

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Cover Page and Acronym List

Section I IU File Evaluation

Section II Data Review/Interview/IU Site Visit(s)

Section III Findings

Attachment A Pretreatment Program Status Update

Attachment B Pretreatment Program Profile

Attachment C Worksheets

IU Site Visit Data Sheet

WENDB Data Entry Worksheet

RNC Worksheet

Attachment D Supporting Documentation

Control Authority (CA) name and address

Date(s) of audit

Humboldt Utilities Authority
600 S 7th Ave
Humboldt TN 38343

5/14/2024

AUDITOR (S)

Name	Title/Affiliation	Telephone Number
Samantha O'Neil	EC II	615-961-4440
Gordon Holcomb	EPS II	

CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Tyler Landrum	*	
Jane Leatherland		
Brett Waldrup		

*Identified program contact

ACRONYM LIST

Acronym	Term
AO	Administrative order
BMP	Best management practices
BMR	Baseline monitoring report
CA	Control authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DMR	Discharge monitoring report
DSS	Domestic sewage study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-weighted average
Gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	Not applicable
ND	Not determined
NOV	Notice of violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and grease
PCI	Pretreatment compliance inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
SUO	Sewer use ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic organic management plan
TRC	Technical review criteria
TRE	Technical review evaluation
TRIS	Toxics release inventory system
TSDF	Treatment, storage, and disposal facility
TTO	Total toxic organics
UST	Underground storage tank
WENDB	Water Enforcement National Data Base

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section I of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that he/she follows up on any and all violations noted in the previous inspection and annual report during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE <u> A </u> Industry name and address West Rock 1720 Ninth Avenue Humboldt TN 38343	Type of industry Corrugated Box Manufacturing	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Existing Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments		
FILE <u> B </u> Industry name and address Bongards Creameries 3001 U.S. Hwy 45 Bypass West Humboldt TN 38343	Type of industry Dairy	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION I: IU EVALUATION

File <u>A</u>	File <u>B</u>	File 	File 	File 	IU FILE REVIEW	Reg. Cite
A. ISSUANCE OF IU CONTROL MECHANISM						
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
X	X				a. Individual control mechanism	
NA	NA				b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
X	X				a. Statement of duration (≤ 5 years)	
X	X				b. Statement of nontransferability	
A					c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
X	X				• Identification of pollutants to be monitored	
NA	NA				• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
X	X				• Sampling locations/discharge points	
X	X				• Sample types (grab or composite)	
X	X				• Reporting requirements (including all monitoring results)	
X	X				• Record-keeping requirements	
1. X	1. X				e. Statement of applicable civil and criminal penalties	
NA					f. Compliance schedules	
X	X				g. Notice of slug loading	
					h. Notification of spills, <u>bypasses</u> , upsets, etc.	
X	X				i. Notification of significant change in discharge	
X	X				j. 24-hour notification of violation/resample requirement	
X	X				k. Slug discharge control plan, if determined by the POTW to be necessary.	
Comments						
<p>1. States "up to \$10,000 per violation. Does not specify per violation per day.</p> <p>A = Local limits match those in the SVO Appendix, except CBOD is in lb/day in permit</p> <ul style="list-style-type: none"> Permit LL list pH 6-10 under Daily <u>Ave</u> Maximum. Should be footnoted as not an average but Daily max/min <p>- Permits contain necessary certification statement but do not include who is able to sign.</p>						

SECTION I: IU EVALUATION (Continued)

File A	File B	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
NA	NA				3. Issuance of General Control Mechanisms a. Involve the same or similar operations b. Discharge the same types of wastes c. Require the same effluent limitations d. Written request by the IU for coverage by a general control mechanism including: <ul style="list-style-type: none"> • Contact information • Production processes • Types of waste generated • Location for monitoring all wastes covered by the general permit e. Documentation to support the POTW's determination	403.8(f)(1)(iii)(A)
↓	↓					
↓	↓					
↓	↓					
↓	↓					
↓	↓					
↓	↓					
↓	↓					
↓	↓					
↓	↓					
Comments						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDRDS	
1.	1.				1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
NA	NA				a. Classification by category/subcategory	
↓	↓				b. Classification as new/existing source	
↓	↓				c. Application of limits for all regulated pollutants (Section 428.56)	
↓	↓				d. Classification of nonsignificant CIU	403.3(v)(2)
X	X				3. Application of local limits (Make sure Limits in permits match approved)	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
NA	NA				5. Calculation and application of production based-standards	403.6(c)
↓	↓				6. Calculation and application of CWF or FWA	403.6(d)&(e)
↓	↓				7. Application of most stringent limit	403.8(f)(1)(ii)
<p>Comments</p> <p>1. Industry is a non categorical significant industrial user</p>						

SECTION I: IU EVALUATION (Continued)

File A	File B	File	File	File	IU FILE REVIEW	Reg. Cite
C. CA COMPLIANCE MONITORING						
					Sampling	
H	B				1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
NA	NA				2. Sampling at frequency specified in approved program	
✓	✓				3. Documentation of sampling activities	403.8(f)(2)(vi)
✓	✓				4. Analysis for all regulated parameters	
✓	✓				5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
I.	I.				6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
NA	NA				7. Inspection at frequency specified in approved program	
✓	✓				8. Documentation of inspection activities	403.8(f)(2)(vi)
✓	✓				9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
<p>Comments</p> <p>A) West Rock Conventional: 4/24 ^{QA} 5/14/24</p> <p>A West Rock 10/24/23, 1/12/24</p> <p>B Bongards 1/25/24, 5/11/23</p> <p>1. Both Inspection files are missing inspection reports from Fall 2022</p> <p style="padding-left: 400px;">↳ Found later in audit</p> <p style="padding-left: 400px;">↳ Not found > 12 months apart</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
A	B				D. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
✓	✓				2. Calculation of SNC	403.8(f)(2)(vi)
✓	✓				3. Adherence to approved ERP	403.8(f)(5)
	B				4. Escalation of enforcement	403.8(f)(5)
	B				5. Publication for SNC	403.8(f)(2)(vi)
<p>Comments</p> <p>A West Bek NOV 1/18/23 for TSS November 2022</p> <p>B Bongard's 1/9/23 for Failure to monitor COP as per admin order Failure to report violation within 24hr for TSS 11/3/22 SNC repeated Published in newspaper</p>						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	File _____	File _____	File _____	IU FILE REVIEW	Reg. Cite
------------------	------------------	---------------	---------------	---------------	-----------------------	----------------------

E. IU COMPLIANCE STATUS

					Self-Monitoring and Reporting	
<u>A</u>	<u>B</u>				1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
<u>✓</u>					2. Analysis of all required pollutants	403.12(g)(1)&(h)
<u>NA</u>					3. Submission of BMR/90-day report	403.12(b) &(d)
<u>✓</u>					4. Periodic self monitoring reports	403.12(e)&(h)
<u>✓</u>					5. Reporting all required pollutants	403.12(g)(1)&(h)
<u>✓</u>					6. Signatory/certification of reports	403.12(l)
<u>NA</u>					7. Annual certification by NSCIUs	403.12(q)
<u>I</u>					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
<u>✓</u>					• Slug load	
<u>NA</u>					• Accidental spill	
<u>NA</u>					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
<u>NA</u>					11. Notification of hazardous waste discharge	403.12(j)&(p)
<u>Resid</u>					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
<u>NA</u>					13. Notification of significant changes	403.12(j)

INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.

					Discharge	
<u>Yes</u>					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	403.5(a)(1)
					• Spill or slug load	403.12(f)
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
<u>Yes</u>					16. SNC with reporting requirements	403.8(f)(2)(vii)

Comments 11/22

A West Rock Conventional 4/24, 3/24, 2/24, 1/24, 12/23, 11/23, 10/23, 9/30/23, 8/23, 7/23, 6/23, 5/23, 4/23
↳ noted that pH probe last calibrated 11/29/2021
 10/14/23 TSS 15700/1000 mg/L Flow meter " " 4/19/2022
 West Rock Metals 7/13/23, 1/11/2024
↳ Phenols (Total) 1.52/0.6616

B Conagra Foods Metals 5/11/23
 Bongards metals 6/7/23 6/13/23

C Determined to be a lab error, letter from lab. There is a resample schedule

B Bongards Conventional 4/24, 3/24, 2/24, 1/24, 12/23, 11/23, 10/23, 9/23, 8/23, 7/23
 6/23, 5/23, 4/23, 3/23, 2/23, 1/23, 12/22, 11/22, 10/22

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. OTHER	
Comments						
<ul style="list-style-type: none"> • Both permits pH listed under average • " Industries missing Fall 2022 inspection reports → Found → Not found, and >12 months ^{apart} • West Rock question about how often pH & flow probes recalibrated as late 2023 self monitoring reports listed calibrations over a year old <ul style="list-style-type: none"> ↳ calibrations confirmed during audit. Ensure dates are updated on future reports <p>Industrial Inspection Reports were found in file.</p>						

Before Audit Parts A & B completed by Samantha O'Neil ECI 5/13/2024

SECTION I COMPLETED BY: <i>Gordon Holcomb</i>	DATE: <i>5/17/24</i>
TITLE: <i>WV Prot Spec II</i>	TELEPHONE: <i>615-339-9956</i>

SECTION II: DATA REVIEW/IU SITE VISIT

INSTRUCTIONS: Complete this section based on CA activities to implement its pretreatment program. Answers to these questions may be obtained from a combination of sources including discussions with Ca personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data may be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit; indicate the reason(s) why these items were not addressed (e.g., lack of time, appropriate CA personnel were not available to answer)
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?	Yes	No
		X

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, DSS requirements, multijurisdictional situation, etc.)?	Yes	No
		X

If yes, describe.

c. Has the CA adopted the 3 required components of the streamlining regulations (slug control requirements referenced in the control mechanism, definition of SNC, and Modification to sampling requirements)?	Yes	No
	X	

If not, when?

d. Does the CA plan to adopt any of the non-mandatory aspects of the streamlining regulations?	Yes	No
		X

If yes, describe.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

B. LEGAL AUTHORITY [403.8(f)(1)]

1. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes	No
	X

If yes, explain how the legal authority addresses the contributing jurisdictions.

2. a. Has the CA updated its legal authority (e.g., SUO) to reflect changes in the General Pretreatment Regulations ?
- b. Has the CA updated its legal authority to reflect the streamlining changes?
- c. Did all contributing jurisdictions update their SUOs in a consistent manner?

Yes	No

Explain

NA

3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?

Yes	No

If yes, explain.

NA

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. How does the CA define SIU? (Is it the same in contributing jurisdictions?)

Same as State and Federal

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Discuss any problems.

Based on SIU definition, IWS, inspection

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

Every 5 years

gets list from main office of all industries currently here and those interested in moving in.

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including those in contributing jurisdictions)?

Industrial notification, flow changes in DMR.

c. Does the CA have procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

Yes	No
X	

d. Indicate which methods are used to update the IWS.

- Review of newspaper / phone book
- Review of water billing records
- Review of plumbing / building permits

X
X

- Onsite inspections
- Permit application requirements
- Citizens involvement
- Other (specify)

X
X

e. How often is the IWS to be updated?

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

C. IU CHARACTERIZATION (continued) [403.8(f)(2)(i)&(ii)]

4. How many IUs are currently identified by the CA in each of the following groups?

- | | | |
|----|---|---|
| a. | 6 | SIUs (as defined by the CA) [WENDB - SIUS] |
| | 0 | CIUs |
| | | Zero-discharging SIUs |
| | | Noncategorical SIUs (including zero-discharging noncat. SIUs) |
| b. | | Other regulated noncategorical IUs (specify) |
| c. | 6 | TOTAL |
| d. | | NSCIUs** (as defined by 40 CFR 403.3(v)(2)) |

List Nonsignificant Categorical Industrial Users:

** A NSCIU never discharges more than 100 gpd of total categorical wastewater (excluding, noncontact cooling and boiler blowdown wastewater) and the following conditions are met:

- Discharger consistently complied with all applicable categorical requirements
- Discharger submits annual certification statement required in 40 CFR 403.12(q)
- Discharger never discharges any untreated concentrated wastewater.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism? [WENDB - NOCM] [RNC - II]

None	0	%
------	---	---

b. How many SIUs (as defined by the CA) are required to be covered by a general control mechanism? NA

List SIUs:

c. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC - II] None

If any, explain.

2. a. Do any UST, CERCLA, RCRA corrective action sites and / or other contaminated ground water sites discharge wastewater to the CA? No

b. How are control mechanisms (specifically limits) developed for these facilities?

Discuss

	Yes	No
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe?		X
b. Is any of the waste hazardous as defined by RCRA?		X

c. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)]

NA

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.8(f)(2)(iii)]

NA

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

Continuing Education,

3. Local limits evaluation: [403.8(f)(4); 122.21(j)]

a. For what pollutants have local limits been set

Same as PTL

b. How were these pollutants decided upon

PTL

c. What was the most prevalent / most stringent criteria for the limits

varies

d. Which allocation method(s) were used?

general

e. Has the CA identified any pollutants of concern beyond those in its local limits?
If yes, how has this been addressed?

Yes	No
	X

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (Continued)

4. What problems, if any, were encountered during local limits development and/or implementation?

None

5. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA?

Yes	No
X	

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

CA Sampling: 2/yr

Self-monitoring: monthly for conventional, 116 no metals.

CA Inspect: 2/yr

IU Reporting: monthly

b. Is the frequency established above more, less, or the same as required? Explain any difference.

go same same

c. If the CA does all of the sampling in lieu of the industry, does the CA repeat the sample and analysis within 30 days of any violation?

NA

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]
(Define the 12 month period _____ to _____.)

- a. Not sampled or not inspected at least once [WENDB - NOIN]
- b. Not sampled at least once
- c. Not inspected at least once (all parameters) ?

0	0	%
0	0	%
0	0	%

If any, explain. Indicate how percentage was determined (e.g. actual, estimated).



SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

F. COMPLIANCE MONITORING (Continued)

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report? [WENDB] [RNC - II]

			SNC Evaluation Period	Oct 2023 - Mar 2024	
1	16	%	Applicable pretreatment standards and reporting requirements	*SNC defined by:	
0	0	%	Self-monitoring requirements	POTW	X
0	0	%	Pretreatment compliance schedule(s)	EPA	

3a. Indicate the number of SIUs that have been in 100% compliance with all pretreatment requirements?

Evaluation Period: Oct 2023 - Mar 2024

Number of SIUs: 5

Names of SIUs: Tyson (x2), Dana, Bongards

4. What does the CA's basic inspection include? (Process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous waste handling procedures, sampling procedures, laboratory procedures, and monitoring records.) [403.8(f)(2)(v)&(vi)]

NA

✓

✓ ✓ ✓ ✓ ✓

5. Who performs CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name
Waypoint
Waypoint
Waypoint

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(vi)]

Yes blanks have been sent following suspicious phenols report.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

F. COMPLIANCE MONITORING (Continued)

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

None

8. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

Yes	No
	X

If yes, summarize.

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug control plan? [403.8(f)(2)(v)]

Anytime the IU makes changes, during inspections

b. How many SIUs were not evaluated for the need to develop slug discharge control plans*?

0

* For dischargers identified as significant prior to November 14, 2005, this evaluation must be performed at least once by October 14, 2006. Additional SIUs must be evaluated within 1 year of being designated as a SIU.

10. Does the CA use Best Management Practices (BMPs) as a local limit? If yes, did they make necessary changes to their legal authority and the IU control mechanism? Do they have documentation of supporting rationale for each BMP?

Dry sweep chaise rather than spray off.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(vii)]

Same as State & Federal

2. ERP implementation: [403.8(f)(5)]

a. Status

Active & Implemented

b. Problems with implementation

None

c. Is the ERP effective and does it lead to compliance in a timely manner? Provide examples if any are available.

Yes, AO had to be issued to Bongard's along with penalties prior to compliance.

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide examples.

Yes	No
X	
X	

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

G. ENFORCEMENT (Continued)

4. Did the CA publish all SIUs in SNC in the largest daily newspaper in the previous year? [403.8(f)(2)(vii)]	Yes	No
	X	

If yes, attach a copy. *WestRock hasn't been published yet, but Bongard's was published.*

If no, explain.

5. How many SIUs are in SNC with self - monitoring requirements and were not inspected and / or sampled (in the four most recent full quarters)? [WENDB]	<i>None</i>
--	-------------

6. a. Has the CA experienced any problems since the last inspection (interference, pass through, collection system problems, illicit dumping of hauled wastes, or worker health and safety problems) caused by industrial discharges?	Unk	Yes	No
			X

b. If yes, describe and explain the CA's enforcement action against the IUs causing or contributing to problems.
[RNC - I]

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

If given they would be placed in locked cabinet in locked office.

2. How are requests by the public to review files handled?

They would be referred to the manager.

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

3. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

4. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

Public Notice, public hearing

5. Explain any public or community issues impacting the CA's pretreatment program.

None

6. How long are records maintained? [403.12(o)]

3 years

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sample collection, sample analysis, data analysis, review and response, enforcement, and administration (including record keeping and data management)].

3 FTEs

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

I. RESOURCES [403.8(f)(3)] (Continued)			Yes	No
2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)		X		
3. a. Estimate the annual operating budget for the CA's program.	\$	20,000		
b. Is funding expected to: stay the same, increase, decrease (note time frame; e.g., following year, next 3 years, etc.) ? Discuss any changes in funding.	Increase			
4. Discuss any problems in program implementation which appear to be related to inadequate resources.				
5. a. How does the CA ensure personnel are qualified and up - to - date with current program requirements? <p style="text-align: center; margin-left: 100px;">Continuing Education</p>				
b. Does the CA have adequate reference material to implement its program?		X		
6. Identify the sources of funding for the pretreatment program.				
a. POTW general operating fund	<input style="width: 80px; height: 20px;" type="text"/> <input style="width: 80px; height: 20px;" type="text"/> <input style="width: 80px; height: 20px;" type="text"/>	d. Monitoring charges	<input style="width: 80px; height: 20px;" type="text"/> <input style="width: 80px; height: 20px;" type="text"/>	
b. IU permit fees		e. Other (specify)	<input style="width: 80px; height: 20px;" type="text"/>	
c. Industry surcharges		Industry has a flat monthly fee.		

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times were the following monitored by the CA during in the past year?

- Metals
- Priority pollutants
- Biomonitoring
- TCLP
- EP toxicity
- Other (specify)

Influent	Effluent	Sludge	Ambient (Receiving Water)
2 / yr	2 / yr		
	1 / 5 yr		
	1 / yr		
		1 / 3 yr	

Less	Equal	More
	X	

b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Explain any differences.

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on:

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality ?

Yes	No
	X
	↓
	↓
	↓

b. Has the CA documented these findings ?

c. If they have been documented, what form does the documentation take?
 Explain. (Attach a copy of the documentation, if appropriate.)

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

J. ENVIRONMENTAL EFFECTIVENESS / POLLUTION PREVENTION (Continued)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on pollutant - by - pollutant basis.

NA

4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes	No
	x

If yes, what was found?

5. a. Has the CA attempted to implement any kind of public education program?
 b. Are there any plans to initiate such a program to educate users about pollution prevention?
 Explain.

Yes	No
	x

Just word by mouth mainly.

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

No

SECTION II: DATA REVIEW/IU SITE VISIT (Continued)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

7. Does the CA have any documentation concerning successful pollution prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes

No

Explain.

NA

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION II COMPLETED BY:

DATE:

TITLE:

TELEPHONE:

SECTION III: FINDINGS

INSTRUCTIONS: Based on information and data evaluated, summarize the findings of the audit for each program element shown below. Identify all problems or deficiencies based on the evaluation of program components. Clearly, distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> • Status of program modifications 	403.18	II.A.1
<ul style="list-style-type: none"> • Modify the program to accommodate the streamlining regulations 	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(viii), 403.12(g)	II.A.1.c
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> • Minimum legal authority requirements 	403.8(f)(1)	II.B.2 & 3
<ul style="list-style-type: none"> • Adequate multijurisdictional agreements 	403.8(f)(1)	II.B.1 & 3

SECTION III: FINDINGS (Continued)

Description	Regulatory Citation	Checklist Question(s)
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> • Application of "significant industrial user" definition 	403.3(v)	II.C.1; Attach B.E.2
<ul style="list-style-type: none"> • Identify and categorize IUs 	403.8(f)(2)(i)&(ii)	I.A.4.c; II.C.2 & 3
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> • Issuance of individual or general control mechanisms to all SIUs 	403.8(f)(1)(iii)	II.D.1
<ul style="list-style-type: none"> • Adequate control mechanisms 	403.8(f)(1)(iii)(B)	I.A.4
<ul style="list-style-type: none"> • Adequate control of trucked, railed, and dedicated pipe wastes 	403.5(b)(8)	II.D.2 & 3, E.1

SECTION III: FINDINGS (Continued)

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> • Appropriately categorize, notify, and apply all applicable pretreatment standards 	403.8(f)(1)(ii)&(iii) 403.5	I.A
<ul style="list-style-type: none"> • Basis and adequacy of local limits 	403.8(f)(4); 122.21	II.E.3 & 4
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> • Adequate sampling and inspection frequency 	Approved program 403.8(f)(2)(ii)&(v)	I.B.1.a & b, 2.a & b II.F.1&2
<ul style="list-style-type: none"> • Adequate inspections 	403.8(f)(2)(v)&(vii)	I.B.2.c; II.F.3
<ul style="list-style-type: none"> • Adequate sampling protocols and analysis 	403.8(f)(2)(vii)	I.B.1.c, d & e; II.F.4, 5 & 6
<ul style="list-style-type: none"> • Adequate IU self – monitoring 	403.8(f)(2)(iv)	I.A.4.d, C.1.b; II.F.6, G.5
<ul style="list-style-type: none"> • Notification of changed and hazardous waste discharges 	403.12(j)&(p)	I.C.1.b; II.F.7

SECTION III: FINDINGS (Continued)

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (Continued)		
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans 	403.8(f)(2)(vi)	I.B.2.d; II.F.8
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) 	403.12(g)(1)&(2) 403.8(f)(2)(vi)	I.A.4.d, C.1.b
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of "significant noncompliance" definition 	403.8(f)(2)(viii)	I.C.2; II.G.1 Attach B.I.1
<ul style="list-style-type: none"> Develop and implement an ERP 	403.8(f)(5)	I.C.3; II.G.2
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC 	403.8(f)(2)(viii)	I.C.6; II.G.4
<ul style="list-style-type: none"> Effective enforcement 	403.8(f)(1)(iv)(A)	I.C.1.c, 4 & 5; II.G.2.c & d, 5 & 6

SECTION III: FINDINGS (Continued)

Description	Regulatory Citation	Checklist Question(s)
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> • Effective data management/public participation 	403.5(c)(3); 403.12(o); 403.14	II.H
I. RESOURCES		
<ul style="list-style-type: none"> • Adequate resources 	403.8(f)(3)	II.I

SECTION III: FINDINGS (Continued)

Description	Regulatory Citation	Checklist Question(s)
.1 J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> • Understanding of pollutants from all sources 		II.J.1&3
<ul style="list-style-type: none"> • Documentation of environmental improvements/effectiveness 		II.J.2
<ul style="list-style-type: none"> • Integration of pollution prevention 		II.J.6
.2 K. ADDITIONAL EVALUATIONS/INFORMATION		

SECTION II COMPLETED BY:	DATE:
--------------------------	-------

TITLE:

TELEPHONE:

ATTACHMENT A
PRETREATMENT PROGRAM STATUS UPDATE

PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. It should be updated prior to each audit based on information obtained from the most recent PCI and / or audit and the last pretreatment program performance report

A. CA INFORMATION

1. CA name <i>Humboldt Utilities Authority</i>		
2. a. Pretreatment contact <i>Tyler Landrum</i>	b. Mailing address <i>P.O. Box 850 Humboldt TN 38343</i>	
c. Title <i>operator in charge</i>	d. Telephone number <i>(731) 784-4301</i>	
3. Date of last CA report to Approval Authority <i>4/25/2024</i>		
4. Is the CA currently operating under any pretreatment - related consent decree, Administrative Order, compliance schedule, or other enforcement action?	Yes	No
		x
5. Effluent and sludge quality		
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)		
Parameters Violated	Cause(s)	
b. Has the treatment plant had any violations of biosolids regulations?		

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.			
<ul style="list-style-type: none"> a. Program modification b. Legal authority c. Local limits d. IU characterization e. Control mechanism f. Application of pretreatment standards g. Compliance monitoring h. Enforcement program i. Data management j. Program resources k. Other (specify) 	Last PCI	Last Audit	Program Report
	Date: <i>6/14/22</i>	Date: <i>7/9/19</i>	Date: <i>4/25/24</i>
	x	x	

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS			
2. Is the CA presently in RNC for any of these violations ? a. Failure to enforce against pass through and / or interference [RNC - I] [SNC] b. Failure to submit required reports within 30 days [RNC - I] [SNC] c. Failure to meet compliance schedule milestones within 90 days [RNC - I] [SNC] d. Failure to issue / reissue control mechanisms to 90 percent of SIUs within 6 months [RNC - II] e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC - II] f. Failure to enforce standards and reporting requirements [RNC - II] g. Other (specify) [RNC - II]	Data Source	Yes	No
	QPCR		X
			↓
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)			
Name of SIU in SNC	Compliance Status	Source	
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.			
		SNC Evaluation Period	
	%	Applicable pretreatment standards and reporting requirements	*SNC defined by:
	%	Self - monitoring requirements	POTW
	%	Pretreatment compliance schedules	EPA
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program			

ATTACHMENT A COMPLETED BY: <i>Samantha O'Neil</i>	DATE: 4/29/24
TITLE: <i>ECII</i>	TELEPHONE: 615-961-4440

ATTACHMENT B
PRETREATMENT PROGRAM PROFILE

PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. This background information should be obtained from the original, approved pretreatment program submission and modifications and the NPDES permit. The profile should be updated, as appropriate, in response to approved modifications and revised NPDES permit requirements.

A. CA INFORMATION

1. CA name *Humboldt Utilities Authority*
2. Program Approval Date *11/4/1985*
3. Required frequency of reporting to Approval Authority *Semi-Annual*
4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
<i>Humboldt STP</i>	<i>TN0062588</i>	<i>9/1/2022</i>	<i>8/31/2027</i>

- | | | |
|--|------------|-----------|
| 5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?
If yes, provide the following information. | Yes | No |
| | <i>X</i> | |

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants
<i>Humboldt STP</i>	<i>TDEC</i>	<i>9/1/2022</i>	<i>8/31/2027</i>	<i>Same as 40 CFR 503</i>

B. PRETREATMENT PROGRAM MODIFICATIONS

1. Does the CA's NPDES permit have pretreatment language? [WENDB - PTIM] *Yes*
2. Identify any recent substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]

Date Approved	Description of Modification
<i>4/18/2024</i>	<i>Sewer Use Regulation for name change</i>
<i>12/1/2022</i>	<i>Industrial Waste Survey</i>
<i>11/14/2022</i>	<i>Technical Eval of LL</i>
<i>4/16/2021</i>	<i>Local Limit Final Approval</i>

PRETREATMENT PROGRAM PROFILE (Continued)

C. TREATMENT PLANT INFORMATION				
INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.				
1. Treatment plant name Humboldt STP		2. Location address 600 S 7 th Ave Humboldt TN 38343		
3. a. NPDES permit number TN0062588	b. Expiration date 8/31/2027	4. Treatment plant wastewater flows Design 5 MGD Actual 201 MGD		
5. a. Industrial contribution (MGD) 1.247	b. Number of SIUs discharging to plant 6	c. Percent industrial flow to plant 62%		
6. Level of treatment	Type of Process(es)			
a. Primary				
b. Secondary	X	SBR activated sludge		
c. Tertiary	X	Sodium hypochlorite disinfection		
7. Indicate required monitoring frequencies for pollutants identified in NPDES permit.				
	Influent (Times / Year)	Effluent (Times / Year)	Sludge (Times / Year)	Receiving Stream (Times / Year)
a. Metals	2/yr	2/yr		
b. Organics		1/permit		
c. Toxicity testing		1/yr		
d. EP toxicity				
e. TCLP				
9. Effluent Discharge				
a. Receiving water name 8th Forked Deer North Fork Middle Fork Forked Deer RM 23.4		b. Receiving water classification Fish & Aquatic, Recreation, Livestock & Wildlife, Irrigation		
d. If effluent is discharged to any location other than the receiving water, indicate where.				

C. TREATMENT PLANT INFORMATION (Continued)

	N / A	Yes	No
10. Did the CA submit results of whole effluent biological toxicity as part of its NPDES permit application(s) ? [122.21(j)(1)&(2)]			X
a. If yes, did the CA use EPA - approved methods ? [122.21(j)(3)]	X		
b. Has there been a pattern of toxicity demonstrated?	X		

11. Indicate methods of biosolids use or disposal.

a. Land application	<input type="checkbox"/>	c. MSW landfill	<input checked="" type="checkbox"/>
b. Surface Disposal	<input type="checkbox"/>	d. Other (specify)	<input type="checkbox"/>
c. Incineration	<input type="checkbox"/>		

If not land applying biosolids, list reason why.

D. LEGAL AUTHORITY

1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority). *Sewer Use Regulation*

b. Date enacted / adopted *11/4/1985* c. Date of most recent revisions *4/18/2024*

2. Does the CA's legal authority enable it to do the following ? [403.8(f)(1)(i - vii)]

	Yes	No
a. Deny or condition pollutant dischargers [403.8(f)(1)(i)]	X	
b. Require compliance with standards [403.8(f)(1)(ii)]		
c. Control discharges through permit or similar means [403.8(f)(1)(iii)]		
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)]		
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)]		
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)]		
g. Comply with confidentiality requirements [403.8(f)(1)(vii)]		

3. a. How many contributing jurisdictions are there ?

List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.

Jurisdiction Name	Number of CIUs	Number of Other SIUs

D. LEGAL AUTHORITY (Continued)

3. b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions ?

Yes	No

If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform.

a. IWS update

b. Permit issuance

c. Inspection and sampling

d. Enforcement

e. Notification of IUs

f. Receipt and review of IU reports

g. Analysis of samples

h. Other (specify)

E. IU CHARACTERIZATION

1. Date of last IWS submitted to WPC.

12 / 1 / 2022

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations ? [403.3(t)(1)]

Yes	No
X	

If no, provide the CA's definition of "significant industrial user."

F. CONTROL MECHANISM

1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).	Permit
b. What is the maximum term of the control mechanism ?	5 years

G. APPLICATION OF STANDARDS

1. If there is more than one treatment plant, were local limits established specifically for each plant?	N / A x	Yes	No x 80
2. Has the CA technically evaluated the need for local limits for all pollutants listed below? [WENDB - EVLL] [403.5(c)(1); 403.8(f)(4)]			
Partial Technical Evaluation (not all 10 pollutants evaluated)?			

	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)							
b. Cadmium (Cd)							0.001
c. Chromium (Cr)							Report
d. Copper (Cu)							0.302
e. Cyanide (CN)							0.127
f. Lead (Pb)							0.108
g. Mercury (Hg)							0.002
h. Nickel (Ni)							0.287
i. Silver (Ag)							0.0057 *
j. Zinc (Zn)							0.693
k. Other (specify)							

* - Daily max - Found in SVO approval files from Feb 2021
but limits table says revised 2012

H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.				
Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
a. Inspections				
• CIUs	*	1/yr	1/yr	1 / year
• Other SIUs	*	1/yr	1/yr	1 / year
b. Sampling by POTW				
• CIUs	2/yr	1/yr	1/yr	1 / year
• Other SIUs	2/yr	1/yr	1/yr	1 / year
c. Self - monitoring				
• CIUs	*	2/yr	2/yr	2 / year
• Other SIUs	*	2/yr	2/yr	2 / year
d. Reporting by IU				
• CIUs	*	2/yr	2/yr	2 / year
• Other SIUs	*	2/yr	2/yr	2 / year

* Not explicitly specified

I. ENFORCEMENT

	Yes	No
1. Does the CA's program define "significant noncompliance" ?	x	
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's ? [403.8(f)(2)(vii)]	x	
If no, provide the CA's definition of "significant noncompliance".		

	Yes	No
2. Does the CA have an approved, written ERP ? [403.8(f)(5)]	x	

3. Indicate the compliance / enforcement options that are available to the POTW in the event of IU noncompliance.
[403.8(f)(1)(vi)]

a. Notice or letter of violation	x	f. Administrative Order	x
b. Compliance schedule	x	g. Revocation of permit	x
c. Injunctive relief	x	h. Fines (maximum amount)	x
d. Imprisonment	x	• Civil \$ <u>10,000</u> /day/violation	
e. Termination of service	x	• Criminal \$ _____ /day/violation	
		• Administrative \$ _____ /day/violation	

L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY: <i>Samantha O'Neil James</i> TITLE: <i>EC II</i>	DATE: <i>4/29/24</i> TELEPHONE: <i>615-961-4440</i>
---	--


ATTACHMENT C

WORKSHEETS

- **IU SITE VISIT DATA SHEET**
- **WENDB DATA ENTRY WORKSHEET**
- **RNC WORKSHEET**

IU SITE VISIT DATA SHEET (Continued)

IU Name	Date
<p>Notes:</p> <p>5. Filtrate tank is where samples are taken. } permit should be updated CA takes samples @ manhole</p> <p>6. Washdown → floor drain → 3500 gal retention → filter press → filtrate tank → Humboldt ↳ sludge to landfill</p> <p>7. Borax - 250 gal totes - containment unit Corn Starch - silo NaOH - tank in boiler Rm 1500 gal Resin - 250 gal totes - containment unit Inks - 5 gal buckets, 61K 250 gal tote ink storage area glue - 75 gal totes pH adjuster - company brand } stored in treatment area CaOH, MgOH, H₂O coagulant - lubricate oils throughout the plant.</p> <p>8. None</p>	

IU SITE VISIT REPORT FORM COMPLETED BY: Samantha O'Neil  TITLE: EC II	DATE: 5/14/2024 TELEPHONE: 615-961-4440.
---	---

IU SITE VISIT DATA SHEET

I. IU SITE VISIT REPORT FORM

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name and address of industry *Bongard's Creameries 3001 U.S. Hwy 45 Bypass West*

Date of visit *5/14/24* Time of visit *1:30*

Name(s) of inspector(s) *Samantha O'Neil, Gordon Holcomb, Jane Leatherland, Tyler Landrum*

Provide name(s) and title(s) of industry representative(s).

Name	Title
<i>David Falkenheim</i>	<i>Quality Assurance Manager</i>
<i>Christy Whitwell</i>	<i>Plant Manager</i>
<i>Stephanie McDonald</i>	<i>EHS Manager</i>

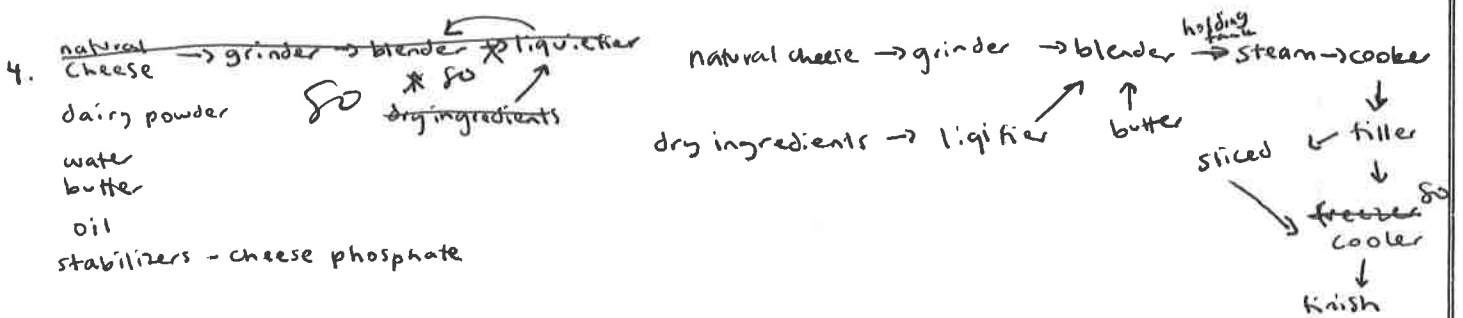
Classification assigned by CA:

Provide the following documentation:

1. Describe the products manufactured or the services provided by the IU.
2. Verify CA's classification or discuss any errors.
3. Describe any significant changes in process or flow.
4. Identify the raw materials and processes used. (Include discussion of where wastewater is produced and discharged and attach a step - by - step diagram if possible.)
5. Describe the sample location and any differences in CA and IU locations.
6. Describe the treatment system which is in place.
7. Identify the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discuss the adequacy of spill prevention.
8. Discuss whether hazardous wastes are stored or discharged and any related problems.

Notes:

1. cheese
2. SIU
3. Adding blender cooler CIP, adding a line which would add 20k Gallons per week



IU SITE VISIT DATA SHEET (Continued)

IU Name	Date
<p>Notes:</p> <ul style="list-style-type: none">5. Fume Room6. process wastewater found in attachment7. Attachment8. aerosol cans, printer solvent	

<p>IU SITE VISIT REPORT FORM COMPLETED BY: <i>Samantha O'Neil</i> TITLE: <i>ECII</i></p>	<p>DATE: <i>5/14/2024</i> TELEPHONE: <i>615-961-4440</i></p>
--	--

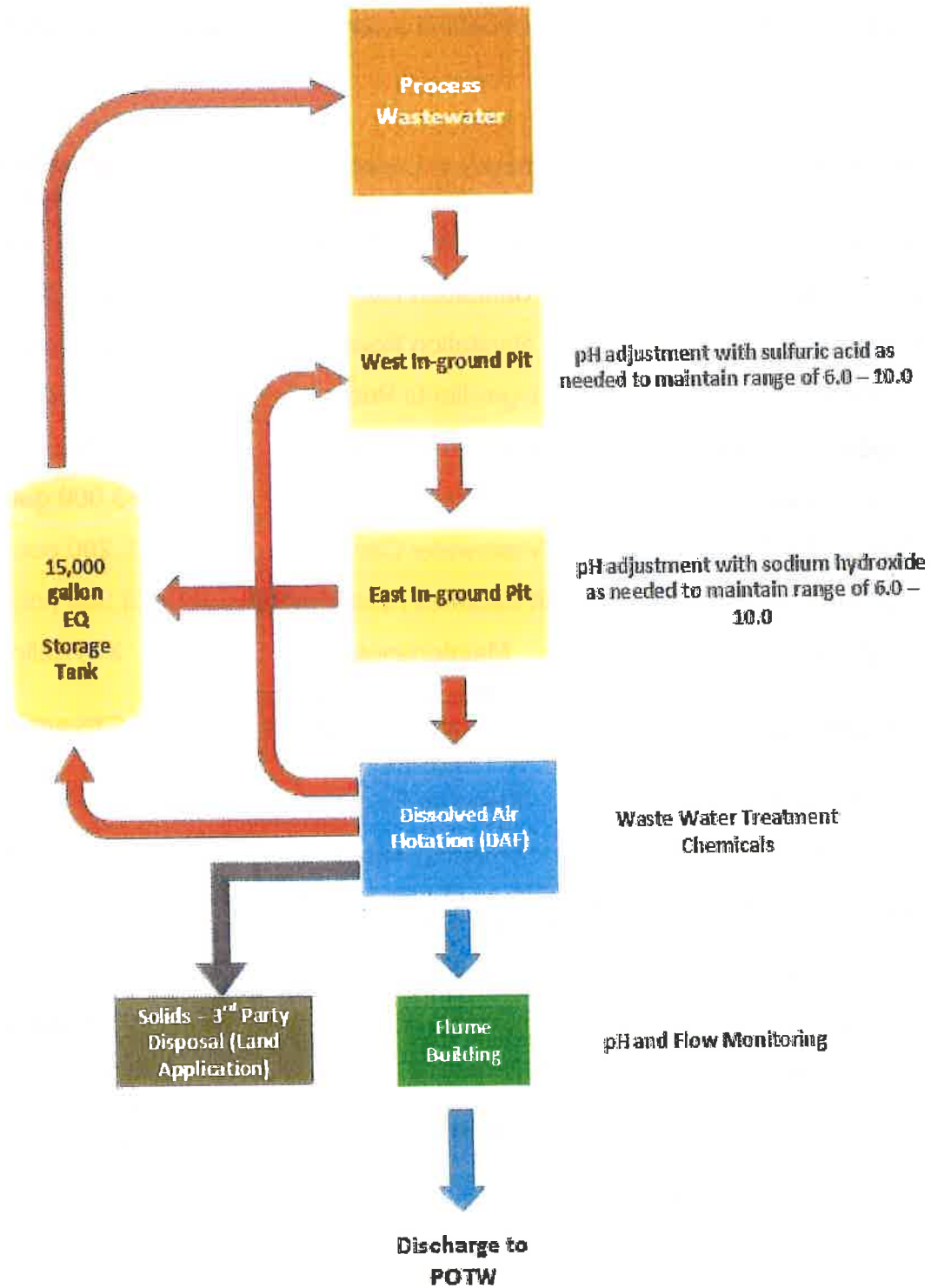
Hazardous Material Inventory

Attachment A must be completed for EACH chemical storage location listed in the Chemical Inventory List.

All Lubrication oils and chemicals are kept behind a containment wall or on a containment spill pallet.

Chemical Name	Chemical Location	Average Quantity Onsite
Anhydrous Ammonia	New Engine Room	21,000 pounds
Nitric Acid Mixture	Sanitation Room	4,050 gallons
Sodium Hydroxide Solution	Sanitation Room	4,050 gallons
Sodium Hydroxide Solution	Ingredients Room	6,500 gallons
Sodium Hydroxide Solution	Wastewater Canopy	275 gallons
Sodium Phosphate	Ingredients Room	13,000 gallons
Sulfuric Acid	Wastewater Canopy	5,200 pounds
Sulfuric Acid	Forklift Batteries / Warehouse	3,363 pounds
Lubrication Oils	Maintenance	275 gallons
Mineral Oil	Stripping Room (1 drum in use)/ Robot Room (up to 4 drums stored)	275 gallons
Acetic Acid	Stripping Room	220 gallons
Lactic Acid	Stripping Room	220 gallons
Sunflower Lecithin	Casting Room (1 tote in use)/Robot Room (1 tote stored)	550 gallons
Refrigerant Oil	Engine Room	110 gallons
Used Oil	Engine Room	110 gallons
Used Oil	Wastewater Canopy	330 gallons
Benzyl Ammonium Chloride	Sanitation Room	275 gallons (5% or less Mixture)

Appendix A – WASTEWATER FLOW CHART



WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name <i>Humboldt Utilities</i>			
NPDES number <i>TN0062588</i>			
Date of audit <i>5/14/2024</i>			
	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	6
• Number of CIUs	CIUS	II.C.4.a	0
- Number of SIUs without control mechanism	NOCM	II.D.1.A	0
- Number of SIUs not inspected or sampled	NOIN	II.F.2.a	0
- Number of SIUs in SNC** with standards or reporting	PSNC	Attach A.B.4	0
- Number of SIUs in SNC with self - monitoring	MSNC	Attach A.B.4	0
- Number of SIUs in SNC with self - monitoring and not inspected or sampled	SNIN	II.G.5	0
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."			
**As defined in 40 CFR 403.8(f)(2)(vii).			

WENDB DATA ENTRY WORKSHEET COMPLETED BY: <i>Samantha O'Neil</i> TITLE: <i>EC II</i>	DATE: <i>5/15/2024</i> TELEPHONE: <i>615-961-4440</i>
---	--

RNC WORKSHEET

III. RNC WORKSHEET		
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.		
CA name <i>Humboldt Utilities</i>		
NPDES number <i>TN 0062588</i>		
Date of audit <i>5/14/2024</i>		
NA	Failure to enforce against pass through and / or interference	I
↓	Failure to submit required reports within 30 days	I
↓	Failure to meet compliance schedule milestone date within 90 days	I
↓	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II
↓	Failure to inspect or sample 80% of SIUs within the last 12 months	II
↓	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II
↓	Other (specify)	II
SNC		
NA	CA in SNC for violation of any Level I criterion	
↓	CA in SNC for violation of two or more Level II criterion	
For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements</u>		

RNC WORKSHEET COMPLETED BY: <i>Samantha O'Neil</i>	DATE: <i>5/15/2024</i>
TITLE: <i>EC II</i>	TELEPHONE: <i>615-961-4440</i>

1000
1000
1000

A
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100