC		Choose an item.		Choose an item.
Dibenzo(a,h)anthracene (1,2,5,6-Dibenzanthracene)		Choose an item.		Choose an item.
Dieldrin		Choose an item.		Choose an item.
Diethyl Phthalate		Choose an item.		Choose an item.
Dimethyl Phthalate		Choose an item.		Choose an item.
Di-N-Butyl Phthalate		Choose an item.		Choose an item.
Di-N-Octyl Phthalate		Choose an item.		Choose an item.
Endosulfan sulfate		Choose an item.		Choose an item.
Endrin		Choose an item.		Choose an item.
Endrin aldehyde		Choose an item.		Choose an item.
Fluoranthene		Choose an item.		Choose an item.
Fluorene		Choose an item.		Choose an item.
Gamma-BHC		Choose an item.		Choose an item.
Heptachlor		Choose an item.		Choose an item.
Heptachlor epoxide (BHC-hexachlorocyclohexane)		Choose an item.		Choose an item.
Hexachlorobenzene		Choose an item.		Choose an item.
Hexachlorobutadiene		Choose an item.		Choose an item.
Hexachlorocyclopentadiene		Choose an item.		Choose an item.
Hexachloroethane		Choose an item.		Choose an item.
Indeno(1,2,3-cd) pyrene (2,3-o-phenylene pyrene)		Choose an item.		Choose an item.
Isophorone		Choose an item.		Choose an item.
Naphthalene		Choose an item.		Choose an item.
Nitrobenzene		Choose an item.		Choose an item.
N-Nitrosodimethylamine		Choose an item.		Choose an item.
N-Nitrosodi-N-Propylamine		Choose an item.		Choose an item.
N-Nitrosodiphenylamine		Choose an item.		Choose an item.
PCB-1016 (Arochlor 1016)		Choose an item.		Choose an item.
PCB-1221 (Arochlor 1221)		Choose an item.		Choose an item.
PCB-1232 (Arochlor 1232)		Choose an item.		Choose an item.
PCB-1242 (Arochlor 1242)		Choose an item.		Choose an item.
PCB-1248 (Arochlor 1248)		Choose an item.		Choose an item.
PCB-1254 (Arochlor 1254)		Choose an item.		Choose an item.
PCB-1260 (Arochlor 1260)		Choose an item.		Choose an item.

Pentachlorophenol		Choose an item.		Choose an item.
Phenanthrene		Choose an item.		Choose an item.
Phenol		Choose an item.		Choose an item.
Pyrene		Choose an item.		Choose an item.
Toxaphene		Choose an item.		Choose an item.
Comments				

S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet
* - Required parameter to be analyzed for Groundwater Remediation only

Continuation of Sec. VIII, 2 - For **Pharmaceutical** category

VIII.	GLWA MONITORING

Parameter	SL#		SL#	
	Sample Date	Status	Sample Date	Status
Acetone		Choose an item.		Choose an item.
Ethyl Acetate		Choose an item.		Choose an item.
Isopropyl Acetate		Choose an item.		Choose an item.
Methylene Chloride (Dichloromethane)		Choose an item.		Choose an item.
n-Amyl Acetate		Choose an item.		Choose an item.
Comments				

S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet

Continuation of Sec. VIII, 2 - For **Centralized Waste Treatment**

VIII.	GLWA MONITORING				
Parameter	SL#		SL#		
	Sample Date	Status	Sample Date	Status	
Antimony		Choose an item.		Choose an item.	
Arsenic		Choose an item.		Choose an item.	
Cadmium		Choose an item.		Choose an item.	
Chromium		Choose an item.		Choose an item.	
Cobalt		Choose an item.		Choose an item.	
Copper		Choose an item.		Choose an item.	
Lead		Choose an item.		Choose an item.	
Mercury		Choose an item.		Choose an item.	
Nickel		Choose an item.		Choose an item.	
Silver		Choose an item.		Choose an item.	
Tin		Choose an item.		Choose an item.	
Titanium		Choose an item.		Choose an item.	
Vanadium		Choose an item.		Choose an item.	
Zinc		Choose an item.		Choose an item.	
Bis(2-Ethylhexyl) phthalate		Choose an item.		Choose an item.	
Carbazole		Choose an item.		Choose an item.	
n-Decane		Choose an item.		Choose an item.	
Fluoranthene		Choose an item.		Choose an item.	
n-Octadecane		Choose an item.		Choose an item.	
o-Cresol (2-Methyl Phenol)		Choose an item.		Choose an item.	
p-Cresol (4-Methyl Phenol)		Choose an item.		Choose an item.	
2,4,6-Trichlorophenol		Choose an item.		Choose an item.	
Comments					

S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet

Continuation of Sec. VIII, 2 - For **Landfill**

VIII.	GLWA MONITORING

Parameter	SL#		SL#	
	Sample Date	Status	Sample Date	Status
1,1-Dichloroethylene		Choose an item.		Choose an item.
1,2-Dichloroethane		Choose an item.		Choose an item.
1,4-Dichlorobenzene		Choose an item.		Choose an item.
2,4,5-TP (Silvex)		Choose an item.		Choose an item.
2,4,5-Trichlorophenol		Choose an item.		Choose an item.
2,4,6-Trichlorophenol		Choose an item.		Choose an item.
2,4-D		Choose an item.		Choose an item.
2,4-Dinitrotoluene		Choose an item.		Choose an item.
Benzene		Choose an item.		Choose an item.
Carbon Tetrachloride (Tetrachloromethane)		Choose an item.		Choose an item.
Chlordane		Choose an item.		Choose an item.
Chlorobenzene		Choose an item.		Choose an item.
Chloroform		Choose an item.		Choose an item.
Cresol		Choose an item.		Choose an item.
Endrin		Choose an item.		Choose an item.
Heptachlor		Choose an item.		Choose an item.
Hexachlorobenzene		Choose an item.		Choose an item.
Hexachlorobutadiene		Choose an item.		Choose an item.
Hexachloroethane		Choose an item.		Choose an item.
Lindane		Choose an item.		Choose an item.
m-Cresol		Choose an item.		Choose an item.
Methoxychlor		Choose an item.		Choose an item.
Methyl Ethyl Ketone		Choose an item.		Choose an item.
Nitrobenzene		Choose an item.		Choose an item.
o-Cresol (2-Methyl Phenol)		Choose an item.		Choose an item.
p-Cresol (4-Methyl Phenol)		Choose an item.		Choose an item.
Pentachlorophenol		Choose an item.		Choose an item.
Pyridine		Choose an item.		Choose an item.
Tetrachloroethylene		Choose an item.		Choose an item.
Toxaphene		Choose an item.		Choose an item.
Trichloroethylene		Choose an item.		Choose an item.
Vinyl Chloride		Choose an item.		Choose an item.
Comments				

S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet

Continuation of Sec. VIII, 2 - For **Organic Chemicals, Plastics and Synthetic Fibers**

VIII.	GLWA MONITORING				
Parameter	SL#		SL#		
	Sample Date	Status	Sample Date	Status	
Cyanide (Total)		Choose an item.		Choose an item.	
Lead (Total)		Choose an item.		Choose an item.	
Zinc (Total)		Choose an item.		Choose an item.	
Acenaphthene		Choose an item.		Choose an item.	
Anthracene		Choose an item.		Choose an item.	
Benzene		Choose an item.		Choose an item.	
Bis (2-Ethylhexyl) Phthalate		Choose an item.		Choose an item.	
Carbon Tetrachloride		Choose an item.		Choose an item.	
Chlorobenzene		Choose an item.		Choose an item.	
Chloroethane		Choose an item.		Choose an item.	
Chloroform		Choose an item.		Choose an item.	
Di-N-Butyl Phthalate		Choose an item.		Choose an item.	
1,2-Dichlorobenzene		Choose an item.		Choose an item.	
1,3-Dichlorobenzene		Choose an item.		Choose an item.	
1,4-Dichlorobenzene		Choose an item.		Choose an item.	
1,1-Dichloroethane		Choose an item.		Choose an item.	
1,2-Dichloroethane		Choose an item.		Choose an item.	
1,1-Dichloroethylene		Choose an item.		Choose an item.	
1,2-trans-Dichloroethylene		Choose an item.		Choose an item.	
1,2-Dichloropropane		Choose an item.		Choose an item.	
1,3-Dichloropropylene		Choose an item.		Choose an item.	
Diethyl Phthalate		Choose an item.		Choose an item.	
Dimethyl Phthalate		Choose an item.		Choose an item.	
4,6-Dinitro-O-Cresol		Choose an item.		Choose an item.	
Ethylbenzene		Choose an item.		Choose an item.	
Fluoranthene		Choose an item.		Choose an item.	
Fluorene		Choose an item.		Choose an item.	
Hexachlorobenzene		Choose an item.		Choose an item.	
Hexachloroethane		Choose an item.		Choose an item.	
Methyl Chloride		Choose an item.		Choose an item.	
Methylene Chloride		Choose an item.		Choose an item.	
Naphthalene		Choose an item.		Choose an item.	
Nitrobenzene		Choose an item.		Choose an item.	
2-Nitrophenol		Choose an item.		Choose an item.	

4-Nitrophenol		Choose an item.		Choose an item.
Phenanthrene		Choose an item.		Choose an item.
Pyrene		Choose an item.		Choose an item.
Tetrachloroethylene		Choose an item.		Choose an item.
Toluene		Choose an item.		Choose an item.
1,2,4-Trichlorobenzene		Choose an item.		Choose an item.
1,1,1-Trichloroethane		Choose an item.		Choose an item.
1,1,2-Trichloroethane		Choose an item.		Choose an item.
Trichloroethylene		Choose an item.		Choose an item.
Vinyl Chloride		Choose an item.		Choose an item.
Comments				

S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet

Continuation of Sec. VIII, 2 - **Per- and Poly-Fluoroalkyl Substances (PFAS)**

VIII.	GLWA MONITORING

Parameter		SL#	
		Sample Date	Status
Perfluorobutanoic acid	(PFBA)		Choose an item.
Perfluoropentanoic acid	(PFPeA)		Choose an item.
Perfluorohexanoic acid	(PFHxA)		Choose an item.
Perfluoroheptanoic acid	(PFHpA)		Choose an item.
Perfluorooctanoic acid	(PFOA)		Choose an item.
Perfluorononanoic acid	(PFNA)		Choose an item.
Perfluorodecanoic acid	(PFDA)		Choose an item.
Perfluoroundecanoic acid	(PFUnDA)		Choose an item.
Perfluorododecanoic acid	(PFDoDA)		Choose an item.
Perfluorotridecanoic acid	(PFTrDA)		Choose an item.
Perfluorotetradecanoic acid	(PFTeDA)		Choose an item.
Perfluorobutane Sulfonic acid	(PFBS)		Choose an item.
Perfluoropentane Sulfonic acid	(PFPeS)		Choose an item.
Perfluorohexane Sulfonic acid	(PFHxS)		Choose an item.
Perfluoroheptane Sulfonic acid	(PFHpS)		Choose an item.
Perfluorooctane Sulfonic acid	(PFOS)		Choose an item.
Perfluorononane Sulfonic acid	(PFNS)		Choose an item.
Perfluorodecane Sulfonic acid	(PFDS)		Choose an item.
Perfluorooctane sulfonamide	(PFOSA)		Choose an item.
4:2 Fluorotelomer sulfonic acid	(4:2 FTSA)		Choose an item.
6:2 Fluorotelomer sulfonic acid	(6:2 FTSA)		Choose an item.
8:2 Fluorotelomer sulfonic acid	(8:2 FTSA)		Choose an item.
2-N-Ethyl perfluorooctane sulfonamido acetic acid	(NEtFOSAA)		Choose an item.
2-N-Methyl perfluorooctane sulfonamido acetic acid	(NMeFOSAA)		Choose an item.
Hexafluoropropylene oxide dimer acid	(HFPO-DA)		Choose an item.
11-Chloroeiosafluoro-3-oxaundecane-1-sulfonic acid	(11Cl-PF3OUDS)		Choose an item.
9-Chlorohexadecafluoro-3-oxanone-1-sulfonic acid	(9Cl-PF3ONS)		Choose an item.
4,8-Dioxa-3H-perfluorononanoic acid	(ADONA)		Choose an item.
Comments			

S and A - has already been sampled and analyzed within the last 6 months of the file review period
Not (S&A) - has not been sampled and analyzed (requires investigation and corrective action)
S but NAD - has been sampled based in Linko but no available data yet

CERTIFIED MAIL
Date: 9/27/2022 0:00:00
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF ACCEPTANCE
SIX MONTH REPORT, (Reporting Period)

The Great Lakes Water Authority (GLWA), Industrial Waste Control Division (IWC), has reviewed the Six-Month Report (SMR) submitted for your company listed below:

INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP
Permit No.: INDUSTRY NUMBER

The GLWA has determined that your SMR complies with the reporting requirements of your Wastewater Discharge Permit and applicable federal and local regulations, including the GLWA Rules.

Enclosed is a blank SMR form for your next report, which will be due on <Insert Date>. If you have any questions, please contact me at (313) <EngineerPhone>

<MGMTPROFFName>
Management Professional
Industrial Waste Control Group

Enclosure

CERTIFIED MAIL
Date: 9/27/2022
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF VIOLATION
SIX MONTH REPORT REVIEW {Enter Report Period}

The Great Lakes Water Authority (GLWA), Industrial Waste Control Division (IWC), has reviewed the Six Month Report (SMR) submitted for your company listed below:

INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP
Permit No.: INDUSTRY NUMBER

The GLWA has determined that your SMR has not met the minimum requirements as specified in your Wastewater Discharge Permit.

☐ The specified deficiency (ies) is/are shown in the enclosed checklist.

☐ The GLWA has also identified self-monitoring violation during this period for the parameter listed below. Please note that self-monitoring violation is handled separately from this notification. If you have already complied or are still complying with the 24-hour call notification and the 30-day compliance reporting, you may ignore this concern. If not, a GLWA representative will be contacting you on this matter.

Parameter	**Sample Date**	**Sample Result**	**Permit Limit**

[Add Information as Needed]

The GLWA requires your company to respond to this notice within fourteen (14) calendar days, addressing the corrective action being taken to remedy the above deficiencies. Failure to respond to this notice will result in appropriate enforcement action.

Enclosed is a blank SMR form for your next report which will be due on [Enter Date]. Should you have any questions, please contact me at (313) <EngineerPhone>.

<EngineerName>
Engineer
Industrial Waste Control Group

Enclosure

CERTIFIED MAIL
Date: 9/27/2022 0:00:00
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF NONCOMPLIANCE

The Great Lakes Water Authority (GLWA), Industrial Waste Control Division (IWC) hereby notify your facility located at CONTACTADDR1 CITY , Michigan that it was cited for noncompliance with the notification requirements established in the General Pretreatment Regulations 40 CFR Part 403 and your Wastewater Discharge Permit.

INDUSTRY NAME has failed to notify the Great Lakes Water Authority within twenty-four (24) hours of becoming aware of the self-monitoring noncompliance with the limits of the parameter << insert Parameter>> on << insert date>>, as submitted in << Enter reporting Period>> Six Month Report.

Establishing a pattern of violations will result in an enforcement action as may be appropriate.

Should you have any questions, please contact me at (313) <EngineerPhone>

Sincerely,

<EngineerName>
Engineer
Industrial Waste Control Group

WB

CERTIFIED MAIL

Date: <<DATE>>

Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1 GOES
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF ACCEPTANCE

SLUG CONTROL/SPILL PREVENTION PLAN (SC/SPP)

The Great Lakes Water Authority (GLWA), Industrial Waste Control Group, has reviewed the SC/SPP submitted on «date1» for your facility located at CONTACTADDR1, CONTACTCITY, MI. The GLWA has determined that your SC/SPP complies with our current requirements based on the GLWA Rules and the General Pretreatment Regulations 40 CFR Part 403.

Should the GLWA revise its requirements in the future, you will be informed on a timely basis so that you may update your SC/SPP accordingly.

If you have any questions or require further information, please contact me at (313) 297-5857.

Sincerely,

William Ware, Engineer
Incident Prevention Emergency Response
Industrial Waste Control Group

CERTIFIED MAIL
Date: 9/27/2022 0:00:00
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF ACKNOWLEDGEMENT
TOXIC ORGANIC MANAGEMENT PLAN (TOMP)

The Great Lakes Water Authority (GLWA), Industrial Waste Control (IWC) Group, hereby acknowledges receipt of your (new/updated) Toxic Organic Management Plan (TOMP) on <<date>> for your facility located at CONTACTADDR1, CONTACTCITY, MI. The GLWA has determined that your TOMP complies with our current requirements based on the GLWA Rules and the General Pretreatment Regulations 40 CFR 403.

Should the GLWA revise its requirements in the future, you will be informed in a timely manner so that you can update your TOMP, accordingly.

Should you have any questions or require further information, please contact ENGINEER NAME at (313) ENGINEER PHONE.

Sincerely,

Jose Belen/ Thomas Eapen, P.E.
Management Professional
Industrial Waste Control Group

CERTIFIED MAIL
Date: 9/27/2022
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF ACKNOWLEDGMENT

The Great Lakes Water Authority (GLWA), Industrial Waste Control Division (IWC) acknowledges receipt of your {MERGEFIELD Date} response to the Notice of Exceedance (NOE) dated {MERGEFIELD Notification date}. The GLWA finds that your response complies with the NOE requirements and submitted analytical data also comply with the discharge limitations stipulated in your Wastewater Discharge Permit No.: INDUSTRY NUMBER

Should you have any questions, please contact me at (313) <EngineerPhone>

<EngineerName>
Engineer
Industrial Waste Control Group

CERTIFIED MAIL
Date: 9/27/2022 0:00:00
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

Re: Notice of Permit Cancellation

Dear Mr. Dein:

Effective immediately, the Wastewater Discharge Permit No.: INDUSTRY NUMBER issued to your facility at CONTACTADDR1, CONTACTCITY, MI is cancelled. The said facility will no longer be discharging process wastewater into the sewer system. This permit cancellation is based << Reason/finding>>

No further discharge of process water shall be made into the sewer system without prior approval from the GLWA. Should you have any questions, please contact <EngineerName>, of the Industrial Waste Control Division, Permits Section, at (313) <EngineerPhone>.

Stephen J Kuplicki, P.E, J.D.
Operations Manager
Industrial Waste Control Group

SJK/

CERTIFIED MAIL

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Date: October 5, 2022
Permit No.: NUMBER

RE: Notice of Determination of Significant Noncompliance

Dear: CONTACT NAME:

The Great Lakes Water Authority (GLWA) has determined, based on information in its record that your facility located at ADDRESS1 in SITE CITY, Michigan was in Significant Noncompliance with the General Pretreatment Regulations 40 CFR Part 403.

The General Pretreatment Regulations, 40 CFR Part 403.8 (f) (2) (viii) states:

> "…*These procedures shall include provision for at least annual public notification in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW of Industrial users which, at any time during the previous twelve (12) months, were in significant noncompliance with applicable Pretreatment requirements*."
>
> The said regulation establishes criteria for significant noncompliance industrial user. Your facility meets one or more of the following criteria:

( ) (A) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR403.3(1);

( ) (B) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(1) multiplied by the applicable TRC (TRC = 1.4 for BOD , TSS, Fats, Oil and Grease, and 1.2 for all other pollutants except pH);

( ) (C) Any other violation of a Pretreatment Standard or Requirement as defined by 40 CFR 403.3(1) (daily maximum, long-term average, instantaneous limit, or narrative Standard_ that the POTW determines has caused, alone or in combination with other Discharges, Interference or Pass Through (including endangering the health of POTW personnel or the general public);

( ) (D) Any discharge of a pollutant that has caused imminent endangerment to human health or welfare, or to the environment, or has resulted in the POTW's exercise of its emergency authority;

( ) (E) Failure to meet a compliance schedule milestone contained in a local control mechanism, or enforcement order for starting construction, completing construction, or attaining final compliance within ninety (90) days after the scheduled date;

( ) (F) Failure to provide, within thirty (30) days after the due date, required reports such as baseline monitoring reports, ninety (90) days compliance reports, periodic self-monitoring reports, and reports on compliance with compliance scheduled within thirty (30) days after the due date;

( ) (G) Failure to accurately report noncompliance; or

( ) (H) Any other violation or group of violations which we determines adversely affect the operation or implementation of the local pretreatment program.

In accordance with the GLWA Rules, we are forwarding a copy of the proposed publication for Significant Noncompliance with applicable pretreatment requirements and providing an opportunity of a thirty (30) day period to comment on the accuracy of the proposed publication. Your comments may be submitted in writing, or you may request a meeting with us to comment on accuracy of the proposed publication notice.

All comments should include appropriate documentation. We will consider all comments received during the thirty (30) date period before proceeding with all the proposed publication during the year [AddYear]. Should you request a meeting, please contact POTW PERSONELL FULLNAME at POTW PERSONNEL PHONE, within the thirty (30) day time period.

We reserve the right to modify the proposed language to reflect any additional enforcement actions and/or the current compliance status of the company, prior to the publication date.

Sincerely,

Thomas Eapen, P.E.
Management Professional
Industrial Waste Control Group

PUBLIC NOTICE
OF

SIGNIFICANT NONCOMPLIANCE

LISTED BELOW ARE INDUSTRIAL WASTEWATER DISCHARGERS IN SIGNIFICANT NONCOMPLIANCE WITH THE REQUIREMENTS OF THE GENERAL PRETREATMENT REGULATION 40 CFR PART 403.

INDUSTRY NAME:	**INDUSTRY NAME GOES HERE**
ADDRESS:	ADDRESS1 SITE CITY, STATE ZIP
VIOLATION:	VIOLATION DESCRIPTION GOES HERE
COMPLIANCE STATUS:	**INDUSTRY NAME GOES HERE** has failed to demonstrate compliance with its Wastewater Discharge Permit applicable limitation/reporting requirements.

Great Lakes Water Authority
Industrial Waste Control Group
9300 West Jefferson, Detroit, MI 48209
313-297-5804 |Stephen.kuplicki@glwater.org

Telephone Contact Report

TO:		FROM:	Stephen Kuplicki
WITH		PAGES:	
PHONE:		DATE:	
RE:		CC:	iwc@glwater.org

☐ Urgent ☐ For Review ☐ Please Comment ☑ Please Reply ☐ Please Recycle

Summarize telephone discussion

CERTIFIED MAIL
Date: 9/27/2022
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIPE

Dear CONTACT NAME

NOTICE OF ACKNOWLEDGMENT
SELF-MONITORING COMPLIANCE DATA

The Great Lakes Water Authority (GLWA), Industrial Waste Control Division (IWC) acknowledges receipt of your { MERGEFIELD Date} response to the self-monitoring noncompliance notification dated { MERGEFIELD Notification date}. The GLWA has determined that your response complies with the requirements as set forth in your Wastewater Discharge Permit No.: INDUSTRY NUMBER GOES HERE

Should you have any questions, please contact me at (313) <EngineerPhone>

<EngineerName>
Engineer
Industrial Waste Control Group

TO: SIU Email

Cc: iwc@glwater.org

Subject: Copy of NOE – GLWA Sampling

Attachment: NOE.docx

Enclosed, please find an electronic copy of a Notice of Exceedance from recent GLWA sampling. A copy is also being provided by US Mail. You are required to comply with this notice.

SENDER Information

CERTIFIED MAIL
Date: DATE
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF EXCEEDANCE (NOE)

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND NOTICE ISSUED PURSUANT TO SECTION II-1003 OF THE GLWA RULES, THE GENERAL PRETREATMENT REGULATIONS, 40 CFR PART 403. THIS NOTICE IS BASED ON FINDINGS ON VIOLATION OF THE CONDITIONS OF THE WASTEWATER DISCHARGE PERMIT UNDER SECTION II OF THE GLWA RULES.

FINDING

1) The Great Lakes Water Authority is implementing, administering and enforcing GLWA Industrial Pretreatment Program.
2) Under this pretreatment program, INDUSTRY NAME, hereinafter referred to as "The Company", was issued a Wastewater Discharge Permit.
3) The Wastewater Discharge Permit issued to The Company contained numerical limits on the quality of pollutants which The Company could discharge.
4) Pollutant analysis revealed exceedances of the Wastewater Discharge Permit limitation as identified in the enclosed noncompliance table.

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS, THE COMPANY IS HEREBY NOTIFIED THAT:

1) It is in noncompliance with its Discharge Permit No.: 123-12345-IU.
2) A compliance report shall be submitted to the Industrial Waste Control Division within thirty (**30) days** of this notice. The following information shall be included in this report:
   a) The cause of the exceedance and the corrective measures which have been made to prevent future noncompliance.
   b) Analytical results for a minimum of two samples collected by The Company after the noncompliance date to demonstrate compliance with the permit limitation of the exceeded pollutant(s). The sampling and analysis must be conducted in accordance with Federal Regulations, 40 CFR Part 136.
3) Failure to comply with the requirements of this notice will be considered a significant noncompliance and could result in escalation of enforcement action.

_____
ENGINEER NAME
Industrial Waste Control Group
(313) 297-5878

Enclosures

EFFLUENT EXCEEDANCES

Date Occurred	Description
DATE	Cyanide (Total) Daily Limit was exceeded. The Result was 1.91 mg/l while the Daily Limit was 1.2 mg/l. The Violation occurred for Sample '123456789-005' on the Sample Date of DATE and for Monitoring Point '01'

CERTIFIED MAIL
Date: DATE
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF NONCOMPLIANCE (NON)

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND NOTICE ISSUED PURSUANT TO SECTION II-1003 OF THE GLWA RULES, THE GENERAL PRETREATMENT REGULATIONS, 40 CFR PART 403. THIS NOTICE IS BASED ON FINDINGS ON VIOLATION OF THE CONDITIONS OF THE WASTEWATER DISCHARGE PERMIT UNDER SECTION II OF THE GLWA RULES.

FINDING

1) The Great Lakes Water Authority is implementing, administering and enforcing GLWA Industrial Pretreatment Program.
2) Under this pretreatment program, INDUSTRY NAME, hereinafter referred to as "The Company", was issued a Wastewater Discharge Permit.
3) [Option 1] Based on the Inspection of DATE, we have identified the following noncompliance issues {ADD DETAIL ON SPECIFIC NATURE OF NONCOMPLIANCE}
4) [Option 2] Based on a review of the [SAMPLING PLAN, pH Monitoring plan, BMP …] of DATE, we have identified the following noncompliance issues {ADD DETAIL ON SPECIFIC NATURE OF NONCOMPLIANCE}

NOTICE

THEREFORE, BASED ON THE ABOVE FINDINGS, THE COMPANY IS HEREBY NOTIFIED THAT:

1) It is in noncompliance with its Discharge Permit No.: 123-12345-IU.
1) [FOR OPTION 1] The following corrective action is required {ADD DETAIL ON SPECIFIC COMPLIANCE REQUIREMENTS}. These corrective actions must be completed by DATE. You are to send a written notice of completion. We will assess your response following receipt.
2) [FOR OPTION 2] The following corrective action is required {ADD DETAIL ON SPECIFIC COMPLIANCE REQUIREMENTS AND PLAN CORRECTIONS REQUIRED}. These corrective actions must be completed by DATE. You are to send a written notice of completion. We will assess your response following receipt.
3) Failure to comply with the requirements of this notice will be considered a significant noncompliance and could result in escalation of enforcement action.

_____
ENGINEER NAME
Industrial Waste Control Group
(313) 297-5878

Enclosures (IF REQUIRED)

CERTIFIED MAIL
Date: DATE
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF VIOLATION
SIX MONTH REPORT REVIEW [SMR PERIOD]

The Great Lakes Water Authority (GLWA), Industrial Waste Control Division (IWC), has reviewed the Six Month Report (SMR) submitted for your company listed below:

INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP
Permit No.: INDUSTRY NUMBER

The GLWA has determined that your SMR has not met the minimum requirements as specified in your Wastewater Discharge Permit.

☐ The specified deficiency (ies) is/are shown in the enclosed checklist.

☐ The GLWA has also identified self-monitoring violation during this period for the parameter listed below. Please note that self-monitoring violation is handled separately from this notification. If you have already complied or are still complying with the 24-hour call notification and the 30-day compliance reporting, you may ignore this concern. If not, a GLWA representative will be contacting you on this matter.

Parameter	**Sample Date**	**Sample Result**	**Permit Limit**

[Add Additional Information as Needed]

The GLWA requires your company to respond to this notice within fourteen (14) calendar days, addressing the corrective action being taken to remedy the above deficiencies. Failure to respond to this notice will result in appropriate enforcement action.

Enclosed is a blank SMR form for your next report which will be due on [Enter Date]. Should you have any questions, please contact me at (313) <EngineerPhone>.

<EngineerName>
Engineer
Industrial Waste Control Group

Enclosure – SMR Review Form
(See Forms CV – FORM 1, 2 or 3)

CERTIFIED MAIL
Date: DATE
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF VIOLATION

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND NOTICE ISSUED PURSUANT TO SECTION II-1003 OF THE GLWA RULES AND THE GENERAL PRETREATMENT REGULATIONS 40 CFR PART 403. THIS NOTICE IS BASED ON FINDINGS OF THE VIOLATION OF THE CONDITIONS OF THE WASTEWATER DISCHARGE PERMIT ISSUED UNDER SECTION II OF THE GLWA RULES.

FINDINGS

1) INDUSTRY NAME, located at ADDRESS, Michigan, discharges non-domestic wastewater containing toxic pollutants into the GLWA Sewer System.
2) INDUSTRY NAME, located at ADDRESS in CITY, Michigan, is a "Significant Industrial User", as defined by the GLWA RULES and 40 CFR Part 403 and [NCPS IF APPLICABLE].
3) INDUSTRY NAME, located at ADDRESS in CITY, Michigan was reissued a Wastewater Discharge Permit No. 123-#####-IU, effective DATE which contains requirements, prohibitions, restrictions and other limitations on the wastewater discharged to the sewer system.
4) INDUSTRY NAME, located at ADDRESS in CITY, Michigan is in violation of {ADD ADDITIONAL INFORMATION}.

NOTICE

THEREFORE BASED ON THE ABOVE FINDINGS, MICHIGAN COMPANY IS IN VIOLATION OF ITS WASTEWATER DISCHARGE PERMIT NO. 123-#####-IU, THE GLWA RULES, AND THE GENERAL PRETRATMENT REGULATIONS 40 CFR PART 403 AND IS REQUIRED TO:

1) {PROVIDE CORRECTIVE ACTIONS REQUIRED AND TIME FRAME FOR SUBMISSION}
2) Failure to comply with the requirements of this notice will be considered a significant noncompliance and could result in escalation of enforcement action.

Should you have any questions, please call ENGINEER NAME at (313) PHONE NUMBER.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS NOTICE WILL SUBJECT YOU TO FURTHER ENFORCEMENT ACTION AS PROVIDED IN THE GLWA RULES.

_____
Thomas Eapen, P. E.
Management Professional
Industrial Waste Control Group

CERTIFIED MAIL
Date: DATE
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF VIOLATION

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND NOTICE ISSUED PURSUANT TO SECTION II-1003 OF THE GLWA RULES AND THE GENERAL PRETREATMENT REGULATIONS 40 CFR PART 403. THIS NOTICE IS BASED ON FINDINGS OF THE VIOLATION OF THE CONDITIONS OF THE WASTEWATER DISCHARGE PERMIT ISSUED UNDER SECTION II OF THE GLWA RULES.

FINDINGS

1) INDUSTRY NAME, located at ADDRESS, Michigan, discharges non-domestic wastewater containing toxic pollutants into the GLWA Sewer System.

2) INDUSTRY NAME, located at ADDRESS in CITY, Michigan, is a "Significant Industrial User", as defined by the GLWA RULES and 40 CFR Part 403 and [NCPS IF APPLICABLE].

3) INDUSTRY NAME, located at ADDRESS in CITY, Michigan was reissued a Wastewater Discharge Permit No. 123-#####-IU, effective DATE which contains requirements, prohibitions, restrictions and other limitations on the wastewater discharged to the sewer system.

4) INDUSTRY NAME, located at ADDRESS in CITY, Michigan is in violation of the effluent limitations set forth in the Wastewater Discharge Permit No. 123-#####-IU for daily maximum limitation of the parameter [PARAMETER] based on {ADD ADDITIONAL INFORMATION}

NOTICE

THEREFORE BASED ON THE ABOVE FINDINGS, MICHIGAN COMPANY IS IN VIOLATION OF ITS WASTEWATER DISCHARGE PERMIT NO. 123-#####-IU, THE GLWA RULES, AND THE GENERAL PRETRATMENT REGULATIONS 40 CFR PART 403 AND IS REQUIRED TO:

1) Attend a conference at the Industrial Waste Control Division, Enforcement Section office located at 9300 W. Jefferson Suite # 210, Detroit, Michigan 48209 scheduled for _____ at _____ am

   At the said conference an authorized representative of your facility as defined in the GLWA Rules, Chapter I, shall present an explanation and corrective measures on violation in concern.

2) Complete the attached compliance schedule form and present it during the conference.

Should you have any questions, please call ENGINEER NAME at (313) PHONE NUMBER.

YOUR FAILURE TO APPEAR IN RESPONSE TO THIS NOTICE WILL SUBJECT YOU TO FURTHER ENFORCEMENT ACTION AS PROVIDED IN THE GLWA RULES.

_____
Thomas Eapen, P. E.
Management Professional
Industrial Waste Control Group

TE/RG/rrg
Attachments

COMPLIANCE AGREEMENT

THIS AGREEMENT ENTERED INTO THIS THE THIRTEENTH DAY OF {DATE} BY AND BETWEEN

THE GREAT LAKES WATER AUTHORITY
INDUSTRIAL WASTE CONTROL GROUP
9300 W. JEFFERSON, STE. 210
DETROIT, MICHIGAN 48209 (THE GLWA)

AND

COMPANY NAME INC.
00000 STREET
CITY, MI 48XZS (THE COMPANY)

WHEREAS, THE GLWA IS THE CONTROL AUTHORITY RESPONSIBLE FOR ADMINISTERING AND ENFORCING THE FEDERAL PRETREATMENT REGULATIONS AND WHEREAS THE GLWA HAS CITED THE COMPANY FOR DISCHARGING COMPOUND IN VIOLATION OF ONE OR MORE OF THE POLLUTION LAWS CITED IN:

( ) GLWA Rules
( ) FEDERAL CATEGORICAL PRETREATMENT STANDARDS
( ) WASTEWATER DISCHARGE PERMIT NO:123-ADFGH-IU

Description of Violation(s):

The GLWA has identified your facility as a significant source of xxxx compounds based on either self-monitoring or GLWA sampling data and notified your facility on <DATE> to reduce and/or eliminate XXX compounds from the wastewater discharge. Your facility failed to comply with the requirements. To continue discharge wastewater incompliance with the wastewater discharge permit, the Company agree to the following terms and conditions:

Corrective Action(s):

1) {DECRIBE}

2) {DESCRIBE ADDITIONAL SELF-MONITORING REQUIREMENTS (IF REQUIRED)}

3) {PROVIDE ADDITIONAL REQUIREMENTS FOR STATUS REPORTS OR CONFERENCES}

4) The Company shall submit a copy of the {DESCRIBE ADDITIONAL DOCUMENTATION REQUIREMENTS AS REQUIRED}

5) During the course of this Agreement, any reports or correspondence are to be submitted to the Department at the following address:

Great Lakes Water Authority
Industrial Waste Control Group
9300 W. Jefferson, Suite#210

Detroit, Michigan 48209
Attention: Mr _____
Telephone Number: (313) 297-58xx

6) This agreement expires on {DATE}. Failure to comply with this Agreement shall constitute further violation of the GLWA Rules and may subject INDUSTRY NAME to judicial or criminal penalties or such other escalated enforcement action as may be appropriate.

THE GLWA RESERVES THE RIGHT TO TERMINATE THIS COMPLIANCE AGREEMENT AND ESCALATE THE ENFORCEMENT ACTION, IF SATISFACTORY COMPLIANCE IS NOT ACHIEVED.

THE GLWA RESERVES THE RIGHT TO USE ANY AND ALL COLLECTED DATA AND EVIDENCE AGAINST THE COMPANY IN ANY JUDICIAL LITIGATION.

THIS AGREEMENT DOES NOT PRECLUDE ANY ACTION, WHICH MAY BE TAKEN BY THE FEDERAL OR STATE AGENCIES.

_____ _____

Department Representative (signature) Company Representative (signature)

_____ AUTHORIZED REPRESENTATIVE

Name/Title (print) Name/Title (print)

Date: _____ Date: _____

TE/XX

CERTIFIED MAIL
Date: DATE
Permit No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Dear CONTACT NAME

NOTICE OF VIOLATION AND CITATION

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND NOTICE ISSUED PURSUANT TO SECTION II-1003 OF THE GLWA RULES AND THE GENERAL PRETREATMENT REGULATIONS 40 CFR PART 403. THIS NOTICE IS BASED ON FINDINGS OF THE VIOLATION OF THE CONDITIONS OF THE WASTEWATER DISCHARGE PERMIT ISSUED UNDER SECTION II OF THE GLWA RULES.

FINDINGS

1) INDUSTRY NAME, located at ADDRESS, Michigan, discharges non-domestic wastewater containing toxic pollutants into the GLWA Sewer System.
2) INDUSTRY NAME, located at ADDRESS in CITY, Michigan, is a "Significant Industrial User", as defined by the GLWA RULES and 40 CFR Part 403 and [NCPS IF APPLICABLE].
3) INDUSTRY NAME, located at ADDRESS in CITY, Michigan has established a pattern of violation meeting one of more criteria listed in Section I-1004 of the GLWA Rules as specified on the attached Citation Form {ADD CITATION FORM AND DOCUMENTATION}.

NOTICE

THEREFORE BASED ON THE ABOVE FINDINGS, {INDUSTRY NAME} IS IN VIOLATION OF ITS WASTEWATER DISCHARGE PERMIT NO. 123-#####-IU, AND ASSESS THE FOLLOWING FINES IN ACCODANCE WITH THE GLWA RULES, AND IS REQUIRED TO:

1) Tender payment in the amount of $ _____ within _____ days to the GLWA in satisfaction of the citation amount.
2) {PROVIDE ANY ADDITIONAL CORRECTIVE ACTIONS REQUIRED AND TIME FRAME FOR SUBMISSION}

Should you have any questions, please call ENGINEER NAME at (313) PHONE NUMBER.

YOUR FAILURE TO RESPOND TO THIS NOTICE WILL SUBJECT YOU TO FURTHER ENFORCEMENT ACTION AS PROVIDED IN THE GLWA RULES.

_____
Stephen J. Kuplicki, P.E. J.D.
Operations Manager
Industrial Waste Control Group

{Attach Citation Form}

GLWA Citation Form

Citation Number: _____ Permit Number _____

Issued To: INDUSTRY NAME

Address: Industry Address

Date(s) of Occurrence:

Describe Violation:

Violation Type	Criteria	Event	First Violation	Succeeding Violation	Enter Number of Occurences	Total Amount Due
Reporting Violation	>45 days after specified due date	Any occurrence	$250.00	$500.00		
Notification Violation	>24 hrs. beyond specified time	Any occurrence	$100.00	$250.00		
Effluent Violation	Pollutant parameter exceeds applicable TRC (See Article XII)	Daily Maximum	$100.00	$250.00		
Effluent Violation	Pollutant parameter exceeds applicable TRC (See Article XII)	Monthly Average	$250.00	$500.00		
Effluent Violation	Pollutant parameter exceeds applicable chronic criteria (See Article XII)	Daily Maximum	$250.00	$500.00		
Effluent Violation	Pollutant parameter exceeds applicable chronic criteria (See Article XII)	Monthly Average	$500.00	$1,000.00		
Effluent Violation	Stipulated penalty as part of administrative enforcement	Daily Maximum	$250.00	$500.00		
Effluent Violation	Stipulated penalty as part of administrative enforcement	Monthly Average	$500.00	$1,000.00		
				Total Due:		

Citation is due 30 days after issuance

Approved By: _____

Date: <DATE>

Facility Contact Name
Facility Name
Facility Address
City, MI ZipCode

Facility Contact Name
Facility Name
Facility Address
City, MI ZipCode

Unilateral Administrative Order 20yy-abcd

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND NOTICE ISSUED PURSUANT TO THE GLWA RULES (HEREINAFTER "RULES") AND THE GENERAL PRETREATMENT REGULATIONS 40 CFR PART 403.

WHEREAS the GLWA has been designated as the Control Authority under its NPDES Permit MI0022802 for implementation and enforcement of its Industrial Pretreatment Program ("IPP") to comply with R 323.2301 through R 323.2317 of the Michigan Administrative Code, the General Pretreatment Regulations for Existing and New Sources of Pollution (40 CFR 403); and

WHEREAS the Rules declare it unlawful for users to discharge wastewater to the POTW that cause or contributes toward a pass-through violation; and

WHEREAS the Rules declare it unlawful for users to discharge wastewater without a Wastewater Discharge Permit; and

WHEREAS the discharge of wastewater to the GLWA's POTW without the approval, authorization or acceptance by GLWA is an illegal and unauthorized discharge and subject to immediate suspension of service.

Findings of Fact

1. [Describe factual background] …….

Conclusions of Fact and Law

1. The Users are in violation of the GLWA Rules, for failing to report wastewater constituents in the User's discharge.

2. The Users are in violation of the GLWA Rules, Discharge of pollutants that will cause pass-through at the POTW (either singly or in conjunction with a discharge or discharges from other sources);

3. The Users are in violation of the GLWA Rules, Discharge of toxic pollutants that would cause pass-through at the POTW (either singly or in conjunction with a discharge or discharges from

other sources);

4. The Users are in violation of the GLWA Rules, Discharge of toxic pollutants that cause a public nuisance or hazard to life, either singly or in conjunction with a discharge or discharges from other sources.

ADD ADDITIONAL FACTS

Administrative Order

GLWA issues this Administrative Order:

1. The Users are not authorized to discharge wastewater of any type through the [Describe facts and circumstances]

2. Notwithstanding paragraph #1, On or before DATE, the Users named herein are required to cease and desist discharging unauthorized wastes and wastewater as described above. As evidence thereof, each party shall submit a sworn affidavit stating compliance with this order and the cessation of all unauthorized wastes and wastewater through the drain. *This provision is subject to field confirmation by GLWA.*

3. The party(ies) may request a hearing of this Administrative Order before the GLWA Chief Compliance Officer by filing a request for Reconsideration/Appeal in accordance with the GLWA Rules.

4. In the event that the Users do not comply with this Administrative Order, the GLWA reserves the right to seek all legal remedies to enforce its terms and enjoin the wastewater discharges made into the sewerage system.

ADD ADDITIONAL ORDERS

Should you have any questions, please call Engineer Name at (313) Engineer Phone

YOUR FAILURE TO COMPLY WITH THIS ORDER WILL SUBJECT YOU TO FURTHER ENFORCEMENT ACTION AS PROVIDED IN CITY OF DETROIT RULES.

Stephen J. Kuplicki, P.E. J.D.
Operations Manager

Date: <DATE>

Facility Contact Name
Facility Name
Facility Address
City, MI ZipCode

Facility Contact Name
Facility Name
Facility Address
City, MI ZipCode

Administrative Consent Order 20yy-abcd

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND NOTICE ISSUED PURSUANT TO THE GLWA RULES (HEREINAFTER "RULES") AND THE GENERAL PRETREATMENT REGULATIONS 40 CFR PART 403.

WHEREAS the GLWA has been designated as the Control Authority under its NPDES Permit MI0022802 for implementation and enforcement of its Industrial Pretreatment Program ("IPP") to comply with R 323.2301 through R 323.2317 of the Michigan Administrative Code, the General Pretreatment Regulations for Existing and New Sources of Pollution (40 CFR 403); and

WHEREAS the Rules declare it unlawful for users to discharge wastewater to the POTW that cause or contributes toward a pass-through violation; and

WHEREAS the Rules declare it unlawful for users to discharge wastewater without a Wastewater Discharge Permit; and

WHEREAS the discharge of wastewater to the GLWA's POTW without the approval, authorization or acceptance by GLWA is an illegal and unauthorized discharge and subject to immediate suspension of service.

Findings of Fact

1. [Describe factual background] …….

Conclusions of Fact and Law

1. The Users are in violation of the GLWA Rules, for failing to report wastewater constituents in the User's discharge.

2. The Users are in violation of the GLWA Rules, Discharge of pollutants that will cause pass-through at the POTW (either singly or in conjunction with a discharge or discharges from other sources);

3. The Users are in violation of the GLWA Rules, Discharge of toxic pollutants that would cause pass-through at the POTW (either singly or in conjunction with a discharge or discharges from

other sources);

4. The Users are in violation of the GLWA Rules, Discharge of toxic pollutants that cause a public nuisance or hazard to life, either singly or in conjunction with a discharge or discharges from other sources.

ADD ADDITIONAL FACTS

Administrative Order

GLWA issues this Administrative Order:

1. The Users are not authorized to discharge wastewater of any type through the [Describe facts and circumstances]

2. Notwithstanding paragraph #1, On or before DATE, the Users named herein are required to cease and desist discharging unauthorized wastes and wastewater as described above. As evidence thereof, each party shall submit a sworn affidavit stating compliance with this order and the cessation of all unauthorized wastes and wastewater through the drain. *This provision is subject to field confirmation by GLWA.*

3. The party(ies) may request a hearing of this Administrative Order before the GLWA Chief Compliance Officer by filing a request for Reconsideration/Appeal in accordance with the GLWA Rules.

4. In the event that the Users do not comply with this Administrative Order, the GLWA reserves the right to seek all legal remedies to enforce its terms and enjoin the wastewater discharges made into the sewerage system.

ADD ADDITIONAL ORDERS

Should you have any questions, please call Engineer Name at (313) Engineer Phone

YOUR FAILURE TO COMPLY WITH THIS ORDER WILL SUBJECT YOU TO FURTHER ENFORCEMENT ACTION AS PROVIDED IN CITY OF DETROIT RULES.

_____	_____
Department Representative (signature) (signature)	Company Authorized Representative (signature)
_____	_____
Name/Title (print)	Name/Title (print)
Date: _____	Date: _____

CERTIFIED MAIL

Date: <ENTER DATE>
Facility No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

SHOW CAUSE ORDER

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND THE ORDER ISSUED PURSUANT TO SECTION 403.8 (f) (1) (iv) (B) OF THE GENERAL PRETREATMENT REGULATION 40 CFR 403, AND Section II-1004 (f) of the GLWA Rules.

FINDINGS

1) INDUSTRY NAME ("Company"), located at <Address>, Michigan <ZipCode>, discharges non-domestic wastewater containing pollutants into the sanitary sewer system under the jurisdiction of the GREAT LAKES WATER AUTHORITY ("AUTHORITY").

2) INDUSTRY NAME, is a "Categorical Industrial User" as defined by applicable law, including but not limited to Chapter I of the GLWA RULES and the General Pretreatment Regulations 40 CFR 403.

3) INDUSTRY NAME, operates the facility and discharges wastewater subject to the terms and conditions of a Wastewater Discharge Permit with effective DATE.

4) INDUSTRY NAME submitted a permit application to the AUTHORITY on DATE. The AUTHORITY rejected the permit application, finding that (i) INDUSTRY NAME had continuing [POLLUTANT NAME] violations; (ii) failed to identify the characteristics of its wastewater; and (iii) failed to accurately report flowrates of materials discharged.

5) INDUSTRY NAME attended a conference on DATE and verbally indicated its plans to [DESCRIBE]

{ADD ADDITIONAL FACTS}

ORDER

THEREFORE BASED ON THE ABOVE FINDINGS, INDUSTRY NAME LOCATED AT ADDRESS, CITY, MICHIGAN ZIPCODE IS HEREBY ORDERED TO:

1) Appear for a SHOW CAUSE HEARING at the Industrial Waste Control Group at 9300 West Jefferson, Detroit, Michigan 48209 scheduled for DATE at _____ AM.

2) At this SHOW CAUSE HEARING, INDUSTRY NAME must demonstrate why the Great Lakes Water Authority should not:

a. Seek judicial enforcement action against INDUSTRY NAME to compel the submission of a compliance schedule including the investment of capital and operating funds to carry out these improvements;
b. Seek judicial enforcement action against INDUSTRY NAME to compel the payment of future daily penalties of $_____ per day until such time as INDUSTRY NAME can demonstrate minimum compliance for the parameter [Pollutant] for at least One Hundred Eighty Days (180) forward;
c. Seek judicial enforcement action against INDUSTRY NAME, that if INDUSTRY NAME cannot comply with the aforementioned items, why DWSD should not seek relief to permanently enjoin INDUSTRY NAME from the Regional Sewer System and cease all discharges to the System.

3) Representatives of INDUSTRY NAME may be accompanied by legal counsel if they so choose.

4) Failure to comply with this Order shall also constitute a further violation of the GLWA RULES and may subject INDUSTRY NAME to civil or criminal penalties or such enforcement responses as may be appropriate.

5) This Order shall be effective upon receipt by INDUSTRY NAME.

Sincerely,

Stephen J. Kuplicki, P.E., J. D.
Operations Manager
Industrial Waste Control Group

CERTIFIED MAIL
Date: <ENTER DATE>
Facility No.: INDUSTRY NUMBER

CONTACT NAME
INDUSTRY NAME
CONTACTADDR1
CONTACTCITY, STATE ZIP

Cease and Desist & Permit Revocation Order

LEGAL AUTHORITY

THE FOLLOWING FINDINGS ARE MADE AND THE ORDER ISSUED PURSUANT TO SECTION 403.8 (f) (1) (vi) (B) OF THE GENERAL PRETREATMENT REGULATION 40 CFR 403, AND UNDER SECTION II-1004 (g) of the GLWA RULES

FINDINGS

INDUSTRY NAME ("Company"), located at CONTACTADDR1, CONTACTCITY, Michigan ZipCode, discharges non-domestic wastewater containing pollutants into the sanitary sewer system under the jurisdiction of the Great Lakes Water Authority or GLWA ("Authority").

1) INDUSTRY NAME, is a "Significant Industrial User" as defined by applicable law, including but not limited to section I of the GLWA Rules and the General Pretreatment Regulations 40 CFR 403.

2) INDUSTRY NAME, operates the facility at CONTACTADDR1 CONTACTCITY, Michigan ZipCode and discharges non-domestic wastewater subject to the requirements, conditions, restrictions and other limitations specified in the Wastewater Discharge Permit No. 003-XDFRE-IU issued on DATE.

3) On DATE, the Authority received complaints of a [DESCRIBE ISSUE]. INDUSTRY NAME was identified as the source of a materials release [DESCRIBE] and continued until verbally ordered to Cease & Desist by representatives of the Authority on DATE.

4) The materials release by INDUSTRY NAME caused a public nuisance within the POTW, violating the Wastewater Discharge Permit No. 003-XDFRE-IU and the GLWA Rules.

5) INDUSTRY NAME., is in violation of Wastewater Discharge Permit No. 003-XDFRE-IU and the GLWA Rules by releasing a material slug, as described in Item 4, in sufficient quantity as to affect a significant portion within the POTW to which the release was made INDUSTRY NAME failed to notify the Authority of its slug discharge.

6) INDUSTRY NAME was found to be by-passing a section of its wastewater treatment equipment which is in violation of Wastewater Discharge Permit No. 003-XDFRE-IU and the GLWA Rules. INDUSTRY NAME failed to notify the Authority of its by-pass condition.

ORDER

THEREFORE BASED ON THE ABOVE FINDINGS, INDUSTRY NAME **LOCATED AT** CONTACTADDR1 CONTACTCITY, Michigan ZipCode**, SHALL:**

1. **CEASE AND DESIST ALL PROCESS WASTEWATER DISCHARGES INTO THE SEWER SYSTEM EFFECTIVE IMMEDIATELY.**
2. **THE WASTEWATER DISCHARGE PERMIT NO. 003-XDFRE-IU ISSUED TO** INDUSTRY NAME **IS HEREBY REVOKED AS OF DATE.**
3. **WITHIN TEN (10) DAYS,** INDUSTRY NAME**, SHALL PROVIDE A REPORT DESCRIBING THE OCCURRENCE AND HARMFUL CONTRIBUTION, AND WHAT STEPS, IF ANY, MAY BE TAKEN TO PREVENT ANY FUTURE RECURRENCE.**
4. INDUSTRY NAME **IS REQUIRED TO SUBMIT DOCUMENTS TO PROVE THAT THE WASTEWATER IS EITHER STORED AT THE FACILITY OR HAULED AWAY FROM THE FACILITY.**
5. **THE AUTHORITY WILL CONTINUE TO INSPECT THE FACILITY TO DETERMINE COMPLIANCE WITH THIS ORDER.**

IN ORDER TO REINSTATE THE WASTEWATER DISCHARGE PERMIT, DANA CONTAINERS INC. LOCATED AT CONTACTADDR1 CONTACTCITY, Michigan ZipCode **MAY REQUEST A HEARING BEFORE THE GLWA Compliance Officer OR HIS DESIGNATED REPRESENTATIVE. TO SCHEDULE THIS HEARING INDUSTRYNAME GOES HERE SHALL CONTACT EngineerName, AT (313) EngineerPhone, BETWEEN 8:00 AM TO 4:00 PM WITHIN TEN (10) WORKING DAYS EFFECTIVE <DATE>.** INDUSTRY NAME GOES HERE **SHALL CONFIRM THIS HEARING WITH THE AUTHORITY IN WRITING. AT ANY HEARING, THE GREAT LAKES WATER AUTHORITY THROUGH ITS LEGAL COUNSEL, SHALL TAKE ALL ACTIONS NECESSARY TO ASSURE COMPLIANCE WITH THIS ORDER, AND SEEK APPROPRIATE CIVIL AND/OR CRIMINAL FINES AND/OR PENALTIES AS AUTHORIZED BY LAW.**

THIS ORDER SHALL BE EFFECTIVE THIS _____ DAY OF _____, 20___ AND INDUSTRY NAME **LOCATED AT** CONTACTADDR1 CONTACTCITY, Michigan ZipCode**, SHALL COMPLY WITH THIS ORDER UPON RECEIPT.**

Sincerely,

Stephen J. Kuplicki, P.E. J.D.
Operations Manager IWC

GREAT LAKES WATER AUTHORITY
INDUSTRIAL WASTE CONTROL GROUP

ENFORCEMENT REFERRAL FORM (ERF) FOR CIVIL LITIGATION

From: MANAGEMENT PROFESSIONAL Date:

To : _____ Attorney No.: ERF-99-000……

==========

Co. Name: FacilityName
Co. Address: Facility Address
Contact Name: Facility Contact Name
Contact Title: General Manager

Permit # :02x-ghhhh
Process SIC # : 3471
Facility Discharges (GPD) : zz,zzz gpd
Telephone # : (313) abc-defg

Description of Violation(s)

Local/Federal Categorical Requirements : [Describe]

GLWA Rules Requirements: Same as above

Wastewater Discharge Permit Requirements: Same as above.

Comments: [SUMMARIZE BASIS OF REFERRAL INCLUDING VIOLATION(S) AT ISSUE AND REQUESTED RESULT OR OUTCOME]

Prepared By: ENGINEER

Reviewed By: MANAGEMENT PROFESSIONAL

Approved By: OPERATIONS MANAGER IWC

Attachments

GREAT LAKES WATER AUTHORITY
INDUSTRIAL WASTE CONTROL GROUP

ENFORCEMENT REFERRAL FORM (ERF) FOR CRIMINAL LITIGATION

From: MANAGEMENT PROFESSIONAL Date:

To : _____ Attorney No.: ERF-99-000……

==========

Co. Name: FacilityName
Co. Address: Facility Address
Contact Name: Facility Contact Name
Contact Title: General Manager

Permit # :02x-ghhhh
Process SIC # : 3471
Facility Discharges (GPD) : zz,zzz gpd
Telephone # : (313) abc-defg

Description of Violation(s)

Local/Federal Categorical Requirements : [Describe]

GLWA Rules Requirements: Same as above

Wastewater Discharge Permit Requirements: Same as above.

Comments: [SUMMARIZE BASIS OF REFERRAL INCLUDING VIOLATION(S) AT ISSUE AND REQUESTED RESULT OR OUTCOME]

Prepared By: ENGINEER

Reviewed By: MANAGEMENT PROFESSIONAL

Approved By: OPERATIONS MANAGER IWC

Attachments

ATTACHMENT B

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL

The Enforcement Response Guide is part of the overall Enforcement Respose Plan and is based upon the GLWA Rules, as amended and the GLWA IPP Procedures Manual to fully describe methods of investigation and procedures for identifying and taking Enforcement Responses.

Description of Terms - Personnel

MIWC	**Operations Manager - Industrial Waste Control Group**
MPRF	**Management Professional - Industrial Waste Control Group**
PENG	**Engineer - Industrial Waste Control Group**

Description of Terms - Other

No Harm to POTW	**The discharge has not resulted or contributed to POTW inhibition, interference, or pass-through**
Harm to POTW	**The discharge has resulted or contributed to POTW inhibition, interference, or pass-through**
CA	**Control Authority (GLWA)**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Unauthorized Discharge	Unpermitted Discharge	User unaware of requirement; No harm to POTW	None, if survey or permit application filed within 60 days of notice	**PENG**
			Notice of Violation if > 60 days	**PENG**
	Unpermitted Discharge	User unaware of requirement; Harm to POTW	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Cease & Desist Order or Show Cause Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Categorical &/or NonCategorical SIU	User unaware of requirement; No harm to POTW;	Notice of Violation	**MPRF**
			Unilateral Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Categorical &/or NonCategorical SIU	User unaware of requirement; Harm to POTW	Notice of Violation	**MPRF**
			Cease & Desist Order or Show Cause Order	**MIWC**
Discharges from Authorized and Unauthorized Users	All Sources	Harm to POTW and Criminal Intent	Notice of Violation	**MPRF**
			Cease & Desist Order	**MIWC**
			Criminal Litigation Referral	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge (Authorized)	Introduction of unauthorized wastestream	Permit Modification and/or application not filed	Notice of Violation	**PENG**
			Unilateral Administrative Order	**MIWC**
		Application not filed by due date	Cease & Desist Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Failure to report change in Sample Location or Methods All SIUs	Failure to notify; no exigent conditions	Notice of Violation	**MPRF**
			Conference	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Compliance Agreement or recommendation for ACO	**MPRF**
	Failure to report material or substantial change in facility or operations		Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Administrative Consent Order (ACO)	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge (Authorized)	Failure to submit timely permit re-application form	User terminates discharge by permit expiration date	None, based on confirming inspection w/I 30 days	**PENG**
			Permit Cancellation	**MPRF**
		Late submission of application and user requests to continue discharge	Notice of Violation	**MPRF**
			Administrative Order	**MIWC**
			Cease & Desist Order	**MIWC**
		Application form not submitted; User still discharging	Cease & Desist Order	**MIWC**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Failure to notify of slug, spill, upset, bypass, self-monitoring violation, other	Failure to notify	Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
	Failure to submit 90-day report (Categorical Only)		Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
			Cease & Desist Order	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge (Authorized)	Failure to submit Six Month Report	Deficient Report (unreported violations, improper sampling, etc.)	Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
		Failure to Report (>45 days) after due date	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Show Cause Order	**MIWC**
			Cease & Desist Order	**MIWC**
	Failure to meet other Permit Condition	Infrequent or isolated	Notice of Violation	**PENG**
		Recurring Pattern	NOV - Conference	**MPRF**
			Show Cause Order	**MIWC**
			Cease & Desist Order	**MIWC**
Discharge Violation (Sampling)	Exceedance of Daily Permit Limitation (any amount)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge Violation (Sampling)	Exceedance of Daily Permit Limitation (any amount)	Recurring Exceedance (No pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		Recurring Exceedance (Pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
		Recurring Exceedance (Pattern evident) & Triggers SNC Criteria	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Failure to sign (or properly) certify report		Notice of Violation	**PENG**
	Exceedance of Categorical Average Permit Limitation (any amount)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**
		Recurring Exceedance (No pattern evident)	Notice of Violation - Conference	**MPRF**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge Violation (Sampling)	Exceedance of Categorical Average Permit Limitation (any amount)	Recurring Exceedance (Pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
		Recurring Exceedance (Pattern evident) & Triggers SNC Criteria	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation	**MIWC**
	Exceedance of Instantaneous Limit (pH, Temp.)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**
		Recurring Exceedance (No pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		Recurring Exceedance (Pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge Violation (Sampling)	Exceedance of Instantaneous Limit (pH, Temp.)	Recurring Exceedance (Pattern evident) & Triggers SNC Criteria	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation	**MIWC**
Inspection Violations (Observed)	Failure to properly operate or maintain Pretreatment Facility	No violation of Pretreatment Limitations; infrequent & isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		Violation of Pretreatment Limitations; Infrequent & Isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		No violation of Pretreatment Limitations; Recurring or pattern	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Failure to properly operate or maintain Pretreatment Facility	Violation of Pretreatment Limitations; Recurring or pattern	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation	**MIWC**
	Wastestream is diluted in lieu of treatment	Non-intentional or accidental	Notice of Violation	**MPRF**
			Conference	**MPRF**
			Administrative Order	**MIWC**
		Intentional	Notice of Violation	**MPRF**
			Show Cause Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Entry Denial	Based on Report from Field Monitoring Crew or Inspector	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**
	Improper sampling procedure (Observed)	Based on Report from Field Monitoring Crew or Inspector	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Improper sampling procedure	Self-Monitoring	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Conference	**MPRF**
			Administrative Order	**MIWC**
	Inadequate recordkeeping	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
		Recurring or pattern	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
	Failure to report all self-monitoring results in addition to SMR requirements	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
		Recurring or pattern	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Failure to meet compliance date(s)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
		Recurring or pattern	Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**
	Failure to inform of Authorized Representative Change		Notice of Violation	**PENG**
	Reporting false information	SIU or SIU Employee - Unintentional	Notice of Violation	**PENG**
			NOV & Citation: Penalty	**MIWC**
			Show Cause Order	**MIWC**
		SIU or SIU Employee: intentional	Notice of Violation	**MPRF**
			Show Cause Order	**MIWC**
			Civil and/or criminal Litigation Referral	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Tampering with Control Authority Sampling Equipment	SIU or SIU Employee - Unintentional	Notice of Violation	**PENG**
			Show Cause Order	**MIWC**
		SIU or SIU Employee: intentional	Notice of Violation	**MPRF**
			Show Cause Order	**MIWC**
			Civil and/or criminal Litigation Referral	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
		TIMEFRAMES AND RESPONSES FOR ENFORCEMENT RESPONSE		
Effluent Violation - GLWA Data	**Initial or infrequent**	**Identify violation w/i 10 days of receiving compliance information**	**Initiate Enforcement within thirty (30) days of identification; Issue NOV**	
	Recurring or pattern of recurrence	**Identify recurring violation or pattern of recurrence w/i 10 days of receiving compliance information**	**Issue Notice of Violation and Recommend Citation within thirty (30) days of identification**	
Effluent Violation - User Data	**Data submitted as part of six-month report**	**Identify violations and report deficiencies w/i 30 days of receiving Six Month report**	**Issue Notice of Violation and Recommend Citation within ten (10) days of identification**	
	Other Data Submittals	**Identify violation w/i 10 days of receiving compliance information**	**Initiate Enforcement within thirty (30) days of identification; Issue NOV**	
	Recurring or pattern of recurrence	**Identify recurring violation or pattern of recurrence w/i 10 days of receiving compliance information**	**Issue Notice of Violation and Recommend Citation within thirty (30) days of identification**	

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
		TIMEFRAMES AND RESPONSES FOR ENFORCEMENT RESPONSE (Contd)		
Reporting Violation	**Six Month Report: Timeliness**	**Identify violations and report deficiencies w/i 30 days of receiving Six Month report**	**Issue Notice of Violation and Recommend Citation within ten (10) days of identification**	
		Review report for compliance and completeness	**Issue Notice of Violation and Recommend Citation within ten (10) days of identification**	
	Initial finding	**Identify violations and report deficiencies w/i 30 days of completing Inspection**	**Issue written notice within ten (10) days of identification**	

Great Lakes Water Authority – Enforcement Response Plan (ERP)

The Industrial Pretreatment Program is an *Enforcement* program and the requirements for developing an ERP must recognize that it includes (i) GLWA's Rules, as amended, (ii) GLWA's IPP Procedures Manual, as amended, and (iii) the Enforcement Response Guide (ERG) as a 3-part system of enforcement.

The following descriptions are provided to describe GLWA's Enforcement Response Plan compliance with the requirements of 40 CFR 403.8(f)(5) as follows.

> *(5) The POTW shall develop and implement an enforcement response plan. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of industrial user noncompliance. The plan shall, at a minimum:*
>
> (i) *Describe how the POTW will investigate instances of noncompliance;*
>
> GLWA has complied with this requirement with its Industrial Pretreatment Program Procedures Manual, dated October 6, 2022, as amended, which describes the inspection, monitoring, surveillance and data evaluation procedures used for enforcing the program.
>
> (ii) *Describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of industrial user violations and the time periods within which responses will take place;*
>
> The Enforcement Response Guide (attached) and Enforcement Procedures (Chapter 6) satisfy this requirement with the former providing a summary of the anticipated types of noncompliance expected to be encountered and the latter providing a broader description of these enforcement responses.
>
> (iii) *Identify (by title) the official(s) responsible for each type of response;*
>
> The Enforcement Response Guide (attached) and Enforcement Procedures (Chapter 6) satisfy this requirement with the former including Personnel responsible for the individual enforcement responses and the latter providing a broader description of these enforcement responses.
>
> (iv) *Adequately reflect the POTW's primary responsibility to enforce all applicable pretreatment requirements and standards, as detailed in 40 CFR 403.8 (f)(1) and (f)(2).*
>
> GLWA has complied with this requirement with its Enforcement Procedures (Chapter 6) of the Industrial Pretreatment Program Procedures Manual, dated October 6, 2022, as amended and the Enforcement Response Guide (attached).
>
> GLWA uses (i) Administrative Enforcement Actions, (ii) Judicial Enforcement Actions and (iii) Supplemental Enforcement Actions to enforce the terms and conditions of GLWA's rules, and applicable state and federal regulations as detailed in 40 CFR 403.8 (f)(1) and (f)(2).

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL

The Enforcement Response Guide is part of the overall Enforcement Respose Plan and is based upon the GLWA Rules, as amended and the GLWA IPP Procedures Manual to fully describe methods of investigation and procedures for identifying and taking Enforcement Responses.

Description of Terms - Personnel

MIWC	**Operations Manager - Industrial Waste Control Group**
MPRF	**Management Professional - Industrial Waste Control Group**
PENG	**Engineer - Industrial Waste Control Group**

Description of Terms - Other

No Harm to POTW	**The discharge has not resulted or contributed to POTW inhibition, interference, or pass-through**
Harm to POTW	**The discharge has resulted or contributed to POTW inhibition, interference, or pass-through**
CA	**Control Authority (GLWA)**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Unauthorized Discharge	Unpermitted Discharge	User unaware of requirement; No harm to POTW	None, if survey or permit application filed within 60 days of notice	**PENG**
			Notice of Violation if > 60 days	**PENG**
	Unpermitted Discharge	User unaware of requirement; Harm to POTW	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Cease & Desist Order or Show Cause Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Categorical &/or NonCategorical SIU	User unaware of requirement; No harm to POTW;	Notice of Violation	**MPRF**
			Unilateral Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Categorical &/or NonCategorical SIU	User unaware of requirement; Harm to POTW	Notice of Violation	**MPRF**
			Cease & Desist Order or Show Cause Order	**MIWC**
Discharges from Authorized and Unauthorized Users	All Sources	Harm to POTW and Criminal Intent	Notice of Violation	**MPRF**
			Cease & Desist Order	**MIWC**
			Criminal Litigation Referral	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge (Authorized)	Introduction of unauthorized wastestream	Permit Modification and/or application not filed	Notice of Violation	**PENG**
			Unilateral Administrative Order	**MIWC**
		Application not filed by due date	Cease & Desist Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Failure to report change in Sample Location or Methods All SIUs	Failure to notify; no exigent conditions	Notice of Violation	**MPRF**
			Conference	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Compliance Agreement or recommendation for ACO	**MPRF**
	Failure to report material or substantial change in facility or operations		Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Administrative Consent Order (ACO)	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge (Authorized)	Failure to submit timely permit re-application form	User terminates discharge by permit expiration date	None, based on confirming inspection w/I 30 days	**PENG**
			Permit Cancellation	**MPRF**
		Late submission of application and user requests to continue discharge	Notice of Violation	**MPRF**
			Administrative Order	**MIWC**
			Cease & Desist Order	**MIWC**
		Application form not submitted; User still discharging	Cease & Desist Order	**MIWC**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Failure to notify of slug, spill, upset, bypass, self-monitoring violation, other	Failure to notify	Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
	Failure to submit 90-day report (Categorical Only)		Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
			Cease & Desist Order	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge (Authorized)	Failure to submit Six Month Report	Deficient Report (unreported violations, improper sampling, etc.)	Notice of Violation	**PENG**
			NOV - Conference	**MPRF**
		Failure to Report (>45 days) after due date	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Show Cause Order	**MIWC**
			Cease & Desist Order	**MIWC**
	Failure to meet other Permit Condition	Infrequent or isolated	Notice of Violation	**PENG**
		Recurring Pattern	NOV - Conference	**MPRF**
			Show Cause Order	**MIWC**
			Cease & Desist Order	**MIWC**
Discharge Violation (Sampling)	Exceedance of Daily Permit Limitation (any amount)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge Violation (Sampling)	Exceedance of Daily Permit Limitation (any amount)	Recurring Exceedance (No pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		Recurring Exceedance (Pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
		Recurring Exceedance (Pattern evident) & Triggers SNC Criteria	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Failure to sign (or properly) certify report		Notice of Violation	**PENG**
	Exceedance of Categorical Average Permit Limitation (any amount)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**
		Recurring Exceedance (No pattern evident)	Notice of Violation - Conference	**MPRF**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge Violation (Sampling)	Exceedance of Categorical Average Permit Limitation (any amount)	Recurring Exceedance (Pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**
		Recurring Exceedance (Pattern evident) & Triggers SNC Criteria	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation	**MIWC**
	Exceedance of Instantaneous Limit (pH, Temp.)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement or recommendation for ACO	**MPRF**
		Recurring Exceedance (No pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		Recurring Exceedance (Pattern evident)	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation Referral	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Discharge Violation (Sampling)	Exceedance of Instantaneous Limit (pH, Temp.)	Recurring Exceedance (Pattern evident) & Triggers SNC Criteria	Notice of Violation	**MPRF**
			NOV & Citation: Penalty	**MIWC**
			Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation	**MIWC**
Inspection Violations (Observed)	Failure to properly operate or maintain Pretreatment Facility	No violation of Pretreatment Limitations; infrequent & isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		Violation of Pretreatment Limitations; Infrequent & Isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
		No violation of Pretreatment Limitations; Recurring or pattern	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Failure to properly operate or maintain Pretreatment Facility	Violation of Pretreatment Limitations; Recurring or pattern	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
			Civil Litigation	**MIWC**
	Wastestream is diluted in lieu of treatment	Non-intentional or accidental	Notice of Violation	**MPRF**
			Conference	**MPRF**
			Administrative Order	**MIWC**
		Intentional	Notice of Violation	**MPRF**
			Show Cause Order	**MIWC**
			Civil Litigation Referral	**MIWC**
	Entry Denial	Based on Report from Field Monitoring Crew or Inspector	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**
	Improper sampling procedure (Observed)	Based on Report from Field Monitoring Crew or Inspector	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**

ENFORCEMENT RESPONSE GUIDE

TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Improper sampling procedure	Self-Monitoring	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Conference	**MPRF**
			Administrative Order	**MIWC**
	Inadequate recordkeeping	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
		Recurring or pattern	Notice of Violation - Conference	**MPRF**
			Administrative Order	**MIWC**
	Failure to report all self-monitoring results in addition to SMR requirements	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
		Recurring or pattern	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**

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TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Failure to meet compliance date(s)	Infrequent or isolated	Notice of Violation	**PENG**
			Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
		Recurring or pattern	Notice of Violation - Conference	**MPRF**
			Compliance Agreement	**MPRF**
			Administrative Order	**MIWC**
	Failure to inform of Authorized Representative Change		Notice of Violation	**PENG**
	Reporting false information	SIU or SIU Employee - Unintentional	Notice of Violation	**PENG**
			NOV & Citation: Penalty	**MIWC**
			Show Cause Order	**MIWC**
		SIU or SIU Employee: intentional	Notice of Violation	**MPRF**
			Show Cause Order	**MIWC**
			Civil and/or criminal Litigation Referral	**MIWC**

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TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
Inspection Violations (Observed)	Tampering with Control Authority Sampling Equipment	SIU or SIU Employee - Unintentional	Notice of Violation	**PENG**
			Show Cause Order	**MIWC**
		SIU or SIU Employee: intentional	Notice of Violation	**MPRF**
			Show Cause Order	**MIWC**
			Civil and/or criminal Litigation Referral	**MIWC**

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TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
		TIMEFRAMES AND RESPONSES FOR ENFORCEMENT RESPONSE		
Effluent Violation - GLWA Data	**Initial or infrequent**	**Identify violation w/i 10 days of receiving compliance information**	**Initiate Enforcement within thirty (30) days of identification; Issue NOV**	
	Recurring or pattern of recurrence	**Identify recurring violation or pattern of recurrence w/i 10 days of receiving compliance information**	**Issue Notice of Violation and Recommend Citation within thirty (30) days of identification**	
Effluent Violation - User Data	**Data submitted as part of six-month report**	**Identify violations and report deficiencies w/i 30 days of receiving Six Month report**	**Issue Notice of Violation and Recommend Citation within ten (10) days of identification**	
	Other Data Submittals	**Identify violation w/i 10 days of receiving compliance information**	**Initiate Enforcement within thirty (30) days of identification; Issue NOV**	
	Recurring or pattern of recurrence	**Identify recurring violation or pattern of recurrence w/i 10 days of receiving compliance information**	**Issue Notice of Violation and Recommend Citation within thirty (30) days of identification**	

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TYPE OF NON-COMPLIANCE	NATURE OF NON-COMPLIANCE	NATURE OF VIOLATION	ENFORCEMENT RESPONSE(S)	PERSONNEL
TIMEFRAMES AND RESPONSES FOR ENFORCEMENT RESPONSE (Contd)				
Reporting Violation	**Six Month Report: Timeliness**	**Identify violations and report deficiencies w/i 30 days of receiving Six Month report**	**Issue Notice of Violation and Recommend Citation within ten (10) days of identification**	
		Review report for compliance and completeness	**Issue Notice of Violation and Recommend Citation within ten (10) days of identification**	
	Initial finding	**Identify violations and report deficiencies w/i 30 days of completing Inspection**	**Issue written notice within ten (10) days of identification**	