

Wyoming Department of Environmental Quality

WYPDES Industrial Inspection

“What to Expect When You’re Inspected”



Industrial Discharge Facility Inspection

There are 51 individual discharge permitted Industrial facilities in the state of Wyoming. Industrial facility inspections are scheduled with as little pre-warning as possible, to preserve the integrity of the inspection. Minor industrial facilities are inspected at least once every five years, and Major industrial facilities are inspected annually. A WYPDES inspection of an industrial facility consists of two parts: a records review and site inspection. Below is a summary of what occurs during both:

Records Inspection:

A records inspection is a quality assurance/quality control (QA/QC) audit conducted to determine if the information being reported to the regulatory agent is correct. The discharge monitoring reports (DMRs) submitted by the permittee must accurately reflect the analytical results reported by the lab on the associated laboratory reports and/or bench sheets. The audit also ensures that samples were collected and analyzed utilizing standard methods to produce reliable results.

The inspector will request an audit for approximately the last year to 18 months of documentation. Documents necessary to maintaining compliance with the WYPDES permit must be maintained on site or at the nearest local field office for a minimum of three years from creation. All records must be made available to DEQ staff upon request:

1. A copy of the Current WYPDES discharge permit will be requested to confirm compliance.
2. Discharge Monitoring Reports (DMRs) will be compared to their corresponding lab sheets to confirm reported results. This includes WETT testing and lab QA/QC reports.
3. Regulatory correspondence including past inspection reports, enforcement documents, permit renewals, etc... will also be reviewed.
4. Chain of custody (COC) forms will be reviewed to confirm sample dates and times, analysis requested, preservatives used, and temperature of samples upon receipt at the contract or in house lab. The date and time of receipt of samples at the contract lab will also be reviewed to confirm parameter holding times.
5. Operation and Maintenance (O&M) manual and Spill log books are checked to determine that the information provided about the treatment facility is current.
6. Calibration logs for any meter used (ex. pH meter, conductivity meter, DO meter, etc.) will be inspected for calibrations, buffer lot numbers, buffer expiration dates, and maintenance notes.

7. If onsite laboratory is utilized, the following will be inspected: Lab Bench sheets, instrument calibration logs, temperatures of refrigerators for sample storage, incubators, ovens and balances.

The following is a list of common non-compliance issues encountered during a record inspection:

1. Inability to provide pH meter calibration data.
2. Not collecting field pH within the 15 minute required hold time.
3. Field sheets not being consistently filled out.
4. When applicable, not completing unit conversions correctly.
5. Non-compliant holding times and out-of-range temperatures of samples sent to contract laboratory for analysis.

Field Inspection:

Field inspections are conducted to determine compliance with permit conditions. The following list describes the steps taken to set up the field inspection and the type of information the inspector collects when conducting the field inspection:

1. Because of the activities that take place on site at many industrial facilities, it is preferable, if not essential, that the inspector be accompanied by the appropriate facility personal during the site visit.
2. Relevant points of compliance will be inspected including points of discharge (outfalls), waste water ponds, treatment processes, auto-samplers if present, flow measuring devices and outside chemical storage locations.
3. Photographs, GPS coordinates, and notes will be taken at these key inspection points to help determine compliance with permit conditions.
4. Alarms used for system failures will be observed and discussed.
5. Determine if bypass of treatment system is possible and if a bypass has occurred.
6. Determine if industrial products could contaminate storm water onsite.
7. Do sampling protocols comply with current permit and appropriate sampling techniques?
8. Ensure the appropriate methods for water sampling are used and ensure they comply with the current permit.
9. Are samples collected from the permitted monitoring point(s)? If the monitoring point(s) is inaccessible (river at flood stage), are samples being collected from an appropriate location?
10. Collect samples in accordance to the WYPDES permit.

The following is a list of common non-compliance issues encountered during field inspections at industrial facilities:

1. Inadequate freefall at outfall for sample collection.
2. Improper sampling techniques for parameters specified in the permit.
3. Exceedance of parameter(s).
4. Inefficient Best Management Practices (BMPs) for chemical storage.

5. Not performing follow-up sampling specified in permit following an exceedance.