

ADEQ

ARKANSAS
Department of Environmental Quality

May 17, 2012

Russell Thomas
Superintendent
Magnolia Wastewater System
P.O. Box 666
Magnolia, Arkansas 71754-0666

Re: Magnolia (NPDES #AR0043613; AFIN#1400056) Pretreatment Program Audit

Dear Mr. Thomas:

Please find enclosed the finished report for the audit conducted April 4 - 5, 2012. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the findings/deficiencies. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

It is felt with a level of resources dedicated to the City's written Program, the City can soon be back into compliance with your NPDES requirement to implement and enforce the Program.

It was a pleasure working with you during the audit and becoming more familiar with the City of Magnolia, its industries and Pretreatment Program.

Please feel free to contact this office with any questions at (501) 582-0625.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

cc: Rudy Molina/EPA 6WQ-PP
Craig Uyeda/Enforcement Branch Manager

PRETREATMENT PROGRAM AUDIT

CITY OF MAGNOLIA, ARKANSAS

NPDES PERMIT #AR0043613

May 16, 2012

PREPARED BY: ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ADEQ

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Pretreatment Program Audit/Assessment Checklist:

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Section II: Program Analysis and Profile

~~*Section III: Industrial User File Review~~

Reportable Noncompliance (RNC) Worksheet

~~*SIU Site Visit Summaries~~

*The City only had self-monitoring reports from their "SIUs", expired SIU permits, no inspections or City compliance (sampling) information. Therefore, these sections were not addressed during this audit.

Attachment A: Supporting Documentation

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.

An audit was performed April 4 - 5, 2012, of the Pretreatment Program implemented by City of Magnolia, Arkansas. Participants included:

Allen Gilliam ADEQ/Pretreatment Coordinator

Russell Thomas Magnolia/Wastewater System Superintendent

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Magnolia's Pretreatment Program "concurrent with" by ADPC&E (ADEQ) on 1/16/96 and required per their NPDES permit; and

* To determine the effectiveness of the City's Pretreatment Program in eliminating the introduction of toxic pollutants from industrial discharges.

Magnolia's Pretreatment Program was originally concurred with by ADPC&E (ADEQ) on 1/16/96. There have been no modifications to date. The allowance of developing and implementing a Pretreatment Program was part of an agreement between the two entities to be part of the City's toxicity reduction evaluation. Early 1992 documentation that could be found regarding this arrangement is located in Attachment A-1. No NPDES permit modifications reflecting this could be located.

The City's wastewater treatment plant consists of flow equalization; bar screen; grit removal; an oxidation ditch; clarification, chlorination followed by dechlorination prior to discharge to Big Creek thence to Dorcheat Bayou.

During the last three (3) years the City's effluent has exhibited sublethality in the fathead minnow and the ceriodaphnia dubia one (1) time during September 2010.

The plant's design flow is 2.5 MGD and averages about 1.5 MGD with ~0.004 MGD being contributed by two (2) significant industrial users, both being metal finishers regulated under 40 CFR 433. A third categorical, SAPA which had regulated processes limited under the Aluminum Forming category in 40 CFR 467 had ceased operations in June of 2010.

The City had initially designated three (3) other non-categoricals as significant users: Unit Structures (lamination of wooden beams); Amfuel (rubber fuel bladders) and their Regional Medical Center. Their flows are not included in the above IU flows because no rationale could be

provided why they met the “Significant Industrial User” criteria.

As footnoted above, the audit consisted of an informal discussion with the City's Pretreatment personnel covering the required aspects within the attached checklist applicable only to the City's Pretreatment Program.

The report is divided into two sections. Section B provides a summary of the significant findings of the audit which will require action by the City and recommended program modifications to the City's program, including its adopted legal authorities, are outlined in Section C.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Magnolia's Pretreatment Program. Actions required by the City to comply with their current Program will be *paraphrased citations* of the same. A narrative explanation of the finding will follow.

Note: The below procedural and legal requirements mirror closely those in the Federal Pretreatment Regulations located 40 CFR 403.8(f)(1) and (2).

1) Unit 1, Section 1.4, “Elements of a Pretreatment Program”, pages 4 and 5 states, “[the City's] Industrial User (IU) Survey...will be used on a routine basis for adequate program implementation.”

Unit 3: “Identification of Industrial Users”, Section 3.1, “Components of An Industry Survey”, page 10 states, “The necessary components of an [IU] survey involve the following process: Compiling a master list of potential [IUs] located in the area...and Surveying each of these industries...”

During the Audit checklist interview, it was determined the City had not conducted a comprehensive IU survey or “used on a routine basis” in some time. No “master list” or compilation of information from any previous IU surveys could be produced.

An initial industry survey was conducted in 1992 when the City began developing the foundation of their Pretreatment Program, but for a City the size of Magnolia a comprehensive industrial/non-domestic user survey should be completed at least once per five (5) years to coincide with their NPDES permit cycle (EPA guidance recommends a comprehensive IU survey should be conducted every three (3) years).

The City must conduct a comprehensive IU/non-domestic user survey and have a compilation (master list) of this survey on hand available for ADEQ's review upon request. This on-going survey is one of the cornerstones of successful Pretreatment Program. Significant industries can be determined and subsequently permitted from the ongoing survey process.

2) Unit 7: “Administrative Procedures”, Section 7.3: “Program Management and Oversight”, pages 28 and 29 states, “Daily implementation of the program will involve some of the following activities: Review of self-monitoring reports; Recording Data and Comparison of Permit Limits...”

Section 7.4: “Addressing Compliance Issues”, page 29 states, “Violations should be detected by some of the following means: Review of Industrial self-monitoring reports...”

During the Audit’s checklist review the City Pretreatment contact indicated the above procedures were not currently being conducted.

The City must review its IUs’ self-monitoring reports for instances of non-compliance for follow up enforcement action as necessary.

3) Section 7.0: “General”, page 26 states, “...other planned program activities will be conducted on a regular basis. Some of these ongoing activities involve the following: Monitoring of SIU – the monitoring program includes sampling, inspection...”

Section 7.2: “Inspection of Industrial Users”, page 27 states, “An inspection will be performed on all SIUs at least annually.”

During the Audit’s checklist review the City Pretreatment contact indicated the above procedures were not currently being conducted.

The City must conduct compliance monitoring (sampling) “on a regular basis” and inspect its SIUs at least once per year (40 CFR 403 minimum).

4) Ordinance #95-12, Section 3.2: “Accidental Discharge/Slug Control Plans”, page 7 states, “At least once every two (2) years, The Superintendent shall evaluate where each significant industrial user needs an accidental discharge/slug control plan.”

No evidence could be produced indicating a slug discharge potential evaluation had been conducted at any of the City’s “significant industrial users”.

The City must conduct this evaluation at least once every two (2) years.

5) Ordinance #95-12, Section 10.0: “Publication of Users in Significant Noncompliance [SNC] of the Pretreatment Program”, (F) Failure to provide within thirty (30) days after the due date, any required reports, including baseline monitoring reports...”, pages 19 and 20.

Southern Aluminum (SA) was discovered by ADEQ as a Metal Finisher regulated under 40 CFR 433 in December of 2008. The first documented contact with SA was via an e-mail dated 2/18/2009 indicating their operations generated wastewater federally regulated under the Metal

Finishing regulations located in 40 CFR 433. A Baseline Monitoring Report (BMR) was due to be compliant with the Federal Pretreatment Regulations. This e-mail correspondence was copied to the City's Pretreatment contact.

Subsequent certified mail to SA's Vice President on 9/16/10 reiterated they were in SNC because their BMR was incomplete and "must be resubmitted". This correspondence was also copied to the City's Pretreatment contact.

There could be no documentation produced indicating the City had published SA being in SNC. The City must identify and publish in the local newspaper any significant industrial users who are in SNC per the City's Pretreatment Program.

6) Unit 6: "Wastewater Discharge Permits", Section 6.1: "Permit Application", pages 22 and 23, states, "Prior to being issued a permit, the industrial user will have to apply for a permit."

Ordinance #95-12, Section 3.4: "Wastewater Discharge Permits", pages 8 and 9 states, "No significant industrial user shall discharge wastewater into the City of Magnolia's Wastewater System without first obtaining a wastewater discharge permit from the Superintendent. All users required to obtain a wastewater discharge permit must submit a permit application..."

Conversations with the City's Pretreatment contact indicated this required application procedure had not been enforced in several years. The latest application found on file was one from Southern Aluminum (signed on 3/24/11) which is currently under ADEQ's scrutiny because of its SNC status. No current significant industrial applications or permits could be produced.

The City must enforce the permit application requirement for all of its significant industrial users and either renew or revoke its expired SIUs' permits.

7) Ordinance #95-12, Section 3.6: "Wastewater Discharge Permit Duration", page 10 states, "A wastewater discharge permit shall be issued for a one year time period from the effective date of the permit."

During the Audit Checklist review no current wastewater discharge permits could be produced.

The City must either renew or revoke permits after their "one year time period".

8) Section 8.1: "Organization and Staffing" states, "The City of Magnolia has a staff of at least three (3) people who will be working collectively in the pretreatment program implementation. One person, the Pretreatment Coordinator, will be devoted solely to the daily implementation of the program. This will involve performing the following on a routine basis: Sampling; Facility Inspections; Program Administration; Laboratory Data Evaluation and Technical Responsibility."

It was evident the City's Pretreatment Program was not being implemented nor its provisions enforced because there was a lack of funds available to fill even one City Pretreatment Coordinator

position.

The City must dedicate enough time for a Pretreatment Coordinator to meet the needs of its current Pretreatment Program.

C) RECOMMENDED PROGRAM MODIFICATIONS TO THE CITY'S PRETREATMENT PROGRAM TO BRING THE PROGRAM MORE IN-LINE WITH THE LETTER OF ITS CURRENT PRETREATMENT PROGRAM

1) Regarding requirement 4) above, it is advised to revise Ordinance #95-12, Section 3.2: "Accidental Discharge/Slug Control Plans" to read, "The City will evaluate whether each Significant Industrial User needs a plan or other action to control Slug Discharges." See remaining language in 40 CFR 403.8(f)(2)(vi) for recommended revisions to this Ordinance section. Streamlining revisions to 40 CFR 403 have removed the provision to conduct these "Slug discharge potential evaluations" once per year.

2) Regarding requirement 7) above, it is advised to revise Ordinance #95-12, Section 3.6: "Wastewater Discharge Permit Duration" to read, "A wastewater permit shall be issued for no more than a five (5) year period" [see 40 CFR 403.8(f)(iii)(B)(1)]. The City's current requirement of a "one-year" permit seems an administrative excess and is not the national "norm".

3) It is recommended to revise Ordinance #95-12 to include a definition section similar to that in 40 CFR 403.3. The definitions of Significant Non-Compliance from 40 CFR 403.8(f)(2)(viii)(A) through (H) and a Slug Discharge per 40 CFR 403.8(f)(2)(vi) should also be incorporated into the Ordinance's definition section.

* * * * *

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

PRETREATMENT AUDIT CHECKLIST

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information Pages 1- 4
 Section II: Pretreatment Program Analysis Pages 5-19
 Section III: Industrial User File Evaluation N/A
(See next page for explanation)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Magnolia NPDES #: AR0043613
 Mailing address: P.O. Box 666, Magnolia 71754

Permit Signatory: Russell Thomas Title: Wastewater Superintendent

Telephone: 870.234.2955 Cell number: 870.904.1694
 e-mail: mwws@sbcglobel.net
 Pretreatment Contact: Same Title: Same
 Address: Same
 Telephone: Same

Pretreatment program "concurred with" date: 1/16/96

Dates of approval of any substantial modifications: N/A

Month Annual Pretreatment Report Due: N/A

Pretreatment Year Dates: N/A Date(s) of Audit: 4/4 - 4/5/12
(ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
* Russell Thomas	Superintendent	870.234.2955

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
N/A		

YES NO

 Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?
 If yes, describe the required corrective action: _____

 Is the Control Authority currently in SNC or RNC?

.....
This "Audit" was to determine the City's compliance with their Pretreatment Program ADEQ "concurrent with" on 1/16/96. Their NPDES permit requires "the City shall continue to implement the pretreatment program 'concurrent with' by ADEQ on 1/16/96."

Upon receipt of ADEQ requested (10/28/11) information, it was evident the City had not been inspecting nor monitoring (sampling) its SIUs. The City's current "SIUs" have expired permits and one SIU (categorical) does not have a permit. The City has not conducted comprehensive industrial/non-domestic user surveys. Based on the information received (12/5/11) the City is currently in Significant Non-Compliance (SNC) with its NPDES permit requirements.

Section III. The City only had expired (most were questionably significant, by the 40 CFR 403 definition) industrial user permits, no inspections or City monitoring results. No IU file review was conducted although there was some IU self-monitoring reports sent with their 12/5/11 submittal. Time constraints restricted a more thorough review of any other old industry information the City may have had stored elsewhere than the Superintendent's office.

1) Amfuel Plant #1 May - September '11 monthly reports were submitted, but no permit was supplied to determine if they were in compliance with pollutants of concern/expired permit limits;

2) Unit Structures November '10 thru September '11 monthly reports were submitted, but no permit was supplied to determine if they were in compliance with pollutants of concern/expired permit limits;

3) Magnolia Regional Med. Center's June thru October '11 monthly reports were submitted, but no permit was supplied to determine if they were in compliance with pollutants of concern/expired permit limits;

4) SAPA's June thru October '11 monthly reports were submitted, but a) All reports indicated "zero flow" mirroring the fact the facility had shut down their Aluminum Forming operations and there had been no regulated wastewater discharged which the facility had reported on their 7/2010 self-monitoring report; b) Their permit from the City had expired on 3/29/2000; and c) Their self-monitoring reports were the only ones seen that included the required certification statement required in 40 CFR 403.12(l), "Signatory requirements for Industrial User reports."

5) Southern Aluminum's application for a permit was signed on 3/24/11, over two (2) years after ADEQ discovered this Metal Finisher. E-correspondence dated 2/18/09 detailed what the facility needed to submit to come into compliance with the Federal Pretreatment Requirements. The City's Superintendent was e-copied on this correspondence.

6) Section III, "Industrial User File Evaluation" will not be completed in this case where the City has no current or complete documentation.

No Pollution Prevention Assessment was conducted. The main focus of this "Audit" was to identify deficiencies in the City's implementation of their Pretreatment Program.

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
*AR0043613	Big Creek	1/1/11	12/31/15

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Big Creek
 Location Address: 72 Columbia Road 300

Treatment Plant Wastewater Flow: Design- 2.5 MGD; Actual (Avg.)- 1.5 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 10

Industrial Contribution to this Treatment Plant

of SIUs: 2* # of CIUs: 2* (*based on ADEQ's current information)

Industrial Flow (mgd): ~.004 Industrial Flow (%): ~0.3 %

Level of Treatment

Type of Process(es):

Primary Flow equalization; bar screen; grit
 Secondary removal; oxidation ditch; clarification;
 Tertiary post aeration

Method of Disinfection: Chlorine

Dechlorination: YES NO

Effluent Discharge

Receiving Stream Name: Big Creek then to Dorcheat Bayou

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

Receiving Stream Use: primary/secondary contact recreation; raw water source; propagation of desirable species of fish

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

Method of Sludge Disposal:

Quantity of Sludge:

<input checked="" type="checkbox"/> Land Application	<u>160</u> dry metric tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input 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.

* Class A biosolids sold to local farmers for land application.

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

a. (continuation of individual treatment plant information for
Big Creek 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: "EPA"
 Issuance Date: ?
 Expiration Date: ?

List pollutants that are specified in current sludge permit:
Permit could not be located.

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?) The facility showed sublethal effects on the fathead minnow and the water flea during 10/10. Sublethal WET limits @ 80% effluent are a requirement of their permit.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>1</u>	<u> </u>
Priority **	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
Biomonitoring	<u> </u>	<u>4</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u>1</u>	<u> </u>
Other: <u>conventionals</u>	<u> </u>	<u>12</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.

City has the data, but not graphed. "It's stayed about the same for all parameters."

YES NO N/A
 Has the POTW begun tracking the trends in the above samples?
 Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

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

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>Ammonia as N (4/30/11)</u>	<u>existing sludge treatment undersized</u>
<u>Fecal (4/30/11)</u>	<u>chemical feed problems</u>

YES NO
 Has the treatment plant sludge violated the TCLP Test?

Section II: Pretreatment Program Analysis

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

n/a 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)]

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

1. Modifications:

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

2. Modifications in Progress:

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

YES NO

Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

n/a 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 "concurrence" 1/16/96 [WENDB-PTIM]

Date of most recent Ordinance approved by the Control authority: 11/27/95

Date of most recent Pretreatment Program modification approval: n/a

Does the Control Authority's legal authority enable it to: [403.8(f)(1)(i-vii)]

YES	NO	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Deny or condition pollutant discharges
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Require compliance with standards
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Control discharges through permit or similar means
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Require compliance schedules and IU reports
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Carry out inspection and monitoring activities
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Obtain remedies for noncompliance
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Comply with confidentiality requirements
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Establish Pollution Prevention
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Has the city developed and adopted a Pollution Prevention policy?

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: No resources available to implement/enforce it

Section II: Pretreatment Program Analysis

YES NO

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:

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. <u>n/a</u>			
2. _____	_____	_____	_____

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

Problems

Updating industrial waste survey	<u>n/a</u>
Notification of IUs	_____
Permit issuance	_____
Receipt and review of IU reports	_____
Inspection and sampling of IUs	_____
Assessment of IUs for P ² 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:

IU Name	Problem	NPDES Permit Violation	
		Yes	No
<u>n/a</u>	_____	_____	_____

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)]

** 4 (2011) surveys were submitted to ADEQ on 12/5/11 upon request. No others could be produced.*

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)]

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?

Section II: Pretreatment Program Analysis

What methods are used to update the IWS:

1/16/96 program indicates:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) business licenses, property taxes, city IU records

How often is the survey to be updated? "..on a routine basis.."

Are there any problems that the Control Authority has in identifying and categorizing SIUs: Yes, the City does not have the resources to allow implementation of their "concurrent with" Pretreatment Program. A comprehensive IU survey has not been conducted in some time.

YES NO

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

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

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

- a. 5 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 2 Categorical Industrial Users (CIUs) [WENDB-CIUS] *Everette Plating & Southern Aluminum*
- c. 3 Noncategorical SIUs *City would include Amfuel, Unit Structures and Magnolia Med. Center*
- d. 1 Other regulated nonsignificant IUs (Describe) Lake Columbia Campground
- 6 TOTAL of a. + d. septage (~2/yr)

YES NO

Has the POTW identified any IUs with Pollution Prevention opportunities?
 Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(v)]

If not, the Control Authority has defined "significant industrial user" to mean:
*City's Program still contains the old pre-"Streamlining" definition on page 13.

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? Program says "one year"

5* 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:

**per above "SIU" number*

<u>IU NAME</u>	<u>PERMIT EXPIRATION DATE</u>
<u>Southern Aluminum (CFR 433)</u>	<u>Permit not issued</u>
<u>Everette Plating (CFR 433)</u>	<u>~2000</u>
<u>SAPA (CFR 467; currently shut down)</u>	<u>Permit expired on 3/29/2000</u>
<u>Amfuel, Unit Structures & Magnolia Med. Center</u>	

Section II: Pretreatment Program Analysis

- | | | |
|-------------------------------------|-------------------------------------|--|
| <u>YES</u> | <u>NO</u> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Does the Control Authority accept trucked septage wastes? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Does the Control Authority accept other trucked wastes? |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Does the Control Authority have a control mechanism for regulating <u>trucked wastes</u> ? If yes, answer the following: |
| <u>n/a</u> | | Does Control Mechanism designate a discharge point? [403.5(b)(8)] |
| <u>n/a</u> | | Are all applicable categorical standards and local limits applied to trucked wastes ? |

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

Pollutant	Limit
<u>n/a</u>	

Describe the discharge point(s) (including security procedures):
"At a manhole just upstream of the w.w. plant's headworks. A city employee witnesses every 'dump'".

- | | | |
|--------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes? |
| <u>n/a</u> | | 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
<u>n/a</u>	

G. Application of Pretreatment Standards and Requirements

- | | | |
|--------------------------|-------------------------------------|--|
| <u>YES</u> | <u>NO</u> | |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW? |
| <u>n/a</u> | | Date Notified <u>n/a</u> Method of Notification |

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

- | | | | |
|-------------------------------------|---------------------|-------------------------------------|--------------------------------------|
| <input type="checkbox"/> | Federal Register | <input type="checkbox"/> | Journals, Newsletters |
| <input checked="" type="checkbox"/> | Meetings, Training | <input checked="" type="checkbox"/> | Other <u>ADEQ e-mail newsletters</u> |
| <input checked="" type="checkbox"/> | Government Agencies | <input type="checkbox"/> | Other _____ |

- | | | |
|--------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit, or Annual Report? |
|--------------------------|-------------------------------------|---|

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
<u>n/a</u>			

Section II: Pretreatment Program Analysis

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?		1995 MAHL Numerical values in Program (lb/d)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.96
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.09
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	24.33
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	2.19
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	8.64
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.48
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.97
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3.94
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	6.89
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.89
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.48
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	6.76

* - If necessary for the sludge disposal option chosen.

YES NO

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

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
n/a	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

YES NO

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

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

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)	_____	_____	_____
Cadmium (Cd)	_____	_____	_____
Chromium-Total	_____	_____	_____
Copper (Cu)	_____	_____	_____
Cyanide (CN)	_____	_____	_____
Lead (Pb)	page 21 of the City's old Program states,		
Mercury (Hg)	"the contributory allocation method"		
Molybdenum (Mo)	_____	_____	_____
Nickel (Ni)	_____	_____	_____
Selenium (Se)	_____	_____	_____
Silver (Ag)	_____	_____	_____
Zinc (Zn)	_____	_____	_____

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? n/a

Section II: Pretreatment Program Analysis

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
		N/A	
Inspections:			
CIUs	<u>annually</u>	1/year	_____
Other SIUs	<u>"</u>	1/year	_____
Sampling:			
CIUs	<u>"on a regular</u>	1/year	_____
Other SIUs	<u>basis"</u>	1/year	_____
Reporting:			
CIUs	<u>"listed in</u>	2/year	_____
Other SIUs	<u>permit"</u>	2/year	_____
Self-Monitoring:			
CIUs	<u>"listed in</u>	2/year	_____
Other SIUs	<u>permit"</u>	2/year	_____

<u>#</u>	<u>%</u>	<u>How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)</u>
<u>5*</u>	<u>100</u>	Not sampled at least once in the past reporting year?
<u>5*</u>	<u>100</u>	Not inspected at least once in the past Pretreatment reporting year? <i>*By the City</i>
<u>--</u>	<u>--</u>	Not inspected or not sampled at least once in the past reporting year ? [WENDB-NOIN] - [403.8(f)(2)(v)]

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

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

Everette Plating and Southern Aluminum (no funds available for Pretreatment personnel for Program implementation)

Does the Control Authority routinely split samples with industrial personnel:

YES NO
 n/a If requested?
 n/a To verify IU self-monitoring results?

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

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals	<u> n/a </u>	_____
Cyanide	_____	_____
Organics	_____	_____
Other	_____	_____

Were all wastewater samples analyzed by 40 CFR 136 methods? *Unknown*

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

Section II: Pretreatment Program Analysis

YES NO

* Does the POTW use QA/QC for sampling and analysis? If yes, describe:
*only for their pH meters which are correctly calibrated.

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

5 days Conventionals
2 wks Metals
1 mo. Organics

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

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: No resources available to implement the Program.

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

YES NO

- * Scheduled compliance monitoring **currently conducted by ADEQ*
- Unscheduled compliance monitoring
- Demand monitoring for IU compliance
- * IU self-monitoring **currently required/received by ADEQ*
- Other: _____

YES NO

Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year (interference and pass-through)? If yes, describe below.

I. ENFORCEMENT

* Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] **Program has the pre-Streamlining definition.*

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

YES NO

- Describe how the Control Authority will investigate instances of 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

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"/> Consent Administrative Order |
| <input 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>1,000</u> /day/violation
criminal	\$ <u>1,000</u> /day/violation
administrative	\$ _____ /day/violation

Section II: Pretreatment Program Analysis

- Imprisonment
- Termination of Service
- Other: Show cause hearing, Compliance Order, Emergency Suspension of Service

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: No resources available due to lack of funds.

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)]. **Only by ADEQ currently*

Comment: This condition was in the City's old expired permits

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		Return to Compliance?	
		Type	Date	Yes (Date)	No
Southern Al.	11/30/99	"NOV"	11/30/09	11/6/10	✓
(via ADEQ e-mail dated the same for no BMR submittal. City was copied the 1 st request on 2/18/09)				(BMR)	(Zn violations)

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

**City is not required by their NPDES permit to submit annual reports. The below is based on ADEQ's records.*

#	%	
1*		Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0		Self-monitoring requirements [WENDB-MSNC]
0		Reporting requirements [WENDB-PSNC]
0		Pretreatment compliance schedule [WENDB-SSNC]

How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN] **From ADEQ's efforts and tracking report*

YES NO

Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. Program does not include a complete ERP, only an ERG which could be improved.

Section II: Pretreatment Program Analysis

Has the Control Authority experienced any of the following:

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

0 How many SIUs are currently on compliance schedules?

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

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

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ _____
Administrative	<u>0</u>	\$ _____
Total	<u>0</u>	\$ _____

[WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO
 & * Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

** Recent City inspection and sampling records could not be produced.*

<u>YES</u>	<u>NO</u>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	computerized
<input checked="" type="checkbox"/>	<input type="checkbox"/>	hard copy
<input type="checkbox"/>	<input type="checkbox"/>	OTHER: _____

Are the following files computerized:

<input checked="" type="checkbox"/>	<input type="checkbox"/>	Control Mechanism Issuance
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Inspection and Sampling schedule
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Monitoring Data
<input type="checkbox"/>	<input checked="" type="checkbox"/>	IU Compliance Status Tracking
<input type="checkbox"/>	<input type="checkbox"/>	Other: _____
Can IU monitoring data can be retrieved by:		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Industry name
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pollutant type
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Industrial category or type
<input type="checkbox"/>	<input checked="" type="checkbox"/>	SIC Code
<input type="checkbox"/>	<input checked="" type="checkbox"/>	IU discharge volume
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Geographic location
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Receiving treatment plant (i.e.if > one plant in the system)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other (specify) _____

Section II: Pretreatment Program Analysis

YES NO

Does the POTW have provisions to address claims of confidentiality?
[403.8(f) (1) (vii)]

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

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

If yes, please explain: _____

Are all records maintained for at least 3 years?

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f) (3)] * - FTE = Full Time Equivalent Employee
Page 33 of original Program states "one person...will be devoted..." At current, there are no FTEs dedicated to the implementation of the City's Pretreatment Program.

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:
Expired SIU permits, no inspections, no City compliance sampling

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general operating fund	<u>100%</u>
<input type="checkbox"/> IU permit fees	_____
<input type="checkbox"/> monitoring charges	_____
<input type="checkbox"/> industry surcharges	_____
<input type="checkbox"/> other (describe) _____	_____
Total	100%

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

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

YES NO

If no, explain

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

Section II: Pretreatment Program Analysis

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	<u>1 ISCO auto sampler, 6 portable pH meters.</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	<u>Standard equipment, gas detectors, etc.</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	<u>1 pick-up</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	<u>everything sent to contract lab.</u>

L. POLLUTION PREVENTION (This Audit will not include a P2 assesment)

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.):

2. Has the source of any toxic pollutants been identified? If yes, what was found?

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

4. Does the POTW have any pollution prevention success stories for industrial users documented? _____. If yes, please attach.
5. Are SIUs required to get a pollution prevention audit or assesment as a part of their permit application or as a requirement of their permit?

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?
 If yes, which of the "Guides to Pollution Prevention" were used? _____

SECTION III: INDUSTRIAL USER FILE REVIEW

This audit does not include an IU File Review for reasons stated throughout the checklist above.

FILE #: 1 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: YES NO

Comments: _____

FILE #: 2 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: YES NO

Comments: _____

FILE #: 3 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: YES NO

Comments: _____

FILE #: 4 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: YES NO

Comments: _____

FILE #: 5 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: YES NO

Comments: _____

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

Control Authority: Magnolia NPDES #: AR0043613

Date of Audit: 4/4 -4/5/12 Date entered into QNCR: N/A

		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
YES	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
YES	Failure to inspect or sample 80% of SIUs within the last reporting year	II
YES	Failure to enforce pretreatment standards and reporting requirements	II
YES	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

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

Attachment A-1



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 8913
LITTLE ROCK, ARKANSAS 72219-8913
PHONE: (501) 562-7444
FAX: (501) 562-4632



hold for test results

February 25, 1992

Mr. Jim Wilson, Superintendent
Magnolia Wastewater System
Post Office Box 1126
Magnolia, Arkansas 71753

RE: Results of Biomonitoring for NPDES # AR0043613

Dear Mr. Wilson:

Review of the biomonitoring results required by the above referenced permit for the test period ending June 30, 1992 has been completed. The toxicity test results for Outfall 001 show significant lethal effects, well below the critical dilution.

Permit requirements under Part III 8.i., provide for increased toxicity testing if lethal effects occur; therefore, the Department requires verification testing of Magnolia's outfall. The retests shall consist of two consecutive toxicity tests conducted within the next 90 days, with the first retest commencing within 30 days of receiving information demonstrating lethality at low flow. Results shall be submitted to the Department within 15 days of their receipt from your contract lab. A toxicity reduction evaluation (TRE) plan will be required if consistent toxicity is demonstrated.

Since the latest biomonitoring results were similar to the previous results, these data may be interpreted as consistent toxicity. The City of Magnolia may elect to proceed with the TRE Plan in lieu of verification testing. Enclosed is the TRE Protocol for Municipal Wastewater Treatment Plants. An acceptable TRE Plan must include the Information/Data Acquisition and POTW Performance Evaluation portions of the protocol. Also, the TRE Plan must include a proposed timeframe for completion. The Plan would be due 5/1/92.

We appreciate your efforts in isolating and correcting these problems. If you have questions concerning these requirements, please contact me at extension 225 of the above number.

Sincerely,

Nathaniel P. Nehus
PC Section Manager

cc. Gayla Purvis, ADPC&E
Lorraine Spann, ADPC&E

April 30, 1992

RECD MAY 04 1992

State of Arkansas
Department of Pollution Control & Ecology
Division of Construction Grants
Mr. Nathaniel P. Nehus
PC Section Manager
P.O. Box 8913
Little Rock, Arkansas 72219-8913

RE: Magnolia, Arkansas *AR0043613 AFIN 14-00059*

Dear Mr. Nehus:

In response to your letter of February 25, 1992, the City of Magnolia has elected to proceed with the TRE Plan in lieu of verification testing. The City has initiated influent and effluent testing in an effort to classify the toxic pollutants in the waste stream. As we discussed in the meeting with Jim Wilson in the PC&E Offices, the difficulty in performing the TRE arises from lack of information, as a pre-treatment program is non-existent. We are requesting that the City be allowed to establish a pre-treatment program as an integral part of performing the TRE.

As a part of the TRE Plan, we are attaching the following:

- 1) Information/Data Acquisition/POTW Performance Evaluation
 - a) Project Performance Report - This submittal presents a summary of performance data for a period of twelve (12) months.
 - b) Plant Design Criteria
 - c) Analytical Data (Plant Influent)
- 2) TRE Schedule of Completion - Schedule proposes an eighteen (18) month period for plan adoption.

Due to the extensive effort and expense associated with performing the TRE, the City hereby requests that the routine bio-monitoring requirements be waived until the toxic pollutant can be identified and corrected.

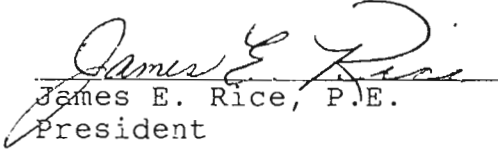
A-1b

April 30, 1992
PC&E/Mr. Nathaniel P. Nehus
Page 2 of 2

If you have any questions or need additional information,
please do not hesitate to contact me.

Sincerely,

NRS CONSULTING ENGINEERS


James E. Rice, P.E.
President

enclosures (4)

JER/cem

A/c

**CITY OF MAGNOLIA
TRE AND PRETREATMENT PROGRAM
SCHEDULE OF COMPLETION**

Information & Data Acquisition (1st Submittal)	May 1, 1992
Perform Industrial Waste Survey	May 1 - August 1, 1992
Require Pollutant Scan from each Industry	May 1 - August 1, 1992
Adopt Pretreatment Ordinances	August, 1992
Evaluate POTW Performance	July 1 - August 15, 1992
Develop Industrial Monitoring Procedures	July 1 - August 15, 1992
Information & Data Acquisition (2nd Submittal)	September 1, 1992
Identify Effluent Toxicants	September 1 - December 1, 1992
Source Evaluation of Toxicity	January 1 - July, 1993
Evaluate Toxicity Reduction Alternatives	August - November, 1993
Adopt Toxicity Control Plan	December, 1993
Establish Local Industrial Limits	January, 1994
Toxicity Control Implementation	February - December, 1994
Follow-up Monitoring	January, 1995

A-1d



STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 8913
LITTLE ROCK, ARKANSAS 72219-8913
PHONE: (501) 562-7444
FAX: (501) 562-4632



May 13, 1992

Mr. Jim Wilson, Superintendent
Magnolia Wastewater System
Post Office Box 1126
Magnolia, Arkansas 71753

RE: Toxicity Reduction Evaluation (TRE) Plan
for NPDES Permit # AR0043613

Dear Mr. Wilson:

We have received the TRE Plan submitted on your behalf by NRS Consulting Engineers. The Plan is complete and approved for implementation. An additional requirement will be the submission of quarterly progress reports. These reports will contain all information back to the previous report. Since the TRE Plan proposes an eighteen month schedule, the first report is due by September 30, 1992.

Regarding the request to waive the routine biomonitoring requirements of the permit, we agree to suspend these requirements while the TRE is in progress.

Good luck in finding a quick and effective solution to the toxicity problems at your facility. If you have questions concerning these requirements, please contact me at extension 222 of the above number.

Sincerely,

Nathaniel P. Nehus
PC Section Manager

cc. James Rice, NRS
Gayla Purvis, ADPC&E
Lorraine Spann, ADPC&E
File NPDES # AR0043613

A-1e