

ADEQ

ARKANSAS
Department of Environmental Quality

September 4, 2009

Michael Sims
Wastewater Superintendent
City of De Queen
P O Box 730
De Queen, AR 71832

Re: City of De Queen (NPDES #AR002733) Pretreatment Program
Audit/Municipal Pollution Prevention (P2) Assessment

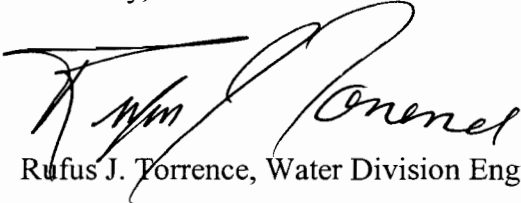
Dear Mr. Sims:

Please find enclosed the finished report for the audit/assessment conducted August 18 through August 19, 2009. The report should be made available for review to appropriate City and industrial officials. You and the City staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

The Department appreciates your cooperation during this audit. The City should closely examine and consider the recommendations in the attached audit/assessment.

Please do not hesitate to contact my office if you or any City staff has questions or concerns.

Sincerely,



Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)
Eric Flemings / ADEQ Technical Assistant Mgr-Field Services (w/o attmt)
Cindy Garner / ADEQ Technical Assistant Mgr-Enforcement (w/o attmt)

PRETREATMENT PROGRAM AUDIT

POLLUTION PREVENTION ASSESSMENT

DE QUEEN, ARKANSAS

NPDES PERMIT #AR0021733

September 04, 2009

AUDITOR: RUFUS TORRENCE

WATER DIVISION ENGINEER II

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 Northshore Drive

NORTH LITTLE ROCK, ARKANSAS 72118

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- C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs
- D) Required Program Modifications to the Approved Pretreatment Program Necessary to Bring the Program Into Compliance with the Letter or Intent of the Current Regulatory Requirements

LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

- Section I: General Information
- Section II: Program Analysis and Profile
- Section III: Industrial User File Review
- Reportable Noncompliance (RNC) Worksheet
- SIU Site Visit Summary

Attachments: Supporting Documentation

- A - City of De Queen Industrial Wastewater Discharge Permit Pilgrim's Pride Corporation
- B - Application for Industrial Waste Permit
- C - City of De Queen Industrial Inspection Report

A) INTRODUCTION

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

The auditor performed on August 18 & 19, 2009 an assessment of the Pretreatment Program implemented by the City of De Queen, Arkansas.

Participants included:

Rufus Torrence	ADEQ/Engineer & Auditor
Mike Sims	City of De Queen/Wastewater Superintendent

The goals of the audit/assessment were:

- * To determine the implementation and compliance status of the City of De Queen's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403
- * To determine the effectiveness of the City's Pretreatment and P2 Programs in controlling industrial discharges
- * To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements
- * To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

De Queen's Pretreatment Program was originally approved on August 3, 1984. In July 2009 the City submitted a partial program modification. The modification included a revised Pretreatment Ordinance and a certification/demonstration that local limits are currently not necessary. The revised Pretreatment Ordinance has changes to comply with the Streamlining Rule updates.

The City recently upgraded the treatment plant in an effort to comply with the TKN/NH3 NPDES permit limits. The upgrade consisted of a new bar screen, grit chamber, Vertical Loop Reactor-four aeration basins, two clarifiers and a Cannibal Reactor. The city converted an old filter to a chlorine contact chamber. The Cannibal Reactor produces no sludge and just a small quantity of inorganic filter cake. The City sends the filter cake to a local landfill. The City is currently in compliance with the nitrogen limits in the NPDES permit but the POTW is not currently meeting the proposed phosphorous limit.

The City pretreatment coordinator tested the influent from Pilgrim Pride and the domestic only wastewater. The City pretreatment coordinator related to the auditor that Pilgrim's wastewater contained very little phosphorous while the domestic only wastewater had a high phosphorous content. The City should document these tests results for phosphorous. The City may decide that Pilgrim no longer has a reasonable potential for adversely affecting the POTW and deem Pilgrim a non-significant industrial user. If Pilgrim is deemed a non-significant industrial user, the City will not have to permit or inspect Pilgrim. In other words, the City will no longer have day-to-day pretreatment program (Control Authority) responsibilities.

The upgrade increased the plant design flow from 3.4 MGD to 4.0 MGD. The average flow is 2.5 MGD with approximately 1.4 MGD being contributed by only one significant industrial user, Pilgrim Pride.

The audit/assessment began with a tour of the new plant. The audit consisted of informal discussions with the City's Pretreatment personnel, examination of Pilgrim's file (only SIU), the pretreatment records at the treatment plant and, finally, a site visit to Pilgrim. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachments A through C.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of De Queen' Pretreatment Program. The auditor has paraphrased with CFR citations the actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program. A narrative explanation of the finding will follow.

In accordance with **40 CFR 403.8(f)(2)(vi)**, the POTW must "*Evaluate whether each Significant Industrial User needs a plan or other action to control Slug Discharges...this evaluation must have been conducted at least once by October 14, 2006.*" Furthermore, in accordance with **40 CFR 403.8(f)(2)(v)**, the POTW must "*Inspect...each Significant Industrial User at least once a year...*".

The purpose of each inspection is to evaluate the industrial user's potential to adversely affect the POTW and the city must continue to evaluate the possibility of a slug load. The auditor recommends adding a brief narrative someplace in each annual inspection report to show that the City verified that Pilgrim continues to have no potential for a slug load.

C) RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE PRETREATMENT AND POLLUTION PREVENTION PROGRAMS

1) Currently, the City must sample for phosphorous and report the results. The POTW is currently having a problem meeting the proposed final NPDES permit limits for phosphorus. The City should continue to test both Pilgrim Pride and domestic only wastewater for phosphorus. The City should document the results to show that the phosphorus entering the POTW originates primarily from domestic sources and that Pilgrim no longer has the potential to adversely affect the POTW's operation or to cause the POTW to violate its NPDES permit.

2) In accordance with 40 CFR 403.3(v)(3), upon finding that Pilgrim has no reasonable potential for adversely affecting the POTW's operation or for causing the POTW to violate its NPDES permit, the City on its own initiative may determine that Pilgrim is not a Significant Industrial User. In this case, the auditor recommends that the City deem Pilgrim as a non-significant industrial user and the approval authority (ADEQ) will not require the City to permit or inspect Pilgrim. Nonetheless, the City may continue to permit and inspect Pilgrim as a "local" requirement.

3) If the City has no SIUs, the City should petition ADEQ to have the pretreatment language in its NPDES permit modified.

D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS

1) Make necessary revisions to the City's Program in response to this audit's requirements/recommendations.

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, must be submitted to ADEQ for review and approval .

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 De Queen NPDES #: AR0021733
 Mailing address: P.O. Box 730, De Queen, AR 71832

Permit Signatory: Mike Sims Title: Wastewater Superintendent

Telephone: 870.642.5231 FAX NUMBER: 870.642.5231 / 870.642.3111

Pretreatment Contact: Same Title: Same

Address: _____
 Telephone: _____
 E-Mail: msims@dequeen-ar.us

Pretreatment program approval date: 8/3/84

Dates of approval of any substantial modifications: N/A

Month Annual Pretreatment Report Due: August

Pretreatment Year Dates: 8/1 - 7/31 Date(s) of Audit: 08/18 - 8/19/09
 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
<u>Rufus Torrence</u>	<u>Engineer II</u>	<u>(501) 682-0626</u>

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
<u>* Mike Sims</u>	<u>WW Superintendent</u>	<u>same</u>

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
<u>PCI</u>	<u>4-19-07, 9-21-07, 10-29-08</u>	<u>No deficiencies noted</u>

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?

.....
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.

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
<u>AR0021733</u>	<u>DeQueen WW Treatment Plant</u>	<u>03/01/08</u>	<u>02/28/13</u>

2. Individual Treatment Plant Information

a. Name of Treatment Plant: DeQueen WW Treatment Plant
 Location Address: 670 South 9th Street

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 4.0 MGD; Actual (Average)- 2.5 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs 0

Industrial Contribution to this Treatment Plant

of SIUS : 1 # of CIUS : 0
 Industrial Flow (mgd): 1.4 Industrial Flow (%) : 56 %

Level of Treatment

Type of Process(es):

Primary Bar Screen-Grit chamber

Secondary Vertical Loop Reactor-4 Aeration Basins

Tertiary Clarifiers-Sidestream sludge conditioning-Cannibal Reactor

Method of Disinfection: Chlorination

Dechlorination YES NO

Effluent Discharge

Receiving Stream Name: Big Bear Creek in Seg 1 of Red River

Receiving Stream Classification: Segment 1C of the Red River Basin

Receiving Stream Use: Fishable/Swimmable

If effluent is disposed of to any location other than the receiving stream, please note: no

Method of Sludge Disposal:

Quantity of Sludge:

- | | |
|---|---|
| <input type="checkbox"/> <i>none generated</i> | <input type="checkbox"/> dry tons/yr. |
| <input type="checkbox"/> Land Application | <input type="checkbox"/> dry tons/yr. |
| <input type="checkbox"/> Incineration | <input type="checkbox"/> dry tons/yr. |
| <input type="checkbox"/> Monofill | <input type="checkbox"/> dry tons/yr. |
| <input checked="" type="checkbox"/> Mun. Solid Waste Landfill | <input type="checkbox"/> * dry tons/yr. |
| <input type="checkbox"/> Public Distribution | <input type="checkbox"/> dry tons/yr. |
| <input type="checkbox"/> Lagoon Storage | <input type="checkbox"/> dry tons/yr. |
| <input type="checkbox"/> Other (specify) | <input type="checkbox"/> dry tons/yr. |

List of toxic pollutant limits in NPDES permit: None

*The New plant does not produce biosolids. The new plant has a cannibal reactor which consumes over 99% of the biosolids and generates mostly inorganic sludge.

a. (continuation of individual treatment plant information for De Queen Wastewater 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: N/A
 Issuance Date: _____
 Expiration Date: _____

List pollutants that are specified in current sludge permit:
N/A

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?) None, the CA recently upgraded the plant to an activated sludge process (VLR).

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

*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.
none established

YES NO N/A
 Has the POTW begun tracking the trends in the above samples?

 Has the POTW violated it's 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)

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

**New Plant with cannibal reactor does not generate sludge.*

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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)] Program modification still under review by ADEQ.

Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.
CA demonstrated that local limits are not necessary and submitted a request to update legal authority to comply with recent Streamlining Rule.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>July 7, 2009</u>	<u>Update Pretreatment Ordinance</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: 8/3/84 [WENDB-PTIM]

Date of most recent Ordinance approved by the Control authority: 5/3/83

Date of most recent Pretreatment Program modification approval: pending

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:

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

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

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

<u>Name of Jurisdiction</u>	<u>Number of CIUS</u>	<u>Number of Other SIUS</u>	<u>Type of Agreement</u>
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1. N/A
2.

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 P2 activity
- Analysis of samples
- Enforcement
- Other:

Briefly describe other problems:

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

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
<u> </u> <u>None</u>	<u> </u>	<u> </u>	<u> </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 P2 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)]
** size of community does not dictate formal procedures*

 ✓+- If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P2 activity and the distribution of P2 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? ongoing

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:

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

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

- a. 1* SIUs (As defined by the Control Authority) [WENDB-SIUS]
 - b. 0 Categorical Industrial Users (CIUS) [WENDB-CIUS]
 - c. 1 Noncategorical SIUs [Pilgrims]
 - d. 1 Other regulated nonsignificant IUs (Describe) septage hauler
- 2 TOTAL of a. + d.

*The CA 1982 IWS identifies 14 possible SIUs but only one (Pilgrim) was actually categorized as an SIU. Pilgrim remains the sole SIU to this date. Since Pilgrim no longer poses a threat to the new POTW, Pilgrim may be deemed a non-significant SIU.

 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)(i-ii)]
 If not, the Control Authority has defined "significant industrial user" to mean: CA is adopting the Jan 2007 EPA Model Pretreatment Ordinance

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES **NO**

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

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

What is the maximum term of the control mechanism? 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
N/A	

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)]
 Are all applicable categorical standards and local limits applied to trucked wastes?

* General Prohibitions

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):
at the POTW under supervision

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

 N/A 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
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?

2-17-09 Date Notified Letter Method of Notification

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

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

YES NO

Is the Control Authority in the process of making any PCI 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
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submitted modification demonstrating that local limits are not necessary.

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?		Local Limits Adopted? (Ord.)		Old Ordinance Numerical Limit Adopted (mg/l)
	Yes*	No	Yes	No	Yes	No	
Arsenic (As)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Cadmium (Cd)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.5
Chromium-Total	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.5
Copper (Cu)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.8
Cyanide (CN)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.23
Lead (Pb)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.3
Mercury (Hg)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Molybdenum (Mo)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Nickel (Ni)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.8
Selenium (Se)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Silver (Ag)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Zinc (Zn)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	1.8

* The CA has monitored Table III pollutants at the headworks for the past four years & most of the pollutants listed above have not been detected; therefore, the CA is requesting that local limits be deemed unnecessary.

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?		Numeric Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
<u> None </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

YES NO

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

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

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

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>
Inspections:			
CIUS	<u>N/A</u>	1/year	
Other SIUS	<u>1</u>	1/year	
Sampling:			
CIUS	<u>N/A</u>	1/year	
Other SIUS	<u>12</u>	1/year	<u>Surcharge</u>
Reporting:			
CIUS	<u>N/A</u>	2/year	
Other SIUS	<u>N/A</u>	2/year	<u>City does monitoring</u>
Self-Monitoring:			
CIUS	<u>N/A</u>	2/year	
Other SIUS	<u>N/A</u>	2/year	<u>City does monitoring</u>

<u>#</u>	<u>%</u>	<u>How many and what percentage of SIUS were:</u> <u>(refer to p.1 for Pretreatment year)</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 and not sampled at least once in the past reporting year ? [WENDB-NOIN]-[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.

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	If requested?
<input checked="" type="checkbox"/>	<input type="checkbox"/>	To verify city 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>ICAP</u>	<u>Ark Analytical</u>
Cyanide <u>spectrophotometric</u>	<u>Ark Analytical</u>
Organics <u>GasChromo/MassSpec</u>	<u>Ark Analytical</u>
Other	

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 POTW uses a state certified lab has QA/QC procedures.

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

5 days Conventionals
2 wks Metals
2 wks Organics

- Is there an established protocol clearly detailing sampling location and procedures? *The CA samples Pilgrim's wastewater on-site in a surge pit just after a V-Notch weir-flume then the wastewater flows into a dedicated pipeline to the POTW headworks.*

- 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	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	scheduled compliance monitoring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unscheduled compliance monitoring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Demand monitoring for IU compliance
<input type="checkbox"/>	<input checked="" type="checkbox"/>	IU self-monitoring
<input type="checkbox"/>	<input type="checkbox"/>	Other:

YES NO

- N/A Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below: None

I. ENFORCEMENT

YES NO

- Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)]
- Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the draft plan:
- 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"/>	Administrative Order
<input checked="" type="checkbox"/>	Setting of compliance schedule	<input checked="" type="checkbox"/>	Revocation of permit
<input checked="" type="checkbox"/>	Injunctive relief	<input checked="" type="checkbox"/>	Fines (maximum amount):

	civil	\$	<u>1000*</u>	/day/violation
	criminal	\$	_____	/day/violation
	administrative	\$	_____	/day/violation

Imprisonment
 Termination of Service
 Other:

**Approved program has only \$500/day/violation; mod proposes increasing to \$1000*

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: None at this time.

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: *The CA is adopting EPA Jan 2007 Model Pretreatment Ordinance*

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

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

Complete the following table for SIUs identified as SNC.

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

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

#	%	
<u>0</u>	<u> </u>	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
<u>0</u>	<u> </u>	Self-monitoring requirements [WENDB-MSNC]
<u>0</u>	<u> </u>	Reporting requirements [WENDB-PSNC]
<u>0</u>	<u> </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]

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:

YES NO

EXPLAIN and ID Industrial User

 * Interference [WENDB]. *since Pilgrim is not a toxic discharger, this SIU has never caused interference (inhibition or disruption) at the POTW.

 Pass through [WENDB].

 Fire or explosions?
(incl. flash point viol.)

 Corrosive structural damage?
(incl. pH <5.0).

 Flow obstructions?

 Excessive flow
or pollutant
concentrations?

 Heat problems?

 Interference due to oil
or grease?

 Toxic fumes?

 Illicit dumping of
hailed wastes?

 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?

 N/A 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	<u>0</u>	\$
Administrative	<u>0</u>	\$
Total	<u>0</u>	\$
		[WENDB-IUPN]

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
**Not necessary since the CA has only one SIU*
 Monitoring Data
 IU Compliance Status Tracking
 Other:

Can IU monitoring data can be retrieved by:

Industry name
 Pollutant type
 Industrial category or type
 SIC Code
 IU discharge volume
 Geographic location
 Receiving treatment plant (i.e. if > one plant in the system)
 Other (specify)
 Does the POTW have provisions to address claims of confidentiality?
 [403.8(f)(1)(vii)]

Have IUs requested that data be held confidential?
 How is confidential information handled by the Control Authority?

Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain

Are all records maintained for at least 3 years?

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

approximately 1/4; Mike Sims main duties are WWTP superintendent.

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>
<u>✓</u> POTW general operating fund	<u>100</u>
<u> </u> IU permit fees	
<u> </u> monitoring charges	
<u> </u> industry surcharges	
<u> </u> 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
- ✓ Sample analyses
- ✓ Data analysis, review and response
- ✓ Enforcement
- ✓ Administration (inc. record keeping /data management)

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

- ✓ Sampling equipment Standard list
- ✓ Safety equipment
- ✓ vehicles Pick-up
- ✓ Analytical equipment Standard list

SECTION II: PROGRAM ANALYSIS AND PROFILE

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.):
none
2. Has the source of any toxic pollutants been identified?
If yes, what was found?
No; Table II & III analyses shows ND for most pollutants.
3. Has the POTW implemented any kind of public education program? If yes, describe:
plant tours
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
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?

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Pilgram's Pride File/ID No. 032
Industry Address 401 S. 3rd 71833
Industry Description Poultry Processing
Industrial Category N/A 40 CFR N/A SIC Code: 2015
Ave. Total Flow (mgd) 1.8 - 2.0 Ave. Process Flow (mgd) 1.8

Industry visited during audit: YES

Comments: IU constitutes approx 69% of total POTW flow

FILE #: _____ Industry Name _____ File/ID No. _____
Industry Address _____
Industry Description _____
Industrial Category _____ 40 CFR _____ SIC Code: _____
Ave. Total Flow _____ Ave. Process Flow (gpd) _____

Industry visited during audit:

Comments:

FILE #: _____ Industry Name _____ File/ID No. _____
Industry Address _____
Industry Description _____
Industrial Category _____ 40 CFR _____ SIC Code: _____
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) _____

Industry visited during audit:

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

FILE 1 FILE 2 FILE 3 FILE 4 FILE 5

✓ => Yes N/A => Not Applicable

1. Is the IU considered "significant" by the Control Authority? ✓
2. Is the user subject to categorical pretreatment standards? no
 - a. New source or existing source (NS or ES)? N/A
 - b. Is this IU one identified as having P2 potential? no

B. Control Mechanism

1. Does the file contain an application for a control mechanism? ✓¹
 If yes, what is the application date? 9-1-08¹
 Does it ask for Pollution Prevention information? no
2. Does the file contain a Permit? ✓
 Permit Expiration Date? 8-31-09¹
 Is a fact sheet included? ✓²
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]
 - a. Legal Authority Cite? ✓
 - b. Expiration date? ✓
 - c. Statement of nontransferability? ✓
 - d. Appropriate discharge limitations? ?²
 - e. Appropriate self-monitoring requirements? ✓
 - f. Sampling frequency? ✓³

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
	✓ => Yes		N/A => Not Applicable		
g. Sampling locations?	✓				
h. Requirement for flow monitoring?	✓				
i. Types of samples (grab or composite) for self-monitoring?	✓				
j. Applicable IU reporting requirements?	✓				
k. Standard conditions for:					
Right of Entry?	✓				
Records retention?	✓				
Civil and Criminal Penalty provisions?	✓				
Revocation of permit?	✓				
l. Compliance schedules/ progress reports	✓				
m. General/Specific Prohibitions?	no				
n. Where technologically and economically achievable, are P2 aspect included?	no				
C. Application of Standards					
1. Has the IU been properly categorized?	✓				
2. Were both Categorical Standards and Local Limits properly applied?	N/A				
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	✓				
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A				

Comments: 1. The City received the application on 9-1-08 which is also the effective date of the permit. Pilgrim is to supply the City with a new application before August 31, 2009 (expiration date of current permit). 2. The Fact Sheet does not show how the limits (BOD & TSS). 3. The permit shows "7 day/month". The City samples weekly or four times a month; however, the City analyzes only one sample per month. The sample duration is one week long.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE 1 FILE 2 FILE 3 FILE 4 FILE 5

✓ => Yes N/A => Not Applicable

5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)] N/A

6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied? N/A

7. Is the Control Authority applying a bypass provision to this IU? no

D. Compliance Monitoring

Sampling

1. Does the file contain Control Authority sampling results for the industry? ✓

2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)] ✓

3. Does the sampling report(s) include: [403.8(f)(2)(vi)]

- a. Name of sampling personnel? ✓
- b. Sample date and time? ✓
- c. Sample type? ✓
- d. Wastewater flow at the time of sampling? ✓
- e. Sample preservation procedures? ✓
- f. Chain-of-custody records? ✓
- g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs] ✓

4. Has the Control Authority appropriately implemented all applicable TMO monitoring/management requirements? N/A

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
	✓ => Yes N/A => Not Applicable				
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	✓				
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	✓				
<u>Inspections</u>					
7. Does the IU file contain inspection reports?	_____				
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	_____✓				
b. Date of last Inspection	9-4-08				
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	_____✓				
b. Inspection date and time?	_____✓				
c. Name and title of IU official contacted?	_____✓				
d. Verification of production rates?	_____N/A				
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	_____✓				
f. Evaluation of pretreatment facilities?	_____✓				
g. Evaluation of self-monitoring equipment and techniques?	_____N/A				
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	_____no ⁴				

Comments: 4. The City is to add a statement on the evaluation in the inspection form.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
	✓ => Yes N/A => Not Applicable				
i. Manufacturing facilities?	<u>N/A</u>				
j. Chemical handling and storage procedures?	<u>✓</u>				
k. Chemical spill prevention areas?	<u>✓</u>				
l. Hazardous waste storage areas and handling procedures?	<u>N/A</u>				
m. Sampling procedures?	<u>N/A</u>				
n. Laboratory procedures?	<u>N/A</u>				
o. Monitoring records?	<u>N/A</u>				
p. Evaluation of Pollution Prevention opportunities?	<u>no</u>				
q. Control Authority inspector signature?	<u>✓</u>				
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>✓^s</u>				
11. Does the file include:					
a. BMR?	<u>N/A</u>				
b. 90-Day Report?	<u>N/A</u>				
c. All periodic reports?	<u>N/A</u>				
d. Compliance schedule reports?	<u>N/A</u>				
12. Did the IU report on all required parameters?	<u>N/A</u>				
13. Did the IU comply with the required sampling frequency(s)?	<u>N/A</u>				
14. Did the IU report flow?	<u>N/A</u>				
15. Did the IU comply with the required reporting frequency(s)?	<u>N/A</u>				

Comments: 5. City does all monitoring

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE 1 FILE 2 FILE 3 FILE 4 FILE 5

✓ => Yes N/A => Not Applicable

16. For all SIUs, are self-monitoring reports signed and certified? N/A

17. Did the IU report all changes in its discharge? [403.12(j)] ✓

18. Has the IU developed a Slug Control and Prevention Plan? no

19. Has the industry been responsible for spills or slug loads discharged to the POTW? no

If yes, does the file contain documentation regarding:

a. Did the spill cause Pass Through or Interference? N/A

b. Did POTW respond to the spill? N/A

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]

a. Control Authority monitoring results? ✓

b. IU self-monitoring results? N/A

c. If NS CIU was it compliant within 90 days from commencement of discharge? N/A

2. How many reports submitted during the past reporting year indicated discharge violations? 96

3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)? N/A

Comments: 6. See 2008 Annual Report PPS Attachment C

SECTION III: INDUSTRIAL USER FILE REVIEW

Enforcement (continued)

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
	✓ => Yes N/A => Not Applicable				
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>N/A</u>				
5. Were all nondischarge violations identified in the file?	<u>N/A</u>				
6. Was the IU notified of all violations?	<u>✓</u>				
7. Was follow-up enforcement action taken by the Control Authority?	<u>✓</u>				
8. Did the Control Authority follow its approved ERP?	<u>✓</u>				
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>✓</u>				
10. Is there a compliance schedule? If yes:	<u>N/A</u>				
11. Were there any compliance schedule violations?	<u>N/A</u>				
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>				
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>✓</u>				
b. TRC	<u>✓</u>				
c. Pass through/Interference	<u>✓</u>				
d. Spill/slug loads	<u>✓</u>				
e. Reporting	<u>✓</u>				
f. Compliance schedule	<u>✓</u>				
g. others (specify)	<u>✓</u>				
13. Was the SIU published for SNC?	<u>N/A</u>				
Date of publication.	<u>N/A</u>				

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of De Queen NPDES #: AR0021733

Date of Audit: 8/18-19/09 Date entered into QNCR: 8-24-09
(ASSESSMENT)

Level

- | | | |
|----|--|----|
| NO | Failure to enforce against pass through and/or interference | I |
| NO | Failure to submit required reports within 30 days | I |
| NO | Failure to meet compliance schedule milestone date within 90 days | I |
| NO | Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months | II |
| NO | Failure to inspect or sample 80% of SIUs within the last reporting year | II |
| NO | Failure to enforce pretreatment standards and reporting requirements | II |
| NO | Other violations of concern | II |

SIGNIFICANT NONCOMPLIANCE (SNC)

- | | |
|----|--|
| NO | Is the Control Authority in SNC for violation of any Level I criterion. |
| NO | Is the Control Authority in SNC for violation of 2 or more Level II criterion. |

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

Compliance Monitoring Type:

- AFO Defined
- AFO Designation
- Aerial Photography
- Audit
- Audit (IU)

State: AR

Compliance Monitoring Activity Name:

City of De Queen AR 421733

If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:

Linked Facility

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES				

Compliance Monitoring Dates

Planned Start Date: 08/18/09
 Planned End Date: 09/19/09

Actual Start Date: 08/18/09
 Actual End Date: 08/19/09

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

Programs:

- NPDES - Post Administrative Penalty Case (Settlement)
- NPDES - Pretreatment
- NPDES - Sanitary Sewer Overflow (SSO)
- NPDES - Section 308 Information Requests
- NPDES - Sludge/Biosolids

State Statute:

Compliance Monitoring Action Reason:

- Agency Priority
- Citizen Complaint/Tip
- Core Program
- For Cause
- Random Inspection

If State, Local or Tribal lead, did EPA Assist? No

Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State

If Joint what was the purpose of the participation of the other party?

Which party had the lead?

Compliance Monitoring Agency Type:

- State Contractor
- State - Using Federal Credential
- State
- Regional
- Other Federal

Compliance Monitoring Agency Name:

Government Contacts

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes	4952 Sewerage Systems				
NAICS Codes					
					OECA National Priority: <ul style="list-style-type: none"> 2009 - (CA Only) - Air Toxics - Flares 2009 - (CA Only) - Air Toxics - LDAR 2009 - (CA Only) - Air Toxics - Surface Coating 2009 - (CA Only) - Financial Assurance 2009 - (CA Only) - MP - Mining
					Regional Priority: <ul style="list-style-type: none"> 2009 - Region 06 - Air Toxics Major Sources (O & G) 2009 - Region 06 - Brine Spills from Oil & Gas Operations 2009 - Region 06 - CD Implementation 2009 - Region 06 - Minor Wastewater Collection & Treatment System 2009 - Region 06 - Petroleum Refining

Media Monitored

Compliance Monitoring Information

Media Monitored:

Number of Days Physically Conducting Activity: 2

Compliance Monitoring Media Indicator

Number of Hours Physically Conducting Activity:

Multimedia Indicator:

Compliance Monitoring Action Outcome: No Violations

Compliance Monitoring Rating Code: Satisfactory

Compliance Monitoring Comments

Compliance Monitoring Comments: 001: Significant Industries Site Visits Conducted

User Defined Fields

1:



Special Programs

Pretreatment

Significant Industrial Users (SIUs)

SIUs	1
SIUs Without Control Mechanism	0
SIUs Not Inspected	0
SIUs Not Sampled	0
SIUs in SNC with Pretreatment Standards	0
SIUs in SNC with Reporting Requirements	0
SIUs in SNC with Pretreatment Schedule	0
SIUs in SNC Published in Newspaper	0
SIUs on Schedules	0
Violation Notices Issued to SIUs	0
Administrative Orders Issued to SIUs	0
Civil Suits Filed Against SIUs	0
Criminal Suits Filed Against SIUs	0

Local Limits

Date of Most Recent Technical Evaluation for Local Limits: 07/07/09

Date of Most Recent Adoption of Technically Based Local Limits: []

Local Limit Pollutants: [X]

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval: [X]

Removal Credits: [X]

Acceptance of Waste

Acceptance of Hazardous Waste: No

Acceptance of Non-Hazardous Industrial Waste: No

Acceptance of Hauled Domestic Wastes: No

Deficiencies

Deficiencies Identified During IU File Review: No

Control Mechanism Deficiencies: No

Legal Authority Deficiencies: No

Deficiencies in Data Management and Public Participation: No

Deficiencies in Interpretation and Application of Pretreatment Standards: No

Inadequacy of Sampling and Inspections: No

Adequacy of Pretreatment Resources: Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling: 2

Annual Frequency of Effluent Toxicant Sampling: 2

Annual Frequency of Sludge Toxicant Sampling: 1

Categories: Industrial Users (CIUs)

CIUs: 0

CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

Other Information

SUO Reference: []

SUO Date: []

Annual Pretreatment Budget: \$ []

Pass-Through/Interference Indicator: []

Violation of IU Schedule for Remedial Measures: No

Formal Response to Violation of IU Schedule for Remedial Measures: []

PREVIOUS SAVE & EXIT SAVE & CONTINUE SAVE & ADD ANOTHER COPY & CREATE NEW CANCEL

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of De Queen NPDES #: AR0021733

Name, address and phone number of industry:

Pilgram's Pride, 4015 S 3rd, 870.584.5000

Type of industry:

Poultry Processor/kill plant

Date/Time of visit:

8-18-09 @ 2:00 p.m.

Industry contacts: Bill Matthews, Personnel & Safety Mgr

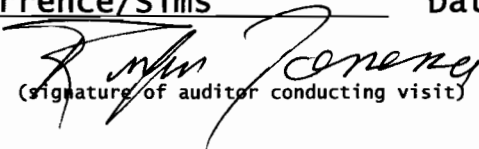
	Yes	No	N/A
1. Significant industrial user?	<input checked="" type="checkbox"/>		
2. Classified correctly?	<input checked="" type="checkbox"/>		
3. Pretreatment equipment or procedures?	<input checked="" type="checkbox"/>		
4. Pretreatment equipment maintained and operational?	<input checked="" type="checkbox"/>		
5. Hazardous waste generated or stored?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Proper solid waste disposal?	<input checked="" type="checkbox"/>		
7. Solvent management/TTO control?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Suitable sampling location?	<input checked="" type="checkbox"/>		
9. Appropriate self-monitoring procedures/equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Adequate spill prevention and control?	<input checked="" type="checkbox"/>		
11. Industrial familiar with limits and requirements?	<input checked="" type="checkbox"/>		
12. Pollution Prevention activity	<input type="checkbox"/>		*

Additional comments:

This single IU contributes approximately 70% of the average daily flow to the POTW. The plant must comply with USDA requirements for wash waters including the truck wash waters; therefore, the facility has no control over "wastewater minimization" and must continue contributing about three quarters of the hydraulic load to the POTW. All wastewater (pH 6) flows by gravity to the pretreatment pit and then is pumped to pretreatment equipment.

Visit conducted by: Torrence/Sims

Date: 8-24-09


 (signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of De Queen NPDES #: AR0021733

Industry name: Pilgram's Pride

Additional comments:

The pretreatment equipment consists of two standard (55,000 gallon) DAF units in parallel. Wastewater flows into a floc tank where ferric sulfide is added. Wastewater then is split and flows into either of the DAF units where anionic polymers are added.

Oil & grease skimmings (about 60,000 lbs/day) from the DAF units are sent to three 8,000 gallon sludge holding tanks. This sludge is hauled off for either cat food or chicken feed.

Caustic is added for neutralization before discharge to the POTW.

Licensed operators are on duty 24 hr/day.

Visit conducted by: Torrence/Sims Date: 8-24-09


(signature of auditor conducting visit)

**CITY OF DE QUEEN
WASTEWATER DISCHARGE PERMIT**

COMPANY NAME : **PILGRIM'S PRIDE CORP.**

DIVISION NAME (if applicable): **DE QUEEN COMPLEX**

MAILING ADDRESS : **P O BOX 389 DE QUEEN AR 71832**

FACILITY ADDRESS : **401 S. 3RD DE QUEEN AR. 71832**

SIC NO : **2015**

The above Industrial User is authorized to discharge industrial wastewater to the City of De Queen's sewer system in compliance with City Ordinance Numbers (618,622,634 & 647) and any applicable provisions of Federal or State law or regulations. This in accordance with discharge point(s), effluent limitations, monitoring requirements and other conditions set forth herein.

This permit is granted in accordance with the application filed on (9/1/08) in the office of the Wastewater Superintendent, and in conformity with plans, specifications and other data submitted to the City in support of the submitted application.

EFFECTIVE DATE : **SEPTEMBER 1, 2008**

EXPIRATION DATE : **AUGUST 31,2009**

WASTEWATER SUPT : **MICHAEL SIMS**

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PART 1 - WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS ...

The Industrial User shall comply with the Effluent Limitations specified below by (September 1,2008).

PARAMETER	30DAY AVE.	DAILY MAX.	SAMPLE FREQ.	SAMPLE TYPE
BOD	550 mg/l	650 mg/l	7day/month	24hr composite
TSS	300 mg/l	400 mg/l	7day/month	24hr composite
O & G	100 mg/l	150 mg/l	7day/month	grab
FLOW	2.00 mgd	2.5 mgd	7day/month	24hr totalizer
PH	6 to 9 su		7day/month	grab
TKN/NH3	report only		7day/month	24hr composite

- - Samples will be collected at Pretreatment Final Flume, IU pretreatment Facility

BOD = Biochemical Oxygen Demand
TSS = Total Suspended Solids
O&G = Oil & Grease
TKN = Total Kjeldahl Nitrogen
NH3 = Ammonia Nitrogen

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PART II - SPECIAL CONDITIONS / COMPLIANCE SCHEDULES

All samples will be collected by the City of De Queen wastewater dept. personal and the analysis will be conducted by a lab of the City's choosing. All fees for lab work will be paid by the industry.

- 1) Composite samples will be time composite
- 2) Daily & Monthly flow results are from Pretreatment effluent flow wastewater meter
- 3) 50,000 gallons added to daily flow when DAF units are drained

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PART III - REPORTING REQUIREMENTS

- 1 . The Industrial User shall notify the City immediately upon any accidental or slug discharge to the sanitary sewer as outlined in the Accidental Spill section of the City's Ordinance Number 647 . Formal written notification discussing circumstances and remedies shall be submitted to the City within 5 (five) days of the occurrence .
- 2 . The Industrial User shall notify the City prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the POTW from the User's industrial processes . Formal written notification shall follow within 30 (thirty) days of such introduction .
- 3 . The Industrial User shall report completion of its sampling / monitoring manhole .
- 4 . All reports shall be submitted to the following address :

Wastewater Supt .
City of De Queen
P . O . Box 730
De Queen AR . 71832

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PART IV - STANDARD CONDITIONS

1 . The Industrial User shall comply with all the general prohibitive discharge standards in Section 2-1 of City Ordinance No . 647 .

2 . RIGHT OF ENTRY

The Industrial User shall, after reasonable notification by the City, allow the City or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the User, at all reasonable hours, for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling includes any time the Industrial User is operating any process which results in a process wastewater discharge to the City's sewerage system.

3 . RECORDS RETENTION

The Industrial User shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analysis made by or in behalf of the user in connection with its discharge.

All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City shall be retained and preserved by the Industrial User until all enforcement activities brought by the City shall be retained and preserved by the Industrial User until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

4 . CONFIDENTIAL INFORMATION

Except for data determined to be confidential under Section 4-7 of the City's Ordinance, all reports required by this permit shall be available for public inspection at the office of the Sewer Superintendent.

5 . RECORDING OF RESULTS

For each measurement or sample taken pursuant to the requirements of this permit, the user shall record the following information:

- a) The exact place, date, and time of sampling;
- b) The dates the analysis were performed;
- c) the person(s) who performed the analysis;

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d) The analytical techniques or methods used; and

e) The results of all required analyses.

6 . DILUTION

No Industrial User shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

7 . PROPER DISPOSAL OF PRETREATMENT SLUDGES AND SPENT CHEMICALS

The disposal of sludges and spent chemicals generated shall be done in accordance with Section 405 of Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

8 . SIGNATORY REQUIREMENTS

All reports required by this permit shall be signed by a principal executive officer of the User, or his designee.

9 . REVOCATION OF PERMIT

The permit issued to the Industrial User by the City may be revoked when, after inspection, monitoring or analysis it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, and local laws, ordinances, or regulations.

Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form, shall be cause for permit revocation.

10 . LIMITATION ON PERMIT TRANSFER

Wastewater discharge permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of the City. Sale of a User shall obligate the purchaser to seek prior written approval of the City for continued discharge to the sewerage system.

11 . FALSIFYING INFORMATION OR TAMPERING WITH MONITORING EQUIPMENT

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of the City, as well as being subjected to civil penalties and relief.

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Permit No.: 035

12 . MODIFICATION OR REVISION OF THE PERMIT

a) the terms and conditions of this permit may be subject to modification by the City at any time as limitations or requirements as identified in the City's Ordinance, are modified or other just cause exists.

b) This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.

c) The terms and conditions may be modified as a result of EPA promulgating a new federal pretreatment standard.

d) Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance of necessary.

13 . DUTY TO REAPPLY

The City shall notify a User thirty (30) days prior to the expiration of the User's Permit. Within fifteen (15) days of notification, the User shall reapply for reissuance of the permit on a form provided by the City.

14 . SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

15 . PROPERTY RIGHTS

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of Federal, State, or Local regulations.

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16 . BYPASS OF TREATMENT FACILITIES

a) Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist.

b) The permittee may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to assure efficient operation.

c) Notification of bypass:

1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass to the City of DeQueen Wastewater Department.

2) Unanticipated bypass. The permittee shall immediately notify the City of DeQueen Wastewater Department and submit a written notice to the Department within 5 days. This report shall specify:

- i) A description of the bypass, and its cause, including its duration:
- ii) Whether the bypass has been corrected; and
- iii) The steps being taken or to be taken to reduce, eliminate and prevent a reoccurrence of the bypass.

17 . PENALTIES FOR VIOLATIONS OF PERMIT CONDITIONS

The City of DeQueen's Sewer use Ordinance #634 provides that any person who violates a permit condition is subject to a civil penalty of at least \$1000. per day of such violation. Any person who willfully or negligently violates permit conditions is subject to criminal penalties of a fine of \$1000. per day of violation. The permittee may also be subject to sanctions under State and or Federal laws.

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FACT SHEET

- 1) Description of Operation :** Live chickens are killed & processed into packaging for sale, new pretreatment plant went online 1996.
- 2) Production Data :** @ 1250 employees 16 hr processing / 8 hr cleanup, 300,000 birds killed daily.
- 3) Processes / Flows :** All drains in production, truck wash & tray wash areas flow to pretreatment wet well.
- 4) Classification :** Significant, high wastewater flow (1.60mgd to 1.80mgd) above domestic BOD & TSS.
- 5) Monitoring :** 24hrs / 7 days a week, flow metered at IU discharge, a weeks worth of results taken Monday through Sunday each month will be used for surcharge and permit sampling.
- 6) Parameters Monitored :** BOD, TSS, OIL & GREASE, PH, TKN, NH₃, FLOW
BOD - (550mg/l 30day ave.)

New Verticel (startup August 08) system has the capacity to treat 26,582 lbs of BOD,
50% = 13,291 lbs at 2.00mgd that's 796 mg/l

Surcharge ord. changed May 2007

New refrigerated sampler added May 2006.

\$ 1,000 lab fee charged each month.

July 08 sewer monthly bill start using wastewater flow meter by Ord.

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Application No. 035



APPLICATION FOR INDUSTRIAL WASTE PERMIT

(Please complete this form and return with \$50.00 Application fee)

To: City of De Queen
Sewer Supt.
P. O. Box 730
De Queen AR. 71832

NAME OF FIRM: Pilgrim's Pride Corporation S.I.C. NO. 2015

LOCATION: 401 South 3rd Street PHONE NO: (870) 584-5000

MAILING ADDRESS: P.O. Box 389, DeQueen, AR ZIP 71832

OWNERS NAME (S): Pilgrim's Pride Corporation

TYPE OF BUSINESS / INDUSTRY: Poultry Processing
(restaurant, laundry, gas station, garage etc.....)

WASTE PROCESS (S): Poultry processing wastewater goes through a physical/chemical pretreatment system and discharge to city sewer.
(equipment / floor utensils washing, cooling, metal finishing, mechanical parts cleaning, utility blowdown, etc.....)

MAJOR CHEMICALS USED: Soaps, detergents, disinfectants (USDA approved), ferric chloride, and organic polymers
(soaps, detergents, caustics, solvents, acids, etc.....)

AMOUNT OF WASTEWATER DISCHARGED (GALLONS): 1,100,000 gpd (estimated)
(Measured / Estimated ---- Per Day / Per Month)

NAME AND ADDRESS OF PERSON OR FIRM RESPONSIBLE FOR WORK COVERED BY THIS PERMIT: Vernon D. Rowe, P.E.

SIGNED: [Signature]

TITLE: Corporate Environmental Manager

CHECK OR MONEY ORDER NO.: 1756 DATE: 10/2/2008

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City of De Queen

Page 1 of 2

Industrial Inspection Report

Date 9-4-08

Time 9:00 am 10:00

Inspector #1: Mike Sims

Inspector #2: _____

Industry Name: Pilgrims Pride

Street Address: 123 W Park

Mailing Address: PO Box 389 De Queen Ar

Year Industry Was Established On Site: 1954

Contact Person: Danny Crawford, Frank Hawley Mike Martin

Title: president Market Foreman Complex Mgr.

Phone Number: 584 5000

Average Number of Employees: 1250 Shifts: 2 product 1-cleanup

Working Hours Per Day: 16 prod. 8 cleanup Per Week: 80 / 40

S.I.C. Code Number: 2015

Raw Materials: chickens

Process Description: live chickens killed cut up & packaged & ship out

Products: chickens

Report Completed By: Michael Sims Date: 9-4-08

Inspectors Time Involved: #1 1 hr #2 _____

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Water Source: City of DeQueen

Water Usage: Sanitary: 15%

Process: 75%

Consumed in Product: 7%

Evaporation: ^{ice} 3%

Pretreatment: (Description & Comments)

process water thru drains to offal area where separated, small parts (guts, feathers) are trucked off site, water thru 2 drum screens to pretreatment area - 2 DAF units, solids sent to Tx @ 2 loads a day sludge @ 16,000 gallons

Chemical Storage: (Include types, amounts and proximity to floor drains.)

Ferric chloride, caustic soda, polymers at pretreatment area

potassium sorbate & phosphoric Acid at pet foods

gas & diesel by scales

Sampling Point Location: 4th Street at pretreatment affluent flume

Number of Connections: 1

Condition: good new march 96 - installed new sampler May 06

Are Industry Sampling Results Available: all results by City

(mostly looked at pretreatment area)
mes

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