Typical Problems with HWA:

1) Does not include data summaries.
    a. See HWA presentation for what is required, but essentially need data summary of all LTMP data including influent, effluent, aeration basin and sludge, DMR data used, uncontrollable data and/or uncontrollable mass balance.

2) Does not include narrative to explain various HWA choices.
    a. Source of all values used in HWA must be explained, either from the data summaries attached to the HWA or from the narrative.
    b. Any values not derived from attached data summaries must be explained.
    c. All differences in values used in HWA over those derived from the data summaries must be explained.
    d. Sludge disposal method must be identified, with all applicable sludge limits (for land application, class A distribution, or monofill) must be identified (include copy of permit) and used either in the HWA spreadsheet or in the HASL or both.

3) Derives POTW flow from only those days when LTMP data was collected.
    a. HWA must use POTW flow based on the average of all daily values from all DMR data for applicable period. If other value is used, HWA must show the daily average, explain why it is not used, and show how the number was derived and why it is better.
    b. Examples typically include using only week day flows, adding or deleting flow based on new or dropped SIUs.

4) HWA uses POTW NPDES permitted flow instead of actual WWTP flow.

5) For parameters that the POTW has an extensive data set from the DMRs, for example BOD, TSS, NH3, some metals, derive removal rate from only LTMP data collected.
    a. HWA must use all available data from LTMP and DMRs. If this is not done, HWA must discuss this and explain why.
        i. One example might be elimination of high data points from a hurricane.
        ii. Another example might be that NPDES required once per week data for nickel has a detection level of 50 ug/L whereas the LTMP data meets the LTMP required detection level of 10 ug/L. This would be most applicable where the NPDES data is all below detection. However, if some is below and some is above, the POTW should prepare a data summary of all data and consult with DWQ about what data to use and what to not use and why.

6) No documentation of how derived removal rates from included influent and effluent data.
    a. Must list average influent and effluent values used with derived removal rate next to it or otherwise clearly indicated.

7) Use of wrong NPDES limits.

8) HWA uses action levels when passing toxicity.

9) No discussion of NPDES violations and how HWA does or does not address them.

10) Using data from different time periods without adequate explanation of why this is done. For example, using influent and effluent from 5 years, but SIU data and POTW flows from only the last year.

11) HWA doesn't use nitrification inhibition criteria when needed.

12) Use of wrong sludge standards.
    a. The HWA and HASL spreadsheets provided by DWQ use the land application sludge standards. Facilities with other standards such as distribution and marketing or sludge monofill must change the standards to the ones in your sludge permit.

13) Incorrect carrying of data values from one spreadsheet to another. For example, using a different non-SIU flow in the HWA than the one derived from the uncontrollable mass balance. If the POTW has done this intentionally, the HWA submission must explain the reasoning.

14) Incorrect use of below detection data. Also incorrect choices for removal rates as related to the percentage of below detection data.