



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

Jackson Environmental Field Office
1625 Hollywood Drive
Jackson, TN 38305

Phone 731-512-1300 Statewide 1-888-891-8332 Fax 731-661-6283

June 24, 2022

The Honorable Eric Jordan
Mayor
City of Bells
e-copy: cityhall@cityofbellstenn.us
PO Box 760
Bells, TN 38006

Subject: **Pretreatment Compliance Inspection**
Bells Lagoon
NPDES Permit TN0026247
Bells, Crockett County, Tennessee

Dear Mayor Jordan:

As representatives of the Division of Water Resources, on June 9, 2022, Ms. Graci Ellis and I met with Ms. Angela West and Mr. Marlon Jordan, Jr. to conduct a Pretreatment Compliance Inspection (PCI) for the city's Pretreatment program under your NPDES permit for the lagoons. We appreciate their concern and cooperation.

I. Permit

The municipal NPDES permit includes parameters and limits for surface water discharge along with the means to achieve compliance. One means of achieving and maintaining compliance encompasses the use of industrial pretreatment limits in Industrial User permits. These means help prevent the city from exceeding their own wastewater treatment facility NPDES limits.

II. Pretreatment

The following comments and observations refer to the current inspection and updates on items noted in the 2020 Pretreatment Compliance Inspection and the 2021 Technical Assistance Visit:

1. Pictsweet's reports do not show a method for pH analysis. Waypoint notes "field" for pH analysis method. The chain of custody filled in by Pictsweet does not note what method is used for analysis. The chain of custody should note the method used for obtaining the pH.
2. Pictsweet has had permit violations for BOD, Total Suspended Solids and E. Coli and has received verbal warnings. They have not been in Significant Non-compliance. The city has followed its Enforcement Response Plan correctly.
3. The city has submitted its Industrial Waste Survey.

A site visit to Pictsweet was conducted. There have been no changes in processing except for adding a new line. We found the main chemical storage area has secondary containment. There is no secondary containment at a smaller storage area. Spills will flow to floor drains under the process equipment. Floor drains discharge to the city sewer along with domestic waste. Process wastewater is discharged through a dedicated sewer line to the city's final lift station. It is suggested that Pictsweet provide secondary containment for the rest of their chemicals.

III. Conclusion

The city's pretreatment program is effective. The city's records and reports are being well maintained and are available for review. Compliance with NPDES Permit TN0026247 requirements helps ensure discharges that are protective of downstream fish and aquatic life and water quality. Thank you for your efforts to ensure permit compliance and to protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (731) 202-1027 or via email at ken.lewis@tn.gov. I am retiring June 30, 2022, so after that date contact Mr. Gregg Overstreet at (731) 225-2689 or via email at Gregg.overstreet@tn.gov.

Sincerely,



Ken (Bud) Lewis
Environmental Protection Specialist

cc: Mr. Marlon Jordan, Jr., Superintendent, City of Bells Lagoon, bellsww@bellsouth.net

POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

PCI CHECKLIST CONTENTS

Cover Page <input checked="" type="checkbox"/> Section I <input checked="" type="checkbox"/> Section II <input type="checkbox"/> Section III <input checked="" type="checkbox"/> Attachment A <input type="checkbox"/> Attachment B <input checked="" type="checkbox"/> Attachment C Attachment D	IU File Evaluation Supplemental Data Review/Interview Evaluation and Summary Pretreatment Program Status Update Pretreatment Program Profile Worksheets <input checked="" type="checkbox"/> WENDB Data Entry Worksheet <input checked="" type="checkbox"/> RNC Worksheet <input checked="" type="checkbox"/> IU Site Visit Report Form (Optional) <input type="checkbox"/> File Review Worksheets (Optional)
	Supporting Documentation _____ _____ _____ _____

CA name and address: City of Bells PO Box 760 Bells, TN 38002	Date(s) of PCI June 9, 2022 Period covered by PCI From Oct 1, 2021
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Pretreatment Implementation Review Taskforce / Domestic Sewage Study incorporated in NPDES permit?	Yes X	No
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INSPECTOR (S)		
Name	Title/Affiliation	Telephone Number
Ken Lewis	EPS	731.512.1319
Graci Ellis		

CA REPRESENTATIVE (S)		
Name	Title/Affiliation	Telephone Number
	*	
Marlon Jordan	Operator	731 694 2377
Angel West	PT Coordinator	731 663 2383

*Identified program contact

ACRONYM LIST

Acronym

BMR
CA
CFR
CIU
CSO
CWA
CWF
DSS
EP
EPA
ERP
FTE
FWA
gpd
IU
IWS
MGD
MSW
NA
N/D
NPDES
NSCIU
O&G
PIRT
POTW
RCRA
RNC
SIU
SNC
TCLP
TRC
TTO
WENDB

Term

Baseline Monitoring Report
Control Authority
Code of Federal Regulations
Categorical industrial user
Combined sewer overflow
Clean Water Act
Combined wastestream formula
Domestic Sewage Study
Extraction Procedure
U.S. Environmental Protection Agency
Enforcement response plan
Full-time equivalent
Flow-weighted average
Gallons per day
Industrial user
Industrial waste survey
Million gallons per day
Municipal solid waste
Not applicable
Not determined
National Pollutant Discharge Elimination System
Nonsignificant Categorical Industrial User
Oil and grease
Pretreatment Implementation Review Task Force
Publicly owned treatment works
Resource Conservation and Recovery Act
Reportable noncompliance
Significant industrial user
Significant noncompliance
Toxicity Characteristic Leachate Procedure
Technical review criteria
Total toxic organics
Water Enforcement National Data Base

SECTION I: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on problems identified. 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.

NARRATIVE COMMENTS			
FILE <u> 1 </u> Industry name and address Pictsweet Frozen Foods 10 Pictsweet Drive Bells TN 38006	Total flow (gpd)	Process flow (gpd)	<div style="text-align: center; font-size: 1.2em; color: blue;">1.5 MGD</div>
Type of industry (products manufactured) Frozen foods			
Industry visited during PCI Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category N/A	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)	
Type of industry (products manufactured)			
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			

NARRATIVE COMMENTS			
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Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS

FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)
	Type of industry (products manufactured)	
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing

Comments

NARRATIVE COMMENTS

FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)
	Type of industry (products manufactured)	
Industry visited during PCI Yes <input type="checkbox"/> No <input type="checkbox"/>	Applicable Federal category	Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing

Comments

SECTION I: IU EVALUATION (Continued)

Industry Name					<p><i>INSTRUCTIONS: Evaluate the contents of SIU files. If no problem exists for a particular question, mark the square with a check (✓). Use (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Where a problem is indicated, mark with a numerical value and provide a corresponding explanation in the comment area below. Comment on each problem identified. For example, if the file is missing a notification of classification, place a (1) in the square and a matching statement as to the nature of the problem that exists in the space below. The next problem would be marked as (2) and so on. Clearly indicate the file that each comment pertains to; also indicate where a comment applies to all the files.</i></p>	
<p style="color: blue; font-family: cursive;">P. 10/10/10</p>						
File	File	File	File	File	IU FILE REVIEW	Reg. Cite
1	—	—	—	—		
					A. CA NOTIFICATION OF IU	
NA					1. Notification of classification or change in classification	403.8(f)(2)(iii)
NA					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
<p>Comments</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM	
✓					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
✓					a. Statement of duration (≤ 5 years)	
✓					b. Statement of nontransferability	
✓					c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
✓					• Identification of pollutants to be monitored	
					• Info on waiver if allowing a waiver for pollutant not present or expected to be present (for CIUs only)	
✓					• Sampling locations/discharge points	
✓					• Sample types (grab or composite)	
✓					• Reporting requirements (including all monitoring results)	
✓					• Record-keeping requirements	
					e. Statement of applicable civil and criminal penalties	
					f. Compliance schedules	
NA					g. Notice of slug loading	
✓					h. Notification of spills, bypasses, upsets, etc.	
✓					i. Notification of significant change in discharge	
✓					j. 24-hour notification of violation/resample requirement	
✓					k. Slug discharge control plan, if determined by the POTW to be necessary.	
Comments						
Slug control plan is required						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					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	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDRDS	
NA					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
↓					a. Classification by category/subcategory	
↓					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					d. Classification of nonsignificant CIU	403.3(v)(2)
✓					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
NA					5. Calculation and application of production based-standards	403.6(c)
NA					6. Calculation and application of CWF or FWA	403.6(d)&(e)
NA					7. Application of most stringent limit	403.8(f)(1)(ii)
Comments						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
D. CA COMPLIANCE MONITORING						
					Sampling	
✓					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)
✓					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.					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
✓					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)	
✓					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)
Comments						
<p style="font-size: 1.2em; color: blue;">5. "field" noted under analytic methods, slopping on CAC (foc pH)</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vii)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vii)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vii)
<p>Comments</p> <p style="font-size: 1.2em; color: blue;">1a BOD TSS E.Coli</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
F. IU COMPLIANCE STATUS						
					Self-Monitoring and Reporting	
✓					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓					2. Analysis of all required pollutants	403.12(g)(1)&(h)
NA					3. Submission of BMR/90-day report	403.12(b) &(d)
✓					4. Periodic self monitoring reports	403.12(e)&(h)
✓					5. Reporting all required pollutants	403.12(g)(1)&(h)
					6. Signatory/certification of reports	403.12(l)
					7. Annual certification by NSCIUs	403.12(q)
NA					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	
✓					• Slug load	
NA					• Accidental spill	
NA					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
NA					11. Notification of hazardous waste discharge	403.12(j)&(p)
✓					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
NA					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
X					Discharge	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(viii)
					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)(viii)
					16. SNC with reporting requirements	403.8(f)(2)(viii)
Comments						

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

INSTRUCTIONS: Complete this section during the onsite visit based on CA activities since the last PCI or audit. Attach documentation where appropriate. Specific data may be required in some cases.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Did the CA make substantial changes to the pretreatment program recently? (e. g., definitions, limits)?

Yes	No
	✓

b. Were the changes approved by TDEC?

Describe any recent changes that have been implemented.

2. Is the CA in the process of making any substantial changes to the pretreatment program (including legal authority, local limits, streamlining requirements, etc.)?

Yes	No
	✓

If yes, describe.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

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

1. How and when does the CA update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

1 in 5 yrs 120 days of new NPDES

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

- | | | |
|----|--------------------------------|--|
| a. | <input type="text" value="1"/> | SIUs (as defined by the CA) [WENDB - SIUS] |
| | <input type="text" value="0"/> | CIUs [WENDB - CIUS] |
| | <input type="text" value="1"/> | Noncategorical SIUs** |
| b. | <input type="text"/> | Other permitted nonsignificant IUs |
| c. | <input type="text" value="1"/> | TOTAL |

d. NSCIUs** (as defined by 40 CFR 403.3(v)(2))

List NSCIUs:

** 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: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

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

1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism?

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

List SIUs:

c. How many SIUs are not covered by an existing, unexpired permit or other control mechanism ? [WENDB - NOCM] [RNC - II]

If any, explain.

2. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC - II]

If any, explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. a. How many SIUs have not been evaluated for the need to develop slug discharge control plans*? [403.8(f)(2)(vi)] 0

b. List the SIUs below or attach additional sheets as needed.

* 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.

2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW?

N/A	Yes	No
		X

If yes, identify the industries.

If no, explain.

Maples Septic

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

Yes	No
	✓

If yes, identify and explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS			
1. Identify the following.			
Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection (by CA)			
• CIUs			
• NSCIUs			
• Other SIUs	2/year	2	
b. Sampling (by CA)			
• CIUs			
• NSCIUs			
• Other SIUs	1/mo	3	
c. Self – Monitoring (by industry)			
• CIUs			
• Other SIUs	1/month	1	
d. Reporting (by industry)			
• CIUs			
• NSCIUs			
• Other SIUs	1/month	1	
2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(vi)] [WENDB - NOIN] [RNC - II]			
a. Not sampled at least once		5	%
b. Not inspected at least once		5	%
If any, explain.			
3. 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 becoming aware of any violation?			
NA			
4. Does the CA use Best Management Practices (BMP) 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?			
NA			

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT

1. Which of the following enforcement actions did the CA use?

- a. Notice or letter of violation
- b. Administrative orders
- c. Administrative fines
- d. Show cause hearings
- e. Compliance schedules
- f. Permit revocation
- g. Civil suits
- h. Criminal suits
- i. Termination of services
- j. Other (specify)

N/A	Yes	No

Explain if appropriate

verbal warning

2. Did the CA comply with its approved ERP? [403.8(f)(5)] [RNC - II]

N/A	Yes	No
	<input checked="" type="checkbox"/>	

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. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the inspection.

SNC Evaluation Period Oct 2017 – Mar 2018

0	%	
0	%	Applicable pretreatment standards
0	%	Applicable reporting requirements
0	%	Pretreatment compliance schedules

*SNC defined by:

POTW	
EPA	X

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)			N/A	Yes	No
4. Did the CA publish all SIUs in SNC in a newspaper of general circulation that provides meaningful public notice within the jurisdictions(s) served by the POTW in accordance with NPDES permit requirements? [403.8(f)(2)(viii)]	✓				
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 - SINN]		0			
6. a. Did the CA experience any of the following caused by industrial discharges?					
<ul style="list-style-type: none"> • Interference • Pass through • Fire or explosions (flashpoint, etc.) • Corrosive structural damage • Flow obstruction • Excessive flow rates • Excessive pollutant concentrations • Heat problems • Interference due to O&G • Toxic fumes • Illicit dumping of hauled wastes • Worker health and safety • Other (specify) 	Yes	No	Unknown	Explain	
		↓			
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]	Yes	No			

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)									
7. a. How many SIUs are on compliance schedules?	0								
b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%; text-align: center;">SIU</th> <th style="width: 40%; text-align: center;">End Date</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> <tr><td> </td><td> </td></tr> </tbody> </table>	SIU	End Date							
SIU	End Date								
8. Were any CIUs allowed more than 3 years from the effective date of a categorical standard to achieve compliance? [403.6(b)] If yes, identify and explain.	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Yes	No						
Yes	No								
NA									
9. a. Were any SIUs in noncompliance since the last pretreatment inspection by TDEC?	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> </thead> <tbody> <tr> <td> </td> <td style="text-align: center;">✓</td> </tr> </tbody> </table>	Yes	No		✓				
Yes	No								
	✓								
b. If yes, what enforcement was taken?									
c. Have they returned to compliance?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="width: 50%;"> </td> <td style="width: 50%;"> </td> </tr> </tbody> </table>								
d. If not, what is the CA doing to bring the SIU back into compliance?									
G. ADDITIONAL EVALUATIONS									

SECTION II COMPLETED BY: TITLE:	DATE:
POTW REPRESENTATIVE	TELEPHONE:
PROVIDING RESPONSES:	DATE:
	TELEPHONE:

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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 City of Bells		
2. a. Pretreatment contact Angel West	b. Mailing address PO Box 760 Bells TN 38002	
c. Title – Lab Technician	d. Telephone number – 731.663.2383; cell 780 2951	
3. Date of last CA report to Approval Authority April 20, 2022		
4. Is the CA currently operating under any pretreatment - related consent decree, Administrative Order, compliance schedule, or other enforcement action?	Yes	No
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? NA		

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient in the last PCI, Audit or Program Report (SAR/AR).

- 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:	Date: 6-3-2021	Date:
	X	
	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
			/
			/
			/
			/
			/
			/
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	10/17- 3/18
0	%	Applicable pretreatment standards	*SNC defined by:
0	%	Applicable reporting requirements	
0	%	Pretreatment compliance schedules	
		POTW	
		EPA	X
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program			

ATTACHMENT A COMPLETED BY:	DATE:
TITLE:	TELEPHONE:

ATTACHMENT C

WORKSHEETS

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

IU SITE VISIT REPORT FORM

III. IU SITE VISIT REPORT FORM

INSTRUCTIONS: Use this form to record observations made during the site visit and findings based on the site visit. Please provide as much detail as possible.

Name of industry and city

Pictsweet
Bells, TN

Date of visit **June 9, 2022**

Time of visit

Name(s) of inspector(s)

Ken Lewis, TDEC, Graci Ellis, TDEC
Marlon Jordan, City of Bells, and Angel West, City of Bells

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

Name

Title

Jeff Duck

Plant Manager - West

Josh Work

VP operations

Alex Hall

Director

1. What does this industry produce?

Frozen vegetables

2. How is this industry classified by the POTW? Is this classification correct?

Significant Non-categorical

3. Have there been any significant changes in processes or flow?

No

4. What raw materials are used?

Raw vegetables

IU SITE VISIT REPORT FORM (CONTINUED)

5. What processes are used to make the product(s)? (Attach a step by step diagram if possible.)

Dirt Reel for initial cleaning

Large rock and chunk removal

Small Rock Unit

Cluster removal for green beans using hook belt . Rotating cutter slices off tips.

MAT 3000 (vid-cam) – removes unwanted objects that are not green.

N. P. Snippers, UBR, for green beans

Washer (is actually a rinse) uses very small amount of water

Color sorter to remove bad product

Blanch and cool produces the majority of wastewater.

Freezer storage

6. Where is water used and what is the source of the water (city, well, river, etc.)?

Small rock unit

Washer

Blanch and cool unit

City water for domestic. Company wells for production.

7. Describe the processes that discharge wastewater.

See 6.

IU SITE VISIT REPORT FORM (CONTINUED)

8. Describe the sample location. Are the CA and industry using the same location?

Manhole on Hwy 79 just upstream of the lagoon

9. Describe the treatment system which is in place.

Hydro sieve and tower screen

IU SITE VISIT REPORT FORM (CONTINUED)

10. What chemicals are maintained onsite? How are they stored? Is adequate spill prevention in place?

Disinfectants and cleaners

Logan

Solvents for cleaning tools

Lubrication for equipment

11. Are any hazardous wastes stored or discharged?

Fluorescent bulbs - *service picks up bulbs*
Crystal
KB *Kleen*

Additional comments.

IU SITE VISIT REPORT FORM
COMPLETED BY:

TITLE:

DATE:

TELEPHONE:

WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET		
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.		
CA name		
NPDES number		
Date of audit		
	Checklist Reference	Data
• Number of SIUs*	II.B.2.a.	1
• Number of CIUs	II.B.2.a.	0
- Number of SIUs without control mechanism	II.C.1.a.	0
- Number of SIUs not inspected	II.E.2.b.	0
- Number of SIUs not sampled	II.E.2.a.	0
- Number of SIUs in SNC with Pretreatment Standards	II.F.3.	0 0
- Number of SIUs in SNC with Reporting Requirements	II.F.3.	0
- Number of SIUs in SNC with Pretreatment Schedule	II.F.3.	0
- Number of SIUs in SNC Published in the Newspaper	II.F.4.	0
- SIUs on Schedules	II.F.7.	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)(viii).		

WENDB DATA ENTRY WORKSHEET	DATE:
COMPLETED BY:	
TITLE:	TELEPHONE:

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		
NPDES number		
Date of audit		
	Level	Checklist Reference
<input type="checkbox"/> Failure to enforce against pass through and / or interference	I	II.G.6
<input type="checkbox"/> Failure to submit required reports within 30 days	I	Attach A.B.2.b
<input type="checkbox"/> Failure to meet compliance schedule milestone date within 90 days	I	Attach A..B.2.c
<input type="checkbox"/> Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II	II.D.1.b
<input type="checkbox"/> Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.F.2.a
<input type="checkbox"/> Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II	I.C.1; II.G.2
<input type="checkbox"/> Other (specify)	II	
SNC		
<input type="checkbox"/>	CA in SNC for violation of any Level I criterion	
<input type="checkbox"/>	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:	DATE:
TITLE:	TELEPHONE: