



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4601 N Monroe Street • Spokane, WA 99205-1295 • 509-329-3400

September 6, 2018

The Honorable Shirley Sands
City of Newport
200 S. Washington Avenue
Newport, WA 99156

RE: Newport Wastewater Treatment Plant - NPDES Permit No. WA0022322
Compliance Inspection August 22, 2018

Dear Mayor Sands:

I met with Josh Howard to complete a compliance inspection for the City of Newport, NPDES Permit No. WA0022322. The City Wastewater Facility won the perfect compliance award for 2017. Your wastewater treatment staff have perfect compliance so far this year.

I did not find any blatant violations of the NPDES permit during the inspection. However, I did find a number of issues that need to be addressed as soon as possible. Please create a plan with a timeline for completing the following actions and send it to me. I will be conducting another inspection in approximately a year.

Please address the following items:

- A backup power source is required for all wastewater facilities. Please start the planning process and submit a timeline for installation of a backup power source.
- Update the existing Quality Assurance Manual or develop a new Quality Assurance Manual for the laboratory. This should include the documentation identified in Ecology Publication 16-03-025 "Model of a Quality Assurance Manual for a Small Wastewater Treatment Plant" that I sent to Josh Howard on August 30, 2018.
- The operator's plan for the year's maintenance is on a whiteboard located at the wastewater treatment plant. This should be in a log and available upon request. The log should contain detailed information for what was done, by whom, and when. It should also include the schedule identified in the equipment specific manuals.
- The operators are required to maintain an operations log that includes the results from tests used to make operational decisions, the operational decision, and comments as to adjustments made and who made them.



The Honorable Shirley Sands
September 6, 2018
Page 2 of 2

The complete inspection report is enclosed. If you have any questions, please contact me at (509) 329-3519 or dwas461@ecy.wa.gov.

Regards,

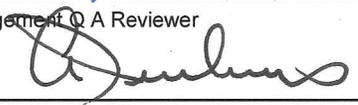


Diana Washington, P.E.
Senior Engineer
Water Quality Program

DW:red

Enclosure: Compliance Inspection Report

cc: Josh Howard, Wastewater Treatment Plant Operator

 DEPARTMENT OF ECOLOGY State of Washington		State of Washington Department of Ecology Eastern Regional Office Water Compliance Inspection Report			
Section A: National Data System Coding (i.e., PCS)					
Transaction Code 1 N	NPDES # 3 WA-0022322 11	yr/mo/day 12 18/08/22 17	Inspection Type 18 C	Inspector 19 S	Fac Type 20 1
Inspection Work Days 67 2 69	Facility Self-Monitoring Evaluation Rating 70 4	BI 71 N	QA 72 N		
Section B: Facility Data					
Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) City of Newport Wastewater Treatment Plant 801 N. Union Avenue Newport, WA 99156 NE1/4, SW1/4, Section13, Township 29N, Range 41E W.M.			Entry Time/Date 9:16 AM 8/22/2018		Permit Effective Date 5/01/2010
			Exit Time / Date 1:42 PM 8/22/2018		Permit Expiration Date 4/30/2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Joshua L Howard Group II Certificate #8468 Exp 12/31/2018 Wastewater Treatment Plant Supervisor 509- Bryce W Seaney Group I Certificate # 8926 Exp 12/31/2018 509-671-2533 David North Public Works Director			Other Facility Data (<i>e.g. SIC NAICS, and other descriptive information</i>) Oxidation Ditch Followed by chlorination and discharge to the Pend Oreille River Discharge Location: Latitude: 48.19027778 Longitude: -117.04027778		
Name, Address of Responsible Official/Title/Phone and Fax Number Mayor Shirley Sands City of Newport 200 S. Washington Ave Newport, WA 99156			Contacted? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Phone 509-447-5611 Fax 509-550-7552		
Section C: Areas Evaluated During Inspection (Check only those areas evaluated)					
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4		
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	<input type="checkbox"/> Other:		
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Stormwater			
<input type="checkbox"/> Effluent/Receiving Water	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow			
<input type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input checked="" type="checkbox"/> Sanitary Sewer Overflow			
Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)					
Ecology permit manager Diana Washington met with Josh Howard, Wastewater Treatment Plant Supervisor, and Bryce Seaney, Operator In Training. The inspection followed the standard method typically used to evaluate compliance with the permit and identify issues during the document review and the site evaluation. Congratulations to the Operations team for hitting perfect compliance for the 2017 calendar year. No significant violations were found during the inspection. Some recommendations are provided in the cover to this report.					
Documentation review:					
<ul style="list-style-type: none"> Josh provided a copy of the most recent permit and the operations and maintenance manual (O&M). The Fact Sheet for the permit was not available. I left a copy of the Fact Sheet with them and requested that they add it to the O&M manual and update or develop standard operation procedures (SOP) for everyday items and emergency conditions and keep them together and up to date with contact phone numbers for emergency contacts list. The facility receives wastewater from Oldtown, Idaho via a contract or MOU. According to Josh, Oldtown owns some of the capacity at the facility. We do not have a pretreatment permit so I requested a copy of the MOU. 					
Name(s) and Signatures of Inspector(s) Diana Washington PE. 		Agency/Office/Phone and Fax Numbers Ecology/Water Quality/Spokane/509-329-3515		Date 9/6/2018	
Signature of Management or QA Reviewer Art Jenkins PE. 		Agency/Office/Phone and Fax Numbers Ecology/Water Quality/Spokane/509-329-3504		Date 9/6/2018	

Water Compliance Inspection Report
Section D. Summary of Findings/Comments (continued)

- Review of lab logs and DMRs identified that all records are kept for the required three years and reporting appeared to be correctly documented.
- Review of Operator Daily Log found that the operators are briefly documenting collected samples and facility inspections. The logs are generic and do not include times and operator name or comments on any issues found during the inspection.

I recommend that the operators develop checklists used to document daily, weekly, monthly, quarterly, and annual maintenance activities.
- In 2013, Newport requested to move from a seven-day to five-day per week operation using an on-call operator and alarm system. The letter requesting the operational was approved. The letter indicated that the on-call operator was to inspect the site each day of the weekend or holiday and respond to alarms when notified by law enforcement that the alarm was triggered. Post inspection, Josh was asked if the operators still follow this procedure. Josh did not provide a response as of the publication of this report.
- The operator indicated that the alarm system does not dial them.

Laboratory review:

- Inspection of the Ecology certified laboratory at the Newport facility. All solutions current. No date when opened or received.
- Operator walked through each parameter sample prep and analytical procedure. Did not have a written procedure. Josh walked me through this by memory.

I recommend that Josh have an SOP for each lab procedure used when running tests.
- The Operator provided lab bench sheets for each sample. They run a blank for BOD but not for solids.
- Solids filter prepped by running one hundred milliliters of distilled water through the glass fiber filter, drying, and then placing in a desiccator to cool. No blank run to verify scale method or filter prep. Only one sample per sampling event.
- None of the statistical information was available for the lab.
- Grab samples are collected between 8 a.m. and 2 p.m. Discussed that this is not representative of the actual 24-hour flow conditions. Josh indicated that they are working on getting a new composite sampler for the influent and effluent.
- They only calibrate the pH meter periodically. Requested that they look up the recommended calibration schedule.
- They were not sure what the Operations Manual for the instrument required. They keep the DO probe in a bottle of water. They do not verify that the liquid is at saturation.
- They do not use written procedures but do the lab test from memory as taught by their mentor.
- Identified with the Operator that they need to have complete lab log for each procedure. It should have documentation for each test each time they run it. The bench log should provide the same level of documentation as the lab sheets they get from other labs for their permit application and annual sampling.
- Post inspection, I requested information from Josh regarding the availability of the Quality Assurance Manual for the lab. Josh indicated that they have one but it was created in 1994 and needs to be updated.

Facility Inspection

The Operator provided a site inspection tour. The facility consists of a hauled waste receiving area, where septage and biosolids are accepted from haulers (Photo 7). The unit processes consist of:

- Headworks with a coarse screen (Photo 8) followed by a fine screen (Photo 9). The solids from the screen and grit removal sump (Photo 11) are bagged (Photo 10 and 12) and hauled to solid waste.
- From the headworks, the flow is measured using a Parshall flume (Photo 13) and flow is split to either the primary clarifier (Photo 16) or the oxidation ditch (Photos 19 through 21)

- The solids from the primary clarifier go to the subsurface anaerobic digester and the overflow goes to the oxidation ditch (Photos 19 through 21). The oxidation ditch discharges to two secondary clarifiers via a distribution weir (Photo 22).

The operator indicated that they have concrete damage that can't be repaired because the redundant ditch was not installed. They do not have a way to pull the oxidation ditch off line for maintenance and still meet permit required quality limits. Josh indicated that they have limited options with respect to operations of the pumps for the oxidation ditch. They have a control box for the oxidation ditch pump located on the oxidation ditch platform (Photo 23).

- The secondary clarifier had significant solids floating on the surface and pin flock going over the weir (Photo 24).
- Josh indicated that they have to clean the chlorine contact chamber out every three days or so as a result of the settling of the solids in the contact chamber. Particles of what appeared to be grease were floating on the contact chamber surface. However, the effluent from the chamber appeared to be very clear (Photos 25 through 27). I asked if they had difficulty meeting the technology-based effluent limits for fecal coliforms and they indicated that they do not. They use gas chlorination and do not dechlorinate. They do not have a limit for chlorine in the permit.
- The solids from the bottom of the secondary clarifier are pumped back to the oxidation ditch or to the aerobic digester.
- The anaerobic digester sends solids to the aerobic digester via a solid displacement pump purchased in the 1940s. This pump is in the boiler building. The operator indicated that they keep the anaerobic digester at 80 degrees. They do not produce enough methane so use propane as the primary gas for the boiler. They flame off any unneeded methane.
- The solids are conditioned with polymer (Clarifloc WE642) by mixing with hot water (Photo 29) then added to the biosolids in batches (Photo 30). The solids are pumped to the belt press (Photos 31 through 34) then sent to a compost facility for additional treatment then disposal.

Observations during the inspection identified the following issues that appear to be affecting the operations of the facility. I asked the operators to explain how they were dealing with these issues:

Collection system lift station (Photos 3 through 6)

The operators indicated that they do not have alarms that notify them for failures at the lift pumps. They do not find out until the public notifies them that the alarm is going off and the light is flashing. Additionally, the pumps plug regularly due to the fact that none of them are grinder pumps. All of them have limited access - i.e., confined space that requires the operator to suit up with respirators in order to enter the space and complete emergency and routine maintenance. Each lift station has an auditory alarm and a light. The operators are dependent upon the neighbors to notify them that a station is plugged.

I informed the operator that I had not received or found any documentation of sanitary system overflows (SSO) for the community in the last eight years. The operator indicated that they do not report a plugged pump unless they get notification of a house backup or a spill to ground.

The procedure for dealing with a plugged lift stations is to use a trash pump and haul truck to get the lift station to a level where they can complete the maintenance. They haul the sewage to the gravity portion of the collection system without any spillage to the ground. As a result, they have not reported an SSO. The operator was not aware of any home owner or rental unit reports of backups of sewer into houses as a result of pump failure.

- Missing backup power source and alarm issues.

The power went off at the facility over the weekend and they did not have a backup generator or power source. There is no documentation indicating that Ecology was contacted and outage reported. These type of issues are mandatory reporting.

According to documentation in the PARIS communication log from 2013, Ecology approved a modified operations schedule which included operational alarms and on-call operator daily inspections of the facility. After the inspection I requested this information from the operator and a report of when the procedure provided in 2013 was changed.

- Aging pumps and lack of operational control of the pumps.

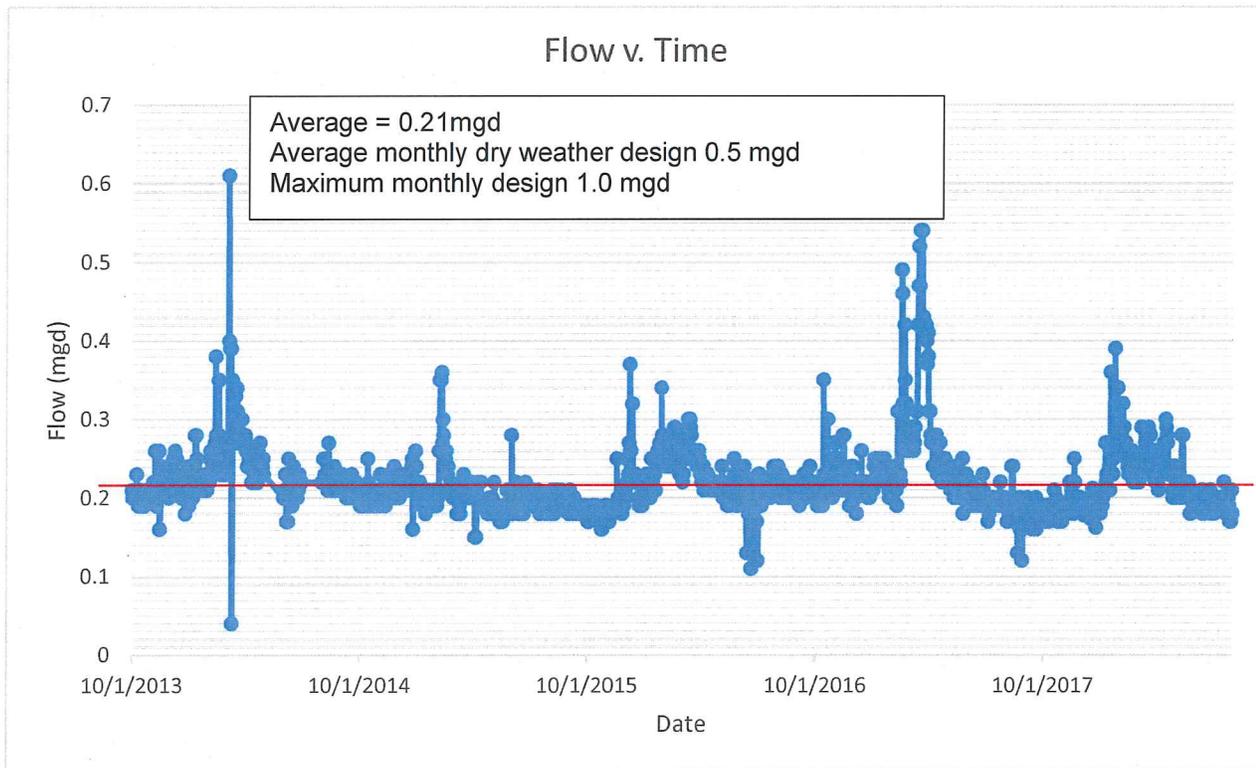
The pumps' plug and maintenance access is limited. The pumps are old and the operators have limited operational control. Additionally, the pumps are in confined spaces and difficult to fix, so they have to pump out the lift station, haul the wastewater to another manhole, and then use a hazardous materials suit with a respirator to access and fix the pump.

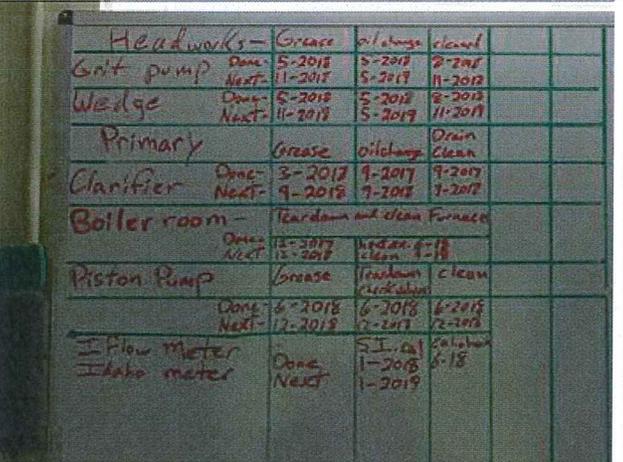
Josh indicated that he is working with the Dave North, Public Works Director, to address the issues with the aging pumps and access issues. This is also a public education issue. The City should be providing educational materials on what should be flushed and what should be put in a solid waste can.

- I indicated that the data shows seasonal infiltration and inflow (Figure 1) and requested information from the operators regarding collection system maintenance.

Josh and Bryce indicated that they do not have much time to look for or address I&I issues. The plugged pumps and other maintenance work keep them from being able to focus on identifying I&I and fixing it.

Figure 1 Flow vs. time



Description	Photographs																																																																														
<p>Entry to the WWTP documenting arrival time.</p>		<p>Photo 1</p>																																																																													
<p>Maintenance planning whiteboard.</p>	 <table border="1"> <thead> <tr> <th>Equipment</th> <th>Task</th> <th>Done</th> <th>Next</th> <th>Other</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Headworks</td> <td>Grease</td> <td>5-2018</td> <td>5-2019</td> <td>oil change cleaned</td> </tr> <tr> <td></td> <td>11-2018</td> <td>5-2019</td> <td>2-2019</td> </tr> <tr> <td rowspan="2">Grit pump</td> <td>Done</td> <td>5-2018</td> <td>5-2019</td> <td>2-2019</td> </tr> <tr> <td>Next</td> <td>11-2018</td> <td>5-2019</td> <td>11-2018</td> </tr> <tr> <td rowspan="2">Weir</td> <td>Done</td> <td>5-2018</td> <td>5-2019</td> <td>2-2019</td> </tr> <tr> <td>Next</td> <td>11-2018</td> <td>5-2019</td> <td>11-2018</td> </tr> <tr> <td rowspan="2">Primary</td> <td>Grease</td> <td></td> <td></td> <td>oil change</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Drain Clean</td> </tr> <tr> <td rowspan="2">Clarifier</td> <td>Done</td> <td>3-2018</td> <td>9-2018</td> <td>9-2018</td> </tr> <tr> <td>Next</td> <td>9-2018</td> <td>7-2019</td> <td>7-2019</td> </tr> <tr> <td rowspan="2">Boiler room</td> <td></td> <td></td> <td></td> <td>Shutdown and clean Furnace</td> </tr> <tr> <td>Done</td> <td>12-2017</td> <td>12-2017</td> <td>hydro. 6-18</td> </tr> <tr> <td rowspan="2">Piston Pump</td> <td>Done</td> <td>6-2018</td> <td>6-2018</td> <td>6-2018</td> </tr> <tr> <td>Next</td> <td>12-2018</td> <td>7-2019</td> <td>7-2019</td> </tr> <tr> <td rowspan="2">I Flow meter</td> <td>Done</td> <td>1-2018</td> <td>1-2018</td> <td>5-18</td> </tr> <tr> <td>Next</td> <td>1-2019</td> <td>1-2019</td> <td>5-18</td> </tr> </tbody> </table>	Equipment	Task	Done	Next	Other	Headworks	Grease	5-2018	5-2019	oil change cleaned		11-2018	5-2019	2-2019	Grit pump	Done	5-2018	5-2019	2-2019	Next	11-2018	5-2019	11-2018	Weir	Done	5-2018	5-2019	2-2019	Next	11-2018	5-2019	11-2018	Primary	Grease			oil change				Drain Clean	Clarifier	Done	3-2018	9-2018	9-2018	Next	9-2018	7-2019	7-2019	Boiler room				Shutdown and clean Furnace	Done	12-2017	12-2017	hydro. 6-18	Piston Pump	Done	6-2018	6-2018	6-2018	Next	12-2018	7-2019	7-2019	I Flow meter	Done	1-2018	1-2018	5-18	Next	1-2019	1-2019	5-18	<p>Photo 2</p>
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<p>Collection system map with pipeline size and lift stations.</p>		<p>Photo 3</p>																																																																													

Problem lift stations in blue are on the request schedule for the Operator. These lift stations are confined entry and need updating to grinder pumps and improved maintenance access.



Photo 4

The blue line is being considered for replacement.



Photo 5

Shows all four lift stations at the end of the blue pipelines.



Photo 6

Septage and biosolids receiving station. Biosolids on the left go to the digester. Septage on the right goes through the headworks.



Photo 7

Coarse screen in the headworks.



Photo 8

Fine screen in the headworks.



Photo 9

Bagger for screenings.



Photo 10

Grit removal sump.



Photo 11

<p>Grit bagger.</p>		<p>Photo 12</p>
<p>Parshall Flume flow meter.</p>		<p>Photo 13</p>
<p>Digital control panel. Does not include phone notification.</p>		<p>Photo 14</p>
<p>Digital controller for flow meter.</p>		<p>Photo 15</p>

<p>Primary clarifier with scum removal.</p>		<p>Photo 16</p>
<p>Flow distribution box between primary clarifier and subsurface anaerobic digester. Aerobic digester in the background to the left of the distribution box. Boiler for digester and solids pump house in the background right of the subsurface anaerobic digester.</p>		<p>Photo 17</p>
<p>Aerobic digester.</p>		<p>Photo 18</p>
<p>Oxidation ditch foam control sprayer.</p>		<p>Photo 19</p>

Oxidation ditch foam control sprayer.

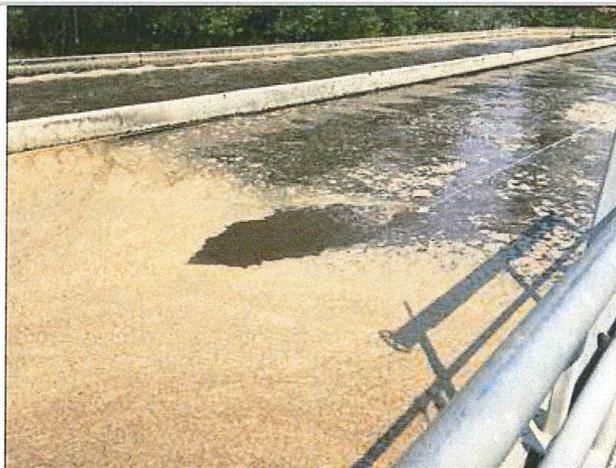


Photo 20

Oxidation ditch.



Photo 21

Oxidation ditch distribution box to secondary clarifier 1 and 2.



Photo 22

Oxidation ditch pump control panel.



Photo 23

Secondary clarifier with floating solids.



Photo 24

Chlorine contact chamber with floating solids. Solids look like FOG globules.



Photo 25

Chlorine contact chamber with floating solids. Solids look like FOG globules.

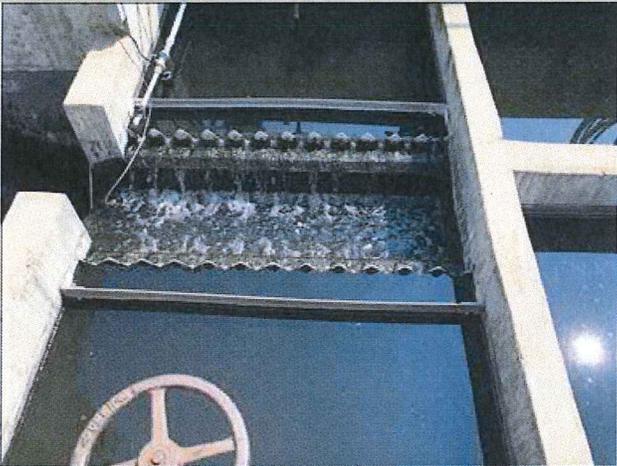


Photo 26

Duplicate disinfection contact chamber effluent is very clear.



Photo 27

Solids pumps located in confined space not inspected.



Photo 28

Solids system polymer addition system.



Photo 29

Solids-polymer mixing.

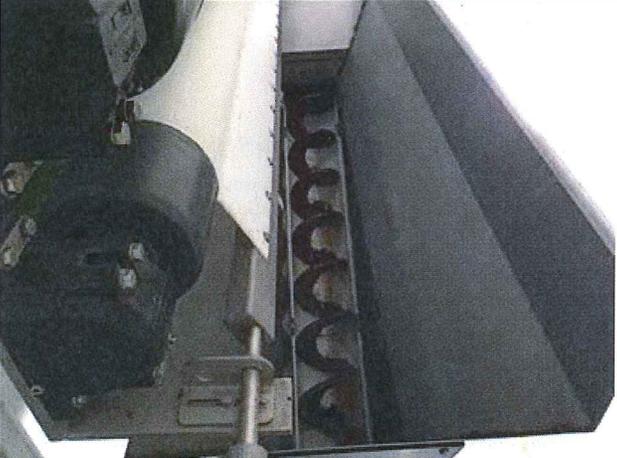


Photo 30

Solids belt press.



Photo 31

Solids belt press.		Photo 32
Solids belt press.		Photo 33
Belt press solids screw conveyor.		Photo 34



Section D: COMPLETED BY: Diana Washington, PE. TITLE: Senior Engineer/Permit Manager	DATE: 8/24/2018 TELEPHONE: 509-329-3519
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INSTRUCTIONS

Section A: National Data System Coding (*i.e.*, PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Column 3 - 11: NPDES Permit No.: Enter the facility's NPDES permit number – third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12 - 17: Inspection Date: Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type*: Use one of the codes listed below to describe the type of inspection:

A	Performance Audit	U	IU Inspection with Pretreatment Audit	!	Pretreatment Compliance (Oversight)
B	Compliance Biomonitoring	X	Toxics Inspection	@	Follow-up (enforcement)
C	Compliance Evaluation (non-sampling)	Z	Sludge – Biosolids	{	Stormwater-Construction-Sampling
D	Diagnostic	#	Combined Sewer Overflow-Sampling	}	Stormwater-Construction-Non-Sampling
F	Pretreatment Follow-up	\$	Combined Sewer Overflow-Non-Sampling	:	Stormwater-Non-Construction-Sampling
G	Pretreatment (Audit)	+	Sanitary Sewer Overflow-Sampling	~	Stormwater-Non-Construction-Non-Sampling
I	Industrial User (IU) Inspection	&	Sanitary Sewer Overflow-Non-Sampling	<	Stormwater-MS4-Sampling
M	Multimedia	\	CAFO-Sampling	-	Stormwater-MS4-Non-Sampling
N	Spill	=	CAFO-Non-Sampling	>	Stormwater-MS4-Audit
O	Compliance Evaluation (Oversight)	2	IU Sampling Inspection		
P	Pretreatment Compliance Inspection	3	IU Non-Sampling Inspection		
R	Reconnaissance	4	IU Toxics Inspections		
S	Compliance Sampling	5	IU Sampling Inspection With Pretreatment		
		6	IU Non-Sampling Inspection with Pretreatment		
		7	IU Toxics With Pretreatment		

Column 19: Inspector Code: Use one of the codes listed below to describe the *lead agency* in the inspection

A - State (Contractor)	O - Other Inspectors, Federal/EPA (Specify in Remarks columns)
B - EPA (Contractor)	P - Other Inspectors, State (Specify in Remarks columns)
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors-EPA Lead	S - State Inspector
L - Local Health Department (State)	T - Joint State/EPA Inspectors-State Lead
N - NEIC Inspectors	

Column 20: Facility Type: Use one of the codes below to describe the facility.

1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.

2 - Industrial. Other than municipal, agricultural, and Federal facilities.

3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.

4 - Federal. Facilities identified as Federal by the EPA Regional Office.

5 - Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389

Columns 21-66: Remarks: These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days: Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating: Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information: Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection: Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K-CAFO, V-SSO, Y-COS, W-Stormwater, 9-MS4. States may also use the new wet weather CAFO and MS4 inspection types show in column 19 of this form. The EPA regions are required to use the new wet weather CAFO and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

Attachment - Single Event Violation Table - Codes and Descriptions*

CODE	DESCRIPTION
Effluent Violations	
A0018	Approved Bypass
A0013	Failed Toxicity Test
A0023	Industrial Spill
A0017	Inspection sample above historic DMR range
A0022	Narrative Effluent Violation
A0012	Numeric effluent violation
A0016	Reported Fish Kill
A0011	Unapproved Bypass
A0015	Unauthorized Discharge of Brine
Management Practice Violations	
B0019	Best Management Practice Deficiencies
B0024	Biosolids/Sewage Sludge Violation (Part 503)
B0026	Failure to Allow Entry
B0012	Failure to Conduct Inspections
B0027	Failure to Develop Adequate SPCC Plan
B0017	Failure to develop any or adequate SWPPP/SWMP
B0011	Failure to Develop/Enforce Standards
B0028	Failure to Implement SPCC Plan
B0018	Failure to Implement SWPPP/SWMP
B0041	Failure to Maintain Records
B0040	Improper Chemical Handling
B0023	Improper Land Application (non-503, non-CAFO)
B0020	Improper Operation and Maintenance
B0025	Inflow/Infiltration (I/I)
B0021	Laboratory Not Certified
B0022	No Licensed/Certified Operator
B0042	Violation of a milestone in an order
Monitoring Violations	
C0017	Analysis not Conducted
C0011	Failure to Monitor for non-Toxicity Requirements

CODE	DESCRIPTION
CSO	
A0C18	Approved Bypass
A0024	Dry weather overflow
B0030	Failure to Develop Adequate LTCP
B0031	Failure to Implement LTCP
B0029	Failure to Implement Nine Minimum Controls (NMCs)
BC291	Failure to implement required NMC #1(Proper operation and maintenance)
BC292	Failure to implement required NMC #2 (Maximum use of the collection system)
BC293	Failure to implement required NMC #3 (Review pretreatment requirements)
BC294	Failure to implement required NMC #4 (Maximization of flow)
BC295	Failure to implement required NMC #5 (Elimination of dry weather flow)
BC296	Failure to implement required NMC #6 (Control of solids)
BC297	Failure to implement required NMC #7 (Pollution prevention programs)
BC298	Failure to implement required NMC #8 (Public notification)
BC299	Failure to implement required NMC #9 (Monitoring)
B0C41	Failure to Maintain Records or Meet Record Keeping Requirements
C0C11	Failure to monitor
E0C16	Failure to submit required report (non-DMR)
E0C13	Improper/Incorrect reporting
B0044	LTCP implementation schedule milestone missed
A0C22	Narrative effluent violation
E0C14	Noncompliance with section 308 Information Request
A0C12	Numeric effluent violation
A0C11	Related Unapproved Bypass
A0021	Unauthorized CSO Discharge to Waters/Wet Weather
A0025	Unauthorized overflow to dry land or building backup
B0045	Violation of a milestone in a permit
B0C42	Violation of a milestone in an order
SSO	
A0S18	Approved Bypass
A0020	Discharge to Waters

CODE	DESCRIPTION
C0021	Failure to Monitor for Toxicity Requirements
C0015	Frequency of Sampling Violation
C0018	Improper Analysis or Lab Error
C0014	Invalid/Unrepresentative Sample
C0016	No Flow Measurement Device
Permitting Violations	
D0014	Application Incomplete
D0011	Discharge Without a Valid Permit
D0012	Failure to Apply for a Permit
D0015	Failure to Pay Fees
D0016	Failure to Submit Timely Permit Renewal Application
D0013	Unapproved Operation
D0017	Violation Specified in Comment

Reporting Violations	
E0017	Failure to Notify
E0012	Failure to Submit DMRs
E0016	Failure to submit required report (non-DMR, non-pretreatment)
E0013	Improper/ Incorrect Reporting
E0011	Late Submittal of DMRs
E0014	Noncompliance with Section 308 Information Request
Pretreatment	
C0012	Baseline Monitoring Report Violation
B0P12	Failure to Conduct Inspections
B0P11	Failure to Develop/Enforce Standards
B0013	Failure to Enforce Against I/U
B0015	Failure to Establish Local Limits
C0013	Failure to Establish Self-Monitoring Requirements
B0014	Failure to Issue SIU Permits
B0016	Failure to Meet Inspection and Sampling Plan for SIUs
E0015	Failure to submit required report (non-DMR)
B0P40	Improper Chemical Handling

CODE	DESCRIPTION
D0S11	Discharge without a valid permit (includes satellite systems)
B0S41	Failure to Maintain Records or Meet Record Keeping Requirements
C0S11	Failure to monitor
E0018	Failure to report other violation
E0019	Failure to report violation that may endanger public health 122.41(l)(7)
D0S12	Failure to submit required permit application info (includes satellite systems)
B0S20	Improper Operation and Maintenance
A0S22	Narrative effluent violation
E0S14	Noncompliance with section 308 Information Request
A0S12	Numeric effluent violation
A0026	Overflow to Dry Land or Building Backup
A0S11	Related Unapproved Bypass
BS42A	Violation of milestone in an administrative order
BS42J	Violation of milestone in judicial decree
B0046	Violation of sewer moratorium or restriction
Stormwater Construction	
D0R11	Discharge without a permit
D0R18	Failure to apply for a notice of termination
B0R12	Failure to Conduct Inspections
B0C17	Failure to develop any or adequate SWPPP/SWMP
B0C18	Failure to Implement SWPPP/SWMP
B0R41	Failure to Maintain Records
C0R11	Failure to Monitor
BR19A	Failure to properly install/implement BMPs
BR19B	Failure to properly operate and maintain BMPs
D0R12	Failure to submit required permit application information
E0R16	Failure to submit required report (non-DMR)
A0R22	Narrative effluent violation
E0R14	Noncompliance with section 308 Information Request
A0R12	Numeric Effluent Violation
B0R42	Violation of a milestone in an order
Stormwater MS4	
D0M11	Discharge without a permit

CODE	DESCRIPTION
A0014	IU Violation of Pretreatment Standards
CAFO	
B0A19	Best Management Practice Deficiencies
B0038	Direct Animal Contact with Waters of US
D0A11	Discharge without a permit
B0A12	Failure to Conduct Inspections
B0032	Failure to Develop any or adequate NMP
B0033	Failure to Implement NMP
B0A41	Failure to Maintain Records or Meet Record Keeping Requirements
B0043	Failure to meet order final compliance date
C0A11	Failure to Monitor
D0A12	Failure to submit required permit application information
C0019	Failure to Test Manure
B0A40	Improper Chemical Handling
B0A23	Improper Land Application
B0039	Improper Manure Handling (not including land application)
B0037	Improper Mortality Management
B0036	Improper O&M of Storage Facility
E0A13	Improper/Incorrect reporting
B0034	Insufficient Buffers/Setbacks
B0035	Insufficient Storage Capacity
A0A22	Narrative effluent violation
E0A16	No Annual Report Submitted
C0020	No Depth Marker
E0A14	Noncompliance with section 308 Information Request
A0A12	Numeric effluent violation
A0019	Production Area Runoff
B0A42	Violation of a milestone in an order

CODE	DESCRIPTION
D0M18	Failure to apply for a notice of termination
B0M12	Failure to Conduct Inspections
B0M17	Failure to develop any or adequate SWPPP/SWMP
B0M18	Failure to Implement SWPPP/SWMP
B0M41	Failure to Maintain Records or Meet Record Keeping
C0M11	Failure to Monitor
BM19A	Failure to properly install/implement BMPs
BM19B	Failure to properly operate and maintain BMPs
D0M12	Failure to submit required permit application information
E0M16	Failure to submit required report (non-DMR)
A0M22	Narrative effluent violation
E0M14	Noncompliance with section 308 Information Request
A0M12	Numeric Effluent Violation
B0M42	Violation of a milestone in an order
Stormwater Non-Construction	
D0N11	Discharge without a permit
D0N18	Failure to apply for a notice of termination
B0N12	Failure to Conduct Inspections
B0N17	Failure to develop any or adequate SWPPP/SWMP
B0N18	Failure to Implement SWPPP/SWMP
B0N41	Failure to Maintain Records
C0N11	Failure to Monitor
BN19A	Failure to properly install/implement BMPs
BN19B	Failure to properly operate and maintain BMPs
D0N12	Failure to submit required permit application information
E0N16	Failure to submit required report (non-DMR)
A0N22	Narrative effluent violation
E0N14	Noncompliance with section 308 Information Request
A0N12	Numeric Effluent Violation
B0N42	Violation of a milestone in an order

* N. B. The codes and code names listed herein may change over time. Please consult ICIS-NPDES and PCS system documentation for updated lists.

