Inspection Summaries in iPACS

Inspection summaries included in the "Inspection Comments" within iPACS inspection entries are used to populate the Monthly and Quarterly Compliance Report to OC San. Effective immediately the following guidance will be used for entering inspection summaries into the Inspection Comments entry field in iPACS:

Requirements for Inspection Summaries in iPACS

Summaries for "Noncompliant" Industries

- 1. Inspection Date (Autofill from iPACS do not enter into Summary box)
- 2. Inspector Name
- 3. Purpose
 - a. Routine, Compliance, Permit, Closure, Other
- 4. Type of Inspection
 - a. Direct, Indirect, Emergency, Liquid Waste Hauler, Other
- 5. IU Person Contacted (Name and Title)
- 6. Narrative of What Was Done, Discussed, and Required

Example:

Inspected on 8/7/2018 (1 – Autofill from iPACS – do not enter into Summary box)

<u>Lucas Gilbert</u> (2) conducted a <u>compliance inspection</u> (3) of the <u>direct industrial user</u> (4), escorted by <u>George Washington the On-Site Engineer</u> (5). Permittee was issued a Notice of Violation (NOV) for repeated pH violations on 8/1/2018. In the response to the NOV permittee had stated that pH violations were a result of a faulty effluent pH meter and a new meter had been purchased and installed to correct these issues. The new pH meter was inspected and placed in 4.0 and 7.0 buffers to review recordings and observe if alarm system functioned as intended. pH analysis of the buffers were adequate and alarm sounded on the 4.0 buffer as intended. All areas inspected appeared to meet permit and NOV requirements. (6)

Summaries for "Compliant" Industries

- 1. Inspection Date (Autofill from iPACS do not enter into Summary box)
- 2. Inspector Name
- 3. Purpose
 - a. Routine, Compliance, Permit, Closure, Other
- 4. Type of Inspection
 - a. Direct, Indirect, Emergency, Liquid Waste Hauler, Other
- 5. IU Person Contacted (Name and Title)
- 6. Narrative of any relevant findings or statement regarding compliance determination.

Example:

Inspected on <u>9/9/2018</u> (1 – Autofill from iPACS – do not enter into Summary box)

<u>Michael Plasencia</u> (2) conducted a <u>routine inspection</u> (3) of the <u>Liquid Waste Hauler</u> (4), escorted by John Ada<u>ms the Chief Engineer</u> (5). All areas inspected appeared to meet permit requirements. (6)

Violation and Enforcement Summaries in iPACS

Violation and Enforcement summaries included in the corresponding comment entry field within iPACS are used to populate the Monthly and Quarterly Compliance Report to OC San. Effective immediately the following guidance will be used for entering violation and enforcement summaries into the corresponding comment entry fields in iPACS:

Requirements for Violation and Enforcement Summaries in iPACS

Summaries for each Violation

- 1. Date of Noncompliance
- 2. Date Detected
- 3. Violation Description
 - a. Analysis Result and Regulatory Limit Exceeded
 - b. Reporting Requirement Violated and How
 - c. Other with description

Summaries for each Enforcement

- 1. Date of Enforcement
- 2. Enforcement Action
- 3. Enforcement Requirements
- 4. IU Response Date and Details
- 5. Compliance Status/Date

Example:

Violation: Permit Limit Exceedance – First Violation within six-month period – Minor Violation Comments: On <u>4/9/2018</u> (1) SAWPA collected a wastewater sample from Monitoring Point 002. The laboratory analyses results received on <u>4/30/2018</u> (2) indicated a Zinc concentration of 3.93 mg/L, which exceeded the Daily Maximum Discharge Limitation of 2.61 mg/L as stated in Permit No D1234-5. (3)

Enforcement: NOV

Comments: On 5/7/2018 (4) a Notice of Violation and Order for Corrective Action (NOV) (5) was issued, which required the permittee to resample for Zinc and provide the analysis results to SAWPA by 5/23/2018. Furthermore, the permittee was required to submit a written report detailing the cause and corrective actions taken to prevent recurrence of the violation by no later than 5/23/2018. (6) Permittee responded on 5/21/2018 and attributed the cause of the violation to an accumulation of sludge on the bottom of the effluent brine storage tank (Tank). The permittee cleaned the Tank and hauled the sludge off on 5/10/2018 and provided the waste manifest for its disposal in their response. The resample conducted on 5/11/2018 indicated a Zinc concentration of 0.23 mg/L, in compliance with the Daily Maximum Discharge Limitation of 2.61 mg/L as stated in Permit No D1234-5. (7) Enforcement closed on 5/30/2018. (8)