

# Guidance for Completing the Michigan Department of Environmental Quality (MDEQ) Michigan Industrial Pretreatment Program (MIPP)/Federal Industrial Pretreatment Program (FIPP) Industrial Pretreatment Program (IPP) Annual Report Form in MiWaters

**IMPORTANT:** Throughout this Guidance and the IPP Annual Report form the use of "SIU/CIU" refers to the following types of industrial users: Non-Categorical Significant Industrial User(s) = **SIU**, Categorical Industrial User(s) = **CIU** 

**PLEASE NOTE:** Most of the data for this report will be entered in tables/spreadsheets. Please go to Sections 2, 3 and 4 to download the SIU-CIU List Table, the POTW Oversight Table and the Publicly Owned Treatment Works (POTW) Monitoring Data Summary spreadsheet to your computer. Complete the tables offline and upload them in the corresponding section of the report when you are ready to submit your IPP Annual Report. The tables will expand as needed to accommodate all your SIUs/CIUs.

Please save copies of the completed tables/spreadsheets for future reference.

# **Section 1. Control Authority Program Information**

- 1. **Reporting Period.** This question asks for the start and end dates of the reporting period. The reporting period for IPP Annual Reports is January 1 through December 31 of the previous calendar year.
- 2. Did the Control Authority adopt or revise any local limits during the reporting period? Select "YES" if the Control Authority adopted new local limits or revised existing local limits during the previous calendar year. If not, select "NO." If you select "YES" a follow-up question will appear. Please enter the date the new or revised local limits were adopted into your sewer use ordinance. If there was more than one revision or addition to your local limits during the previous calendar year enter the date of the most recent revision or addition.
- 3. Did the Control Authority conduct a local limits evaluation during the reporting period? Select "YES" if the Control Authority conducted an evaluation of the need to revise its local limits during the previous calendar year. Select "NO" If the Control Authority did not conduct a local limits evaluation during the previous calendar year. If you select "YES" a follow-up question will appear. Please enter the date that the local limits evaluation was completed. If more than one evaluation was conducted during the previous calendar year please enter the date the most recent evaluation was completed.

- 4. Did the Control Authority add or delete pollutants from its list of local limits during the reporting period? Select "YES" if the Control Authority added and/or deleted pollutants from its list of local limits. Select "NO" if there were no changes to the list of pollutants for which the Control Authority has established local limits. If you select "YES" question 4a. will appear. Please enter the name of one of the pollutants added to or deleted from the list in the first column and select "ADDED" or "DELETED" in the second column. Add rows until all pollutants added to and/or deleted from the list of local limits have been entered.
- 5. Please identify if there were any problems (e.g., pass-through, interference, violation of [National Pollutant Discharge Elimination System] NPDES permit limits) with the effluent discharge of this POTW covered by this Pretreatment Program during the reporting period. If you select "YES" question 5a. will appear. For each instance of pass-through or interference during the reporting period please select the type of issue and provide a description of the issue including the name(s) of the SIU/CIU(s) that caused the problem. Add a new row for each instance.
- 6. Please identify if there were any problems with the use or disposal of biosolids or sewage sludge for this POTW during the reporting period. If you select "YES" question 6a. will appear. For each problem with the use or disposal of biosolids or sewage sludge during the reporting period please select the type of issue and provide a description of the issue including the name(s) of the SIU/CIU(s) that caused the problem. Add a new row for each instance.

## Section 2. SIU-CIU List

1. Control Authorities are required to provide a list of SIUs/CIUs covered by their pretreatment program to their NPDES permitting authority with each NPDES permit application process (both individual permits and general permits). Approved pretreatment programs also provide updates to their SIU/CIU lists through their Pretreatment Program Report submissions. Because the NPDES E-Reporting rule requires more data for each SIU/CIU than the current NPDES permit application form, POTW Control Authorities are being asked to provide a SIU/CIU list as part of their IPP Annual Report.

Download the SIU-CIU List Table to your computer and complete one row in the SIU-CIU List Table for each SIU/CIU in your approved pretreatment program. We recommend using the previous year's table as a starting point and updating it with any additions, deletions and other changes to the SIU/CIU list. The table below explains what information is required in each column of the SIU-CIU List Table.

**IMPORTANT:** Leave the "NPDES ID" column blank again this year. NPDES IDs will be assigned by MDEQ as we enter the SIU/CIU information into MiWaters. You will be notified when the NPDES IDs are available. Once NPDES IDs are available, please add them to your copy of the SIU-CIU List Table and save it for the following year's IPP Annual Report. The NPDES ID is a unique identifier for each facility in the United States Environmental Protection Agency's ICIS-NPDES database. It does not imply that the facility has a direct discharge (NPDES) permit. The NPDES ID is tied to the facility and **will not change**. If the facility's name or ownership changes, if there is a new categorical standard, or if a categorical facility becomes a SIU it keeps the same NPDES ID.

Column Header	What to enter
A. SIU/CIU NPDES ID	Leave blank again this year. MDEQ will notify you when NPDES IDs are available.
B. SIU/CIU Name	The name of the facility.
C. SIU/CIU Site Address	The address of the physical location of the facility.
D. SIU/CIU City	The name of the city, town, village, or other locality, when identifiable, within which (the majority of) the facility site is located. This is not always the same as the city used for United States Postal Service (USPS) mail delivery.
E. SIU/CIU County	The name of the County within which (the majority of) the facility site is located.
F. SIU/CIU State	The USPS abbreviation for the state or state equivalent where the facility is located.
G. SIU/CIU Zip	The combination of the 5-digit ZIP code and the 4-digit extension code (if available) where the facility is located. This zip code matches the facility site city or the city used for USPS mail delivery.
H. SIU/CIU Legal Name	The legal name of the person, firm, public organization, or other entity that operates the facility. This name may or may not be the same name as the facility. The operator of the facility is the legal entity that controls the facility's operation rather than the facility or site manager. This data element should not use a colloquial (i.e. informal) name.
I. SIU/CIU SIC Code(s) or NAICS Code(s)	The one or more four-digit Standard Industrial Classification (SIC) codes <b>or</b> six-digit North American Industry Classification (NAICS) codes/descriptions that represent the economic activities of the facility.

J. SIU/CIU SIC/NAICS Primary Code Indicator	The SIC <b>or</b> NAICS code that identifies the primary economic activity of the facility.
K. SIU/CIU Contact Affiliation	The affiliation of the designated facility contact with the facility (e.g., "Owner," "Operator," or "Main Contact").
L. SIU/CIU Contact First Name	The given name of the designated facility contact.
M. SIU/CIU Contact Last Name	The surname of the designated facility contact.
N. SIU/CIU Contact Title	The title held by the designated facility contact.
O. SIU/CIU Contact Email Address	The business e-mail address of the designated facility contact.
P. Industrial User Type (SIU or CIU)	Is the facility a SIU or CIU?
Q. SIU/CIU Subject to Local Limits (Y or N)	Is the SIU subject to local limits? This data element also applies to SIUs and CIUs that discharge non-domestic wastewater by truck, rail, dedicated pipe, or other means of transportation to one or more POTWs.
R. If CIU, are any local limits more restrictive than Categorical Standards? (Yes/No/NA)	If this facility is a CIU, is it subject to one or more local limits that are more stringent than the applicable categorical standards? (Yes/No). If the facility is a SIU enter "NA."
S. For CIUs, list applicable Categories(s) by 40 CFR Part Number(s)	If the facility is a CIU, list the 40 CFR part number for ALL applicable categorical standards [e.g. Part 433 (Metal Finishing)]. If the facility is a SIU enter "NA."

# **Section 3. POTW Oversight Table**

1. Cut and paste the second column of the SIU-CIU List Table into the second column of the POTW Oversight Table. Then enter the required information for each SIU-CIU. (In the future, after the NPDES IDs are added to your saved copy of the SIU-CIU List Table, you will cut and paste the first two (2) columns of the saved SIU-CIU List Table into the first two (2) columns of the POTW Oversight Table.) The table below explains what information is required in each column.

**IMPORTANT:** Some answers will require an explanation that you will enter as text or upload as an attachment.

Column Header	What to enter
A. SIU/CIU NPDES ID	Leave blank again this year - MDEQ will notify you when NPDES IDs are available.
B. SIU/CIU Name	Facility name.
C. SIU/CIU Permit Status	What was the permit status for the SIU/CIU at the end of the reporting period? Select one of the following from the drop-down list: Effective, Expired, Administratively Continued, Pending, Not Needed, Required, Denied or Terminated. Administratively continued means that the permit contains language stating that the permit will remain in effect past the expiration date provided the application for permit reissuance is submitted X days before the permit expiration date. SIU/CIU permits <b>may not</b> be administratively continued beyond five (5) years from the effective date.
D. SIU/CIU Permit Effective Date	Enter the most recent date when the current permit for the SIU/CIU became effective. The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day.
E. SIU/CIU Permit Modification Date	If the permit for this SIU/CIU was modified during the reporting period, enter the date of the most recent permit modification. The date must be provided in YYYY-MM-DD format. If the SIU/CIU permit was not modified during the reporting period enter "NA."
F. SIU/CIU Permit Expiration Date	Enter the date when the current permit for the SIU/CIU will expire. The date must be provided in YYYY-MM-DD format.
G. SIU/CIU Maximum Monthly Average Wastewater Flow Rate	Enter the maximum monthly average wastewater flow rate (in gallons per day) within the reporting period.
H. Number of Inspections by Control Authority	Enter the number of inspections the Control Authority conducted at the SIU/CIU within the reporting period. Inspections that should counted include those described in the "Industrial User Inspection and Sampling Manual," EPA-831-B-17-001, January 2017.

I. Number of Sampling Events by Control Authority	Enter the number of <b>complete</b> sampling events the Control Authority conducted at the SIU/CIU within the reporting period. A complete sampling event means that all permitted parameters have been sampled by the Control Authority. For example if a SIU permit contains limits for metals and volatile organics and the Control Authority samples the SIU for metals one month and volatile organics the next month, that counts as <b>one complete</b> sampling event. Or if the Control Authority samples the SIU once for volatile organics and four times for metals during the reporting period, that counts as <b>one complete</b> sampling event.
J. Maximum Number of Required SIU/CIU Self-Monitoring Events	Enter the maximum number of required self-monitoring sampling events the SIU/CIU must report to the Control Authority within the reporting period. For example, if a SIU/CIU must sample for metal pollutants monthly and sample for volatile pollutants twice a year, then the Control Authority should enter "12" for this value. If the Control Authority conducts all the sampling (i.e. the SIU/CIU is not required to conduct any sampling or reporting), then this value should be reported as "0."
K. Did the SIU/CIU Comply with All Required Self-Monitoring and Reporting for All Permitted Pollutants? (Yes/No/NA)	Select "Yes" if the SIU/CIU completed all required self-monitoring and reporting during the reporting period. Select "No" if the SIU/CIU did not complete all required self-monitoring and reporting during the reporting period. Select "NA" (Not Applicable) if the Control Authority conducts all the sampling for the SIU/CIU. If "No" you must include an explanation in question # 2 of this section of the report. This can be done by uploading a WORD document or PDF document or by entering text directly in the "Comment" box.
L. Notification of Changed Discharge Submission (Yes/No)	Did the SIU/CIU submit a notification to the Control Authority within the reporting period of a substantial change in the volume or character of pollutants in its discharge, including the listed or characteristic hazardous wastes for which the SIU/CIU previously submitted notice?
M. SNC with Pretreatment Standards or Limits (Yes/No)	Was the SIU/CIU in Significant Non-Compliance (SNC) with any pretreatment standard or local limit applicable to the SIU/CIU's discharge within the reporting period? [R323.2302 (dd) (i), (ii) and (iii)] Select "Yes" or "No."
N. SNC Pollutant(s)	List the pollutant(s) for which the SIU/CIU was in SNC within the reporting period. If more than one, separate with commas. For example: Copper, Mercury, Nickle, Zinc.
O. SNC with Reporting Requirements (Yes/No)	Was the SIU/CIU in SNC with reporting requirements (including baseline monitoring reports, notice of potential problems, periodic self-monitoring reports, notice of change in industrial user discharge, hazardous waste notification and BMP certification) within the reporting period? [R323.2302 (dd) (v) and (vi)] Select "Yes" or "No."

P. SNC with Other Control Mechanism Requirements (Yes/No)	Was the SIU/CIU in SNC)with any other permit requirements within the reporting period? This does not include instances of SNC that relate to the industrial user's applicable discharge standards or local limits or reporting requirements. [R323.2302 (dd) (vii) and (viii)] Select "Yes" or "No."
Q. SNC for Causing Interference/Pass-Through with POTW Discharge or POTW Operations (Yes/No)	Did the SIU/CIU cause or contribute to any problems (e.g., pass-through, interference, violation of NPDES permit limits) with the receiving POTW's effluent discharge during the reporting period? Select "Yes" or "No." [40 CFR 403.3(k) and (p)] If "Yes" you must include an explanation in question # 2 of this section of the report. This can be done by uploading a WORD document or PDF document or by entering text directly in the "Comment" box.
R. SNC for Causing Interference/Pass-Through with POTW Biosolids or Sewage Sludge Management	Did the SIU/CIU cause or contribute to any problems (e.g., interference with the use or disposal of biosolids or sewage sludge, violation of NPDES permit requirements or EPA's regulations at 40 CFR part 503) with the receiving POTW's biosolids or sewage sludge within the reporting period? Select "Yes" or "No." [40 CFR 403.3(k) and (p)] If "Yes" you must include an explanation in question # 2 of this section of the report. This can be done by uploading a WORD document or PDF document or by entering text directly in the "Comment" box.
S. Listing of Months in SNC	List each month the SIU/CIU was in SNC within the reporting period. These data must be provided in YYYY-MM format. For example, if the SIU/CIU was in SNC status for January and February 2017, enter "2017-01, 2017-02."
T. SNC Published (Yes/No)	Was the SIU/CIU published for SNC within the reporting period? Select "Yes" or "No."  NOTE: MIPPS are only required to publish CIUs in SNC. [Rule 323.2306 (d)] If "Yes" upload proof of publication in question # 3 of this section of the report.
U. Number of Notices of Violation	Enter the number of formal notices of violation or equivalent actions issued to the SIU/CIU by the Control Authority within the reporting period. If none, enter "0."
V. Number of Administrative Orders	Enter the number of Administrative Orders or equivalent actions issued to the SIU/CIU by the Control Authority within the reporting period. If none, enter "0."
W. Number of Civil Suits	Enter the number of civil suits filed against the SIU/CIU by the Control Authority within the reporting period. If none, enter "0."
X. Number of Criminal Suits	The number of criminal suits filed against the SIU/CIU by the Control Authority within the reporting period. If none, enter "0."

Y. SIU/CIU Cash Civil Penalty Amount Assessed	For Civil Judicial Enforcement Actions, enter the dollar amount of the penalty assessed against the SIU/CIU within the reporting period as specified in the final entered Consent Decree or Court Order. For Administrative Enforcement Actions, enter the dollar amount of the penalty assessed in the Consent/Final Order. If none, enter "0."
Z. SIU/CU Cash Administrative/Civil Penalty Amount Collected	For Civil Judicial Enforcement Actions, the dollar amount of the penalty collected from the SIU/CIU within the reporting period. For Administrative Enforcement Actions, it is the dollar amount collected of the penalty assessed in the Consent/Final Order. If none, enter "0."

- 2. Select "YES" if you answered "No" for any SIU/CIU in column K, or if you answered "Yes" for any SIU/CIU in columns Q or R of the POTW Oversight Table. Select "NO" if you answered "Yes" for all SIU/CIUs in column K and if you answered "No" for all SIU/CIUs in columns Q or R. If you select "YES" a text box and a place to upload files will appear. Please provide an explanation for each instance in the text box or upload a WORD or PDF document. We recommend compiling all required explanations into one document if possible.
- 3. Select "YES" if you entered "Yes" for any SIU/CIU in column T of the POTW Oversight Table. Select "NO" if you entered "No" for all SIU/CIUs in column T. If you select "YES" a place to upload a file will appear. Please upload your proof of publication. Note: MIPPs are only required to publish CIU's in SNC.

# **Section 4. Annual Pollutant Monitoring Summary**

Your NPDES Permit requires the following:

- A summary of results of **all** the sampling and analyses performed of the wastewater treatment plant's influent, effluent, and biosolids conducted in accordance with approved methods during the reporting period.
- The summary shall include the [maximum, i.e. highest] monthly average, daily maximum, quantification level, and number of samples analyzed for each pollutant.
- At a minimum, the results of analyses for all locally limited parameters for at least one monitoring event that tests influent, effluent and biosolids during the reporting period shall be submitted with each report, unless otherwise required by the Department.
- 1. Complete the Pollutant Monitoring Summary Table and upload it in the space indicated. In the first column of the table, list all the pollutants for which you have approved local limits and/or an approved maximum allowable headworks loading. In

columns B through G enter information regarding the approved local limits (not all columns may apply). In columns H through L summarize all the influent monitoring data for each pollutant that was collected during the reporting period; in columns M through Q summarize all the effluent monitoring data for each pollutant that was collected during the reporting period; and in columns R through V summarize all the biosolids monitoring data for each pollutant that was collected during the reporting period.

Please remember this is a SUMMARY. Please DO NOT upload your laboratory bench sheets or the analytical reports from your contract laboratory. If District IPP staff have questions about the data, they will contact you directly and request additional information. If you do not have monitoring data for each local limit, please contact District IPP staff to discuss. In the event the data for a single parameter has multiple quantification levels, please enter the highest quantification level.

## Please note:

The monitoring summary must include the results (maximum monthly average and daily maximum) of <u>all</u> the sampling and analysis of the wastewater treatment plant influent, effluent and biosolids for locally limited parameters conducted during the previous year, not just the results of a single sampling event. For example, if you have a local limit for total suspended solids (TSS) and your NPDES Permit requires daily monitoring for TSS, all 365 days' influent and effluent monitoring results should be included in your calculation of the averages reported in the pollutant monitoring summary.

## Section 5. Additional Information and Attachments

- 1. If you made any changes to the approved IPP, substantial or non-substantial, that you have not submitted to DEQ for approval, select "YES." If not, select "NO." If you select "YES" question 1a. will appear. Describe the changes in the text box provided. After submitting the IPP Annual Report please submit the program modifications to MiWaters using the "IPP Unscheduled Submissions for Approval" schedule.
- 2. Please upload additional information as needed, including program highlights and achievements, explanations of additions and/or deletions to your SIU/CIU list, any significant violations and enforcement issues involving permitted and/or un-permitted industrial users, and any other information as appropriate.