

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Thursday, May 19, 2016 11:24 AM  
**To:** pinebluff; 'pine bluff vincent miles'  
**Cc:** Gage, Hannah; Leamons, Bryan; 'Molina.Rudy@epa.gov'  
**Subject:** AR0033316\_Pine Bluff May 2016 Pretreatment Program audit confirmation\_20160519  
**Attachments:** doc21194920160519103917.pdf

Ken and Vincent,

This is to confirm an audit of Pine Bluff's Pretreatment Program has been scheduled for Tuesday, May 24th thru Thursday the 26th, 2016.

Please find the audit's checklist (work copy) attached. Please review and make appropriate changes/revisions to help expedite this portion of the audit.

Tuesday morning will be dedicated to file reviews of several of your permitted significant industrial users (SIUs). Please ensure all files and their sections are in organized chronological order. Hopefully, you've developed "fact sheets" comprehensively describing your SIUs' processes/manufacturing operations and have concise and comprehensive wastewater flow schematics up-to-date on file.

Tuesday afternoon we'll review the audit's checklist to update any pertinent Program elements.

SIU site visits will be conducted Wednesday at several of the SIUs whose files were reviewed. If felt necessary, you may notify their contacts we'll be using our right of entry authority for the purpose of verifying their processes/pretreatment and files coincide with that in the City's files. Time allowing, a full "walk-through" of their facility floor will ensue. Focus will also be directed towards any pollution prevention (P2) activities. The City's latest SIU inspections must be available to enable this auditor to view what the City has observed/documented during its inspections.

Any unfinished business from Tuesday will be addressed or another site visit may be conducted Wednesday morning as necessary.

It's expected to wrap up the audit with an "exit interview" Wednesday afternoon listing any deficiencies and recommendations found during the audit. A draft copy of this list will be left enabling you to begin determining what actions may need to be taken. Any Pretreatment related questions may be fielded after the exit interview.

Other City officials are encouraged to attend any part of the audit, especially the exit interview.

If you have any questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

# PRETREATMENT AUDIT CHECKLIST (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information ..... Pages 1- 4  
 Section II: Pretreatment Program Analysis ..... Pages 5-17  
 Section III: Industrial User File Evaluation ..... Pages 18-25

## SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Pine Bluff NPDES #: AR0033316  
 Mailing address: 1520 S. Ohio Street, Pine Bluff, AR 71601

Permit Signatory: Ken Johnson Title: Manager - PBWU  
 Telephone: 870.535.6603 FAX NUMBER: 870.535.6243  
 email: ken@pbwastewater.com

Pretreatment Contact: Vincent Miles Title: Environmental Compliance  
 Address: 900 Island Harbor Marina Road 71601  
 Telephone: 870.692.8955 email: vincent@pbwastewater.com

Pretreatment program approval date: 9/18/84

Dates of approval of any substantial modifications: 3/31/89, 9/8/92 & 4/4/13

Month Annual Pretreatment Report Due: March  
 Pretreatment Year Dates: 3/1 to 2/29 Date(s) of Audit: 5/24 to 5/26/16  
 (ASSESSMENT)

Inspector(s) :

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
Allen Gilliam	State Pret. Coord./ADEQ	501.682.0625

Control Authority representative(s) :

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
*Vincent Miles	Env Comp Supv/Pret Coord.	870.535.0828
Ken Johnson	Manager PBWU	870.535.6603
Stacy Carpenter	Sr. Lab Tech	870.535.0828
* Program Primary Contact		

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
PCI	12/9/14	No deficiencies noted
PCI	12/12/12	" "

## SECTION I: GENERAL INFORMATION

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?

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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.

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# 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
AR003316	Boyd Point Treatment Facility	7/1/15	6/30/20

### 2. Individual Treatment Plant Information

a. Name of Treatment Plant: Boyd Point Treatment Facility

Location Address: 900 Island Harbor Marina Road, Pine Bluff, AR 71601

Expiration Date of NPDES Permit: 6/30/20

Treatment Plant Wastewater Flow: Design: 14 MGD w/background flow of <5000 cfs and 30 MGD w/background flow of >5,000 cfs; Actual (Avg)-13.26 MGD

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

#### Industrial Contribution to this Treatment Plant

# of SIUs: 10 # of CIUs: 4  
 Industrial Flow (mgd): 2.57 Industrial Flow (%): 21 %

#### Level of Treatment

#### Type of Process(es):

Primary            Two parallel trains of 1 aerated lagoon and one  
 Secondary   ✓   primary pond in series w/chlorine disinfection.  
The 2 parallel trains combine into the 1<sup>st</sup> polishing pond which runs in series  
with the 2<sup>nd</sup> polishing pond, then to optional disinfection via chlorination.  
 Tertiary           

Method of Disinfection: Chlorine contact chamber (optional)

Dechlorination:        YES   ✓   NO

#### Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C Arkansas River Basin

Receiving Stream Use: Primary & secondary contact recreational, raw water source for domestic, industrial & AG water supplies, 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> 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> Sludge is currently in an "Active Sewage Sludge Unit"	

List of toxic pollutant limits in NPDES permit: NH3-N, DO, TRC

# SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for Boyd Point 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: (Sludge is currently accumulating in an "Active Sewage Sludge Unit")

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?) there has been no lethality nor sublethality shown to either species over the last 5 years (13 tests) for the water flea/fathead minnow.

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>4</u>	_____
Priority **	<u>1</u>	<u>1</u>	<u>0</u>	_____
Biomonitoring	<u>0</u>	<u>4</u>	<u>2</u>	_____
TCLP	_____	_____	_____	_____

\* 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.

CA believes parameters stayed the same

YES NO N/A  
 \_\_\_ \_\_\_  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  
 \_\_\_  Has the treatment plant sludge violated the TCLP Test?

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### C. Control Authority Pretreatment Program Modification

Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c) (3)]

YES    NO

Have any substantial modifications been made or requested to any pretreatment program components since the last audit?  
If yes, identify below.

The City submitted an approvable "Streamlined" Pretreatment Program in 4/4/13 and was approved the same day.

#### 1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
<u>4/4/13</u>	<u>Complete Program mod rec'd 4/4/13 to be current with the Streamlining mods to the CFR 403 National Pretreatment Regulations.</u>	<u>???</u>

#### 2. Modifications in Progress:

Date Requested	Nature of Modification
<u>n/a</u>	_____

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: 9/18/84

Date of most recent Ordinance approved by the Control authority: 9/8/92

Date of most recent Pretreatment Program modification approval: 4/4/13

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
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

## 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:

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

Have provisions been made for the incorporation of Pollution Prevention (P<sup>2</sup>) 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>City of White Hall</u>	<u>0</u>	<u>0</u>	<u>Interjurisdictional</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 \_\_\_\_\_
- Notification of IUs \_\_\_\_\_
- Permit issuance \_\_\_\_\_
- Receipt and review of IU reports \_\_\_\_\_
- Inspection and sampling of IUs \_\_\_\_\_
- Assessment of IUs for P<sup>2</sup> 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>(None)</u>	_____	_____	_____

## SECTION II: PROGRAM ANALYSIS AND PROFILE

E. Industrial User Characterization [403.8(f) (2) (i)]

- YES NO 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)]
- 
- If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> 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)]
- If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> 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) \_\_\_\_\_

How often is the survey to be updated? About three years

Are there any problems that the Control Authority has in identifying and categorizing SIUs: None

YES NO

- Have any new SIUs been identified within the last 12 months? If yes:

<u>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>

How many IUs are currently identified by the Control Authority in each of the following groups:

- a. 10 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 4 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 6 Noncategorical SIUs
- d. ?? Other regulated nonsignificant IUs (Describe) Small Commercial IUs
- ?? 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) (1)-(3)]

If not, the Control Authority has defined "significant industrial user" to mean: n/a



## 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?

\*The City plans to include this BMP and P2 information in the application as part of the streamlining modification.

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

What is the maximum term of the control mechanism? 5 years

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

IU NAME	PERMIT EXPIRATION DATE
None	

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

✓           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 applied to waste haulers:

Pollutant	Limit

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

Jefferson Industrial Park Pump Station (Disc Point)  
CA checks references & regulatory agencies records

✓    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 applied to UST cleanup sites:

Pollutant	Limit
N/A	

## 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?

1991 Date Notified Letter Method of Notification

How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

<input checked="" type="checkbox"/> Federal Register	<input checked="" type="checkbox"/> Journals, Newsletters
<input checked="" type="checkbox"/> Meetings, Training	<input checked="" type="checkbox"/> Internet
<input checked="" type="checkbox"/> Government Agencies	<input checked="" type="checkbox"/> Other <u>NACWA</u>

YES NO

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
<u>section in Program only says, "The City...elcects not to implement local limits".</u>			

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		MAHL Limits Adopted?		MAHC** (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.100</u>
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.165</u>
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>1.000</u>
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>1.000</u>
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.100</u>
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.513</u>
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.0004</u>
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.200</u>
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>1.000</u>
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.116</u>
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.190</u>
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.550</u>

\* - If necessary for the sludge disposal option chosen

\*\* - MAHCs are based on April 2012 ADEQ TBLI Spreadsheet; "Old" MAHCs are shown in Section 28-102 of the codes.

## 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	
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____

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?

	TYPE OF ALLOCATION <i>[None mentioned in Program]</i>		
	Uniform Concentration**	Mass	Hybrid
Arsenic (As)	_____	_____	_____
Cadmium (Cd)	_____	_____	_____
Chromium-Total	_____	_____	_____
Copper (Cu)	_____	_____	_____
Cyanide (CN)	_____	_____	_____
Lead (Pb)	_____	_____	_____
Mercury (Hg)	_____	_____	_____
Molybdenum (Mo)	_____	_____	_____
Nickel (Ni)	_____	_____	_____
Selenium (Se)	_____	_____	_____
Silver (Ag)	_____	_____	_____
Zinc (Zn)	_____	_____	_____
_____	_____	_____	_____

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?  
N/A

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### H. COMPLIANCE MONITORING

#### Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
<b>Inspections:</b>			
CIUs	<u>1/yr</u>	1/year	_____
Other SIUs	<u>1/yr</u>	1/year	_____
<b>Sampling:</b>			
CIUs	<u>12/yr</u>	1/year	<u>Approved Program shows monthly</u>
Other SIUs	<u>12/yr</u>	1/year	<u>for all CIUs &amp; SIUs on page 23</u>
<b>Reporting:</b>			
CIUs	<u>2/yr</u>	2/year	_____
Other SIUs	<u>2/yr</u>	2/year	_____
<b>Self-Monitoring:</b>			
CIUs	<u>2/yr</u>	2/year	_____
Other SIUs	<u>2/yr</u>	2/year	_____

<u>#</u>	<u>%</u>	<u>How many and what percentage of SIUs were:</u>
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	Not inspected or not sampled at least once in the past reporting year ? [NOIN]-[403.8(f)(2)(v)]

\* NOIN- this is a count of SIUs that are either not inspected OR not sampled in the past 12 months. This is NOT a count of SIUs that were both not sampled and not inspected. Do not count repetitive SIU names more than once.

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	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	If requested?
<input type="checkbox"/>	<input type="checkbox"/>	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>ICP</u>	<u>In-house</u>
Cyanide	<u>Spectrophotometric</u>	<u>In-house</u>
Organics	<u>GC/MS</u>	<u>In-house</u>
Other	<u>WET 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:  
40 CFR 136 & 20<sup>th</sup> Edition of Standard Methods

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

5days Conventionals  
1week Metals  
1week Organics

Is there an established protocol clearly detailing sampling location 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.

### I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's? [403.8(f) (2) (vii)] Updated per recent Streamlining rule

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

YES NO

Describe how the Control Authority will investigate instances of noncompliance

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

## SECTION II: PROGRAM ANALYSIS AND PROFILE

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

<input checked="" type="checkbox"/> Notice or letter of violation <input checked="" type="checkbox"/> Setting of compliance schedule <input checked="" type="checkbox"/> Injunctive relief	<input checked="" type="checkbox"/> Administrative Order <input checked="" type="checkbox"/> Revocation of permit <input checked="" type="checkbox"/> Fines (maximum amount): civil                                   \$ _____/day/violation criminal                               \$ 1000 _____/day/violation administrative                       \$ * _____/day/
<input type="checkbox"/> Imprisonment <input checked="" type="checkbox"/> Termination of Service <input checked="" type="checkbox"/> Other: _____	

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

YES    NO

       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)].  
 Comment: \_\_\_\_\_

       If no, does the Control Authority conduct all of the monitoring?

YES    NO    N/A

           Does the pattern of enforcement conform to the ERP?

Complete the following table for SIUs identified as SNC.

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

## SECTION II: PROGRAM ANALYSIS AND PROFILE

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

<u>#</u>	<u>%</u>	
<u>0</u>	<u>0</u>	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
<u>0</u>	<u>0</u>	Self-monitoring requirements [WENDB-MSNC]
<u>0</u>	<u>0</u>	Reporting requirements [WENDB-PSNC]
<u>0</u>	<u>0</u>	Pretreatment compliance schedule [WENDB-SSNC]
<u>0</u>	<u>0</u>	How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES    NO  
 \_\_\_\_\_     Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. \_\_\_\_\_

Has the Control Authority experienced any of the following:

<u>YES</u>	<u>NO</u>	<u>EXPLAIN and ID Industrial User</u>
_____	<input checked="" type="checkbox"/>	Interference? _____
_____	<input checked="" type="checkbox"/>	Pass through? _____
_____	<input checked="" type="checkbox"/>	Fire or explosions? _____ (incl. flash point viol.)
_____	<input checked="" type="checkbox"/>	Corrosive structural damage? _____ (incl. pH <5.0)? _____
_____	<input checked="" type="checkbox"/>	Flow obstructions? _____
_____	<input checked="" type="checkbox"/>	Excessive flow? _____ or pollutant concentrations? _____
_____	<input checked="" type="checkbox"/>	Heat problems? _____
_____	<input checked="" type="checkbox"/>	Interference due to oil _____ or grease? _____
_____	<input checked="" type="checkbox"/>	Toxic fumes? _____
_____	<input checked="" type="checkbox"/>	Illicit dumping of _____ hailed wastes? _____

YES    NO  
 \_\_\_\_\_ Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

0 \_\_\_\_\_ How many SIUs are currently on compliance schedules?

\_\_\_\_\_  Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

	<u>Number</u>	<u>Amount</u>
Civil	_____	\$ _____
Administrative	_____	\$ _____
Total	<u>None</u>	<u>\$ 0</u>

## 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: \_\_\_\_\_

Are the following files computerized:

YES NO  
  Control Mechanism Issuance  
  Inspection and Sampling schedule  
  Monitoring Data  
  IU Compliance Status Tracking  
  Other: \_\_\_\_\_

Can IU monitoring data be retrieved by:

Industry name  
  Pollutant type  
  Industrial category or type  
  SIC Code  
  IU discharge volume  
  Geographic location  
 n/a  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?



## SECTION II: PROGRAM ANALYSIS AND PROFILE

### 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:  
~3 FTEs

Mgr (Ken Johnson)-0.2, Pret Coor (Vincent Miles)-0.8; Lab Supv (Stacy Carpenter)-0.6; Secretary- (Jamie Kentle)-0.5; Lab Tech (Najard)-0.5; Monitoring Tech (Samatha)-0.5 = 3.1 full Time Equivalent Employees

YES NO

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:

	<u>Percent of Total Funding</u>
<input type="checkbox"/> POTW general operating fund	100
<input type="checkbox"/> IU permit fees	_____
<input type="checkbox"/> monitoring charges	_____
<input type="checkbox"/> industry surcharges	_____
<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:  
Decrease due to slow down in economy & loss of industries

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

<u>YES</u>	<u>NO</u>	<u>If no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Legal assistance _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Permitting _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU inspections _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample collection _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample analyses _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data analysis, review and response _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enforcement _____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Administration (inc. record keeping /data management) _____

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>	<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment <u>Isco samplers, etc</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment <u>Hard hats, eye protection, etc.</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles <u>Trucks with plans to purchase new van</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment <u>ICAP, GC, etc.</u>

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### I. 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.):  
Household hazardous waste collection; public school presentations;  
Plant tours; brochures sent out educating public about the collection  
system and brochures about keeping grease out of the system.
  
2. Has the source of any toxic pollutants been identified?  
If yes, what was found?  

None

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3. Has the POTW implemented any kind of public education program? If yes, describe:  

See above

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4. Does the POTW have any pollution prevention success stories for industrial users documented?   No  . If yes, please attach.
  
5. 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

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6. 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?  

N/A

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