

Pretreatment Streamlining Rule TPDES Modifications Checklist

Control Authority Name _____ Date _____

CA Slug Control Checklist				
Elements	Yes	No	Section, Page No.	Comments
1. The CA is required to include requirements in the IU permits to control sludge discharges, if determined by the CA to be necessary. <i>[40 CFR §403.8(f)(1)(iii)(B)(6)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
2. The CA is required to include notification requirements in all SIU permits to immediately notify the POTW of facility changes affecting potential sludge discharges. <i>[40 CFR §403.8(f)(1)(iii)(B)(6)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
3. Where the SIU is required to develop a sludge discharge control plan (SDCP), or other action, the CA is required to specify the appropriate requirements in the IU permit. <i>[FR/Vol. 70/No. 198/Pg. 60151]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
4. The CA is required to document the evaluation for the need to develop a SCDP, or other action, to control slug discharges of each SIU within one (1) year from being designated as an SIU. <i>[40 CFR §403.8(f)(2)(vi)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
5. The CA is required to maintain the records of such activities so that the results shall be available to the Approval Authority upon request. <i>[40 CFR §403.8(f)(2)(vi)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		

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6. The CA should perform the following: <i>[FR/Vol. 70/No. 198/Pg. 60151-60152]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Conduct an assessment of the SIU's onsite procedures and measures to control potential slug-related discharges as part of the annual inspection 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Document the assessment as part of the records 	<input type="checkbox"/>	<input type="checkbox"/>		
7. The CA is required to define slug discharge as: Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause interference or pass through, or in any other way violate the CA's regulations, local limits, or permit conditions. <i>[40 CFR §403.8(f)(2)(vi)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
8. The required elements of a SDCP are as follows <i>[40 CFR §403.8(f)(2)(vi)(A) – (C)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Procedures for immediately notifying the CA of slug discharges, including any discharge that would violate a prohibition under 40 CFR §403.5(b) with procedures for follow-up written notification within five (5) days 	<input type="checkbox"/>	<input type="checkbox"/>		

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<ul style="list-style-type: none"> • Description of discharge practices, including non-routine batch discharges 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Description of stored chemicals 	<input type="checkbox"/>	<input type="checkbox"/>		
9. Optional elements of a SDCP include procedures to prevent the adverse impact from accidental spills, include the following: <i>[40 CFR §403.8(f)(2)(vi)(D)]</i>	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Inspection and maintenance of storage areas 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Handling and transfer of materials 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Loading and unloading operations 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Control of plant site run-off 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Worker training 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Building of containment structures or equipment 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Measures for containing toxic organic pollutants (including solvents) 	<input type="checkbox"/>	<input type="checkbox"/>		
<ul style="list-style-type: none"> • Measures and equipment for emergency response 	<input type="checkbox"/>	<input type="checkbox"/>		

CA Sludge Control Checklist	
The approved pretreatment program <u>may</u> need to be revised in one or more of the following components:	
X	Legal Authority
X	Enforcement Response Plan
X	IU Compliance Evaluation
X	Inspection Forms/Procedures
X	Sampling Protocols – Self Monitoring and Compliance Monitoring
X	IU Permits
X	IU Reporting Requirements
X	CA Compliance and Sampling Tracking Database
X	Other Standard Operating Procedures