



ARKANSAS

ENERGY & ENVIRONMENT

December 12, 2022

Lioneld Jordan, Mayor
City of Fayetteville
113 West Mountain Street
Fayetteville, AR 72774
Via email: mayor@fayetteville-ar.gov & tnyander@fayetteville-ar.gov

RE: City of Fayetteville Inspection
AFIN: 72-00781 Permit No.: AR0020010

Honorable Mayor Jordan:

On September 27 & 29, 2022, I performed a Pretreatment Compliance Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.


No violations were noted at the time of the inspection. Please refer to the inspection report for any comments.

If I can be of any assistance please contact me at garrett.grimes@adeq.state.ar.us or 501-837-2067.

Sincerely,

A handwritten signature in blue ink that reads "Garrett Grimes".

Garrett Grimes
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

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|  <p>ENVIRONMENTAL QUALITY</p> | OFFICE OF WATER QUALITY INSPECTION REPORT | | |
| | AFIN: 72-00781 | PERMIT #: AR0020010 | DATE: 9/27/2022 |
| | COUNTY: 72 Washington | PDS #: 123781 | MEDIA: WN |
| | GPS LAT: 36.080674 LONG: -94.089174 LOCATION: Entrance | | |
| FACILITY INFORMATION | | INSPECTION INFORMATION | |
| NAME: City of Fayetteville LOCATION: 1400 North Fox Hunter Road CITY: Fayetteville | | FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 104111 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Pretreatment Compliance | |
| RESPONSIBLE OFFICIAL | | DATE(S): ENTRY TIME: EXIT TIME: PERMIT EFFECTIVE DATE: 9/27/2022 09:00 16:00 1/1/2018 9/29/2022 09:00 13:00 12/31/2022 | |
| NAME: / TITLE Lioneld Jordan / Mayor COMPANY: City of Fayetteville MAILING ADDRESS: 113 West Mountain Street CITY, STATE, ZIP: Fayetteville AR 72774 PHONE & EXT: / FAX: 479-575-8390 / EMAIL: mayor@fayetteville-ar.gov & tnyander@fayetteville-ar.gov | | FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N | |
| CONTACTED DURING INSPECTION: No | | INSPECTION PARTICIPANTS | |
| | | NAME/TITLE/PHONE/FAX/EMAIL/ETC.: John Byrd, Pretreatment Coordinator, Jacobs Engineering Group; Joseph Goolsby, Quality Assurance Manager, Hiland Dairy Foods; Carl Pizzino, EH&S Manager, Elkhart Products Corporation; Will Cody, Inspector, DEQ; Garrett Grimes, Inspector, DEQ | |
| AREA EVALUATIONS | | | |
| (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated) | | | |
| N | PERMIT | N | FLOW MEASUREMENT |
| N | RECORDS/REPORTS | N | LABORATORY |
| N | OPERATION & MAINTENANCE | N | EFFLUENT/RECEIVING WATER |
| N | SAMPLING | N | SLUDGE HANDLING/DISPOSAL |
| N | OTHER: | S | PRETREATMENT |
| SUMMARY OF FINDINGS | | | |
| <p>No violations were identified during the inspection. Please review the "General Comments" section below for observations and additional comments pertaining to the IU site visits.</p> | | | |



GENERAL COMMENTS

1. IU Site Visit #1 – Hiland Dairy Foods:

- a. At the time of the inspection the facility contact was not familiar with the design of the pretreatment system. The contact referred to the maintenance personnel as the employees knowledgeable about the specifics of the structure and function of the system. The contact used by the facility should be able to answer general questions regarding the design of the system including the makeup, design, flow, and treatment of wastewater generated from the process areas. Also, the contact was unclear on the makeup of the chemicals used to lubricate the conveyor line. The lubricant appeared to soap based, but knowledge of the chemical used is important if monitoring reveals non-compliance.
- b. Several spill control kits were observed during the walkthrough with one missing several components. Some areas where spills could occur were lacking kits.

2. IU Site Visit #2 – Elkhart Products Corporation:

- a. The facility does not maintain adequate Quality Assurance/Quality Control for measurements of pH and flow. Calibration records of pH are not recorded. The flow meter was in need of calibration at the time of the inspection and the facility did not have a staff gauge for manual measurements of flow and were not familiar with methods to perform calibration checks of their meter.
- b. The facility utilizes a contract lab for analyses of copper and chromium in their effluent and reports these values on their Discharge Monitoring Reports submitted to the City. However, Elkhart Product Corporation also conducts routine checks of their effluent at the weir for copper and chromium using a Hach handheld meter and does not report these values. If this method follows standard methods outlined in 40 CFR 136, then these values would need to be reported on the DMR following the additional monitoring reporting requirements in the control document. Furthermore, if the facility identifies possible non-compliance in their effluent, Elkhart Products must follow any reporting requirements in their control document including notifying the City and conducting follow-up sampling.

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| INSPECTOR'S SIGNATURE:  Garrett Grimes | DATE: 10/5/2022 |
| SUPERVISOR'S SIGNATURE:  Brent L. Walker | DATE: 12/8/2022 |

Inspection Report: **City of Fayetteville**, AFIN: **72-00781**, Permit #: **AR0020010**
DIVISION OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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| Name of Municipality: City of Fayetteville |
| AFIN Number: 72-00781 |
| NPDES Permit Number(s): AR0020010 & AR0050288 |
| Program Tracked under NPDES Permit Number: AR0020010 |
| Fact Sheet Preparation Date: NA |
| Date of Last PCI/Audit: July 2018 |
| Date of Last Annual Report: May 31, 2022 |
| Name of Inspector: Garrett Grimes & Will Cody |
| Date PCI Performed: September 27 & 29, 2022 |
| Name and Title of Facility Representative: John Byrd, Pretreatment Coordinator |
| Name and Title of Other Participants: Joseph Goolsby, Hiland Dairy Foods; Carl Pizzino, Elkhart Products |
| Number of IUs Visited: 2 |
| Name(s) of IUs Visited: Hiland Dairy Foods, Elkhart Products |
| AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED |
| NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING. |

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. **Superior Industries no longer present, Ecotech added to the program**

2. Has ADEQ or EPA been notified of these changes? **Yes**

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Resent the survey in 2020 and continued into 2021. 85% respondent rate - planning on checking on industries who haven't responded.**

Not sure when form last updated. After previous PCI

Wolf Speed - semiconductor manufacturer - 50-gal day discharge. Discovered in recent survey, several others being monitored on list.

4. What procedures are being used to update the IU Survey? **Survey administered every three years. Next one is in 2024.**

Mail in form sent to each industry as they arrive in Fayetteville. Report sent to Jacobs.

5. Total number of Significant Industrial Users, according to the definition used by the POTW (This number must be greater than or equal to the answer to question 6): **7**

6. Number of Categorical Industrial Users: **4**

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **On-site inspection, Data disclosure form including a baseline monitoring report (Ecotech example). Follow up with control document.**

8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.

| Name of IU: | Category: | Regulated Process: |
|----------------------------------|-------------------|------------------------------------|
| Elkhart Products | 40 CFR 468 | Copper forming |
| Custom Powder Coating | 40 CFR 433 | Metal finishing |
| Ecotech Consumer Products | 40 CFR 463 | Plastic molding and forming |
| Marshalltown Company | 40 CFR 433 | Metal finishing |

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes

2. Describe any apparent problems with the local limits. None noted. Using same from last inspection (same permit term).

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

| Pollutant: | Sampling Frequency | Permit Requirement | Program Requirement |
|-------------------|---------------------------|---------------------------|----------------------------|
| Metals: | | | |
| Influent: | Quarterly | Quarterly | Quarterly |
| Effluent: | Quarterly | Quarterly | Quarterly |
| Sludge: | 60 Days | | |
| Organics: | | | |
| Influent: | Annual | Annual | Annual |
| Effluent: | Annual | Annual | Annual |
| Sludge: | | | |

Comments: TCLP annually for sludge

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective? No, Conagra had an ammonia leak several years ago, but did not cause an upset. This was remedied following notification.

| C. INDUSTRIAL USER CONTROL MECHANISM |
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| 1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Permit |
| 2. How many IU permits (or other control documents) have been issued? 7 |
| 3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT. <u>Yes.</u> |
| 4. Does the control document contain the following items? List the section of the permit each item is listed under. An expiration date: NOC Discharge limitations: Part 1, Section D) Table 1-4 (Categorical); Part 1, Section B) Table I-1 (Non-categorical) |
| If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under. IU self-monitoring requirements: Part 2 Section B) IU reporting requirements: Part 3 |
| 5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under. Sample location: Part 2, Section B) (Categorical); Part 1, Section A) (Non-categorical) Type of sample: Part 2, Section B) (Categorical), Part 1, Section B) (Non-categorical) Monitoring frequency: Part 2, Section B) (Categorical); Part 1, Section B) (Non-categorical) Bypass prohibition: Part 6, Section B) iii) (Categorical); Part 3, Section A) iii) (Non-categorical) Right of entry: Part 6, Section C) v) (Categorical); Part 3, Section A) iii) (non-categorical) Non-transferability: Limitations on Permit Transfer; Part 6, Section A) vii) (Categorical); Part 3, Section A) viii) (Non-categorical) Revocation clause: Part 6, Section A) v) (Categorical); Part 3, Section A) vii) (Non-categorical) Penalty Provisions: Part 6, Section D) vii) (Categorical); Part 3, Section C) viii) (Non-categorical) Slug load notification: Part 3, Section E)i) (Categorical); Part 2, Section C) viii) (Non-categorical) Notification of process change: Part 6, Section D) i) (Categorical); Part 2, Section C) v) (Non-categorical) |

| D. MONITORING OF IUS BY POTW | | | |
|--|---|--|-----------------------|
| 1. Indicate current inspection and sampling frequency and program requirement below. | | | |
| | Current frequency: | | Program Requirements: |
| Sampling: | | | |
| Categorical IUs | At least once per year. | | 1 |
| Other SIUs | Yearly (O&G) Quarterly (BOD, TSS, Phosphorous) | | 1 |
| Non-SIUs | | | |
| Inspection: | | | |
| Categorical IUs | 1 per year | | 1 |
| Other SIUs | 1 per year | | 1 |
| Non-SIUs | | | |
| Comments: Non SIUs will be inspected if permit requirements are suspected. | | | |
| 2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes | | | |
| 3. Are inspections announced or unannounced? Annual long form inspections are scheduled | | | |
| 4. Are records kept of each inspection? Yes | | | |
| 5. Does the inspection report contain an adequate description of the following: | | | |
| Date and time of inspection: Yes | | | |
| Officials present: Yes | | | |
| Inspection of chemical storage areas: Yes | | | |
| Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes | | | |
| Inspection of the pretreatment facilities: Yes | | | |
| Review of self-monitoring records: Yes | | | |
| Observation of IU self-monitoring procedures: Yes | | | |
| Verification that approved analytical techniques are used: Yes | | | |
| Verification of IU flow measurement (where required): | | | |
| 6. Please describe the overall adequacy of inspection documentation: Adequate | | | |
| 7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY). <u>Yes, Hiland Dairy analyzes pH when sampling, The contract lab and Hiland Dairy both collect FOG grabs and composite samples.</u> | | | |
| 8. Are analyses performed in accordance with EPA-approved | | | |

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| methods (40 CFR 136)? Yes |
| 9. Are sampling and flow monitoring equipment properly maintained? Sampling & flow monitoring equipment. Portable sampler for composites and grab equipment for grabs and composites. Maintained in good condition |
| 10. Is the POTW keeping proper field notes and chain of custody forms? Generate own Chain of Custody form - can run pH TSS, TP in house. |
| 11. Is the sampling location representative of the discharge to the collection system? Yes |
| 12. Are sampling locations identified in POTW records? Permit defined outfall location where samples are taken. |
| 13. Are sampling services available in an emergency? Jacobs has the ability to go out and conduct sampling No overt emergency sampling SOP. |
| 14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Receiving stamp when receive documents. Date of data entry line and violation line DMRs, kept in folders, reviewed in five days, Reviewed results entered database, DMRs stored in cabinet. |
| 15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? <u>John Byrd reviews the DMRs from permitted facilities within 10-days of receiving the report.</u> |
| 16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? <u>Enforcement SOP, Table 1 A. Discharge violations and response. Example: NOV sent to Tim Nyander with City of Fayetteville for certification, NOV hand delivered to facility asking for cause and remediation response</u> |
| 17. What are the POTW's procedures for following up violations? Go off of written response to notice. If recurring exceedance - 5 consecutive samples. |
| 18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? Yes |
| Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR. |

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| Name and address: Yes |
| Other environmental permits held: Yes |
| Description of operations: Yes |
| Process flow diagrams: Yes |
| Flow measurements: Yes |
| Measurements of regulated pollutants: Yes |
| Certification of compliance by the IU: Yes |
| Compliance schedule (if needed): |
| |
| 19. Additional comments on the POTW's inspection and sampling procedures: None |
| |

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes

2. How does the POTW respond to the following violations?

Effluent limitations: **Table 1 A.4 - A.7 of Enforcement SOP**

Late reports: **<5-day informal warning, >5-day late report issued NOV, >30-days SNC or Fine.**

Unpermitted discharges: **Enforcement SOP Table A.1 - A.3**

Slug loads or spills: **Table 1 A.8 - A.9**

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

| Name: | Type of Violation: | Enforcement Action: | Compliance Deadline: |
|-------------|--------------------|---------------------|----------------------|
| None | | | |
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5. Comments on the POTW's enforcement procedures: **None**

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Previous coordinators have taken other positions. Now staffed by one individual. Coordinates with on-site laboratory and assist with industrial sampling. Lab personnel have acquired some pretreatment related training.**

2. Are staffing levels adequate? **Yes**

3. Are the responsible officials familiar with the approved program? **Yes.**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: **None**

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?

3. Does the POTW have copies of permits for IUs in other cities?

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators?

5. Comments on multijurisdictional issues:

H. EVALUATION AND COMMENTS

Overall satisfactory, see IU visits for comments.

**PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM**

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| Name of Industry: <u>Hiland Dairy Foods</u> |
| POTW Name: <u>City of Fayetteville Noland Plant</u> |
| Industry Contacts: <u>Joseph Goolsby</u> |
| Date and Time of Visit: <u>9/29/2022 9:50</u> |
| Description of Manufacturing Process: <u>This facility is primarily involved with the bottling of milk and juice products. This facility also separates cream for bottling and dilution purposes.</u> |
| Sources of Process Wastewater: <u>Process wastewater is primarily generated from cleaning equipment, conveyer line lubricant, spills, and off-spec product.</u> |
| Categorical Industry? <u>No</u> |
| Basis for Limits: <u>Local</u> |
| Point of Application: |
| Description of Pretreatment Equipment and Procedures: <u>Cleaning water, lubricant, and spills are conveyed to an equalization tank for holding. This can also be bypassed and wastewater ultimately enters an underground settling tank prior to discharge. Although this tank is referred to a settling tank, wastewater appears to have only a brief settling time prior to discharge and John Byrd described this system as passive.</u> |
| Spill Prevention and Solvent Management Procedures: <u>Several spill kits were observed during the walkthrough, but one was noted as in need of restock and several rooms where spills were likely did not have kits. A chemical storage room had temporary plugs in place in the floor drains. Joseph Goolsby stated that these plugs are only removed during cleaning. Chemicals stored appeared to primarily be related to cleaning and lubrication. A parts washer using petroleum naphtha was present and on a routine removal/replacement schedule with Safety Kleen.</u> |
| Sampling Location and Equipment: <u>The facility uses an in-ground Parshall flume and a bubbler meter for flow measurement. The facility is awaiting a contractor to calibrate the meter, but conducts spot checks. A pH meter is available on-site and appeared properly maintained and calibrated. A composite sample is located in a building adjacent the flume for obtaining composite samples and appeared in good repair.</u> |

**PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM**

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| Name of Industry: <u>Elkhart Products Corporation</u> |
| POTW Name: <u>City of Fayetteville Noland Plant</u> |
| Industry Contacts: <u>Carl Pizzino</u> |
| Date and Time of Visit: <u>9/29/2022 11:25</u> |
| Description of Manufacturing Process: <u>Primary product is copper fittings. Produced by drawing, cutting and forming, and cleaning. Products are shipped to a facility in Westville, OK for packaging</u> |
| Sources of Process Wastewater: <u>Clean line water, mop bucket water, stormwater accumulating in outdoor containment pits.</u> |
| Categorical Industry? <u>Yes</u> |
| Basis for Limits: <u>Local</u> |
| Point of Application: |
| Description of Pretreatment Equipment and Procedures: <u>Wastewater from the cleaning process as well as mop bucket wastewater and potentially contaminated stormwater are sent into two (2) equalization tanks for low pH wastewater and neutral wastewater respectively. These are mixed into a single tank with a pH of 6-7. pH is then lowered and a metal precipitant is added to remove copper and chromium before being raised to just under 7. Wastewater is then delivered into a three phase treatment process where flocculent is added and metal allowed to deposit. Part of this process involves the addition of bentonite clay. The wastewater is passed through a filter where solids are separated from liquids. Effluent discharges to the City POTW while removed solids are pressed into a filter cake and collected for disposal as a non-hazardous waste. TCLP testing is routinely conducted on the filter cake to determine if it qualifies as a hazardous waste.</u> |
| Spill Prevention and Solvent Management Procedures: <u>Spill control materials are available throughout the facility. Used oil is primarily stored in a 500-gallon tank. Chemicals and other used oil containers are stored in a chemical warehouse with a below-grade floor to prevent spills from leaving the facility and a chemical sump built into the floor. Parts washing solvent has been replaced with a citric acid based compound. Plating room is built below grade to prevent spills</u> |

from leaving the room. Some plating solution was on the floor and in an open bucket.

Sampling Location and Equipment: Sampling is done following the weir. pH sampling is done in house and a contract laboratory is used for all additional parameters. A portable composite sample device was located in the vicinity of the outfall. The weir used as the flow measurement device was manufactured by Elkhart and a replacement weir had been constructed, but was awaiting calibration. The flow meter had not been calibrated recently and calibration records and checks were not available for both the flow meter and pH meter. Elkhart lacked a staff gauge for manual checks of flow and calibration checks.

**PPETS CODE SHEET
 PRETREATMENT COMPLIANCE INSPECTION (PCI)**

| | | |
|---|------------------------------------|------|
| | | CODE |
| INSPECTOR'S NAME: | <u>Garrett Grimes</u> | |
| NAME OF FACILITY: | <u>City of Fayetteville</u> | |
| PERMIT NUMBER USED TO TRACK PROGRAM: | <u>AR0020010</u> | NPID |
| DATE OF PCI: | <u>September 27 & 29, 2022</u> | DTIA |

PPETS WENDB DATA ELEMENTS

| | | |
|--|----------|------|
| NUMBER OF SIGNIFICANT IUS (SIUS): | <u>7</u> | SIUS |
| NUMBER OF CATEGORICAL IUS: | <u>4</u> | CIUS |
| SIUS NOT SAMPLED OR INSPECTED BY POTW: | <u>0</u> | NOIN |
| SIUS WITHOUT CONTROL MECHANISM: | <u>0</u> | NOCM |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: | <u>0</u> | PSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS: | <u>0</u> | MSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW: | <u>0</u> | SNIN |