



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

November 20, 2018

Robert Lindsay
Water Programs Manager
Spokane County-Environmental Services
1004 N. Freya Street
Spokane, WA 99202

RE: Spokane County Water Reclamation Facility - NPDES Permit No. WA0093317
Compliance Inspection September 19, 2018

Dear Robert Lindsay:

Thank you for meeting me at the Water Reclamation Facility to complete a compliance inspection for the Spokane County Water Reclamation Facility. I completed the inspection with Valerie Garcia (Jacobs) and Ben Brattebo (Spokane County). The compliance inspection specifically identifies compliance with NPDES permit WA0093317.

The facility is in good condition and I did not identify any violation of the permit during the inspection. I did note areas of rust on some of the bolt heads and fixtures that are exposed to the weather and water. These areas should be painted to minimize the wear on the equipment.

I checked into the compliance issues and the additional flow identified in the permit that should eliminate some of the design criteria exceedances permit triggers and warnings. I am still working to address this issue and will provide you with an update as soon as I know what we are able to do prior to issuing a renewal permit.

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

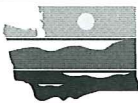
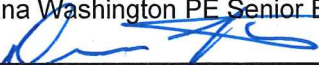
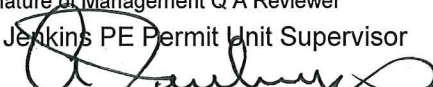
Regards,

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

DW:red

Enclosure: Compliance Inspection Report
cc: Valerie Garcia, Jacobs valerie.garcia@jacobs.com



 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 2 5	NPDES # 3 WA-0093317 11	yr/mo/day 12 18/09/18 17	Inspection Type 18 C	Inspector 19 S	Fac Type 20 1
Remarks 21 _____ 66					
Inspection Work Days 67 4 69	Facility Self-Monitoring Evaluation Rating 70 5	BI 71 N	QA 72 N	-----Reserved----- 73 _____ 74 _____ 75 _____ 80	
Section B: Facility Data					
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Spokane County Regional Water Reclamation Facility 1004 N Freya St Spokane WA			Entry Time/Date 9:52 AM 9/19/2018	Permit Effective Date 12/01/2011	
			Exit Time / Date 3:48 PM 9/19/2018	Permit Expiration Date 11/30/2016	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Valerie Garcia – Project Manager Office # - 509-536-3702 Cell # - 951-833-4030 valerie.garcia@jacobs.com Ben Brattebo, P.E. Water Reclamation Engineer Spokane County Environmental Services Office: 509-477-7521 Cell: 509-979-0807 BBRATTEBO@spokanecounty.org			Other Facility Data (e.g. SIC NAICS, and other descriptive information) Step Feed membrane bioreactor with chlorine disinfection discharging to the Spokane River. The treatment works is operated by Jacobs a contract operator and the collection system is overseen by Spokane County Utilities.		
Name, Address of Responsible Official/Title/Phone and Fax Number Rob Lindsay, LHg Water Programs Manager Spokane County - Environmental Services 509-477-7576			Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
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 checked="" type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pollution Prevention	<input checked="" type="checkbox"/> Other: Collection System		
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input checked="" 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 as necessary)					
Diana Washington, Ecology Senior Engineer and Permit Manager, met with Rob Lindsey and Ben Brattebo, representing the County of Spokane; and Valerie Garcia, Supervising Group 4 Operator for Jacobs, the contract operator for the Spokane County Regional Water Reclamation Facility, to conduct a non-sampling compliance inspection. The following inspection report includes a review of the compliance history, supporting documentation, facility inspection, and collection system maintenance review. I did not identify any violation during the inspection.					
Name(s) and Signatures of Inspector(s) Diana Washington PE Senior Engineer/Permit Manager 		Agency/Office/Phone and Fax Numbers Ecology/WQ Program/Spokane 509 329-3519		Date 11/20/2018	
Signature of Management Q A Reviewer Art Jenkins PE Permit Unit Supervisor 		Agency/Office/Phone and Fax Numbers Ecology/WQ Program/Spokane 509 329-3504		Date 11/20/2018	

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

Jacobs, the contract operator for the County's publicly owned wastewater treatment plant, operates the facility but is not responsible for the collection system. The County provides the staff and completes all operations and maintenance for the collection system.

As a component of the inspection, I reviewed the violations reported in the Permit and Reporting Information System (PARIS) with the staff and operators. Several triggers and warnings for exceedance of the design criteria were identified by the PARIS database. The design flow for the facility relies on the ability to bypass to the City of Spokane Treatment Plant for an additional 10 million gallons per day of capacity. However, this 10 million gallons per day was not added to the design criteria during the permit setup at reissue in 2011. As a result, the PARIS system flags these permit warnings and triggers anytime the facility exceeds 85 percent of the permit-identified design criteria. Review of all violations showed that the County has not had a numeric effluent violation since the metals violations in 2013. I informed the County that I will work with the PARIS staff to fix this issue.

I reviewed the Quality Assurance Manual for the Spokane County Regional WRF Lab, Accreditation #:W974-17 (Photo 4) and the operator log for all sampling events (Photo 6). I reviewed the sampling procedures with the lab staff for the chlorine residual test being completed during the inspection. The lab staff was well-informed and provided an accurate step-by-step procedure for the sampling event. I noted that the lab uses a 100 ppb ($\mu\text{g/L}$) check standard for chlorine but the test results are typically 1-5 ppb ($\mu\text{g/L}$). The check standard should be closer to the actual results expected.

I inspected all analytical equipment and the operator maintenance and calibration logs (Photo 5). The chemicals and calibration reagents were appropriately stored and dated. All equipment was in good running order. All refrigerators and incubators had thermistors or thermometers. The operators check the calibration of the continuous meters weekly. Thermistors are replaced annually. These and other maintenance tasks are assigned to the operators using a tracking system. The Operator 4 closes out the assigned maintenance tasks once they are reported as complete by the operators.

I reviewed the Permit, and the Operations and Maintenance Manual. In Permit Section S2, table footnote 18 requires that *"Beginning March 1, 2018, for the three parameters (CBOD5, NH3 and TP) with WLAs established by the Spokane River and Lake Spokane DO TMDL, the monthly discharge monitoring report must provide the following information for the "ten year assessment" monitoring and future compliance projections: monthly average, daily maximum, running total for the "season," running average for the "season," projected trend of total lbs. and average concentration and average daily lbs. for remainder of the "season" with future compliance target indicated. If the trend projection indicates a significant potential for noncompliance with the allowable mass limitations to be in effect once the period of formal compliance begins in 2021, the Permittee is to communicate the anticipated result of the projection to the Department with appropriate recommendations to correct any trend potentially resulting in noncompliance."* Spokane County and I agreed that this requirement is similar to the process used for the wasteload assessment. The County will begin using the Waste Load Assessment spreadsheet provided by Ecology and adapted to include the footnote required parameters. The County will use this process to trend the data and projects the likelihood for the facility to exceed the allow limits in 2021 when the TMDL limits become effective.

During review of the permit, the County staff requested information regarding the minimum sampling requirements in the permit. They indicated that the Permit Writers Manual indicates five days of sampling per week but the permit requires 7 days per week. I informed the County that I can't change the frequency until the renewal of the expired permit but will take this into consideration when developing the next permit.

I completed a facility inspection with Valerie and Ben. The inspection started at the headworks building and included the primary clarifier. The primary sludge pumps are being upgraded. The step feed aerator has up to eight dissolved oxygen zones for flexibility in operations. Jacob is updating the membranes and additional cassettes are scheduled for replacement in early 2019.

This inspection did not include solids processing. I found the facility to be generally clean and in good condition, but several areas had rusty bolts and pipe joints. The rust should be treated and the areas painted to prevent additional damage. I discussed the importance of good documentation with the operators. I explained that all operations and maintenance logs are required under the permit and review of logs is part of the compliance inspection.

As noted, the collection system operations and maintenance is overseen by Spokane County Environmental Services. On September 24, 2018, I met with Louis Graf, the Wastewater Operations Manager, to complete inspection of the collection system. Spokane County Environmental Services has a collection main cleaning and video inspection program. During the inspection, Louis provided a document with the 2015-2018 results for the program compared to their goal (attached). The County has over 624 miles of gravity sewer pipe in the collection system. They track work orders and maintenance issues in an electronic database provided by CityWorks. The County's goal is to clean each gravity sewer line every three years and to video each one every ten years. According to the information provided, the County is on track to meet their goal.

The County evaluates flows regularly to evaluate the potential for infiltration and inflow (I and I). According to the evaluations, Louis reports that the system is tight with a limited amount of I and I. Louis indicated that they are coordinating activities with the City and have an agreement for the areas of the collection system that fall at boundaries. The County receives wastewater from private collection systems for small developments and mobile home parks. The county does not provide maintenance or reporting for SSOs that occur in private collection systems. Home Owner Associations are typically responsible and hire contract operations and maintenance for the actual O&M for the system. The County should have a mechanism for tracking SSOs reported by private collection system owners.

I discussed reporting of Sanitary Sewer Overflows. The County reports these to Ecology's Environmental Response Tracking System (ERTS). I requested that they notify me of all sanitary sewer overflows in addition to the standard reporting to the Ecology spill hotline.

Description	Photographs	Image Name
Entrance to the Spokane County Regional WWTP		Photo 1

Operations Building.
Managers and operators are
located here.



Photo2

Standard Operating
Procedures. The procedures
are available to all operators.

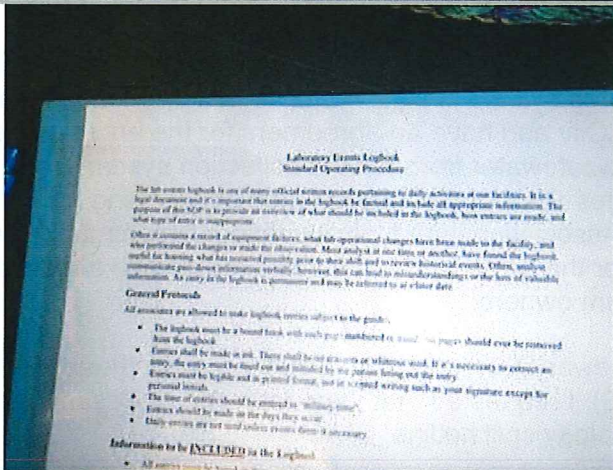


Photo 3

Lab QA Manual includes
methods and equipment
requirements.

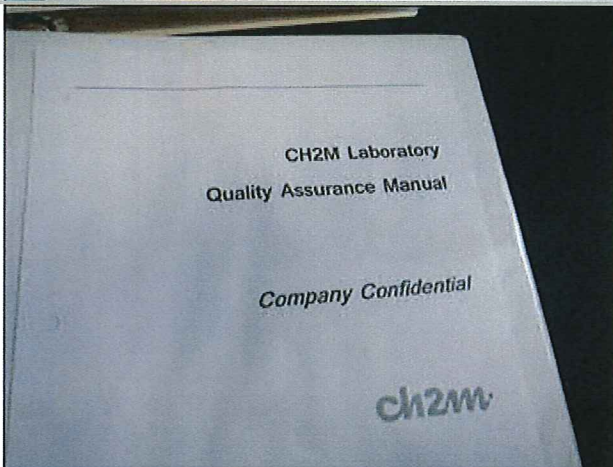


Photo 4

All O and M requirements are
assigned and documented by
the Operator in charge of the
facility.

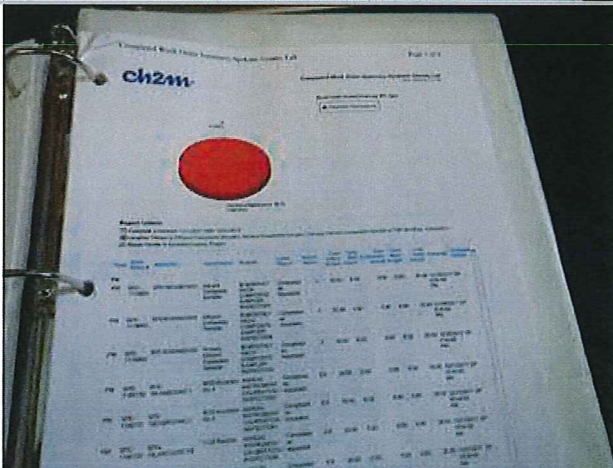


Photo 5

All collected samples have a chain of custody identifying whether they will be processed in house or sent to Anatek.

Photo 6

The facilities inspection started at the Headworks.



Photo 7

The headworks includes grit separation.



Photo 8

Screenings are discharged to a hopper and sent to a solid waste management facility.



Photo 9

The facility send vented air from headworks into a bark filter to control odors.



Photo 10

Screens



Photo 11

Grit separation







Photo 12

Influent composite sampler



Photo 13

Pump controllers		Photo 14
Pumps and hot water feeds		Photo 15
Additional backup power generator		Photo 16
Primary clarifier		Photo 17

Solids digesters.



Photo 18

Chlorine contact is the outer ring of the aeration tank



Photo 19

Step feed control gates



Photo 20

Step feed aeration



Photo 21

Effluent composite sampler



Photo 22

Temporary pump remains on site while they verify that pumps are functioning adequately.



Photo 23

Area outside the membranes stormwater collection.

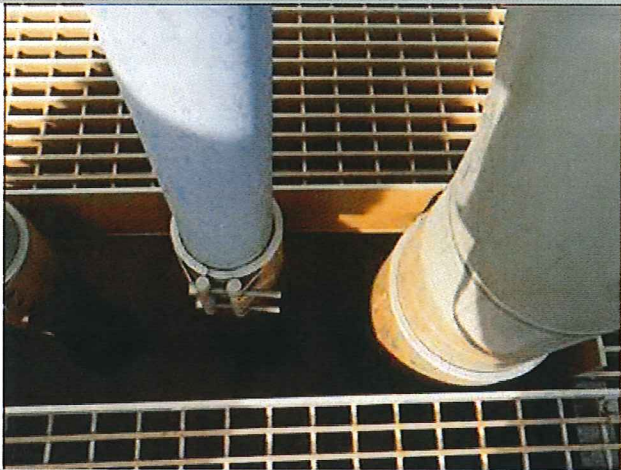





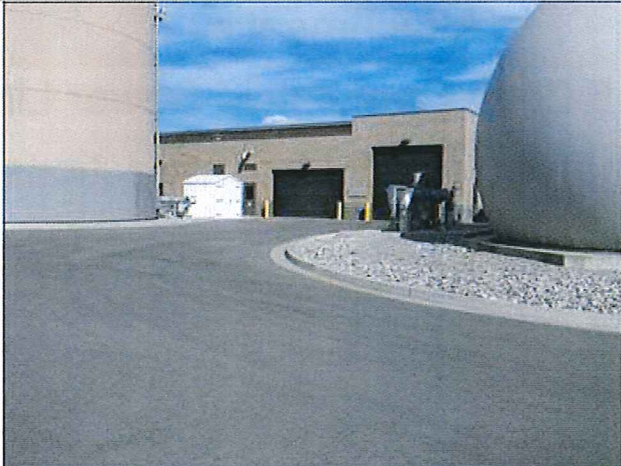

Photo 24

Stormwater around the site is collected and sent to the headworks



Photo 25

Membrane filters		Photo 26
Chemical storage area		Photo 27
Methane collection		Photo 28
Backup generator		Photo 29

Solids processing building		Photo 30
All manuals are located on site and available to operators and staff.		Photo 31

Section D: COMPLETED BY: Diana Washington PE

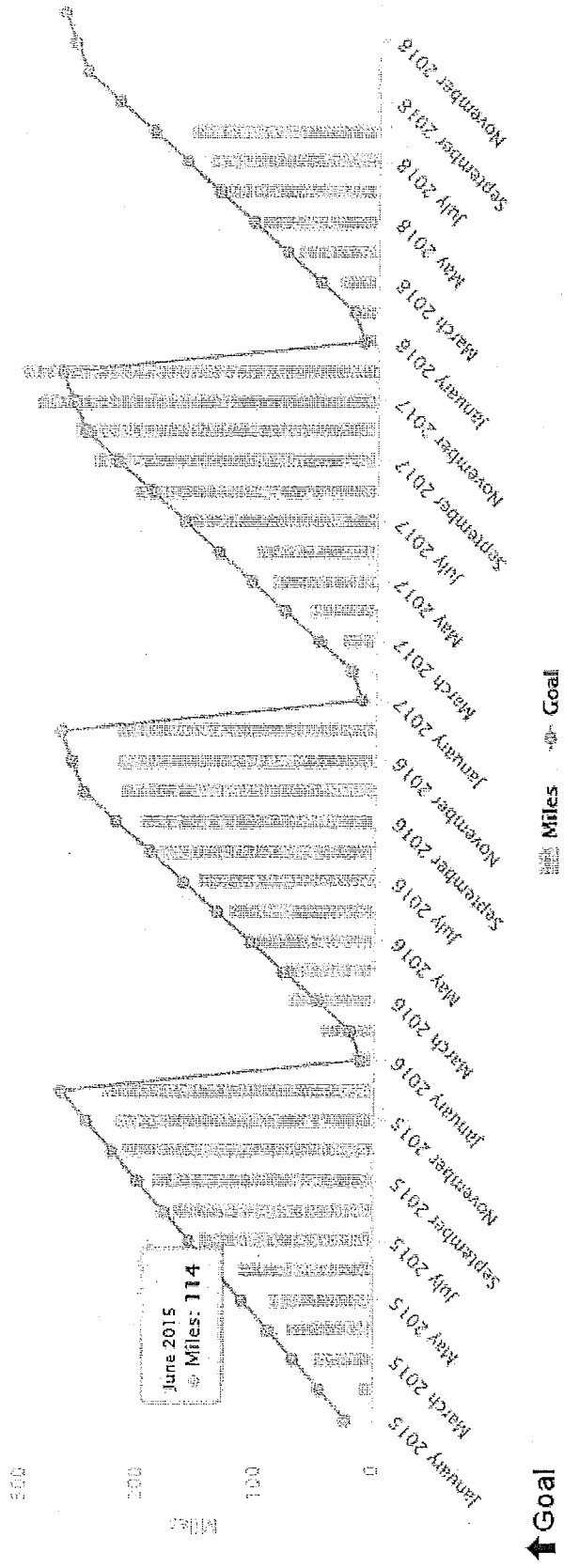
TITLE: Senior Engineer and Permit Manager

DATE: 10/24/2018

TELEPHONE: 509-329-3519

Attachment A:
2015-2018 Cumulative Sewer Line
Cleaning and Video Inspections

2015-2018 Cumulative Sewer Line Cleaning



Associated Projects (0)

Feedback (0)

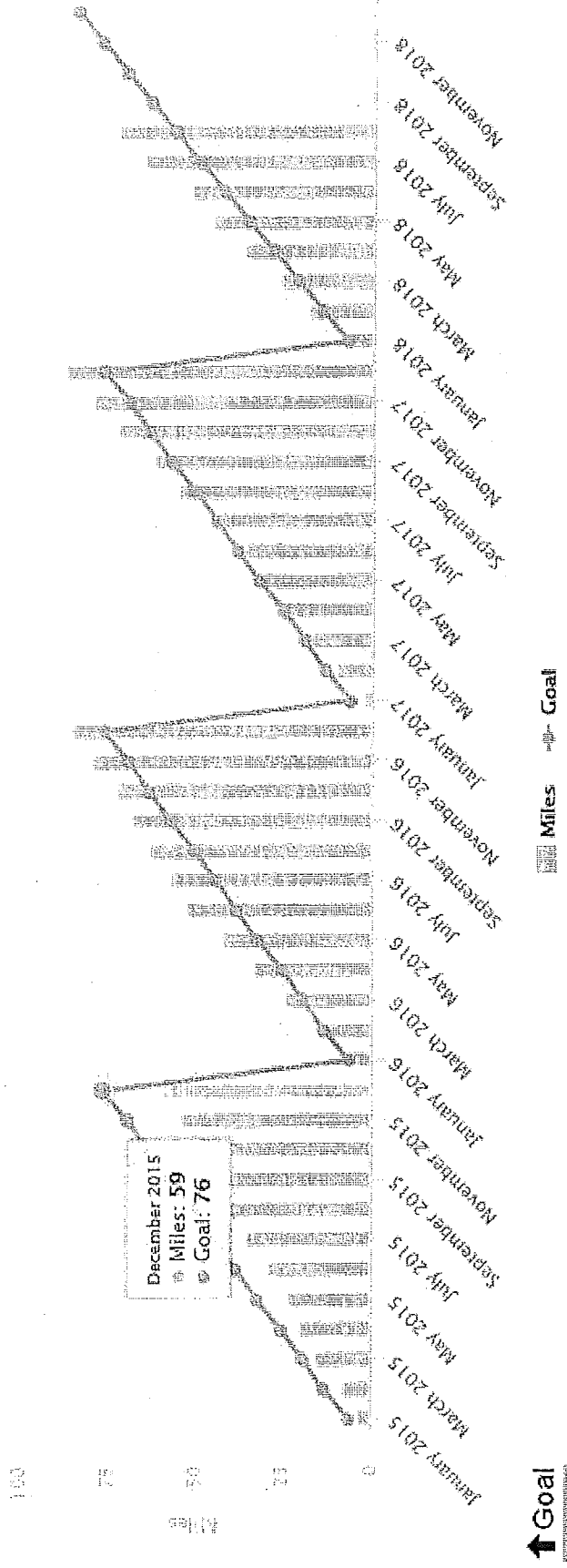
DESCRIPTION:

Spokane County Environmental Services has two line cleaning crews. Our line cleaning program is to clean each gravity sewer line at least every three years. Also, there are problem areas that are cleaned multiple times per year. There are over 624 miles of gravity sewer pipe in our system.

SIGNIFICANCE:

The line cleaning program is an aggressive, proactive program aimed to eliminate sewer spills, odors and backups. Our line cleaning crews are doing important work every day that minimizes emergency repairs and results in excellent service to our customers. Note: Line cleaning production generally slows down during the winter months due to hazardous road conditions and the line cleaning equipment (which use water) cannot work when temperatures are below freezing.

2015-2018 Cumulative Sewer Line Video Inspections



Associated Projects (0)
 Feedback (1)

DESCRIPTION:

Spokane County Environmental Services has two video inspection crews. Our program is to inspect each gravity sewer line every 10 years. New sewer lines are inspected before being put into service. Also, problem areas are inspected more frequently. There are over 624 miles of gravity sewer pipe in our system.

SIGNIFICANCE:

The video inspection program identifies sewer line faults including cracks, roots, obstructions, groundwater infiltration and evidence of backups. This information is used to identify repair projects and develop a condition rating for the sewer system. Our crews are doing very important work every day that results in fewer backups and excellent service to our customers.

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(I)(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.