Wastewater Assessor Training

Before You Begin

Training Objective

Introduction

Legal Requirements

Assessment Schedule

Assessment Scenarios

www.ecamp-online.net

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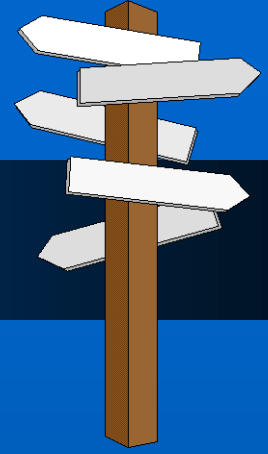
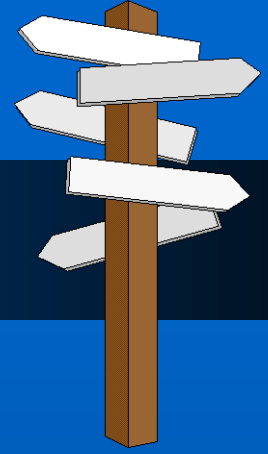
User Tips – Navigating



- **“Next” advances to the next slide**
- **“Home” returns to the first slide**

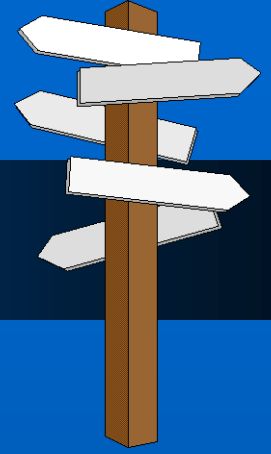
Next Home

Before You Begin



- **First complete the General Assessor Training module**
- **Download these slides to your computer**
- **Print a copy of the handout; you might find it useful while navigating through the presentation**

Printing Checklists



- **Print the relevant checklist for your assessment area from www.ecamp-online.net**
  - **Click View/Print Checklists under Misc on the Home Page or**
  - **Click Assessment Preparation from the menu on the left after you have logged in**

Assessor Training Objective

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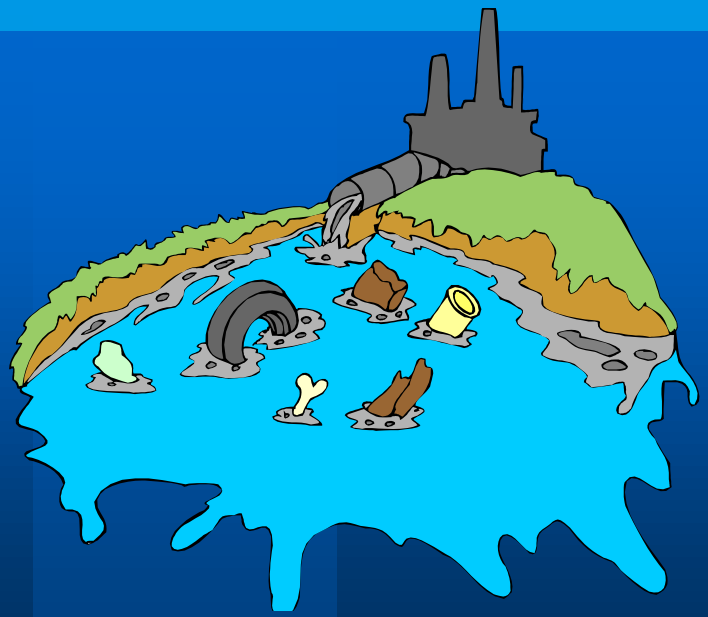
Training Objective

- **Primary purpose – prepare personnel assigned to highly enforceable protocols on external compliance assessments**
- **Secondary purpose – prepare personnel to participate on internal compliance assessments**

Assessment Emphasis

- **External compliance assessments emphasize state and federal requirements**
- **Links to state requirements will be available on the Assessment Preparation web page on www.ecamp-online.net**
- **Your Major Command (MAJCOM) Environmental, Safety, and Occupational Health Compliance Assessment and Management Program representative will give you information to access this site before the assessment**

Wastewater Management



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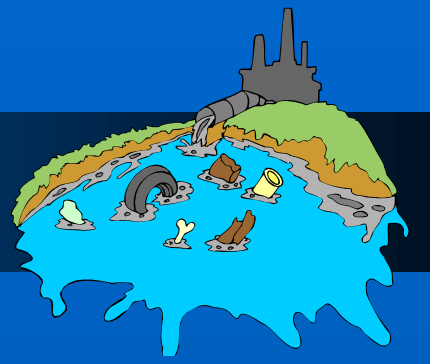
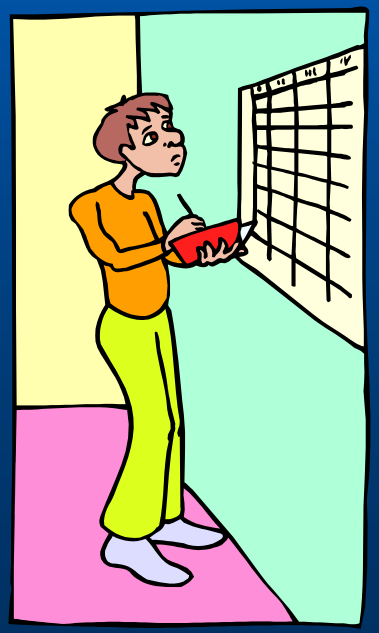
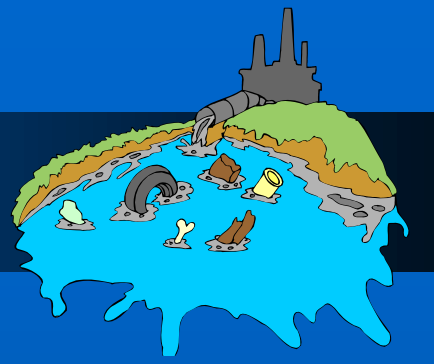
Topics in This Module



- Legal Requirements
- Assessor Assignments
- Protocol Elements
- Schedule
- Priorities
- Approach
- Scenarios
- Summary

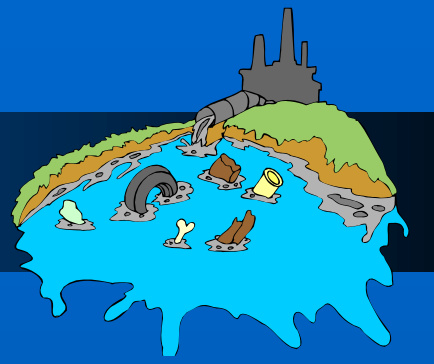


Legal Requirements



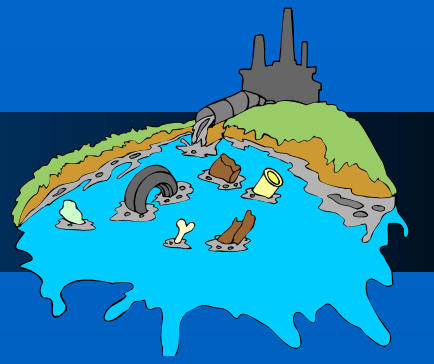
- **Clean Water Act (CWA) and state regulations implemented under CWA authority**
- **Air Force bases must also comply with U.S. Department of Defense and Air Force Instructions (AFIs) and policies on wastewater management**

Assessor Assignments



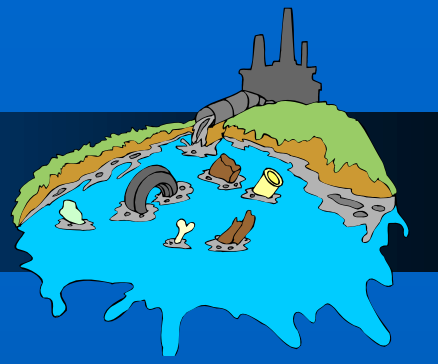
- Assessors are assigned to review protocol elements based on their interest and experience
- They must take responsibility for the completeness and consistency of the assessment of their assigned areas
- They must coordinate with one another at the end of each day to ensure that all elements of wastewater management have been reviewed

Protocol Elements



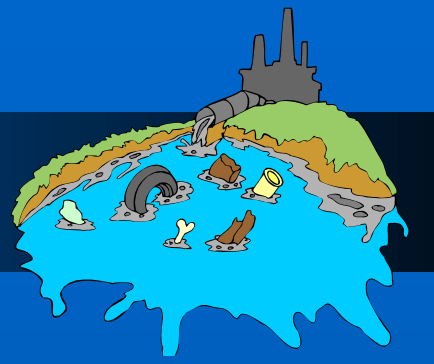
- **National Pollutant Discharge Elimination System (NPDES) permit program includes**
  - **Point source wastewater discharge permit**
  - **Point source storm water discharge permit**
  - **Nonpoint source storm water discharge permit for construction activities**
- **Oil/water separator (OWS) requirements**

Protocol Elements (cont.)



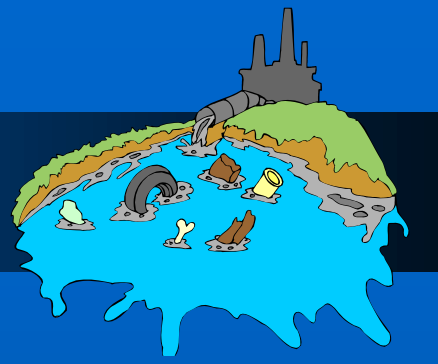
- **Other wastewater permit programs**
  - **Groundwater discharge permits (in some states)**
  - **Permit for indirect point source discharge through a publicly owned treatment works (POTW)**
  - **Compliance agreements or letters of administration**
  - **Biosolids disposal through land application**

Protocol Elements (cont.)



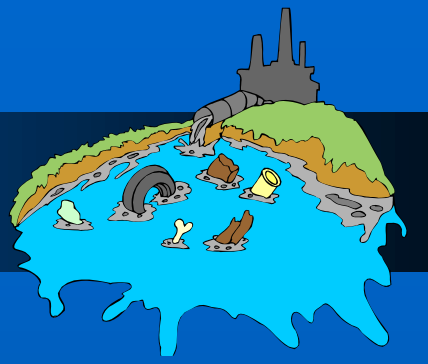
- **Typical permit requirements**
  - **Effluent monitoring records**
  - **Discharge monitoring reports (DMRs) and maintenance records**
  - **Laboratory state certification**
  - **Permit applications and renewals**
  - **State or POTW notifications**

Protocol Elements (cont.)



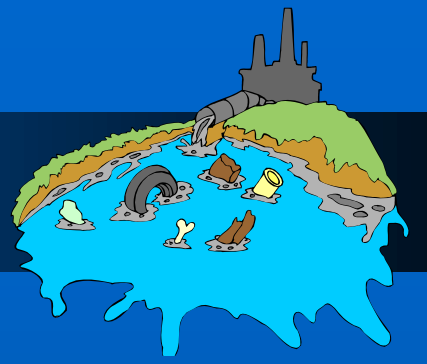
- **Wastewater collection system requirements**
  - **Proper operation and maintenance**
  - **Sewage lift station design**
  - **Excessive infiltration/inflow**
  - **State notification of system design changes**
- **Wastewater treatment system requirements**
  - **Operator certification records and logs**
  - **Operation and maintenance manual**

Training Focus

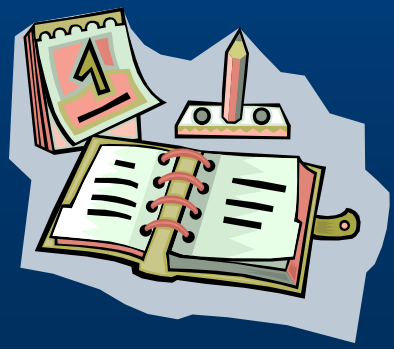


This training focuses on the review of wastewater effluent analyses, records, reports, notifications, and facility design and operations

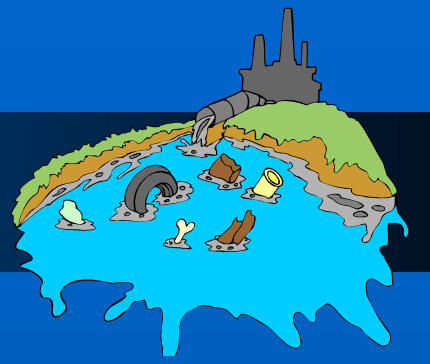
Assessment Schedule



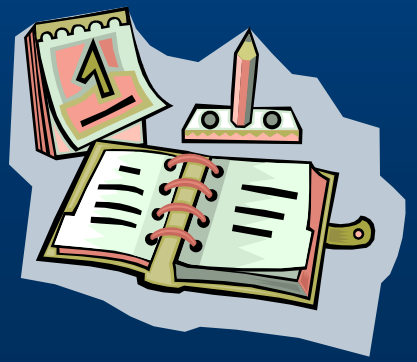
- **Specific assessment schedule varies by MAJCOM**
- **Before assessment begins**
  - **Coordinate with your partner on splitting assessment responsibilities**
  - **Assign sites to visit (examples are shown on the following slides)**



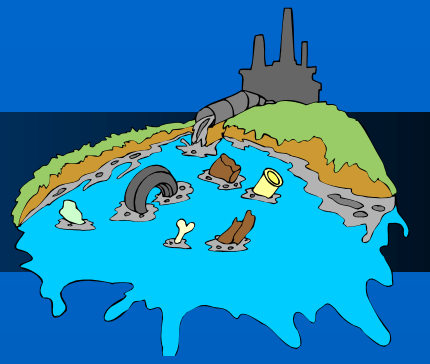
Assessment Day 1



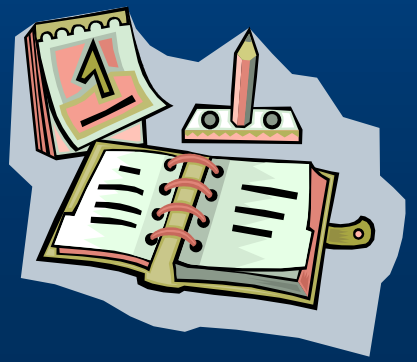
- **Interview Environmental Flight personnel responsible for the wastewater management program**
- **Examine base data, including permits, DMRs, and other records and recordkeeping and reporting procedures**



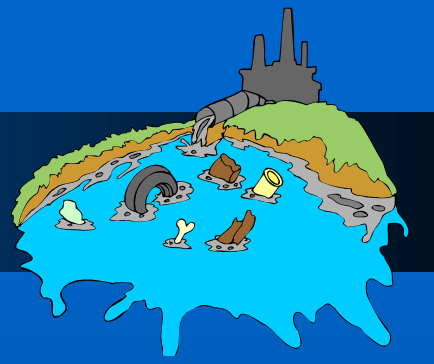
Assessment Day 2



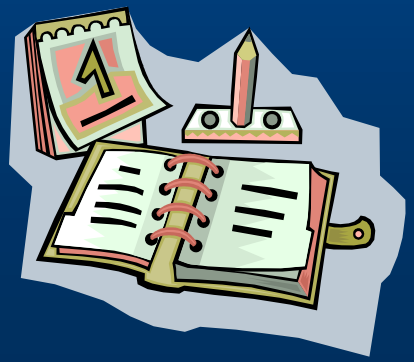
- **Interview Civil Engineering (CE) design personnel**
- **Review Storm Water Pollution Prevention Plan (SWPPP)**
- **Visit construction sites**
- **Visit outfalls**



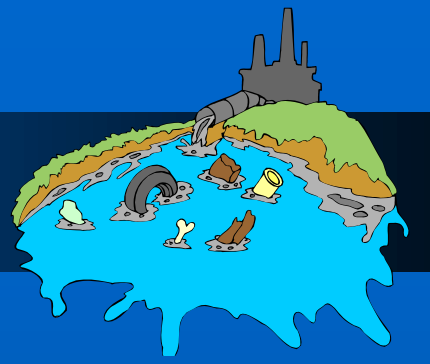
Assessment Day 3



- **Visit**
  - **CE Utilities and Water Shop**
  - **Wastewater lift stations**
  - **Wastewater Treatment Plant (WWTP)**
  - **OWSs**

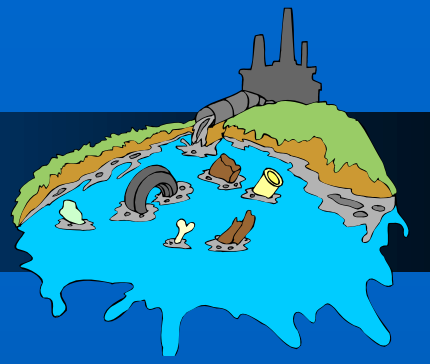


Assessment Priorities



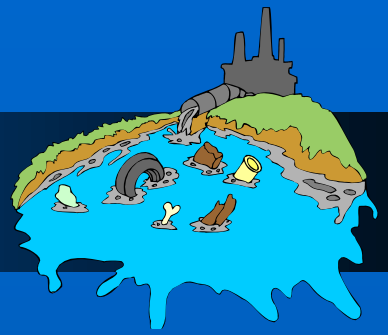
- **Enforceable federal and state legal requirements**
- **Not keeping these priorities in mind is the most common mistake external compliance assessors make**
- **Remember**
  - **Your state rules only apply in your state**
  - **Your procedures only apply to your base**

Assessment Approach



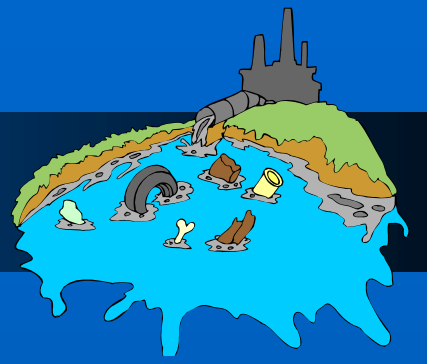
- **As authorized by the CWA, the NPDES permit program controls water pollution by regulating point sources that discharge pollutants into waters of the United States**
- **Therefore assessors must examine a base's point sources of wastewater such as pipes or manmade ditches**

Assessment Approach (cont.)



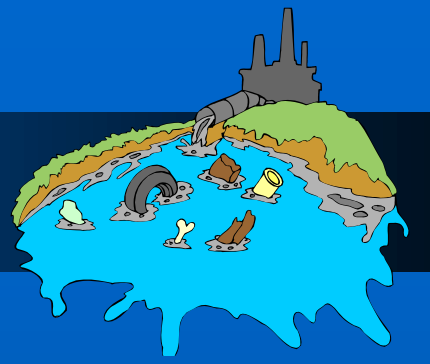
- **Become familiar with applicable definitions**
- **Review permits and plans**
- **Visit areas of wastewater management and treatment such as WWTP, lift stations, and OWSs**
- **Visit construction sites to evaluate storm water management**

Definitions



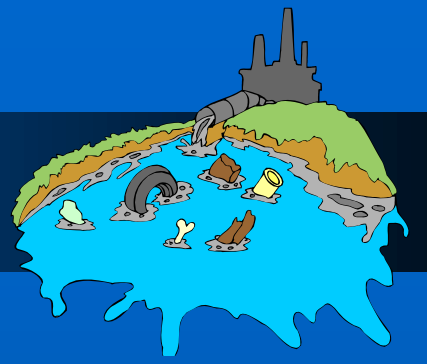
- **Familiarity with the following definitions is essential to identify wastewater findings**
  - **Pollutants**
  - **Point source**
  - **Waters of the United States**
  - **Waters of the state**

Pollutants



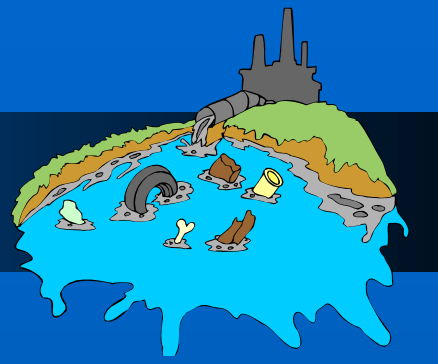
- **Pollutants are defined as dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water (33 *United States Code* 1362)**

Point Sources



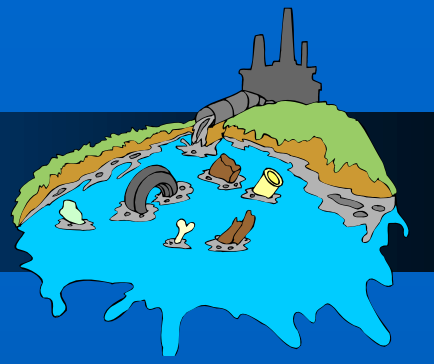
- **Point sources are defined as any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operations, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discarded [40 *Code of Federal Regulations* (CFR) 122.2]**

Waters of the United States



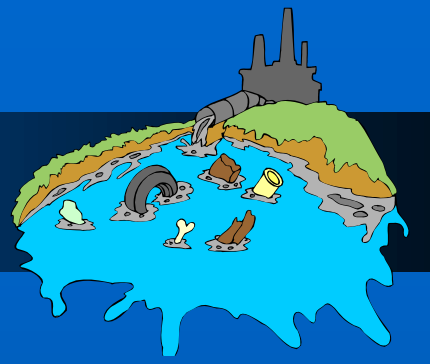
- **Waters of the United States are defined as all waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the ebb and flow of the tide; all interstate waters, including interstate “wetlands”; all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters that are or could be used by interstate or foreign travelers for recreational or other purposes (40 CFR 122.2)**

Waters of the State



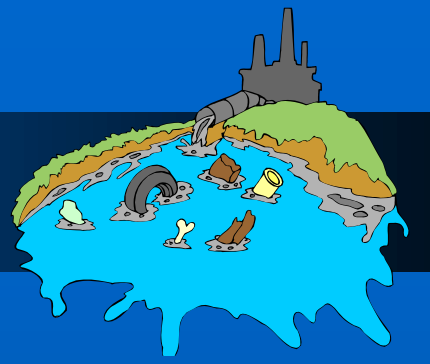
- **Some states, especially in the west, define groundwater as waters of the state and require a discharge permit to discharge to the groundwater**

Permit Review



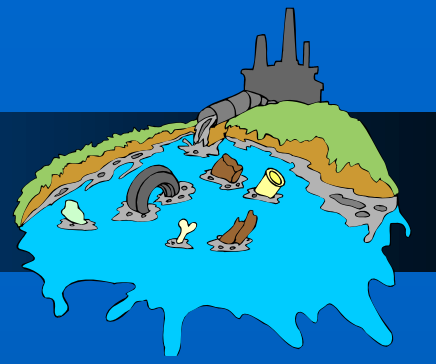
- **Review NPDES point source discharge permit records**
  - **Expiration date**
  - **Renewal application (if applicable)**
  - **Compare wastewater effluent analytical results with permit levels**
  - **Review DMRs for completeness and verify that they are kept the required amount of time**
  - **Verify timely submittal of DMRs**

Permit Review (cont.)

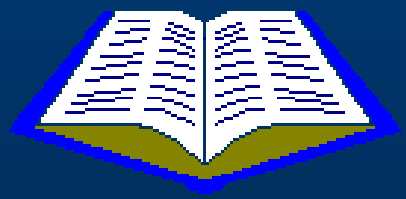


- **Review municipal industrial waste discharge ordinance**
- **Review industrial waste discharge permit to POTW**
  - **Expiration date**
  - **Renewal application (if applicable)**
  - **Verify compliance with permit conditions**

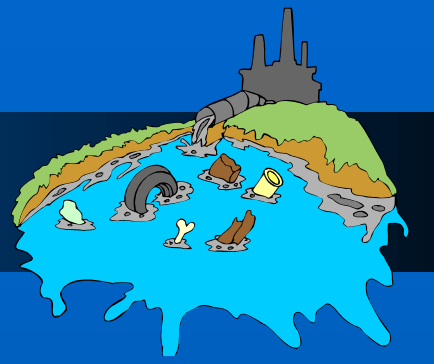
Review Industrial Activity SWPPP



- **Verify that the plan addresses all common requirements for SWPPP**
  - **Identifying major sources**
  - **Training**
  - **Inspections**
  - **Reporting**
  - **Spill logs, etc.**
- **Refer to the assessment checklist for specific provisions**

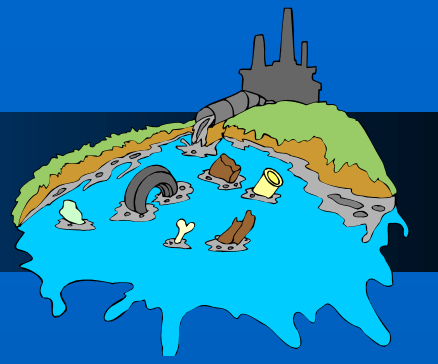


Plan Review

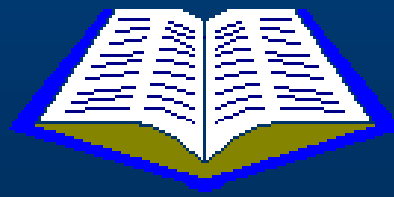


- **Review site-specific construction SWPPP to**
  - **Identify construction projects both planned and ongoing**
  - **Verify that each construction activity is covered by an NPDES permit by filing a Notice of Intent (NOI) for coverage of that site**
  - **Verify that best management practices (BMPs) have been identified for construction projects**
  - **Verify that BMPs have been implemented at construction sites**

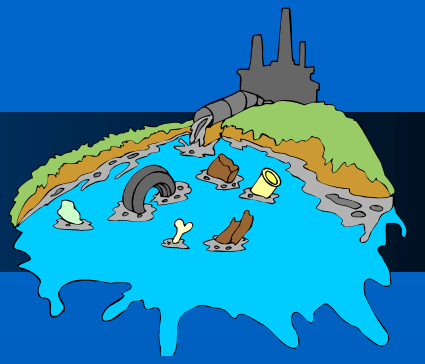
Review Small MS4



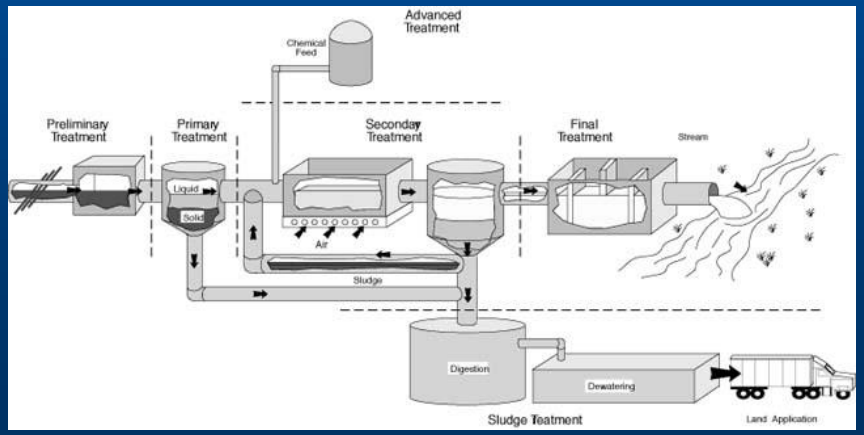
- **Verify that the plan addresses public participation and public education**
- **Verify Small Municipal Separate Storm Sewer System (MS4) assessment checklist requirements are met**



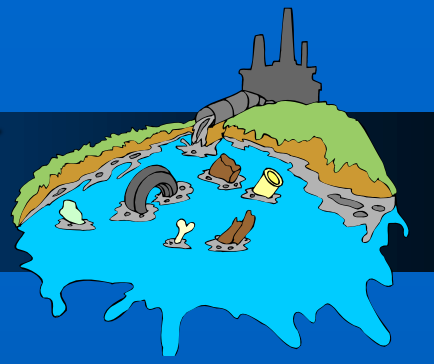
Wastewater System Review



- **Wastewater plans and specifications**
  - **State approval of wastewater system**
  - **State notifications of system changes**

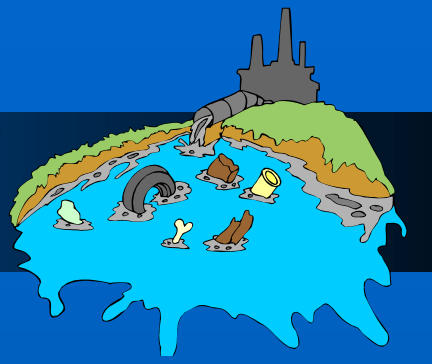


Wastewater System Review (cont.)

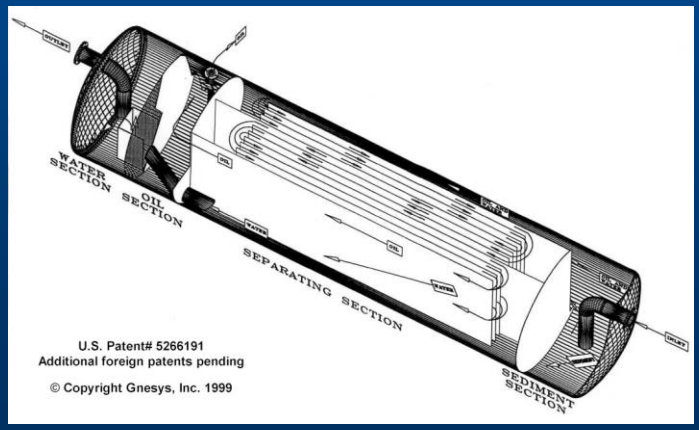


- **Wastewater collection system**
  - **Sewage lift stations**
  - **Treatment plant**
  - **Infiltration/inflow records**
  - **Outfalls**

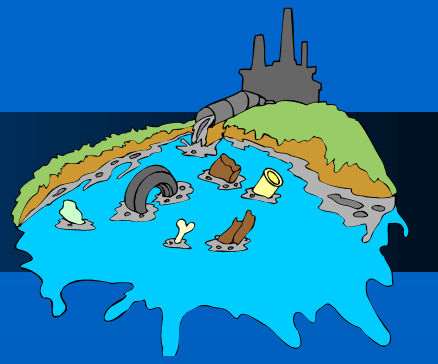
Wastewater System Review (cont.)



- **OWSs**
  - **Review OWS studies**
  - **Evaluate functionality**

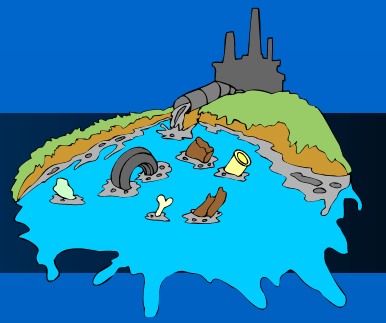


Assessment Scenarios

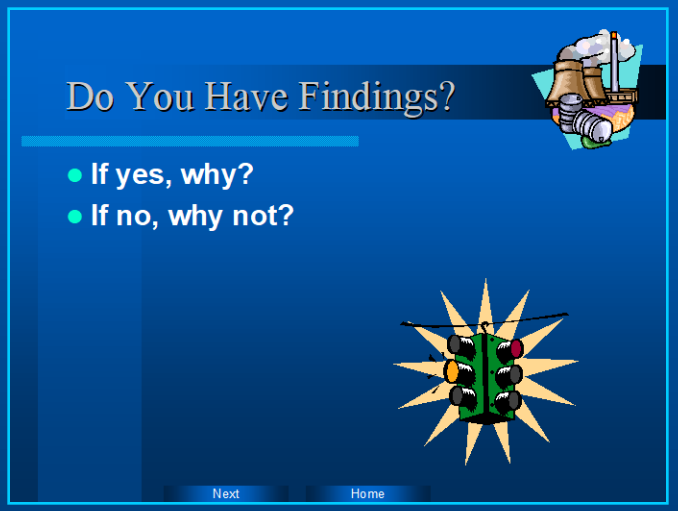


- **Assessment scenarios that follow this slide are organized around**
  - **Organizations to interview**
  - **Activities to visit**
- **Interviews with individual organizations may address several wastewater issues**
- **Activities are specific to the management of a specific wastewater source**

Assessment Scenarios (cont.)



- **Each scenario has a slide like the one on the right to give you an opportunity to pause**
- **Draw your conclusions before proceeding to an explanation**



Next Home

Environmental Flight Interview

Next

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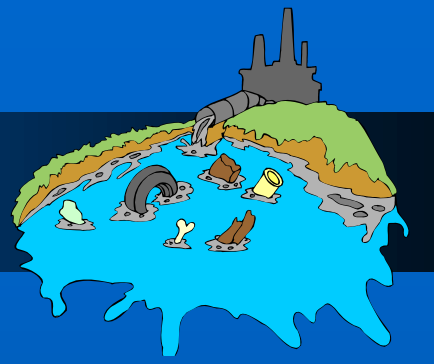
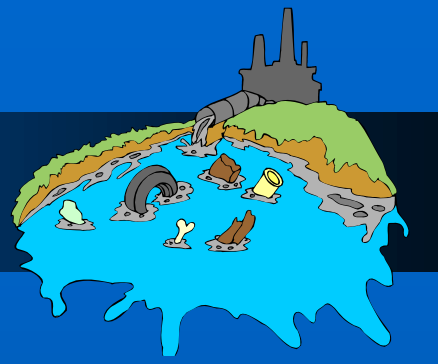
Environmental Flight Interview



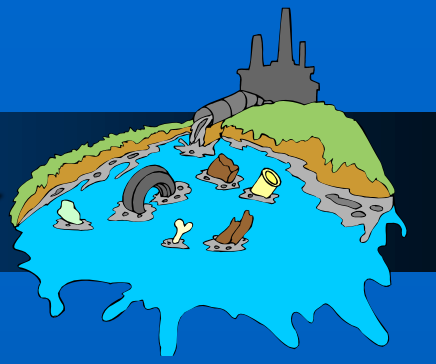
- **Determine who is responsible for the wastewater management program**
- **Determine who maintains the required wastewater records (Environmental Flight, Water shop, Utilities, etc.)**

Interview (cont.)



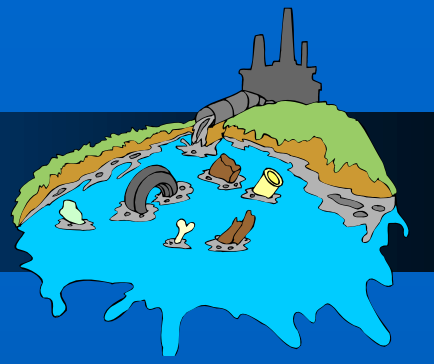
- **Identify all required wastewater-related permits**
  - **NPDES domestic or industrial waste point source discharge**
  - **Industrial wastewater pretreatment permit**
  - **Groundwater discharge permit**
  - **Biosolids land application permit**
  - **NPDES storm water general, multi-sector, or individual permit**
  - **Small MS4 general permit**

Selected Records to Review



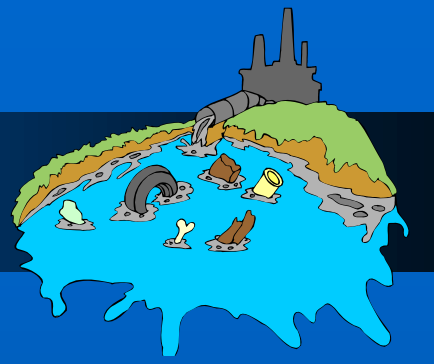
- All permits and their requirements
- Analytical results of effluent water quality monitoring
- State/U.S. Environmental Protection Agency (EPA) routine periodic reports
- State/EPA special (nonroutine) reports
- Infiltration/inflow studies
- SWPPP inspections and BMPs
- DMR submittal date and records

What If You Discover?

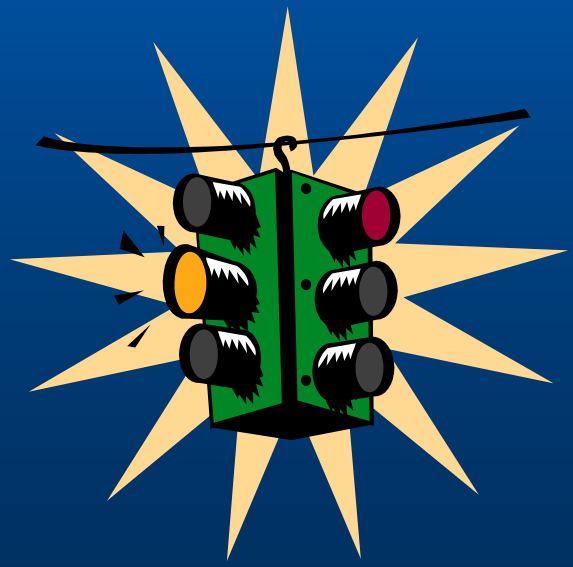


- **No record of DMRs being postmarked by the 15th of the month after monitoring**
- **Incomplete DMR records**
- **DMR records not signed by an authorized representative**
- **Significant industrial user (SIU) not reporting**

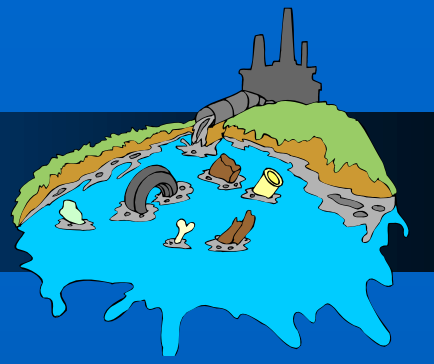
Do You Have A Finding?



- **Is lack of documentation on monthly DMRs sent to the state a finding**
  - **If yes, why?**
  - **If no, why not?**

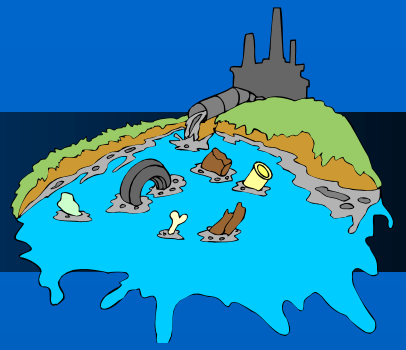


Late DMR Submittal



- **40 CFR 122.41(l)(4) requires DMRs to be submitted on time to the regulatory agency**
- **The state-issued NPDES permit requires that the state receive DMRs by the 15th of the month following the month the results are received**

Late DMR Submittal (cont.)



- **Refer to TEAM Guide Reference Number WW.2.5.1 or state requirement**
- **Document this finding as late submittal of the DMR**
- **Double-click on the icon to view an example finding**

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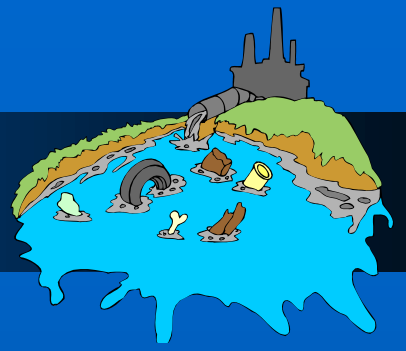
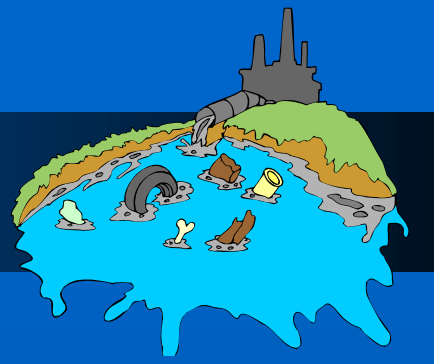
Late DMR Submittal (cont.)

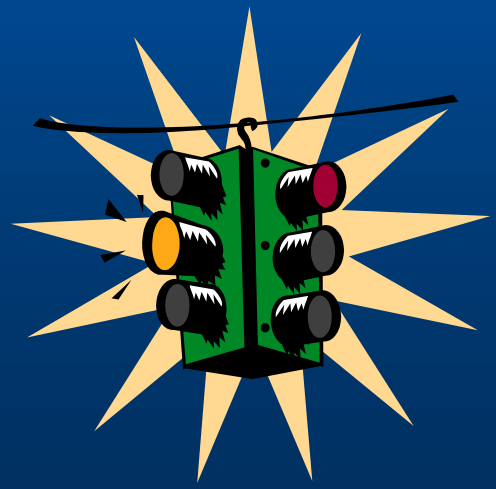


- **Why is late submittal a finding? The DMRs may have been sent even though documentation of it is not available**
- **This is a finding because of the uncertainty of whether they were received on time**

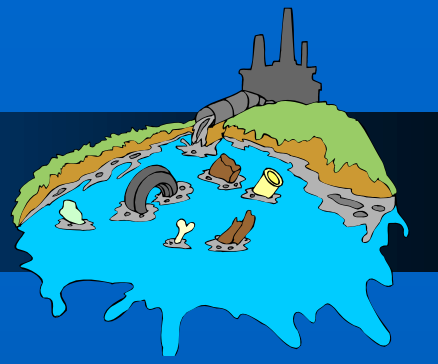
Do You Have A Finding?



- **Is submitting the NPDES permit renewal application to EPA by certified mail return receipt a full 3 months before its expiration a finding**
  - **If yes, why?**
  - **If no, why not?**

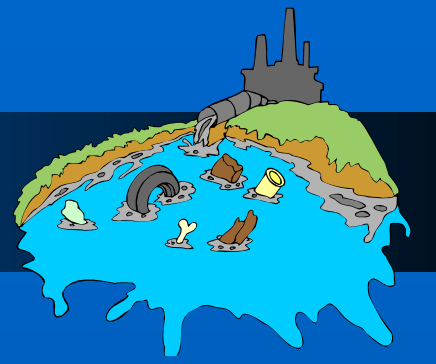


Late Application Submittal



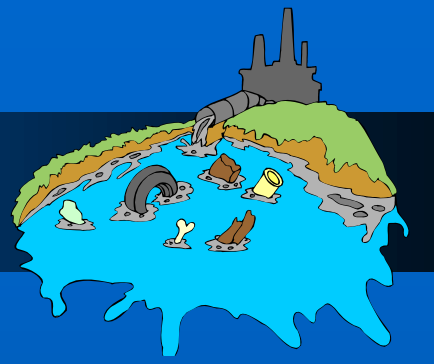
- **40 CFR 122.21(d)(2) requires that a new NPDES application be submitted within 180 days before the expiration date of an existing NPDES permit**

Late Submittal of Renewal

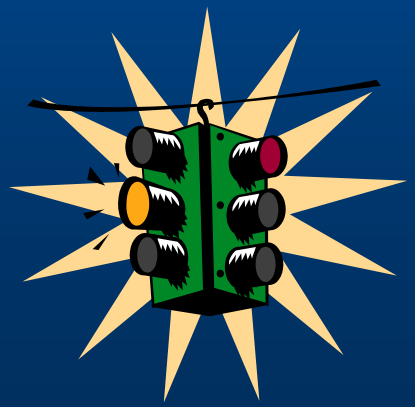


- **Refer to TEAM Guide WW.2.1.3 or state requirement**
- **Document as renewal application not submitted on time**
- **Double-click on the icon to view an example finding**

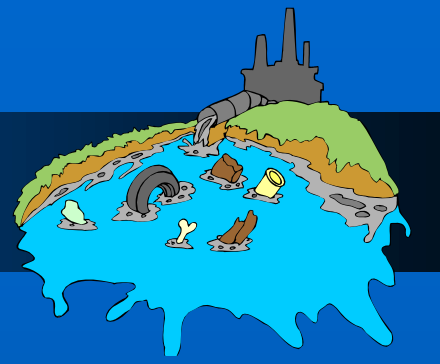
Do You Have A Finding?



- **Is lack of recording minor details, such as name of sampler and time of sampling, a finding**
  - **If yes, why?**
  - **If no, why not?**
- **Is missing DMRs a finding**
  - **If yes, why?**
  - **If no, why not?**

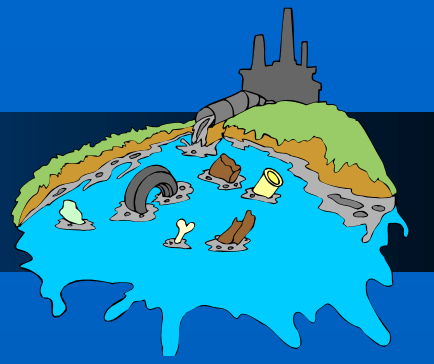


Incomplete DMR Records



- **40 CFR 122.41(j)(2) requires wastewater DMRs to be maintained for 3 years at the base**
- **40 CFR 122.41(j)(3) requires the following information to be part of the records retained**
  - **Date, exact place, methods, and time of sampling**
  - **Individuals taking the samples**
  - **Dates analysis were performed**
  - **Individuals who performed the analysis**
  - **Analytical techniques and methods used**
  - **Results of the analysis**

Incomplete DMR Records (cont.)



- **Refer to TEAM Guide Reference Number WW.2.6.2**
- **Document this finding as incomplete DMR records**
- **Double-click on the icon to view an example finding**

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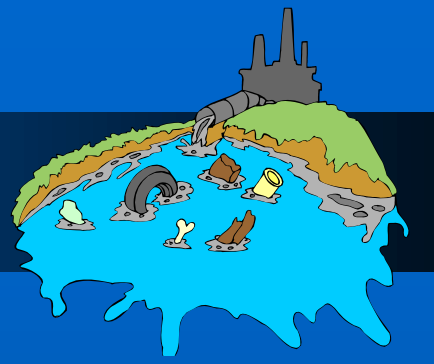
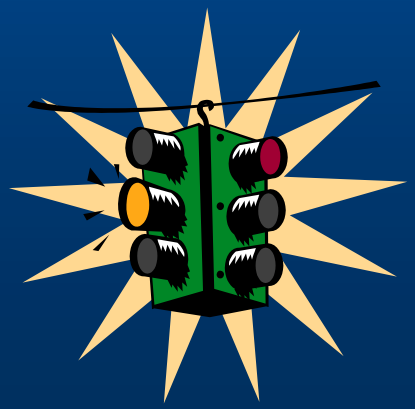
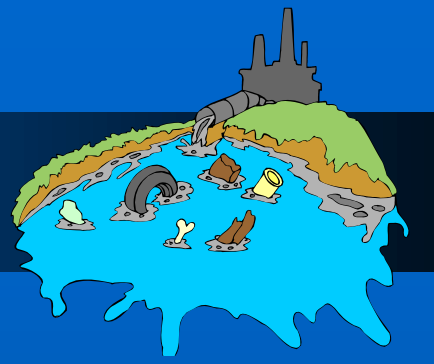
Do You Have A Finding?



- **If the DMR lacks an authorized signature**
  - **If yes, why?**
  - **If no, why not?**

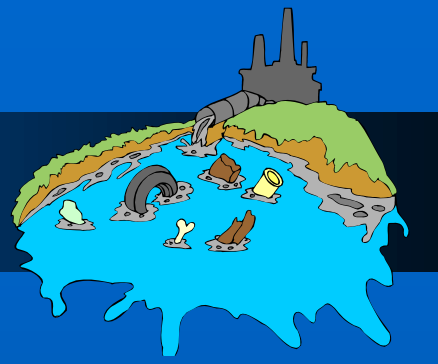


Improper DMR Signature



- **40 CFR 122.22(b) requires all reports to be signed by the principal executive officer or a duly authorized representative of that person (authorization must be made in writing)**

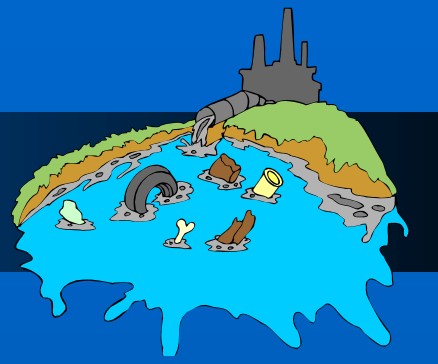
Improper DMR Signature (cont.)



- **Refer to TEAM Guide Reference Number WW.2.5.6**
- **Document this finding as an unauthorized signature**
- **Double-click on the icon to view an example finding**

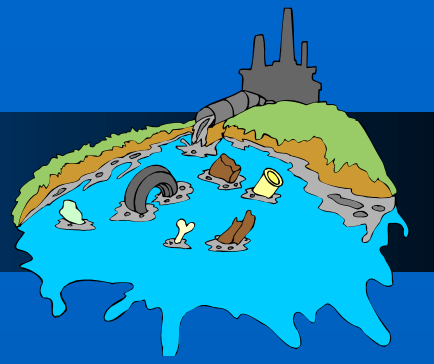
Microsoft Word Document

Discharge to POTW

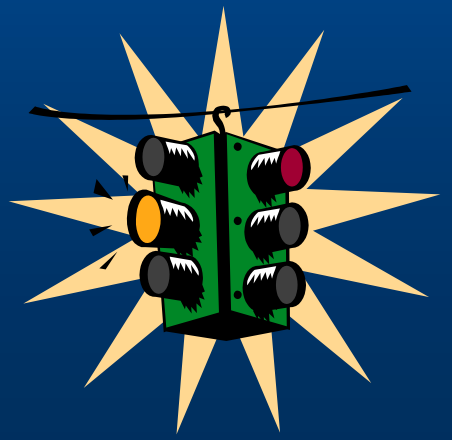


- **The local POTW defines an SIU as one that discharges 5 percent of the POTW's total flow or 25,000 gallons/day of industrial wastewater**
- **The base discharges an average of 700,000 gallons/day of wastewater to this POTW, of which 25 percent is from industrial sources**

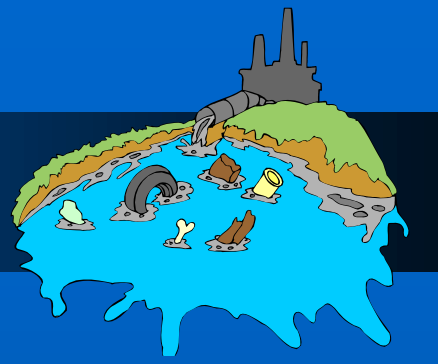
Do You Have A Finding?



- **If the only interaction the base has with the POTW is paying the monthly bill, and the base submits no information about its discharge to the POTW**
  - **If yes, why?**
  - **If no, why not?**

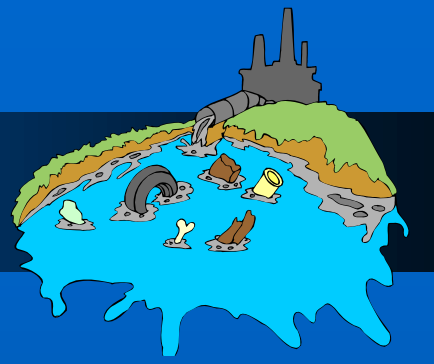


SIU Not Reporting



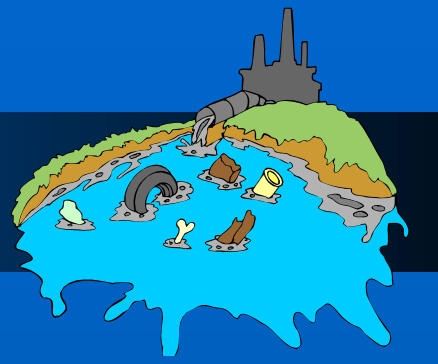
- **40 CFR 403.12(h) requires industrial users that are not required to meet a categorical pretreatment standard (EPA-promulgated pollutant discharge limits) but are significant noncategorical industrial users to submit every 6 months to the control authority (i.e., the local POTW in this case) a description of the nature, concentration, and flow of pollutants**

SIU Not Reporting (cont.)



- **The vast majority of POTW industrial waste ordinances also require SIUs to obtain a discharge permit; therefore, additional requirements may also not be met**

SIU Not Reporting (cont.)



- **Refer to TEAM Guide Reference Number WW.3.4.6 or state regulation**
- **Document this finding as SIU not reporting**
- **Double-click on the icon to view an example finding**

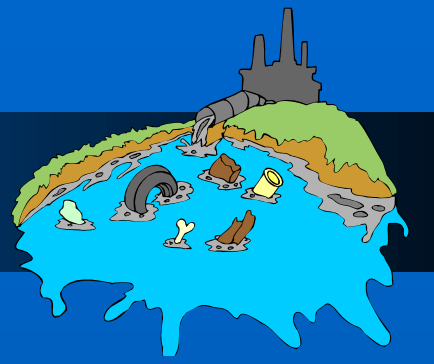
Adobe Acrobat Document

CE Operations Flight Interview

Next

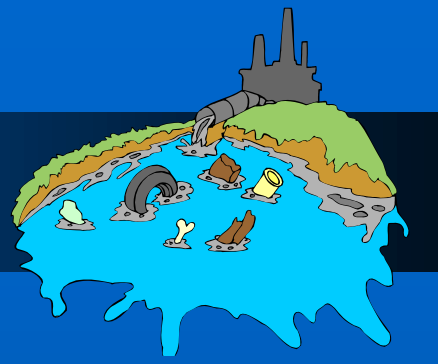
Home

CE Operations Interview



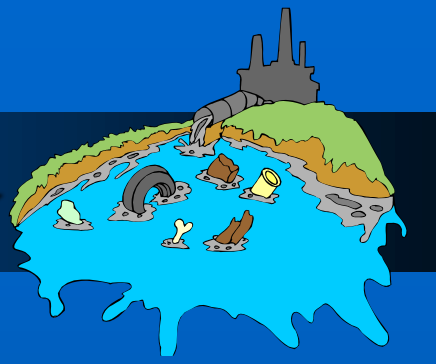
- **Determine who is responsible for wastewater system operations**
- **Determine who performs the required maintenance of wastewater system components (CE Utilities, contractor, etc.)**

CE Operations Interview (cont.)



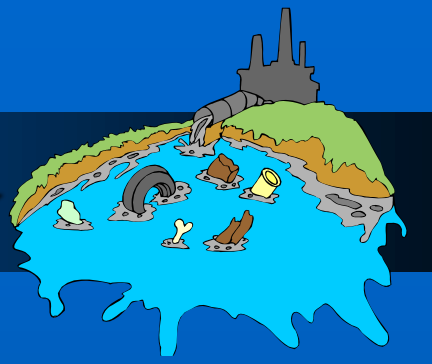
- **Identify wastewater collection system components and associated responsibilities**
  - **OWSs**
  - **Lift stations**
  - **Septic tanks**
- **Identify wastewater system issues and concerns**

Selected Records to Review



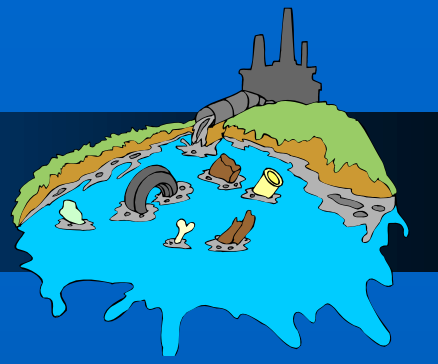
- Wastewater operator certifications
- Wastewater system deficiency studies
  - Lift stations
  - Treatment works
  - Infiltration and inflow
- State inspection records
- Reports on wastewater collection system studies

Selected Records to Review



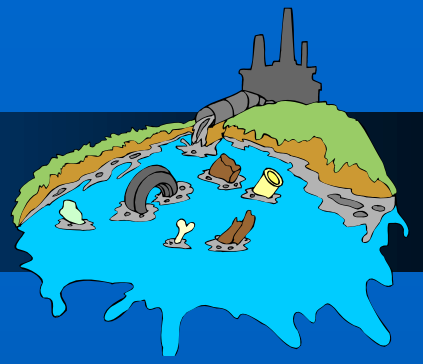
- **Sewer line maintenance and cleaning reports**
- **Wastewater system operator logs**
- **Biosolids treatment and disposal records**

Wastewater System Visits



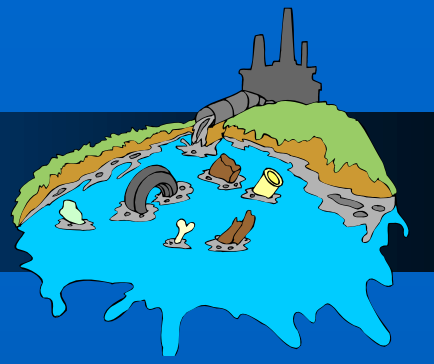
- **Lift stations**
- **Monitoring stations**
- **OWSs**
- **Wastewater outfalls**
- **Construction sites to review storm water BMPs**

What If You Discover?



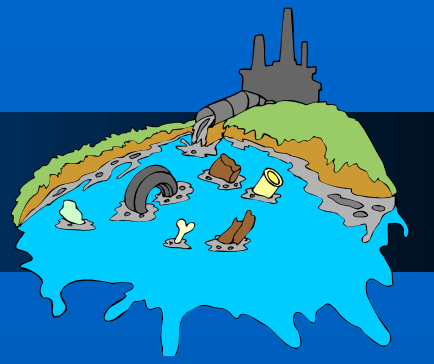
- **Lift station deficiencies**
- **Missing NPDES permit for construction activity**
- **SWPPP deficiencies**
- **Inadequate vector attraction reduction for biosolids (sewage sludge) stabilization**

Lift Station Observations

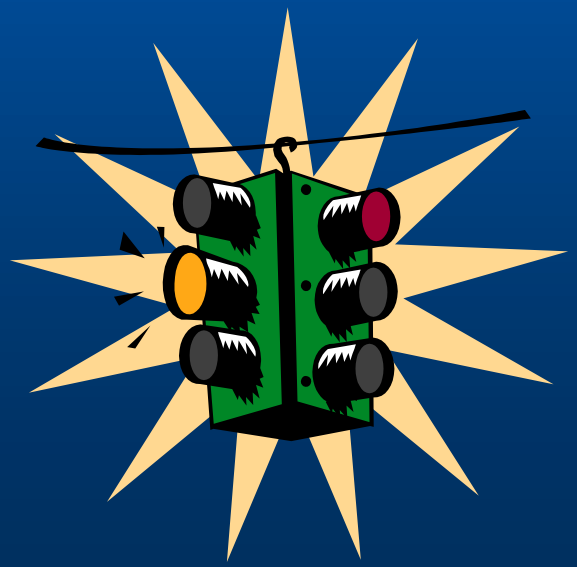


- **Several lift stations on-base have no backup power or alarm system, and some also do not have dual pumps**

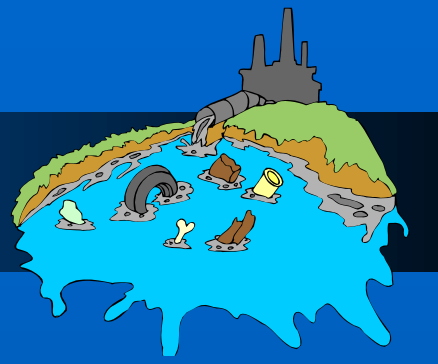
Do You Have A Finding?



- **Are these lift station deficiencies a finding**
  - **If yes, why?**
  - **If no, why not?**

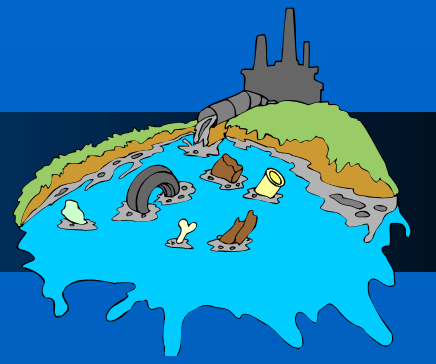


Lift Station Requirements



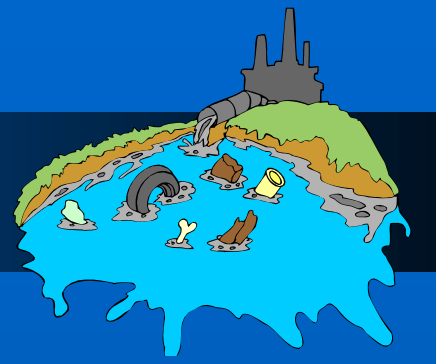
- **AFI 32-7041, paragraph 2.5, requires lift stations to continue to operate during power failures and have redundant pumps to provide adequate pumping capacity for handling the maximum wastewater flow when one pump is out of service**

Lift Station Requirements (cont.)



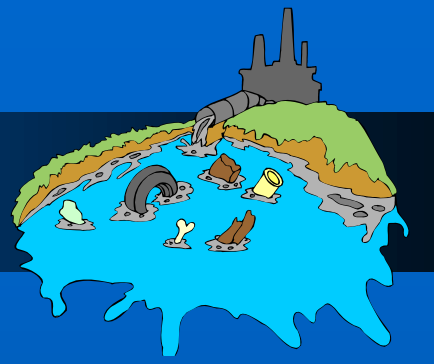
- **AFI 32-7041, paragraph 2.5.1, requires major lift stations to be provided standby power generators, portable power generators, or two independent power sources at each station**
- **AFI 32-7041, paragraph 2.5.2, requires smaller lift stations located in remote areas to be provided a connection for a portable generator**

Lift Station Requirements (cont.)



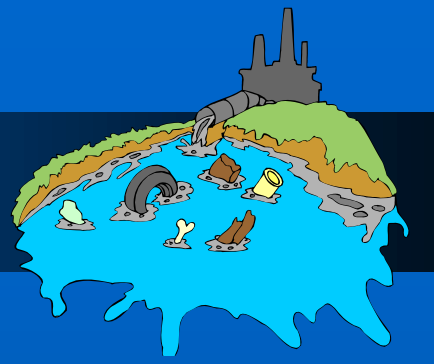
- **AFI 32-7041, paragraph 2.5.3, requires audible and visual alarms at each pump station to alert maintenance staff of pump failures, equipment to transmit alarm signals to a central monitoring point (if possible), and backup batteries or other emergency power sources to retain alarm data during power failures**
- **AFI 32-7041, paragraph 2.5.4, requires failed pumps to be repaired or replaced immediately to maintain redundancy**

Lift Station Requirements (cont.)



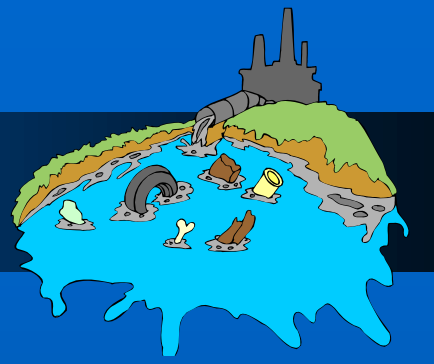
- **Note that state regulations may exist for similar and/or additional lift station requirements**
- **Also, wastewater overflows at the lift stations may be findings for unpermitted discharges or wastewater system not properly operated as previously discussed (in these cases use the state or federal citation not the AFI)**

Lift Station Finding



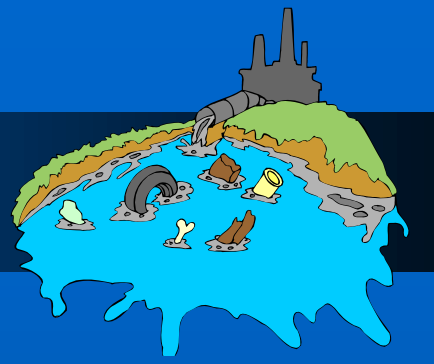
- **Refer to TEAM Guide Reference Number WW.2.2.3 for AFI citation or state requirement**
- **Document this finding as lift station deficiencies**
- **Double-click on the icon to view an example finding**

What if You Discover?

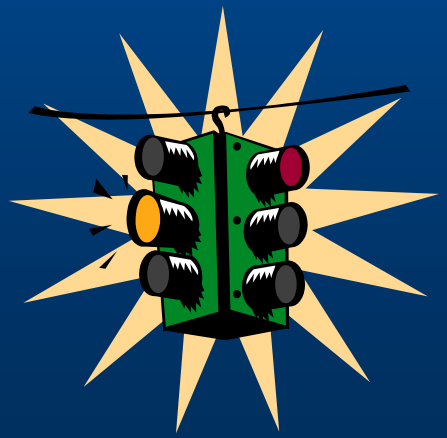


- **An NOI has not been filed for two construction sites visited (1 acre or more in size) and these sites are not otherwise covered in an NPDES permit**
- **An SWPPP for controlling sediment and erosion has not been developed**

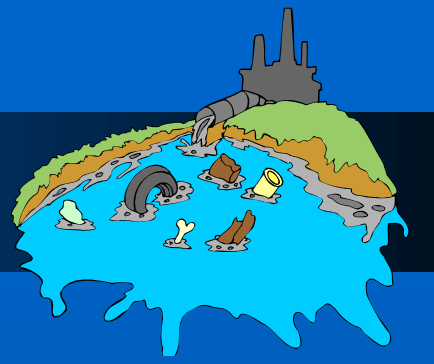
Do You Have A Finding?



- **Is the lack of filing an NOI and preparation of an SWPPP a finding**
  - **If yes, why?**
  - **If no, why not?**

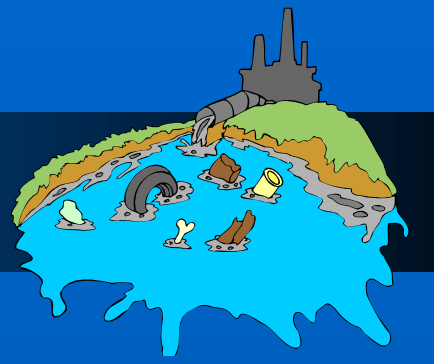


No NOI



- **40 CFR 122.26(b)(14)(x) and 40 CFR 122.21(c)(1) require that a permit application for storm water discharges associated with construction activities (including clearing, grading, and excavation activities) be submitted at least 90 days before the date on which construction commences**

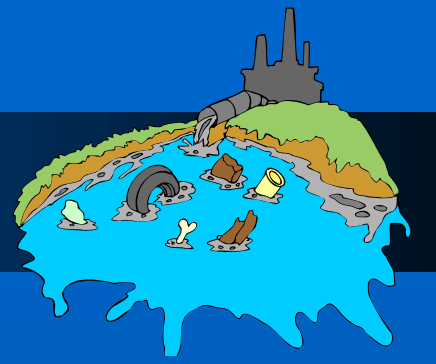
No NOI (cont.)



- **Refer to TEAM Guide Reference Number WW.4.1.2**
- **Document this finding as missing NPDES permits for construction activities**
- **Double-click on the icon to view an example finding**

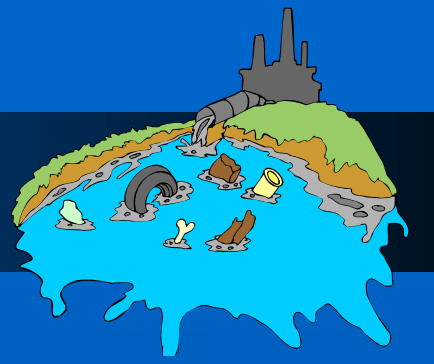
Adobe Acrobat Document

No SWPPP



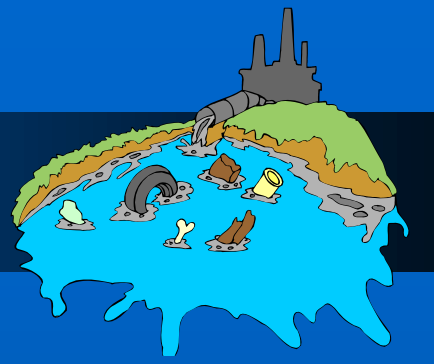
- **Final NPDES General Permit for Storm Water Discharges Associated with Industrial Activity, Section 1.3.1.2, requires a SWPPP to be prepared to obtain authorization under the General Storm Water Permit; Section 4 establishes requirements for the content of a SWPPP**

What If You Discover?

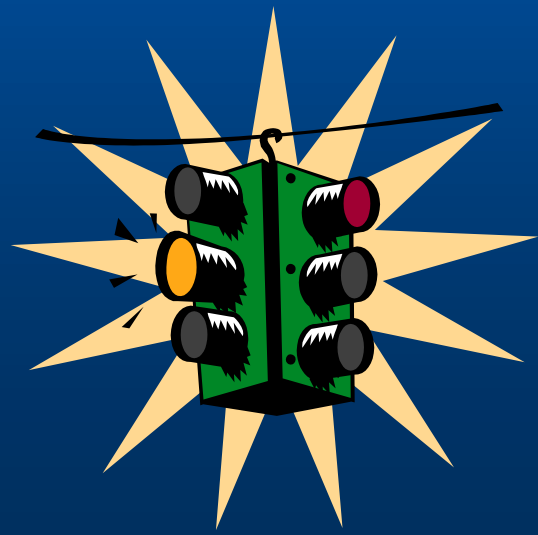


- **The base's SWPPP contains no specific training on BMPs, and the inspections/comprehensive site evaluations are not defined or documented**

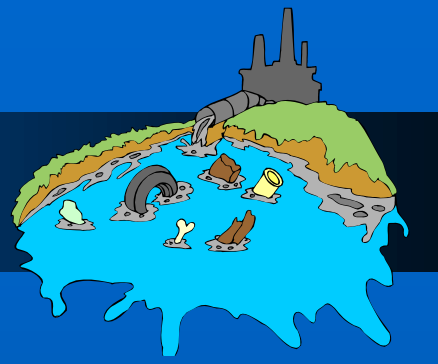
Do You Have A Finding?



- **Are these SWPPP deficiencies a finding**
  - **If yes, why?**
  - **If no, why not?**

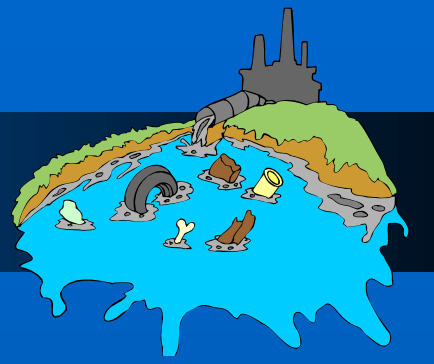


Missing SWPPP Training and Inspections



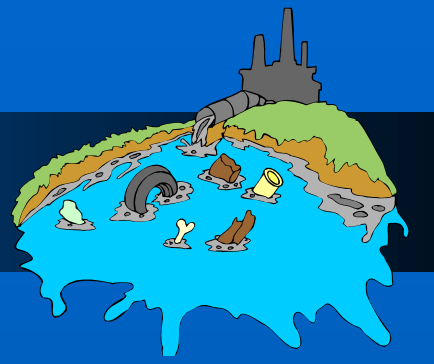
- **Final NPDES General Permit for Storm Water Discharges Associated with Industrial Activity, Section 4.2.7.2.1.6, requires employee training to inform personnel of the components and goals of the SWPPP**

Missing SWPPP Training and Inspections (cont.)



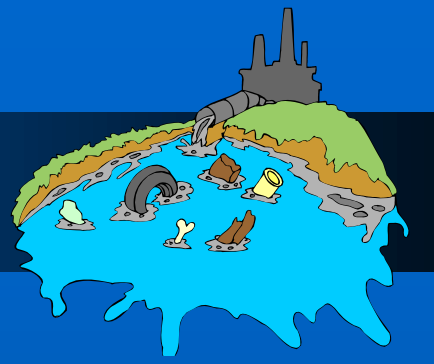
- **Final NPDES General Permit for Storm Water Discharges Associated with Industrial Activity, Section 4.2.7.2.1.5, requires that, in addition to or as part of the comprehensive site evaluation required in the permit, qualified facility personnel be identified to inspect designated equipment and areas of the facility**

Missing SWPPP Training and Inspections (cont.)



- **Certain basic requirements for an SWPPP (such as training and inspections) are required whether the base is covered under a general permit, multi-sector permit, or individual permit**
  - **Appropriate intervals for inspections must be specified**
  - **A set of tracking or follow-up procedures must be identified to ensure that appropriate actions are taken in response to the inspections**
  - **Records of inspection must be maintained**

Missing SWPPP Training and Inspections (cont.)



- **Refer to TEAM Guide Reference Numbers WW.4.2.3 and WW.4.2.14 (one finding for training and one for inspections)**
- **Document these findings as missing SWPPP training and inspections**
- **Double-click on the icons to view example findings**

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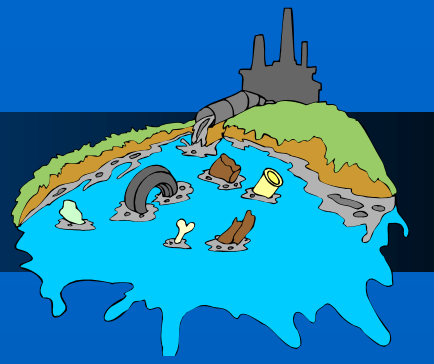
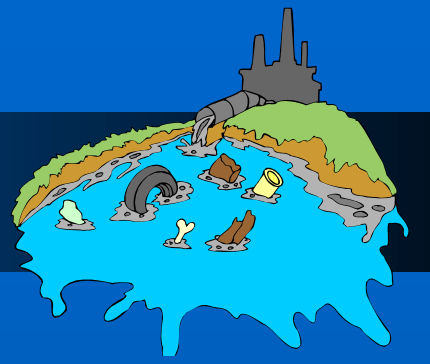
What If You Discover?

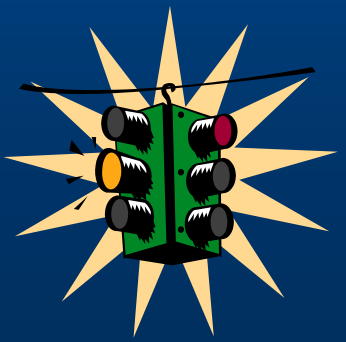


- **The base's wastewater sludge processing operations use pH adjustment through lime addition to meet vector attraction reduction requirements**
- **The operating records indicate that, when the pH drops below 12 during the first 2 hours of treatment, additional lime is added to ensure that the pH is maintained above that level**

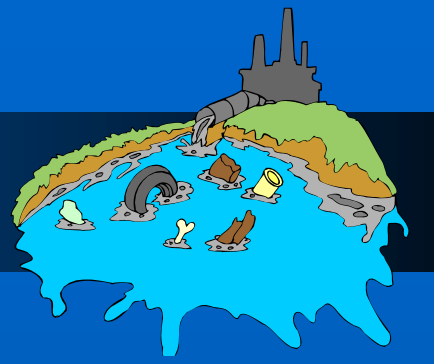
Do You Have A Finding?



- **Is addition of more lime within the 2 hours after initial pH adjustment a finding**
  - **If yes, why?**
  - **If no, why not?**

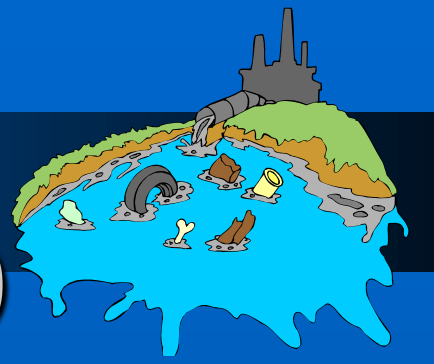


Inadequate Vector Attraction Reduction



- **If the pH method is used for attaining vector attraction reduction, 40 CFR 503.15(c)(1) and 503.33(a)(1) referencing 503.33(b)(6) requires that the pH of the sludge be raised to 12 or higher by alkali addition and, without further addition, remain at 12 or higher for 2 hours and then at 11.5 or higher for an additional 22 hours (i.e., no further addition of alkali can occur during the initial 2 hours of treatment)**

Inadequate Vector Attraction Reduction (cont.)



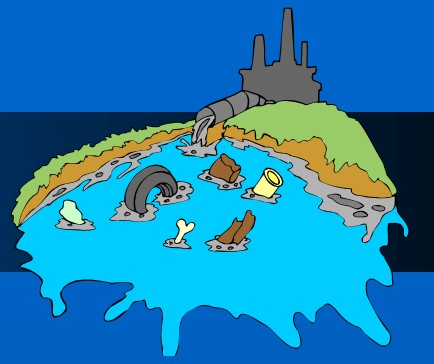
- **Refer to TEAM Guide Reference Number WW.8.2.2.2**
- **Document this finding as vector attraction reduction not attained**
- **Double-click on the icon to view an example finding**

Site Visits

Next

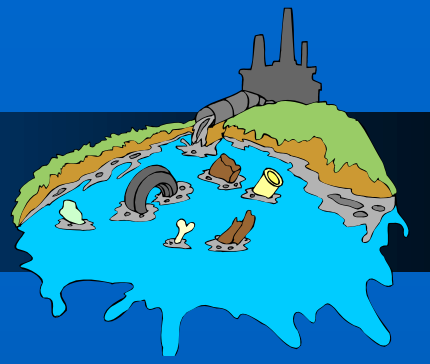
Home

Site Visits



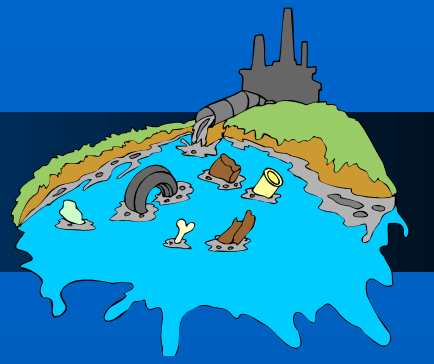
- **Visit selected shops to determine management of industrial wastewater**
  - **Visit shops with OWSs and determine point of discharge (base WWTP, ditch, local POTW, etc.)**
  - **Review maintenance activities of OWS**
- **Review lift stations**
  - **Review operation and condition of lift stations**

What If You Discover?

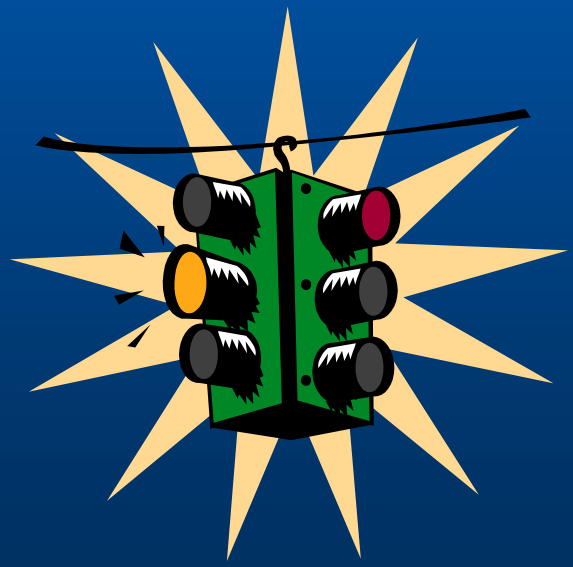


- **An industrial shop on-base washes the shop floors periodically with a detergent; the contaminated wash water flows through an OWS and into a nearby ditch and then flows to the local creek**

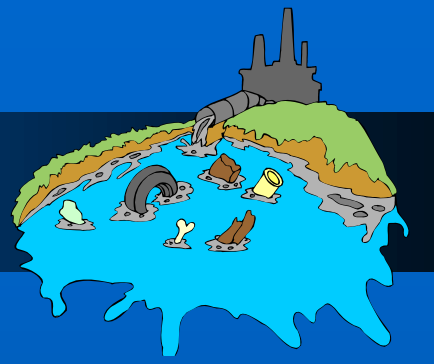
Do You Have A Finding?



- **Is allowing the contaminated floor wash water to enter a local creek a finding**
  - **If yes, why?**
  - **If no, why not?**

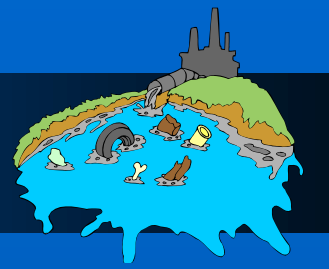


Unpermitted Discharge



- **40 CFR 122.1(b)(1) requires a permit for the discharge of pollutants from any point source into waters of the United States**

Unpermitted Discharge (cont.)



- **Refer to TEAM Guide Reference Number WW.2.1.1**
- **Document this finding as unpermitted discharge of pollutants (this is among the most common of all findings in the wastewater protocol)**
- **Double-click on the icon to view an example finding**

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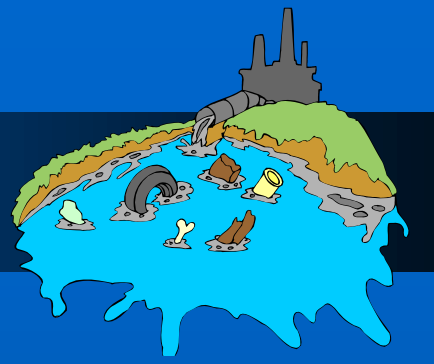
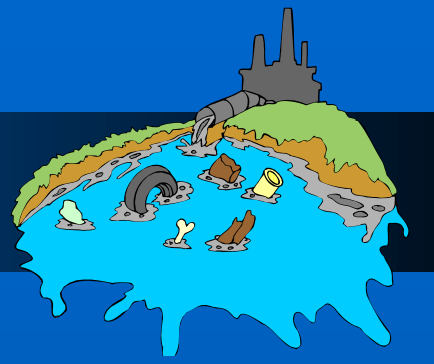
What If You Discover?

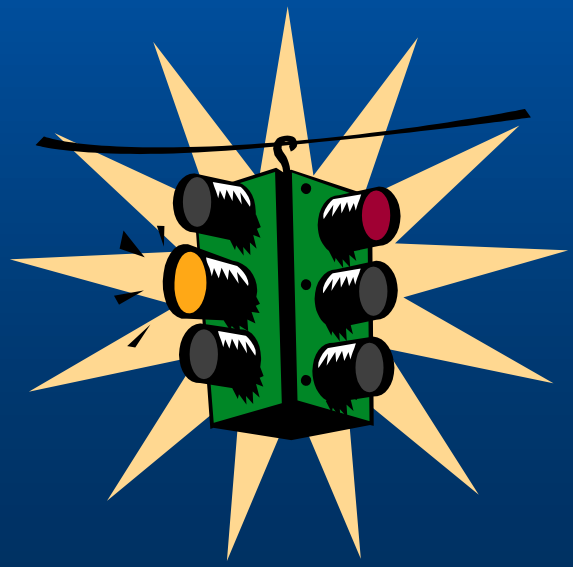


- **Sewage solids are evident on the ground near several lift stations that are located near a streambed**
- **Further investigation reveals that the sewer lines in the area have frequent blockages due to grease discharged from the kitchen at the dining facility, and as a result, the sewer lines overflow**

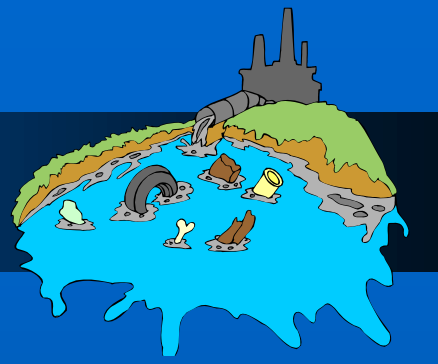
Do You Have A Finding?



- **Is allowing sewage to overflow onto the ground and potentially enter a stream or creek a finding**
  - **If yes, why?**
  - **If no, why not?**

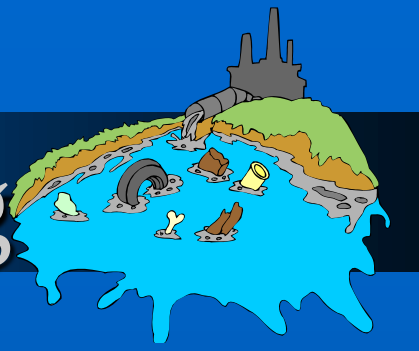


System Malfunction



- **40 CFR 122.41(e) requires that all wastewater facilities and systems of treatment and control be properly operated and maintained**
- **40 CFR 122.1(b)(1) requires permits for the discharge of pollutants from any point source into waters of the United States**

System Malfunction Finding



- **Refer to TEAM Guide Reference Number WW.2.2.1**
- **Document this finding as wastewater system not properly maintained (this could also be a finding for an unpermitted discharge of pollutants, as shown previously)**
- **Double-click on the icon to view an example finding**

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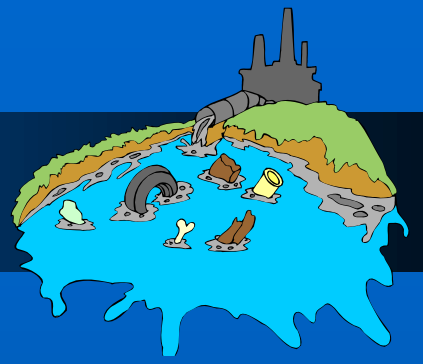
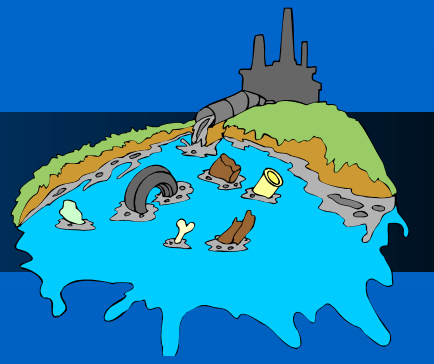
What If You Discover?

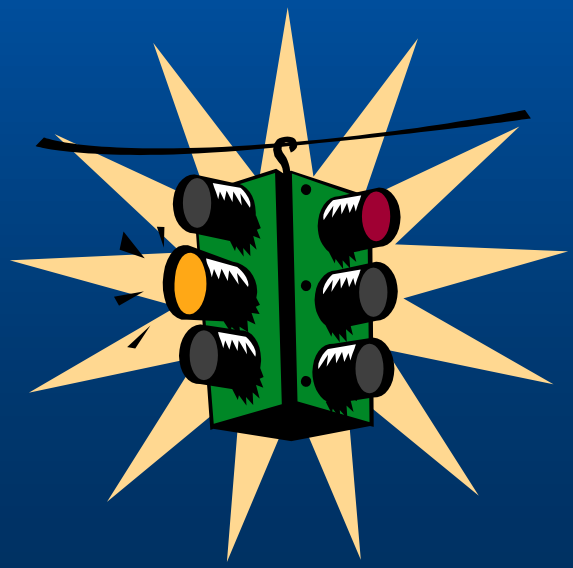


- **After visiting several industrial shops that use OWSs for handling wastewater, you determine that none of the OWSs are inspected regularly and that they are rarely pumped, cleaned, or otherwise maintained**

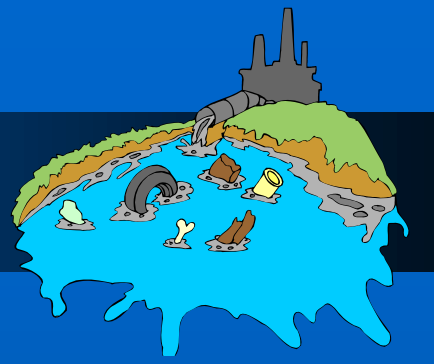
Do You Have A Finding?



- **Is the lack of inspection and maintenance of OWSs a finding**
  - **If yes, why?**
  - **If no, why not?**

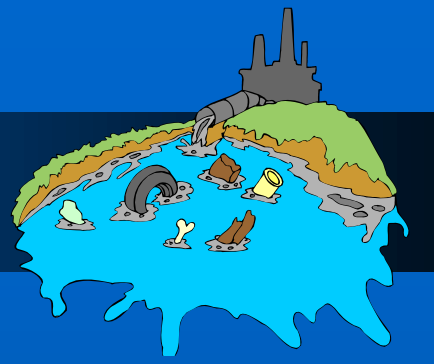


No Inspections



- **AFI 32-7041, paragraph 2.10, requires regular inspection and maintenance of all OWSs**

No Inspections (cont.)

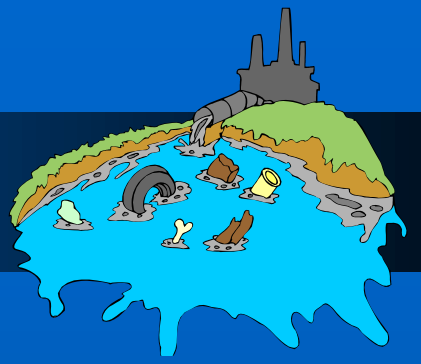


- **Refer to TEAM Guide Reference Number WW.5.4**
- **Document this finding as OWS not inspected and maintained**
- **Double-click on the icon to view an example finding**

Adobe Acrobat Document

Wastewater Discharges

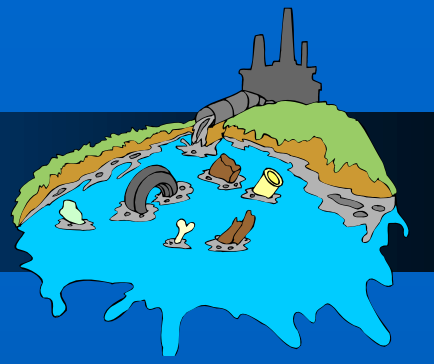
Findings To Watch Out For



- **Unpermitted discharges**
  - **Photographs of industrial/construction discharges that need to be monitored and permitted**

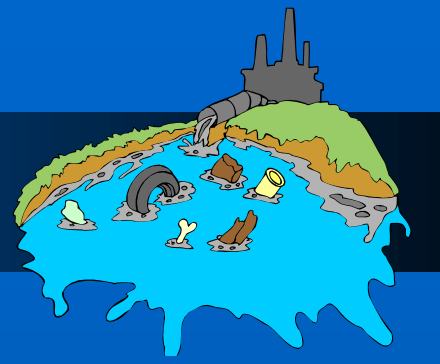
Summary

Findings Summary



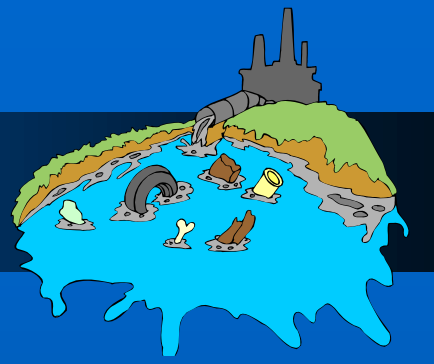
- **The scenarios resulted in the following findings**
  - **Late DMR submittal**
  - **Late submittal of renewal**
  - **Incomplete DMR records**
  - **Improper DMR signature**
  - **SIU not reporting**
  - **Lift station deficiencies**
  - **No NOI**
  - **Missing SWPPP training and inspections**
  - **Inadequate vector attraction reduction**

Findings Summary (cont.)



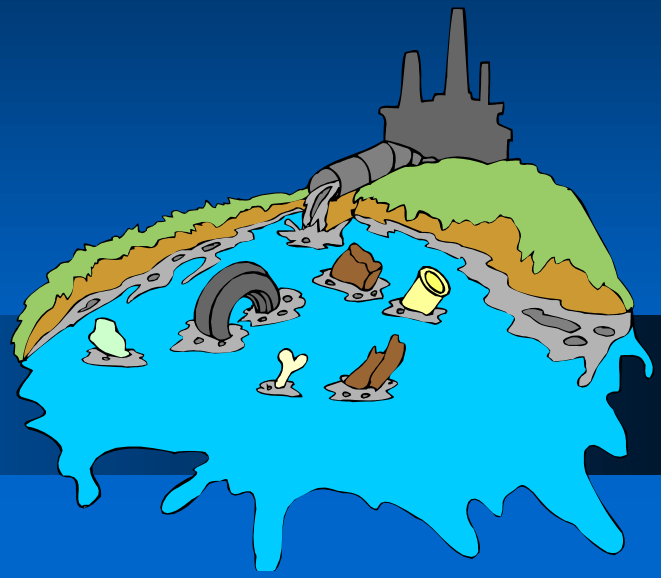
- **The scenarios resulted in the following findings (cont.)**
  - **Unpermitted discharge of pollutants**
  - **Wastewater system not properly maintained**
  - **OWSs not inspected**
- **These are some of the common and uncommon wastewater findings found during external assessments**

Identifying These Findings



- **You identified these deficiencies by**
  - **Examining permits and records relative to recordkeeping and reporting requirements**
  - **Reviewing base construction activities for permit compliance**
  - **Reviewing base activities and handling of industrial wastewater**

Contract



These slides were updated under

Air Combat Command

Contract FA4890-04-D-0005

Task Order 5005


Congratulations!
You Have Completed
Wastewater Assessor Training!