POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

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CA name and address:	Date(s) of PCI
	Period covered by PCI

PIRT / DSS incorporated in NPDES permit?	Yes	No

INSPECTOR (S)		
Name	Title/Affiliation	Telephone Number

CA REPRESENTATIVE (S)		
Name	Title/Affiliation	Telephone Number
	*	

*Identified program contact

ACRONYM LIST

Acronym	Term
BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
FTE	Full-time equivalent
FWA	Flow-weighted average
gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical review criteria
TTO	Total toxic organics
WENDB	Water Enforcement National Data Base

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SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on CA activities <u>since the last PCI or audit</u>. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

	Yes	No
1. Did the CA make substantial changes to the pretreatment program that were not approved by the Approval Authority (e. g., definitions, limits)?		

If yes, describe.

	Yes	No
2. Is the CA in the process of modifying any approved pretreatment program component (including legal authority, local limits, DSS requirements, etc.)?		

If yes, describe.

	YES	NO
3. a. Has the CA adopted the 3 required components of the streamlining regulations (slug control requirements referenced in the control mechanisms, definition of SNC, and modification to sampling requirements)?		

If not, when?

	YES	NO
b. Does the CA plan to adopt any of the non-mandatory aspects of the streamlining regulations?		

If yes, describe.

SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

B. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

2. How many IUs are currently identified by the CA in each of the following groups?

a.		SIUs (as defined by the CA) [WENDB - SIUS]
		Large CIUs [WENDB - CIUS]
		Zero-discharging CIUs
		Middle-Tier CIUs*
		Noncategorical SIUs**
b.		Other regulated noncategorical IUs (specify)
c.		TOTAL

The following section is to be completed only if the POTW has adopted Middle Tier Permitting.

List Large CIUs:

List Middle-Tier CIUs:

List Noncategorical SIUs:

d. NSCIUs** (as defined by 40 CFR 403.3(v)(2))

List NSCIUs:

* Middle Tier CIUs are those that discharge categorical wastewater that does not exceed any of the following:
- 0.01% of the design dry weather hydraulic capacity of the POTW, or 5,000 gpd whichever is smaller, as measured by a continuous effluent flow monitoring device
- 0.01% of the design dry weather organic capacity of the POTW
- 0.01% of the maximum allowable headworks loading for any pollutant for which approved local limits were developed by a POTW.

** A NSCIU never discharges more than 100 gpd of total categorical wastewater (excluding, noncontact cooling and boiler blowdown wastewater) and the following conditions are met:
- Discharger consistently complied with all applicable categorical requirements
- Discharger submits annual certification statement required in 40 CFR 403.12(q)
- Discharger never discharges any untreated concentrated wastewater.

SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism ?

   List SIUs:

   b. How many SIUs (as defined by the CA) are required to be covered by a general control Mechanism?

   List SIUs:

   c. How many SIUs are not covered by an existing, unexpired permit or other control mechanism ? [WENDB - NOCM] [RNC - II]

   If any, explain.

2. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism ? [RNC - II]

   If any, explain.

SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. a. How many SIUs were not evaluated for the need to develop slug discharge control plans*? [403.8(f)(2)(vi)]

b. List the SIUs below or attach additional sheets as needed.

* For dischargers identified as significant prior to November 14, 2005, this evaluation must be performed at least once by October 14, 2006. Additional SIUs must be evaluated within 1 year of being designated as a SIU.

	N/A	Yes	No
2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW ?			

If yes, identify the industries.

If no, explain.

	Yes	No
3. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]		

If yes, identify and explain.

SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. Identify the following.

Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection			
• CIUs			
• Middle-Tier CIUs			
• NSCIUs			
• Other SIUs			
b. Sampling (by CA)			
• CIUs			
• Middle-Tier CIUs			
• NSCIUs			
• Other SIUs			
c. Self – Monitoring			
• CIUs			
• Middle-Tier CIUs			
• Other SIUs			
d. Reporting			
• CIUs			
• Middle-Tier CIUs			
• NSCIUs			
• Other SIUs			

2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(vi)] [WENDB - NOIN] [RNC - II]

a. Not sampled or not inspected at least once [WENDB - NOIN]		%
b. Not sampled at least once		%
c. Not inspected at least once		%

If any, explain.

SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT

1. Which of the following enforcement actions did the CA use?

	N/A	Yes	No
a. Notice or letter of violation			
b. Administrative orders			
c. Administrative fines			
d. Show cause hearings			
e. Compliance schedules			
f. Permit revocation			
g. Civil suits			
h. Criminal suits			
i. Termination of services			
j. Other (specify)			

Explain if appropriate

	N/A	Yes	No
2. Did the CA comply with its approved ERP? [403.8(f)(5)] [RNC - II]			

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the inspection.

SNC Evaluation Period

	%	Applicable pretreatment standards and reporting requirements
	%	Self - monitoring requirements
	%	Pretreatment compliance schedules

*SNC defined by:

POTW	
EPA	

3a. Indicate the number of SIUs that have been in 100% compliance with all pretreatment requirements?

Evaluation Period: _____

Number of SIUs: _____

Names of SIUs:

SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)

	Yes	No
4. Did the CA publish all SIUs in SNC in the largest local daily newspaper in accordance with NPDES permit requirements ? [403.8(f)(2)(vii)]		

5. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENDB - SINN]	

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unk	Explain
• Interference				
• Pass through				
• Fire or explosions (flashpoint, etc.)				
• Corrosive structural damage				
• Flow obstruction				
• Excessive flow rates				
• Excessive pollutant concentrations				
• Heat problems				
• Interference due to O&G				
• Toxic fumes				
• Illicit dumping of hauled wastes				
• Worker health and safety				
• Other (specify)				

	Yes	No
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]		

SECTION I: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)

7. a. How many SIUs are on compliance schedules? _____

b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).

SIU	End Date

	Yes	No
8. Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)] If yes, identify and explain.		

	Yes	No
9. Did any SIUs return to compliance by any of the following? [RNC -I]		
a. Within 90 days		
b. Within the time specified in the ERP		
c. Through a compliance schedule component (including legal authority, local limits, DSS requirements, etc.) ?		

G. ADDITIONAL EVALUATIONS

SECTION I COMPLETED BY: TITLE:	DATE: TELEPHONE:
POTW REPRESENTATIVE PROVIDING RESPONSES:	DATE: TELEPHONE:

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SECTION II: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on problems identified. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

NARRATIVE COMMENTS			
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes [ ] No [ ]	Applicable Federal category	Compliance status [ ] SNC (period:_____) [ ] Noncompliance/corrected [ ] Noncompliance/continuing	
Comments			

SECTION II: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes [ ] No [ ]	Applicable Federal category	Compliance status [ ] SNC (period:_____) [ ] Noncompliance/corrected [ ] Noncompliance/continuing	
Comments			

NARRATIVE COMMENTS			
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes [ ] No [ ]	Applicable Federal category	Compliance status [ ] SNC (period:_____) [ ] Noncompliance/corrected [ ] Noncompliance/continuing	
Comments			

SECTION II: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes [ ] No [ ]	Applicable Federal category	Compliance status [ ] SNC (period:_____) [ ] Noncompliance/corrected [ ] Noncompliance/continuing	
Comments			

NARRATIVE COMMENTS			
FILE _____ Industry name and address		Total flow (gpd)	Process flow (gpd)
		Type of industry (products manufactured)	
Industry visited during PCI Yes [ ] No [ ]	Applicable Federal category	Compliance status [ ] SNC (period:_____) [ ] Noncompliance/corrected [ ] Noncompliance/continuing	
Comments			

SECTION II: IU EVALUATION (Continued)

Industry Name					
					INSTRUCTIONS: Evaluate the contents of SIU files. If no problem exists for a particular question, mark the square with a check (√). Use (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Where a problem is indicated, mark with a numerical value and provide a corresponding explanation in the comment area below. Comment on each problem identified. For example, if the file is missing a notification of classification, place a (1) in the square and a matching statement as to the nature of the problem that exists in the space below. The next problem would be marked as (2) and so on. Clearly indicate the file that each comment pertains to; also indicate where a comment applies to all the files.

File ___	File ___	File ___	File ___	File ___	**IU FILE REVIEW**	**Reg. Cite**
					A. CA NOTIFICATION OF IU	
					1. Notification of classification or change in classification	403.8(f)(2)(iii)
					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)

Comments

SECTION II: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
					a. Statement of duration (≤ 5 years)	
					b. Statement of nontransferability	
					c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
					• Identification of pollutants to be monitored	
					• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
					• Sampling frequency	
					○ Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to be not present? (Y/N)	
					• Sampling locations/discharge points	
					• Sample types (grab or composite)	
					• Reporting requirements (including all monitoring results)	
					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
					g. Notice of slug loading	
					h. Notification of spills, bypasses, upsets, etc.	
					i. Notification of significant change in discharge	
					j. 24-hour notification of violation/resample requirement	
					k. Slug discharge control plan, if determined by the POTW to be necessary.	

Comments

SECTION II: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					e. Documentation to support the POTW's determination	

Comments

SECTION II: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDRDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification of nonsignificant CIU	403.3(v)(2)
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
					5. Calculation and application of production based-standards	403.6(c)
					6. Calculation and application of CWF or FWA	403.6(d)&(e)
					7. Application of most stringent limit	403.8(f)(1)(ii)

Comments

SECTION II: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	
					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
					b. If a POTW has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Sample and analyze IU discharge at least once every 2 years	
					2. Sampling at frequency specified in approved program	
					3. Documentation of sampling activities	403.8(f)(2)(vi)
					4. Analysis for all regulated parameters	
					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
					b. If a POTW has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Inspect at least once every 2 years	
					7. Inspection at frequency specified in approved program	
					8. Documentation of inspection activities	403.8(f)(2)(vi)
					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)

Comments

SECTION II: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vi)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vi)

Comments

SECTION II: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					F. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
					2. Analysis of all required pollutants	403.12(g)(1)&(h)
					3. Submission of BMR/90-day report	403.12(b) &(d)
					4. Periodic self monitoring reports	403.12(e)&(h)
					5. Reporting all required pollutants	403.12(g)(1)&(h)
					6. Signatory/certification of reports	403.12(l)
					7. Annual certification by NSCIUs	403.12(q)
					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					11. Notification of hazardous waste discharge	403.12(j)&(p)
					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
					Discharge	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	403.5(a)(1)
					• Spill or slug load	403.12(f)
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)

Comments

SECTION II: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments

SECTION II COMPLETED BY:	DATE:
TITLE:	TELEPHONE:

SECTION III: EVALUATION AND SUMMARY

INSTRUCTIONS: Identify program components that the CA is recommended (Rec.) or required (Req.) to implement in order to effectively implement the pretreatment program and/or to meet its regulatory requirements. Specify the corrective action the CA needs to take.

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
A. CA PRETREATMENT PROGRAM MODIFICATION				
1. Notify of program modification	403.18	I.A		
2. Modify the program to accommodate the streamlining regulations	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(viii), 403.12(g)	I.A.3; II.B.2.d; II.B.2.k; II.E.2		
B. IU CHARACTERIZATION				
1. Identify and locate all SIUs	403.8(f)(2)(i)	I.B		
2. Identify the character and volume of pollutants contributed to POTW by IUs	403.8(f)(2)(ii)	I.B.1; I.E.1		
C. CONTROL MECHANISM EVALUATION				
1. Issue individual or general control mechanisms to all SIUs	403.8(f)(1)(iii)	I.C.1 & 2; II.B.1;		

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
C. CONTROL MECHANISM EVALUATION (Continued)				
2. Ensure control mechanisms contents include: a. A statement of duration b. A statement of nontransferability c. Effluent limits d. Self - monitoring requirements e. A statement of penalties f. Compliance schedules g. Notice of slug loading h. Notification of spills, bypasses, upsets, etc. I. Notification of significant change in discharge j. 24-hour notification of violation/resample requirement	403.8(f)(1)(B)	II.B.2.a-j		
D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS				
1. Apply all applicable pretreatment standards	403.8(f)(1)(iii)	II.B.2.a-j		
2. Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(vi); 403.5	I.D.2; II.C.1 - 6		
E. COMPLIANCE MONITORING				
1. Inspect and sample each SIU in accordance with approved program	Approved program	I.E.1; II.D.2 & 7;		

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
E. COMPLIANCE MONITORING (Continued)				
2. Inspect and sample each SIU once a year	403.8(f)(2)(v)	I.E.1 & 2; II.D.1 & 6		
3. Use proper sampling analysis (40 CFR Part 136) and inspection procedures	403.8(f)(2)(vii)	II.D.3, 5 & 8		
4. Require, receive, and analyze reports from SIUs	403.8(f)(2)(iv)	I.E.1; II.B.2.d; II.F.1-12		
5. Monitor to demonstrate continued compliance and resampling after violation(s)	403.8(f)(2)(vii)	II.F.3, 4 & 9		
6. Ensure CIUs report on all regulated pollutants at least once every 6 months	403.12(g)(1)&(2)	II.F.2 & 5		

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
E. COMPLIANCE MONITORING (Continued)				
7. Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months	403.12(h)	II.F.2 & 5		
8. Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed	403.12(l); 403.6(a)(2)(ii)	II.F.6		
9. Receive notification of hazardous waste discharges	403.12(j)&(p)	I.D.3; II.F.10		
F. ENFORCEMENT				
1. Implement approved ERP	403.8(f)(5)	I.F.2; II.E.3		
2. Annually publish a list of IUs in SNC	403.8(f)(2)(viii)	I.F.4; II.E.5		

SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
F. ENFORCEMENT (Continued)				
3. Develop IU compliance schedules	403.8(f)(1)(iv)(A)	I.F.1, 7 & 9; II.B.2.f		
4. Ensure IU compliance within 3 years of standards effective date (or less than 3 years where required by standard)	403.6(b)	I.F.8		
5. Ensure new sources report on compliance with appropriate standards within first 90 days of discharge	403.12(d)	II.F.3		
G. ADDITIONAL EVALUATIONS				

SECTION III COMPLETED BY:	DATE:
TITLE:	TELEPHONE: