

Gage, Hannah

From: Gilliam, Allen
Sent: Friday, October 28, 2016 2:04 PM
To: 'van buren kim redo'
Cc: Gage, Hannah; Yates, Adam; McWilliams, Carrie; Leamons, Bryan
Subject: AR0021482_Van Buren Nov 2016 Pretreatment Program confirmation_20161028
Attachments: Van Buren Nov 2016 Audit Checklist.rtf

Kim,

This is to confirm that a Pretreatment Audit/Pollution Prevention (P2) Assessment of Van Buren's Program has been scheduled for November 15th through 17th, 2016. Please review the attached audit checklist and update/revise/correct any areas to help expedite this portion of the audit.

Adam Yates, one of our talented NPDES permit writers is now devoting 50% of his time to help ADEQ continue the State's Pretreatment Program. Please be as helpful to him during the audit as you have with me throughout the years.

It is scheduled to complete the event in about three (3) days. We'll begin at about 7:30 a.m. at your office at the South POTW on Tuesday the 15th with a review of the files you maintain for the city's industrial users. The files should be in order and complete. All of your industries' files should contain a fairly comprehensive process description and wastewater flow schematic from point of generation through treatment to the final sampling point.

A discussion regarding the updated (attached) checklist and associated information will occur Tuesday afternoon.

Wednesday the 16th, SIU visits will be conducted with you or an appropriate pretreatment representative. If you feel it necessary you might contact the industrial users to let them know we may be conducting a "walk-through visit" of their facility. Focus will be on their wastewater generating processes and Pollution Prevention activities and techniques.

It is anticipated the exit interview will be conducted around noon on Thursday the 17th. General findings, required actions and recommendations will be addressed. Any questions you might have about the audit/assessment can be discussed as well as other pretreatment or P2 related issues. Interested city representatives are welcome and encouraged to attend this meeting. Please make them knowledgeable about the exit interview and subject matter.

If additional time is necessary to wrap up requisite audit information or to discuss your current Pretreatment Program, the exit interview may continue later into the afternoon on Thursday.

If there are any questions please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

YES NO

Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action:

Is the Control Authority currently in SNC or RNC?

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with an asterisk or footnote that tells that there is more explanatory information and where it can be found.

Section I: General Information

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0021482	South (Main)	1/1/15	12/31/19
AR0040967	North	5/1/13	4/30/18
AR0037567	Lee Creek	6/1/13	5/31/18

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: South (Main)

Location Address: 1401 Port Rd.

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 4.0 MGD; Actual (Average)- 2.55 MGD

Sewer System: 100 % # of SSOs due to grease blockages:

Industrial Contribution to this Treatment Plant

of SIUs: 8 # of CIUs: 3

Industrial Flow (mgd): 0.87 Industrial Flow (%): 34.1 %

Level of Treatment Type of Process(es):

Primary
Secondary Activated sludge (two aerated basins)
Tertiary and final clarifiers
Method of Disinfection: UV
Dechlorination YES NO N/A

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3H, Ark. River Basin

Receiving Stream Use: Primary & secondary contact rec., raw water source for domestic, industrial & AG water supplies and propagation of desirable species of fish

If effluent is disposed of to any location other than the receiving stream, please note: N/A

Method of Sludge Disposal:

Quantity of Sludge:

<input checked="" type="checkbox"/> Land Application	<u>~915</u> dry metric tons/yr.
<input checked="" type="checkbox"/> Incineration	<u> </u> dry tons/yr.
<input checked="" type="checkbox"/> Monofill	<u> </u> dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill	<u> </u> dry tons/yr.
<input checked="" type="checkbox"/> Public Distribution	<u> </u> dry tons/yr.
<input checked="" type="checkbox"/> Lagoon Storage	<u>~661</u> dry tons/yr.
<input checked="" type="checkbox"/> Other (specify)	<u> </u> dry tons/yr.

List of toxic pollutant limits in NPDES permit: Conventionals & NH3-N

Section I: General Information

a. (continuation of individual treatment plant information for:
South Treatment Plant.)

YES NO

Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: _____

Issuance Date: _____

Expiration Date: _____

List pollutants that are specified in current sludge permit: _____

Has the Control Authority submitted results of whole effluent biological toxicity testing?

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There has been no lethality or sublethality shown in either the fathead minnow or the water flea over the past 3 yrs (11 tests)

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>0</u>	_____
Priority **	<u>1</u>	<u>1</u>	_____	_____
Biomonitoring	_____	<u>4</u>	_____	_____
TCLP	_____	<u>1</u>	_____	_____
Other:	_____	_____	_____	_____

* As identified at 40 CFR 122, Appendix D, Table III: ** As identified 40 CFR 122, Appenix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

"Remains about the same"

Has the POTW begun tracking the trends in the above samples?

Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>N-NH3 5, 7, 8/31/16</u>	_____

YES NO

Has the treatment plant sludge violated the TCLP Test?

Section I: General Information

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NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0021482	South (Main)	1/1/15	12/31/19
AR0040967	North	5/1/13	4/30/18
AR0037567	Lee Creek	6/1/13	5/31/18

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Lee Creek Industrial Park

Location Address: 1200 Block of Lee Creek Rd.

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 0.04 MGD; Actual (Average)- 0.006 MGD

Sewer System: 100 % # of SSOs due to grease blockages 0

Industrial Contribution to this Treatment Plant

of SIUs: 0 # of CIUs: 0

Industrial Flow (mgd): 0 Industrial Flow (%): 0 %

Level of Treatment

Primary	<u> </u>	<u>Extended aeration activated</u>
Secondary	<u> ✓ </u>	<u>sludge package treatment plant</u>
Tertiary	<u> </u>	<u> </u>

Method of Disinfection: Chlorination

Dechlorination YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3H, Ark. River Basin

Receiving Stream Use: Primary & secondary contact rec., raw water source for domestic, industrial & AG water Supplies and propagation of desirable species of fish

If effluent is disposed of to any location other than the receiving stream, please note: N/A

Method of Sludge Disposal:

Quantity of Sludge:

<u> </u> Land Application	<u> </u> dry tons/yr.
<u> </u> Incineration	<u> </u> dry tons/yr.
<u> </u> Monofill	<u> </u> dry tons/yr.
<u> </u> Mun. Solid Waste Landfill	<u> </u> dry tons/yr.
<u> </u> Public Distribution	<u> </u> dry tons/yr.
<u> </u> Lagoon Storage	<u> </u> dry tons/yr.
<u> ✓ </u> Other (specify)*	<u> </u> dry tons/yr.

*stored in holding tank and sent to the North POTW for disposal

List of toxic pollutant limits in NPDES permit: conventionals

Section I: General Information

a. (continuation of individual treatment plant information for:
Lee Creek Industrial Park Treatment Plant.)

YES NO

 Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: _____

Issuance Date: _____

Expiration Date: _____

List pollutants that are specified in current sludge permit: _____

YES NO N/A

 Has the Control Authority submitted results of whole effluent biological toxicity testing?

 Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?): n/a

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u> 0 </u>	<u> 0 </u>	<u> </u>	<u> </u>
Priority **	<u> 0 </u>	<u> 0 </u>	<u> </u>	<u> </u>
Biomonitoring (acute)	<u> </u>	<u> 0 </u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Other:				

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

Remains the same

 Has the POTW begun tracking the trends in the above samples?

 Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated
 none

Cause(s)

YES NO

 N/A Has the treatment plant sludge violated the TCLP Test?

Section I: General Information

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0021482	South (Main)	1/1/15	12/31/19
AR0040967	North	5/1/13	4/30/18
AR0037567	Lee Creek	6/1/13	5/31/18

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: North
 Location Address: 1945 Wellnitz Dr.

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 2.0 MGD; Actual (Average)- 1.28 MGD

Sewer System: 100 % # of SSOs due to grease blockages: 0

Industrial Contribution to this Treatment Plant

of SIUs: 1 (truck wash) # of CIUs: 0
 Industrial Flow (mgd): 0.013 Industrial Flow (%): 0.83 %

<u>Level of Treatment</u>	<u>Type of Process(es):</u>
Primary _____	<u>Three individual systems of oxidation ditches</u>
Secondary <input checked="" type="checkbox"/>	<u>w/final clarifiers operated in parallel. Equalization</u>
Tertiary _____	<u>pond is used during wet weather conditions.</u>
Method of Disinfection: <u>UV</u>	
Dechlorination <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

Effluent Discharge

Receiving Stream Name: Lee Creek, thence to ↓

Receiving Stream Classification: Segment 3H, Ark. River Basin

Receiving Stream Use: Primary & secondary contact rec., raw water source for domestic, industrial & AG water supplies and propagation of desirable species of fish

If effluent is disposed of to any location other than the receiving stream, please note N/A

Method of Sludge Disposal:	Quantity of Sludge:
<input checked="" type="checkbox"/> Land Application	<u>368*</u> dry tons/yr.
<input type="checkbox"/> Incineration	_____ dry tons/yr.
<input type="checkbox"/> Monofill	_____ dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	_____ dry tons/yr.
<input type="checkbox"/> Public Distribution	_____ dry tons/yr.
<input type="checkbox"/> Lagoon Storage	_____ dry tons/yr.
<input type="checkbox"/> Other (specify)	_____ dry tons/yr.

*last applied Mar 2007

List of toxic pollutant limits in NPDES permit: Conventionals, Cu, Zn, and NO3 + NO2-N

Section I: General Information

a. (continuation of individual treatment plant information for North Treatment Plant.)

YES NO

Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: _____

Issuance Date: _____

Expiration Date: _____

List pollutants that are specified in current sludge permit: _____

YES NO

Has the Control Authority submitted results of whole effluent biological toxicity testing?

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There has been no lethality show to the fathead minnow, but lethality and sublethality shown to the water flea in Nov. 2013 and Jan. 2014 over the last 3 years (12 tests). Facility conducted a TRE due to the lethal failures. TRE began in April 2015 and the final report was received in June 2016. No failures were noted during the TRE, therefore no cause or corrective actions were determined. The facility continues to conduct TIE screening tests even though toxicity has not been noted since Jan. 2014.

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>1</u>	<u>1</u>	___	___
Priority **	<u>1</u>	<u>1</u>	___	___
Biomonitoring	___	<u>4</u>	___	___
TCLP	___	___	___	___
Other:	___	___	___	___

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

Remains the same

YES NO

Has the POTW begun tracking the trends in the above samples?

Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>None</u>	_____

YES NO

N/A Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

 Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

- No oversight authority
- No inspection authority
- No remedies for noncompliance
- No "equivalent" standard
- No clear delineation of responsibility for program implementation
- Interjurisdictional agreements not entered into
- Other, Specify: _____

 Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:

 n/a Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

 N/A Have provisions been made for the incorporation of Pollution Prevention (P2) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1. <u>N/A</u>	<u> </u>	<u> </u>	<u> </u>

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation. N/A

Problems

- Updating industrial waste survey N/A
- Notification of IUs _____
- Permit issuance _____
- Receipt and review of IU reports _____
- Inspection and sampling of IUs _____
- Assessment of IUs for P² Activity _____
- Analysis of samples _____
- Enforcement _____
- Other: _____ _____

Briefly describe other problems: _____

Identify any IUs that have caused problems of interference, upset, pass through, sludge contamination, problems in the collection system, or worker health and safety in the past 12 months:

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>

SECTION II: PROGRAM ANALYSIS AND PROFILE

F. Control Mechanism Evaluation [403.8(f)(1)(iii)]

YES NO

Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 3 years

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? If there are any SIUs without current (unexpired) permits, please complete the information below:

<u>IU NAME</u>	<u>PERMIT EXPIRATION DATE</u>
_____	_____

YES NO

Does the Control Authority accept trucked septage wastes?

Does the Control Authority accept other trucked wastes?

Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

YES NO

N/A Does Control Mechanism designate a discharge point? [403.5(b)(8)]

N/A Are all applicable categorical standards and local limits applied to trucked wastes ?

List all pollutants and applicable limits, other than local limits and categorical standards that are applied to waste haulers:

<u>Pollutant</u>	<u>Limit</u>
<u>N/A</u>	_____

Describe the discharge point(s) (including security procedures):

N/A

Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

Does the Control Authority have a control mechanism for regulating wastes from UST sites?

List all pollutants and applicable limits, other than local limits and categorical standards that are applied to UST cleanup sites:

<u>Pollutant</u>	<u>Limit</u>
<u>N/A</u>	_____

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

 Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

8/00 Date Notified Letter Method of Notification
How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

 Federal Register Journals, Newsletters
 Meetings, Training Other Internet
 Government Agencies Other

 Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit or Annual Report?

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

YES NO

 Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)	
	Yes	No	Yes	No	Yes	No		
Arsenic (As)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	[Program says, "TBLLs for contributors and the MAHLs are calculated and checked no less frequently than annually. The loadings are adopted by the Van Buren Municipal Utilities Commission and are published as they are revised as the MAILs and MAHLs. This document is available upon request of the Van Buren Municipal Utilities Department Office"]
Cadmium (Cd)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Chromium-Total	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Copper (Cu)	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Cyanide (CN)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Lead (Pb)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Mercury (Hg)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Molybdenum (Mo)*	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Nickel (Ni)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Selenium (Se)*	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Silver (Ag)	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
Zinc (Zn)	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	
BOD & TSS	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<u> </u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>See next page</u>	

* - If necessary for the sludge disposal option chosen.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

 Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

YES NO

 N/A Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

What method of allocation was used for local limits for each pollutant that has a local limit in-place? N/A

	TYPE OF ALLOCATION		
	<u>Uniform Concentration</u>	<u>Mass</u>	<u>Hybrid</u>
Arsenic (As)	<u> </u>	<u> </u>	<u> </u>
Cadmium (Cd)	<u> </u>	<u> </u>	<u> </u>
Chromium-Total	<u> </u>	<u> </u>	<u> </u>
Copper (Cu)	<u> </u>	<u> </u>	<u> </u>
Cyanide (CN)	<u> </u>	<u> </u>	<u> </u>
Lead (Pb)	<u> </u>	<u> </u>	<u> </u>
Mercury (Hg)	<u> </u>	<u> </u>	<u> </u>
Molybdenum (Mo)	<u> </u>	<u> </u>	<u> </u>
Nickel (Ni)	<u> </u>	<u> </u>	<u> </u>
Selenium (Se)	<u> </u>	<u> </u>	<u> </u>
Silver (Ag)	<u> </u>	<u> </u>	<u> </u>
Zinc (Zn)	<u> </u>	<u> </u>	<u> </u>
<u>BOD</u>	<u> </u>	<u> </u> ✓	<u> </u>
<u>TSS</u>	<u> </u>	<u> </u> ✓	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? Uniformly to both south and north plants.

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

	<u>Approved Program Aspect</u>	<u>Federal Program</u>	<u>Explain Requirement</u>	<u>Difference</u>
Inspections:				
CIUs	<u>1</u>	1/year	_____	
Other SIUs	<u>1</u>	1/year	_____	
Sampling:				
CIUs	<u>2</u>	1/year	_____	
Other SIUs	<u>2</u>	1/year	_____	
Reporting:				
CIUs	<u>(This varies</u>	2/year	_____	
Other SIUs	<u>from IU to IU)</u>	2/year	_____	
Self-Monitoring: doing some of it at least				
CIUs	<u>2</u>	2/year	_____	
Other SIUs	<u>2</u>	2/year	_____	

 # % How many and what percentage of SIUs were:
(refer to p.1 for Pretreatment year)

 Not sampled at least once in the past reporting year?

 Not inspected at least once in the past Pretreatment reporting year?

 Not inspected and not sampled at least once in the past reporting year ? [403.8(f)(2)(v)]

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected. N/A

Does the Control Authority routinely split samples with industrial personnel:

YES NO

 If requested?

 To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

	<u>Analytical Method*</u>	<u>Name of Laboratory</u>
Metals	<u>200.8</u>	<u>American Interplex</u>
Cyanide	<u>335.2</u>	<u>“</u>
Organics	<u>GC/MS</u>	<u>“</u>
Other	<u>Phenols - 420.1 &</u>	<u>“</u>
NH3-N at the North POTW		<u>Data testing</u>

Were all wastewater samples analyzed by 40 CFR 136 methods? Yes

* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.)

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe: Annual EPA performance kits; blind samples for metals done QA/QC assistance provided by Environmental Resources Assoc (ERA)

How much time normally elapses between sample collection and obtaining analytical results for:

5days Conventionals
>2wks Metals
“ Organics

& Is there an established protocol clearly detailing sampling location and procedures?

The individual permits show sampling location but there is no manual with all the sampling locations and procedures.

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

Does the Control Authority use the following methods for compliance monitoring?

YES NO

- Scheduled compliance monitoring
- Unscheduled compliance monitoring
- Demand monitoring for IU compliance
- IU self-monitoring
- Other: _____

YES NO

Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year ? If yes, describe below.

SECTION II: PROGRAM ANALYSIS AND PROFILE

I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(viii)]

Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the plan:

YES NO

- Describe how the Control Authority will investigate instances of non-compliance
- Describe the Control Authority's types of escalating enforcement responses and the periods for each response
- Identify by Title the Official(s) responsible for implementing each type of enforcement response?
- Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

- Notice or letter of violation
- Setting of compliance schedule
- Injunctive relief
- Administrative Order
- Revocation of permit
- Fines (maximum amount):

civil \$ 1000 /day/violation
 criminal \$ 1000 /day/violation
 administrative \$ 1000 /day/violation

- Imprisonment
- Termination of Service
- Other: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program:

- When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
- Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].
- & If no, does the Control Authority conduct all of the monitoring?
 (City does monitoring for some but, not for others. Depends on permit requirements.)

YES NO

Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Return to Compliance? Date	Return to Compliance?	
				Yes (Date)	No
N/A					

-

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES NO

computerized

hard copy

OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

YES NO

- Control Mechanism Issuance
 Inspection and Sampling schedule
 Monitoring Data *POTW inf/eff, yes, IU data is flow only.
 IU Compliance Status Tracking
 Other: _____

Can IU monitoring data can be retrieved by:

- Industry name
 Pollutant type
 Industrial category or type
 & SIC Code
 IU discharge volume
 Geographic location
 Receiving treatment plant (i.e.if > one plant in the system)
 Other (specify) _____

- Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
 Have IUs requested that data be held confidential? How is confidential information handled by the Control Authority?

 Are there significant public or community issues impacting the POTW's pretreatment program?
 If yes, please explain: _____
 Are all records maintained for at least 3 years?

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] * - FTE = Full Time Equivalent Employee

One FTE _____

- Have any problems in program implementation been observed which appear to be related to inadequate funding?
 If yes, describe and show below the source(s) of funding for the program:

Percent of Total Funding

<input checked="" type="checkbox"/> POTW general operating fund	<u>100</u>
* IU permit fees	*These go to back
* monitoring charges	to the general
* industry surcharges	operating fund
<input type="checkbox"/> other (describe)	_____
Total	100%

- Is funding expected to continue near the current level? If no, will it: Increase ___ or Decrease ___
 If no, describe the nature of the changes: _____

Are an adequate number of personnel available for the following program areas:

YES NO

If no, explain

- Legal assistance _____
 Permitting _____
 IU inspections _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- Sample collection _____
 Sample analyses _____
 Data analysis, review and response _____
 Enforcement _____
 Administration _____
(inc. record keeping/data management)

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

- Sampling equipment 6 automatic samplers
 Safety equipment Standard equip
 Vehicles City pick-up
 Analytical equipment conventional parameter equip.

L. POLLUTION PREVENTION

- Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
The City has included P2 questions in each permit applications, in surveys, etc.
- Has the source of any toxic pollutants been identified? No
If yes, what was found?

- Has the POTW implemented any kind of public education program? If yes, describe:
No
Does the POTW have any pollution prevention success stories for industrial users documented? No. If yes, please attach.
- Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No
- Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No
If yes, which of the "Guides to Pollution Prevention" were used? _____