#### 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 15<sup>th</sup> through 17<sup>th</sup>, 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 15<sup>th</sup> 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 16<sup>th</sup>, 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 17<sup>th</sup>. 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

# PRETREATMENT AUDIT CHECKLIST

### (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information Section II: Pretreatment Program Analysis Section III: Industrial User File Evaluation Pages 1-8 Pages 9-20 Pages 21-31

SECTION I: GENERAL INFORMATION				
A. <u>GENERAL INFORMATION</u>				
Control Authority Name: <u>City of Van Buren</u> NPDES Tracking #: <u>AR0021482</u> Mailing address: <u>2806 Bryan Rd., P.O. Drawer 1269, 72956</u> Permit Signatory: <u>Steve Dufresne</u> Title: <u>Director of Utilities</u>				
Telephone: <u>479.474.5067</u> FAX NUMBER: <u>479.471.8969</u>				
Pretreatment Contact: Kim Redo Title: Pretreatment/Environmental Coordinator Address: Same Telephone: 479-474-0941 e-mail kimredo@aol.com Pretreatment program approval date: 10/1/81 Dates of approval of any substantial modifications: 3/21/90, 3/6/97 & 3/18/11				
Month Annual Pretreatment Report Due: October				
Pretreatment Year Dates: 10/1 - 9/30 Date(s) of Audit: 11/15 - 17/16 (ASSESSMENT) Inspector(s):				
NAME TITLE/AFFILIATION PHONE NUMBER				
Allen Gilliam State Coord. / ADEQ 501.682.0625 Adam Yates Permit Engineer / ADEQ 682.0617				
Control Authority representative(s):				
NAME TITLE PHONE NUMBER				
* Kim Redo Same 479-474-0941 Steve Dufresne Director of Utilities 474.5067  * Identifies Program Contact				
Dates of Previous PCIs/Audits:				
TYPE DATE DEFICIENCIES NOTED  No PCIs found during last four (4) years				

<u>YES</u>	<u>NO</u>	
<u> </u>		_ 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 a asterisk or footnote that tells that there is more explanatory information and where it can be found.

### B. TREATMENT PLANT INFORMATION

	ERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:
	Effective Expiration
Permit No. Name of Treatment Plant	Date Date
	<u>1/1/15</u> <u>12/31/19</u>
	5/1/13 4/30/18 5/21/19
-	6/1/13 5/31/18
* Indicates the permit number/treatment plant under which the Pretre	reatment Program is tracked.
2. <u>Individual Treatment Plant Information</u>	
a. Name of Treatment Plant: South (Main) Location Address: 1401 Port Rd.	
Expiration Date of NPDES Permit: <u>same</u>	
Treatment Plant Wastewater Flow: Design- 4.0 MGD	D; Actual (Average)- 2.55 MGD
Sewer System: 100 % # of SSOs due to grease block	ckages:
Industrial Contribution to this Treatment Plant	
# of SIUs: <u>8</u> # of CIUs: <u>3</u> Industrial Flow (mgd): <u>0.87</u> Industrial Flow (%): <u>3</u>	<u>34.1</u> %
<u>Level of Treatment</u> <u>Type of Process(es):</u>	
Primary Secondary  Activated sludge (two aerated base)  Tertiary  and final clarifiers  Method of Disinfection: Dechlorination  YES  NO  N/A	
Effluent Discharge	
Receiving Stream Name: <u>Arkansas River</u>	
Receiving Stream Classification: <u>Segment 3H, Ark. Re</u>	River Basin
Receiving Stream Use: <u>Primary &amp; secondary contact r</u> supplies and propagation of desirable species of fish	rec., raw water source for domestic, industrial & AG water
If effluent is disposed of to any location other	r than the receiving stream, please note: N/A
Method of Sludge Disposal: Quantity	ty of Sludge:
✓ Incineration	ry metric tons/yr. y tons/yr.

List of toxic pollutant limits in NPDES permit: <u>Conventionals & NH3-N</u>

a. (continuation of individual treatment plant information for: <u>South</u> 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>Sludge</u> <u>Ambient</u>
Metals *         4         4         0           Priority **         1         1
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)
Parameters Violated Cause(s) N-NH3 5, 7, 8/31/16
YES NO  ✓ Has the treatment plant sludge violated the TCLP Test?

### B. TREATMENT PLANT INFORMATION

1. THIS PRETRE NPDES		ERS THE FO	DLLOWING NPDES PERMITS/TREATMENT PLANTS: Expiration
Permit No. Name	of Treatment Plant	Date	<u>Date</u>
*AR0021482 South AR0040967 North	n (Main)	<u>1/1/15</u> <u>5/1/13</u>	12/31/19 4/30/18
AR0037567 Lee C		6/1/13	5/31/18
	treatment plant under which the Pret		
2. <u>Individual Trea</u>	atment Plant Information		
	Plant: <u>Lee Creek Industrial Pa</u> 00 Block of Lee Creek Rd.	<u>ark</u>	
Expiration Date of NPD	ES Permit: <u>same</u>		
Treatment Plant Wastew	vater Flow: Design- <u>0.04</u> MG	D; Actual (A	verage)- <u>.0.006</u> MGD
Sewer System: 100 %	# of SSOs due to grease block	ckages <u>0</u>	
Industrial Contribution t	o this Treatment Plant		
# of SIUs::_0 # of C Industrial Flow (mgd):_	TUs: <u>0</u> <u>0</u> Industrial Flow (%):_	0_%	
Level of Treatment Primary	Type of Process(es): Extended aeration activation		
Secondary Tertiary	sludge package treatment	<u>t plant</u>	
Method of Disinfection:	Chlorination		
Dechlorination	YES VNO		
Effluent Discharge			
Receiving Stream Name	: Arkansas River		
Receiving Stream Class	ification: Segment 3H, Ark. I	River Basin	
	Primary & secondary contact on of desirable species of fish	rec., raw wat	ter source for domestic, industrial & AG water
If effluent is di	sposed of to any location other	er than the rec	ceiving stream, please note: <u>N/A</u>
Method of Sludge Dispo	osal: Quantity of	f Sludge:	
Land Application		ons/yr.	
Incineration Monofill		ons/yr. ons/yr.	
Mun. Solid Waste	Landfill dry to	ons/yr.	
Public Distribution Lagoon Storage	n dry to dry to		
✓ Other (specify)*		ons/yr.	
*stored in holding tank and	d sent to the North POTW for dis	posal	

List of toxic pollutant limits in NPDES permit: conventionals

<ul> <li>a. (continuation of individual treatment plant information for:</li> <li><u>Lee Creek Industrial Park</u> Treatment Plant.)</li> </ul>				
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:				
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?):				
How many times were the following monitored during the past pretreatment year?				
Influent Effluent Sludge Ambient				
Metals *         0         0           Priority **         0         0           Biomonitoring (acute)         0				
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 Cause(s) none				
YES NO  N/A Has the treatment plant sludge violated the TCLP Test?				

#### B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANT NPDES Effective Expiration
Permit No. Name of Treatment Plant Date Date
*AR0021482 South (Main) 1/1/15 12/31/19 AR0040967 North 5/1/13 4/30/18
AR0040707
Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.
2. <u>Individual Treatment Plant Information</u>
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 %
Level of Treatment       Type of Process(es):         Primary       Three individual systems of oxidation ditches         Secondary       ✓       w/final clarifiers operated in parallel. Equalization         Tertiary       pond is used during wet weather conditions.         Method of Disinfection:       UV         Dechlorination       YES       ✓
Effluent Discharge
Receiving Stream Name: <u>Lee Creek, thence to ↓</u>
Receiving Stream Classification: <u>Segment 3H, Ark. River Basin</u>
Receiving Stream Use: <u>Primary &amp; secondary contact rec.</u> , raw water source for domestic, industrial & AG water <u>supplies and propagation of desirable species of fish</u>
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>368*</u> dry tons/yr.
Incineration dry tons/yr Monofill dry tons/yr.
Monorm dry tons/yr Mun. Solid Waste Landfill dry tons/yr.
Public Distribution dry tons/yr.
Lagoon Storage dry tons/yr.
Other (specify) dry tons/yr.
*last applied Mar 2007
List of toxic pollutant limits in NPDES permit: <u>Conventionals, Cu, Zn, and NO3 + NO2-N</u>

a.		inuation of individual treatment plant information for <u>n</u> Treatment Plant.)
		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:
		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 tethality 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?
		Influent Effluent Sludge Ambient
	TCLP Other:	y ** 1 1 1
	Summ	harize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they sed, decreased, or stayed the same. Evaluate for each parameter measured.  Remains the same
		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		ist the NPDES effluent and sludge limits violated and the suspected cause(s)
		Parameters Violated Cause(s) None Cause(s)
	YES :	<u>NO</u>
		A Has the treatment plant sludge violated the TCLP Test?

Control Authority Pretreatment Program Modification [403.18] YES NO modification? [403.5(c)(3)] \_\_\_\_\_ Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below. 1. Modifications: Date Incorporated Ordinance Citation/ Date Approved into NPDES by DEO Nature of Modification Permit N/A N/A N/A 2. Modifications in Progress: Date Requested Nature of Modification None YES NO \_ ✓ Have any changes been made to any pretreatment program components excluding any listed above)? If yes: Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc. D. Legal Authority [403.8(f)(1)] Date of original Pretreatment Program approval: 10/1/81 Date of most recent Ordinance approved by the Control authority: 10/19/09 Date of most recent Pretreatment Program modification approval: 3/18/11 Does the Control Authority's legal authority enable it to: [403.8(f)(1)(i-vii)]YES NO Deny or condition pollutant discharges Require compliance with standards

Control discharges through permit or similar means Require compliance schedules and IU reports Carry out inspection and monitoring activities

Has the city developed and adopted a Pollution Prevention policy?

Obtain remedies for noncompliance Comply with confidentiality requirements

YES NO			
reason:  No oversight No inspection No remedies No "equivale No clear deli Interjurisdict	authority n authority for noncompliance	d into	rdinance? If yes, identify
Are all industrial users the Control Authority	s located within the jurisdict ? If no:	ional boundaries of	
n/a Has the Control Authori enforced in contributin		ments necessary to ensure that	pretreatment standards will be
N/A Have provisions been n	nade for the incorporation of	Pollution Prevention (P2) poli	icies by contributing jurisdictions?
List the name of agreements in those		f any, the number of CIUs, S	SIUs and type of multijurisdictional
Name of Jurisdiction  1. N/A	Number Number of CIUs Other SI		
If relying on activities of co any problems in their impler <u>Problem</u>	mentation. N/A	licate which activities are per	formed by jurisdictions and describe
<ul> <li>Updating industrial waste survey</li> <li>Notification of IUs</li> <li>Permit issuance</li> <li>Receipt and review of IU reports</li> <li>Inspection and sampling of IUs</li> <li>Assessment of IUs for P<sup>2</sup></li> <li>Activity</li> <li>Analysis of samples</li> <li>Enforcement</li> <li>Other:</li> <li>Briefly describe other problems:</li> </ul>			
	m, or worker health and safe	ety in the past 12 months:  NPDES Permit  Violation	gh, sludge contamination, problems in
IU Name	Problem	Yes No	
N/A			

Industrial User Characterization [403.8(f)(2)(i)] \_\_\_\_ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] (*Last one done in 2005*) If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating  $P^2$ activity? ✓ & ✓ Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]  $\checkmark$  If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate  $P^2$  activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify? What methods are used to update the IWS: \_\_ Review of newspaper/phone book Review of plumbing/building permits ✓ Review of water billing records ✓ Permit reapplication requirements ✓ Onsite inspections Citizen involvement ✓ Other (specify) Business list from downtown How often is the survey to be updated? Approx. every 3 years Are there any problems that the Control Authority has in identifying and categorizing SIUs: None apparent YES NO \_ ✓ Have any new SIUs been identified within the last 12 months? If yes: Is the IU Name of IU Type of Industry Permitted? How many IUs are currently identified by the Control Authority in each of the following groups: a. 9 SIUs (As defined by the Control Authority) b. 4 Categorical Industrial Users (CIUs)
c. 5 Noncategorical SIUs d. 0 Other regulated nonsignificant IUs (Describe) TOTAL of a. + d. YES NO \_\_\_ ✓ Has the POTW identified any IUs with Pollution Prevention opportunities? \_\_\_\_ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)] If not, the Control Authority has defined "significant industrial user" to mean:

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
<u>0</u>	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:
	IU NAME PERMIT EXPIRATION DATE
<u>YES</u>	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:
	Pollutant Limit N/A
	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:
	Pollutant Limit

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 Other Internet
Other ✓ Meetings, Training
✓ Government Agencies ✓ 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** Old New Reason Changed Limit Limit 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)] Local Headworks Local Analysis Limits Limits Completed? Needed? Adopted? Numerical Limit Adopted Yes No Yes No (mg/l)[Program says, "TBLLs for contributors and Arsenic (As) Cadmium (Cd) the MAHLs are calculated and checked no less frequently than annually. The loadings Chromium-Total are adopted by the Van Buren Municipal Copper (Cu) Cyanide (CN) Utilities Commission and are published as Lead (Pb) they are revised as the MAILs and MAHLs. Mercury (Hg) This document is available upon request of Molybdenum (Mo)\* the Van Buren Municipal Utilities Nickel (Ni) Department Office"] Selenium (Se)\*

Silver (Ag) Zinc (Zn) BOD & TSS

See next page

<sup>\* -</sup> 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: Headworks Local Local Analysis Limits Limits Completed? Needed? Adopted? Numerical Limit Adopted **POLLUTANT** Yes No Yes No Yes No (mg/l)

#### 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

	IIIDOII		011
	Uniform		
<u>C</u>	Concentration	Mass	<u>Hybrid</u>
Arsenic (As)			
Cadmium (Cd)			
Chromium-Total			
Copper (Cu)			
Cyanide (CN)			
Lead (Pb)			
Mercury (Hg)			
Molybdenum (Mo	0)		
Nickel (Ni)	·		
Selenium (Se)		<del></del>	
Silver (Ag)			
Zinc (Zn)			
BOD			
TSS			
		<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.

#### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

	Approved Program Aspect	Federal Program	Explain Requirement	Difference
Inspections: CIUs Other SIUs	<u>1</u>	1/year _ 1/year _		
Sampling: CIUs Other SIUs	$\frac{2}{2}$	1/year _ 1/year _		
Reporting: CIUs Other SIUs	(This varies from IU to IU)	2/year 2/year		
Self-Monito CIUs Other SIUs		r	_ _	
# _% How many and what percentage of SIUs were:  (refer to p.1 for Pretreatment year)				
0 0 Not sampled at least once in the past reporting year?				
0 0 Not inspected at least once in the past Pretreatment reporting year?				
0 0 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  $\underline{\checkmark}$  \_ If requested? \_ To verify IU self-monitoring results?

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

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

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

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

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: <u>5days</u> Conventionals <u>&gt;2wks</u> Metals <u>"</u> 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
<ul> <li>✓ Scheduled compliance monitoring</li> <li>✓ Unscheduled compliance monitoring</li> <li>✓ Demand monitoring for IU compliance</li> <li>✓ IU self-monitoring</li> <li>Other:</li> </ul>
YES NO

#### **ENFORCEMENT** I. 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)] ✓ Administrative Order ✓ Notice or letter of violation ✓ Setting of compliance schedule ✓ Revocation of permit ✓ Fines (maximum amount): ✓ Injunctive relief \$ 1000 /day/violation civil \$ 1000 /day/violation criminal administrative \$ <u>1000</u>/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.

Date First

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

Indicate the number and percent of SIUs that were identified as being in significant noncompliance <u>during the past Pretreatment reporting period</u>:

#_	%	
0 0	<ul> <li>O Pretreatment Standards (Loca</li> <li>O Self-monitoring requirements</li> <li>O Reporting requirements</li> <li>O Pretreatment compliance sche</li> <li>How many SIUs that are curre</li> </ul>	
YES	NO	
	✓ Does the ERP provide for any	y Pollution Prevention activities as corrective actions? If so, give some examples.
Has t	he Control Authority experienced a	any of the following:
<u>YES</u>	<u>NO</u>	EXPLAIN and ID Industrial User
	<ul> <li>✓ Interference</li> <li>✓ Pass through</li> <li>✓ Fire or explosions?         <ul> <li>(incl. flash point viol.)</li> <li>✓ Corrosive structural damage?</li> <li>(incl. pH &lt;5.0)</li> <li>✓ Flow obstructions?</li> <li>✓ Excessive flow or pollutant concentrations?</li> <li>✓ Heat problems?</li> <li>✓ Interference due to oil or grease?</li> <li>✓ Toxic fumes?</li> <li>✓ Illicit dumping of hauled wastes?</li> </ul> </li> <li>Does the Control Authority contained in the control me</li> </ul>	compare all monitoring data to applicable Pretreatment Standards and requirements chanism? [403.8(f)(2)(iv)]
0	_ How many SIUs are currently	y on compliance schedules?
	with those standards? [403.	Us from which penalties have been collected by the Control Authority during the past
	Civil Administrative Total	<u>Ser Amount</u> <u>\$</u> <u>\$ 12,472</u> \$

### J. <u>DATA MANAGEMENT/PUBLIC PARTICIPATION</u>

YES ✓	 Are inspection & sampling records well documented, organized and readily retrievable?	Are files/records:
	<u>YES</u> <u>NO</u> <u>✓</u> computerized <u>✓</u> hard copy  OTHER:	

Are the following files computerized:
YES NO Control Mechanism Issuance
✓* ✓ Monitoring Data *POTW inf/eff, yes, IU data is flow only.
✓ IU Compliance Status Tracking
Other:
Can IU monitoring data can be retrieved by:
✓ 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)]
Does the FOTW have provisions to address claims of confidentiality. [103.0(1)(1)(1)]
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:
And all records maintained for at least 2 years?
Are all records maintained for at least 3 years?
K. <u>RESOURCES</u>
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:
if yes, describe and show below the source(s) of funding for the program.
Percent of Total Funding
✓ POTW general operating fund 100
* IU permit fees *These go to back
* monitoring charges to the general operating fund
industry surcharges operating rand 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

	Sample collection
<u>/</u>	Sample analyses
<b>√</b>	Data analysis,
,	review and response Enforcement Administration
_/	Enforcement Administration
	(inc. record keeping/data management)
	(me. record keeping/data management)
Do	es the Control Authority have access to adequate:
YE	ES NO If yes then list and if no, explain
\ \frac{1}{\sqrt{1}}	Sampling equipment 6 automatic samplers
	Safety equipment <u>Standard equip</u> Vehicles <u>City pick-up</u>
_/	Venicles <u>City pick-up</u> Analytical equipment <u>conventional parameter equip.</u>
	Anarytical equipment conventional parameter equip.
L.	POLLUTION PREVENTION
1.	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.
	The City has included if 2 questions in each permit applications, in surveys, etc.
2.	Has the source of any toxic pollutants been identified? No
	If yes, what was found?
_	
3.	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.
4.	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?
	<u>No</u>
5.	Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercia users as ways to eliminate or reduce pollutants? No If yes, which of the "Guides to Pollution Prevention" were used?
	n vos. which of the Guides to I olluton i ievention were used: