UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

Ref: 8WP-CWW

AUG 16 2017

Mark Fitzwater
Pretreatment Coordinator
City of Helena
2108 Custer Avenue East
Helena, MT 59602

Re: Pretreatment Audit, National Pollutant Discharge Elimination System (NPDES) Number: MT-0022641

Dear Mr. Fitzwater:

The Environmental Protection Agency conducts Pretreatment Audits of approved pretreatment programs at least once every five years. Where significant areas of concern are identified, the EPA may elect to perform an audit more frequently. The EPA will be performing an audit of the City of Helena Pretreatment Program on September 11, 2017, beginning at approximately 8:00am. The audit will require that you or a member of your pretreatment staff, that is intimately familiar with the Pretreatment Program, be present. The exit interview will tentatively be scheduled on September 13, 2017 in the afternoon. I will work with you to finalize the date and time. The exit interview will include you and any other members of your staff or management you wish to invite. If I require specific people to attend, I will let you know during the audit. The general findings of the audit and any required actions identified during the audit will be summarized at the exit interview.

The following items need to be sent or prepared:

1. Please submit electronic copies of the following documents to me at garcia.al@epa.gov. If you do not have an electronic copy, please mail to my office by **September 1, 2017**.

    - NPDES permit, Statement of Basis and Water Quality Assessment issued or developed by the State NPDES Program.
    - POTW schematic diagram and overview of POTW processes.
    - Copies of the Engineering Hydraulic Design Capacity for your POTW – including design capacities for BOD, TSS, and Ammonia.
    - Summary of Data (most recent 3-year time period) required by your NPDES permit showing the concentrations and loadings of BOD, TSS, Ammonia and metals at your headworks, effluent and in your biosolids. In addition, please submit headworks flow data.
    - Current POTW Legal Authority (Ordinance or Rules)
    - Local Limits Development Records
    - Intergovernmental Sewer Service Agreements with outside contributing jurisdictions, if applicable.

- Program Resources Overview:
  - Titles of Pretreatment Personnel,
  - List of Duties (Pretreatment and non-Pretreatment) for each Pretreatment staff member,
  - Estimate of time and % FTEs for each duty identified above.
- Industrial User Inventory
- Pretreatment Permit Boilerplates or Templates
- Updated list of permitted facilities and category of permits (i.e., CIU and applicable categorical standard, SIU, zero discharge)
- Standard Operating Procedures, including:
  - Industrial User Inventory and Characterization Procedures
  - Sampling Plan, Protocol or QAPP
  - Data Evaluation and SNC determination Procedures
  - Enforcement Response Plan
- Map of service area

2. Please have **all** relevant records available for review during the audit:

- Permitted (Individual or General) Significant Industrial Users and associated management records.
- Other users currently under a Control Mechanism or Strategy (e.g., Oil and Grease, Silver, Sand Interceptor, Mercury Sector Control Programs).
- Pretreatment Procedures Manual or Standard Operating Procedures

The audit consists of an opening interview and file reviews for the first day of the audit. The second day will consist of a POTW tour and on-site visits to selected permitted and non-permitted industrial users in your service area. The exit interview will be scheduled to close the audit.

Mr. Fitzwater, if you have any questions, please contact me at (303) 312.6382 or garcia.al@epa.gov.

Sincerely,

Al Garcia
USEPA Region 8 Pretreatment Coordinator

cc: Rainie Devaney, MT DEQ