CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

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- ☐ RNC Worksheet

Attachment D — Supporting Documentation

Control Authority (CA) name and address	Date(s) of audit
City of Adamsville P.O. Box 301 Adamsville, TN 38310	11/29/22

AUDITOR (S)

Name	Title/Affiliation	Telephone Number
Adam Banuma	EC II	
Gordon Holcomb	EPS II	
Johen Bowling	EPS I	

CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Jim Cooper	PT coordinator *	731-414-1167
Garrett Pettigrew	Wck water Operator	731-439-5863

*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 EVALUATION (Continued)

IU IDENTIFICATION (Continued)

FILE A Industry name and address

Davis Polishing Shop
145 Duren Industrial Drive

Type of industry

Electroplating

[✓] CIU 40 CFR 433 subpart A, PSNS
Metal finishing

Category(ies) _____

[ ] Other SIU [ ] Non SIU

Average total flow (gpd)

490
from Permit Application

Average process flow (gpd)

108
from permit application

Industry visited during audit Yes [ ] No [ ]

Comments

Permit Effective 2/1/20
Expires 1/31/23
Issued 11/7/19

General Comments

SECTION I: IU EVALUATION

File A	File	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)
NA					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	
1					• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
2					• Sampling locations/discharge points	
3					• Sample types (grab or composite)	
✓					• Reporting requirements (including all monitoring results)	
✓					• Record-keeping requirements	
NA					e. Statement of applicable civil and criminal penalties	
✓					f. Compliance schedules	
✓					g. Notice of slug loading	
✓					h. Notification of spills, bypasses, upsets, etc.	
✓					i. Notification of significant change in discharge	
4					j. 24-hour notification of violation/resample requirement	
					k. Slug discharge control plan, if determined by the POTW to be necessary.	

Comments

* 1 Location described, but no diagram or photo

* 2 Sample type identified, but they are all grab samples, including metals. Note says that this is because it is batch discharge

* 3 Copies of reports stated to be sent to Ms. Melissa Boner, JR Wauford, who is retired. The main report is still sent to the city.

* 4 Required. Permit Pg 2 of. says it is on file. Requirements are not listed, but the TN Rule 0400-40-14-.08(6)a(3)(iii)(VI)

SECTION I: IU EVALUATION (Continued)

File A	File	File	File	File	IU FILE REVIEW	Reg. Cite
NA					**A. 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: • 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 A	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDRDS	
✓					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	
NA					d. Classification of nonsignificant CIU	403.3(v)(2)
✓					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
NA					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)
✓					7. Application of most stringent limit	403.8(f)(1)(ii)

Comments

Compare Permit with PSNS in part A 433.17

Cadmium ✓

Cr Total ✓

	Permit		EPA	
	Monthly	Daily	Monthly	Daily
Copper	1.104	2.208	2.07	3.38
Lead	.3024	.648	.43	.69
Nickel	1.422	2.844	2.38	3.98
Silver	.065	.130	.24	.43

Zinc ✓

CN ✓

TTO ✓

Permit more restrictive

Could be Local Limits → Yes. Cu, Pb, Ni, Ag match SVO LL

SECTION I: IU EVALUATION (Continued)

File A	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
(1)					Sampling	
2022					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
NA					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
NO					2. Sampling at frequency specified in approved program	
2022					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)
(2)					Inspection	
NO					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
JUST 2020					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)	
NO					7. Inspection at frequency specified in approved program	
2020					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

(1) CA Monitoring
3/16/22 okay
No other monitoring was found during audit

(2) CA Inspections
No inspection records found during audit ⇒ later found for 2019 & 2020
8/6/2019 No signatures and/or dates 2:24 pm
8/6/2020 Except for the 19 & 20 inter years, the forms for 2019 & 2020 are the same, all computer entry. Found an email from Melissa Boner that the 2019 was incorrect, and the 2020 date was correct 2:24 pm

SARs stated inspection conducted 7/27/22 Mr Cooper confirmed
✓ ✗ No documentation of inspection. Therefore an NOV should be issued for failure to inspect

SECTION I: IU EVALUATION (Continued)

File A	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
(2) (3)					1. Identification of violations a. Discharge violations b. Monitoring/reporting violations c. Compliance schedule violations	403.8(f)(2)(vi)
(1)					2. Calculation of SNC	403.8(f)(2)(vi)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
NA					5. Publication for SNC	403.8(f)(2)(vi)

Comments

(1) CN may be in TRC SNC, but unclear wo CA sampling
↳ in 2021

(2) Issued NOV in 2021 for CN

(3) SIU failed to re test after CN violation. They had a back order excuss.

SECTION I: IU EVALUATION (Continued)

File A	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. 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)
NA					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)
NA					• Discharge violation	
NA					• Slug load	
NA					• Accidental spill	
1					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)
NA					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.	
					Discharge	
2					13. Noncompliance with discharge limits (but not SNC)	403.8(f)(2)(vii)
					14. SNC	
NA					a. Chronic violations	
3					b. TRC	403.5(a)(1)
NA					c. Pass through or interference	403.12(f)
NA					• Spill or slug load	
NA					d. Other discharge violations (specify)	
					Reporting	
NA					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
NA					16. SNC with reporting requirements	403.8(f)(2)(vii)

Comments

Permit Requires reporting quarterly, pH is daily, Flow is daily

A waiver for TTO monitoring has been granted

* Self-Monitoring 9/26/22 CN .769 (>Monthly, 2 daily) ⇒ Not in Oct 22 SAR | Form 5

* Need to request Revisions Dan's Report to city dated 10/12/2022

6/14/22
3/16/22
12/7/21
9/30/21 CN 1.66 (*)
7/14/21 TTO Cert Statement
6/14/21
4/29/21
3/16/21
9/15/20
6/24/20
3/11/20
12/12/19

(*) NOV issued 10/15/21 CN 1.66 on 9/30/21

* (2) NOV, but not listed on Form 5

Found in Revised SAR ⇒

* (1) CN not resampled. Letter from Dan's said CN sample kits backlogged. They included a copy of the order

* (3) 1/3 CN violations for CN may be a TRC violation, but unclear w/o CA Monitoring ⇒ SAR revision indeed showed TRC SNC

SECTION I: IU EVALUATION (Continued)

File A	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. OTHER	

Comments

SECTION I COMPLETED BY: Gordon Holcomb Sean O'Neill DATE: 11/29/2022

TITLE: Env Prot Spec 2 TELEPHONE: 615-339-9956

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)

FILE B Industry name and address Landfill Leachate 320 Industrial Park Road Adamsville, TN 38310	Type of industry Significant non-Categorical Landfill	
[ ] CIU 40 CFR _____, _____, _____ Category(ies) Significant - non categorical	Average total flow (gpd) 11,940 from permit application	Average process flow (gpd) 11,940 from permit application
[ ] Other SIU [X] Non SIU JB	Industry visited during audit	Yes [X] No [ ]

Comments

Permit effective : December 1, 2019
Permit expire : January 31, 2023
Issuance date : November 7, 2019
Revised date : October 5, 2020

General Comments

SECTION I: IU EVALUATION

File	File B	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)
	✓				a. Individual control mechanism	
	N/A				b. General control mechanism	403.8(f)(1)(iii)(A) 403.8(f)(1)(iii)(B)
					2. Individual control mechanism contents	
	✓				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	
	N/A				• Process for seeking 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	
	✓				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	
	N/A				k. Slug discharge control plan, if determined by the POTW to be necessary.	

Comments

d.3: Sampling Locations / discharge points. Diagram for sampling location. Narrative on appendix B does not provide location information.

K. Permit states discharge/slug discharge control plan shall address, at a minimum ... It does not state if the sludge discharge plan is required or not.

2. c. Local limits do not match. (Total Phenols)

Permit	Sewer Ordinance
Monthly Avg: 5.6285 mg/L	0.973 mg/L
Max. for any Day: 8.4427 mg/L	1.946 mg/L

* Permit needs to be updated to show the correct Total Phenols local limits.

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
	B				**A. ISSUANCE OF IU CONTROL MECHANISM (cont.)**	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
	N/A				a. Involve the same or similar operations	
	N/A				b. Discharge the same types of wastes	
	N/A				c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
	N/A				• Contact information	
	N/A				• Production processes	
	N/A				• Types of waste generated	
	N/A				• Location for monitoring all wastes covered by the general permit	
	N/A				e. Documentation to support the POTW's determination	

Comments

SECTION I: IU EVALUATION (Continued)

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

Comments

5. Calculation and application of production based standards? N/A

7. Most Stringent limits? Local limits.

SECTION I: IU EVALUATION (Continued)

File	File B	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
					Sampling	
	X				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)
	X				2. Sampling at frequency specified in approved program	
	X				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	
	X				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)	
	X				7. Inspection at frequency specified in approved program	
	X				8. Documentation of inspection activities	403.8(f)(2)(vi)
	N/A				9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)

Comments

	2022	2021	2020	
1.	3/15/22	X	X	Sampling only found for year 2022. ★

6. August 12, 2019 and August 6, 2020. Inspection forms do not have a signature and date. Still no inspections for year 2021 and 2022.

★ ✓ Mr. Coopper indicated inspections were conducted ★ July 27th, 2022 there was no documentation of the inspection. therefore, an NOV should be implemented due to failure to perform inspection.

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
	NA				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)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vi)

Comments

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. 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)
	✓				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)
	N/A				7. Annual certification by NSCIUs	403.12(q)
	N/A				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	
	N/A				• Slug load	
	N/A				• Accidental spill	
	N/A				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)
	N/A				12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
	N/A				13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
					Discharge	
	N/A				13. Noncompliance with discharge limits (but not SNC)	403.8(f)(2)(vii)
					14. SNC	
					a. Chronic violations	
					b. TRC	403.5(a)(1)
					c. Pass through or interference	403.12(f)
					• Spill or slug load	
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
	↓				16. SNC with reporting requirements	403.8(f)(2)(vii)

Comments

Sampling conducted monthly for year 2020, 2021, 2022.

SECTION I: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					F. OTHER	

Comments

SECTION I COMPLETED BY: Johen Bawling John Bawling	DATE: 11/29/22
TITLE: Env. Protection Specialist, I	TELEPHONE: 731-571-8144

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.

NSCIU provision

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

	Yes	No
1. Are there any contributing jurisdictions discharging wastewater to the POTW?		X

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

	Yes	No
2. a. Has the CA updated its legal authority (e.g., SUO) to reflect changes in the General Pretreatment Regulations ?	X	
b. Has the CA updated its legal authority to reflect the streamlining changes?	X	
c. Did all contributing jurisdictions update their SUOs in a consistent manner?	NA	

Explain

	Yes	No
3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?		X

If yes, explain.

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 & Fed definitions

Includes NSCIU provision.

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

Discuss any problems.

Communication with City Hall and any new potential IUs caught by old IWS.

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

Last IWS was conducted March 2016 copy received November 2017 during audit.

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

Sampling & self-monitoring ; Inspections

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		• Onsite inspections	✓
• Review of water billing records	✓	• Permit application requirements	✓
• Review of plumbing / building permits	✓	• Citizens involvement	
		• Other (specify)	✓ *

* Small town.

e. How often is the IWS to be updated?

Every 5 years

* Include reminder to conduct IWS & track end of LL with issuance of new NPDES permit next year. Sept 2023.

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.	2	SIUs (as defined by the CA) [WENDB - SIUS]	
		1	CIUs
			Zero-discharging SIUs
		1	Noncategorical SIUs (including zero-discharging noncat. SIUs)
b.		Other regulated noncategorical IUs (specify)	
c.	2	TOTAL	

d.	0	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]

0	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] NA

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? NA

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

Discuss

3. a. Does the CA accept any waste by truck, rail, or dedicated pipe?
b. Is any of the waste hazardous as defined by RCRA?

	Yes	No
a.		NA
b.		NA

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)]

CA does not anticipate accepting hauled waste

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)]

TAUD Training
Dickson.
voluntary at certification
add to listserv.
* gpettigrew@cityofadamsville.com
ADJB.
* C3waterandwastewater@gmail.com

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

a. For what pollutants have local limits been set

Metals ; Organics * Arsenic

b. How were these pollutants decided upon

PTLs Issued by TDEC

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

Varies

d. Which allocation method(s) were used?

Uniform.

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?

NA.

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	

Control Mechanism.

F. COMPLIANCE MONITORING

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

Sampling: 1/yr

Inspecting: 1/yr

reporting: Quarterly or monthly

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

Activity 7 of Approved program states 2/yr for sampling & inspecting by CA "may" be used by CA. Not binding.

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 11/29/21 to 11/29/22.)

a. Not sampled or not inspected at least once [WENDB - NOIN]	0	0 %
b. Not sampled at least once	0	0 %
c. Not inspected at least once (all parameters) ?	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: 4/1/22 - 9/30/22

*SNC defined by:

POTW	✓
EPA	

0	0 %	Applicable pretreatment standards and reporting requirements
0	0 %	Self-monitoring requirements
0	0 %	Pretreatment compliance schedule(s)

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

Evaluation Period: 4/1/22 - 9/30/22

Number of SIUs: 2

Names of SIUs: Dons Plating Shop & Masco.

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)]

All areas covered.

5. Who performs CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name
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)]

N/A.

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.

NA.

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)]

Mason is not required to maintain a SDCP.

Dan's is required to maintain a SDCP

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

* 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?

NA.

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 & fed definitions, but the definition only lists "chronic violations" and "TRC" Technical Review Criteria violations but does not contain the full definition of each. Should be revised to include full definition.

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

a. Status

Approved

b. Problems with implementation

NA

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

Appears effective

	Yes	No
3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]		X
b. If yes, are they appropriate? Provide examples.		

NA

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

G. ENFORCEMENT (Continued)

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

If yes, attach a copy.

If no, explain. * Don's polishing shop was in SNC for TRC violation for cyanide. IU was not published in newspaper of publication on 11/29/22

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]	0

	Unk	Yes	No
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?			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]

No confidential information currently.

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

Mr. Pettigrew was unaware of procedure to handle public records request.

* Recommend communicating with City Hall about confidential information and/or public records request.

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.

* Pretreatment files were not well organized and multiple inspection sheets were missing. Recommend that CA work to improve data management system. Mr. Cooper has committed to improve the data management system.

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

Published - newspaper. ; readings in Town boards meetings.

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

NA.

6. How long are records maintained? [403.12(o)] 3 7 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)]. .15 FTEs

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

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

2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)

Yes	No
✓	

3. a. Estimate the annual operating budget for the CA's program. $ 5,000.00

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.

4. Discuss any problems in program implementation which appear to be related to inadequate resources.

Problems do not 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?

Listserv. TPUB. Training

b. Does the CA have adequate reference material to implement its program?

Yes	No
✓	

6. Identify the sources of funding for the pretreatment program.

a. POTW general operating fund	✓	d. Monitoring charges	
b. IU permit fees		e. Other (specify)	
c. Industry surcharges	✓		

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		
2/yr	2/yr		
	4/yr		

Less	Equal	More

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

Explain any differences.

* Most recent SAR stated that last effl sampling occurred on 3/16/22. No sample was taken between 4/1/22 - 9/30/22. Issue NOV for failure to sample.

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
	+

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) ?

   NA.

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

	Yes	No
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)?		X

Explain. NA.

K. ADDITIONAL EVALUATIONS/INFORMATION

* Recommendation for Mr. Pettigrew to attend additional PT training.
√ * SUO lists Local Limits and includes Local Limits in Table I of p 71 of surcharges in same table. Recommend separating to avoid confusion.
√ * SNC definition
/ * Failed to publish Dan's publishing shop in newspaper for being in SNC.
√ * Confidential Info
√ * File organization.
/ * NOV failure to sample during last reporting period.

* add pursuit to listserv.
√ * Reminder about IWS & LL tech eval w/ new NPDES permit.
* Reminder about the transition to myTDEC Forms.

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 **City of Adamsville**

2. a. Pretreatment contact
Scott Klinck

b. Mailing address
P.O. Box 301
Adamsville, TN 38310

c. Title **Public Works Director**

d. Telephone number **(731) 632-4214**

3. Date of last CA report to Approval Authority **10/28/22**

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)
See attached ICIS report	

b. Has the treatment plant had any violations of biosolids regulations?

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

	Last PCI	Last Audit	Program Report
	Date: 10/13/20	Date: 11/29/17	Date: 10/28/22
a. Program modification			
b. Legal authority			
c. Local limits			
d. IU characterization			
e. Control mechanism		X	
f. Application of pretreatment standards		X	
g. Compliance monitoring	X	X	X
h. Enforcement program			
I. Data management			
j. Program resources			
k. Other (specify)			

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS

2. Is the CA presently in RNC for any of these violations ?

	Data Source	Yes	No
a. Failure to enforce against pass through and / or interference [RNC - I] [SNC]	QNCR		X
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]			

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
NA		

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 **4/1/22–9/30/22**

0	0 %	Applicable pretreatment standards and reporting requirements
0	0 %	Self - monitoring requirements
0	0 %	Pretreatment compliance schedules

*SNC defined by:

POTW	X
EPA	

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program

ATTACHMENT A COMPLETED BY: **Adam Bonomo**	DATE: **11/28/22**
TITLE: **EC-2**	TELEPHONE: **615-417-3728**

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 **City of Adamsville**
2. Program Approval Date **12/1/00**
3. Required frequency of reporting to Approval Authority **Semi-annually**
4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
Adamsville STP	**TN0064785**	**9/1/18**	**8/31/23**

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
	X	

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants
Adamsville STP	**TDEC**	**8/1/18**	**8/31/23**	**Same as 40 CFR 503**

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
12/30/14	**SUO & ERP w/ Streamlining**

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	2. Location address
Adamsville STP	**203 Sunrise Dr. Adamsville, TN 38310**

3. a. NPDES permit number	b. Expiration date	4. Treatment plant wastewater flows
TN0064785	**8/31/23**	Design **0.299** MGD Actual **0.253** MGD

5. a. Industrial contribution (MGD)	b. Number of SIUs discharging to plant	c. Percent industrial flow to plant
.00466	**2**	**2%**

6. Level of treatment		Type of Process(es)
a. Primary		
b. Secondary		**Lagoon with Chlorination**
c. Tertiary		

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**	**Same as 40 CFR 503**	**NA**
b. Organics	**n/a**	**1/5yr**		
c. Toxicity testing		**1/yr**		
d. EP toxicity		**Na**		
e. TCLP		**na**		

9. Effluent Discharge

a. Receiving water name	b. Receiving water classification
Snake Creek @ RM 8.0	**F&A; Rec; Livestock W&W; Irr**

d. If effluent is discharged to any location other than the receiving water, indicate where.

PRETREATMENT PROGRAM PROFILE (Continued)

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		c. MSW landfill	
b. Surface Disposal		d. Other (specify)	X (lagoon)
c. Incineration			

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).

b. Date enacted / adopted	**12/01/00**	c. Date of most recent revisions	**12/30/14**

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

PRETREATMENT PROGRAM PROFILE (Continued)

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.).

NA

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

a. IWS update		e. Notification of IUs	
b. Permit issuance		f. Receipt and review of IU reports	
c. Inspection and sampling		g. Analysis of samples	
d. Enforcement		h. Other (specify)	

NA

E. IU CHARACTERIZATION

1. Date of last IWS submitted to WPC. **Copy Received during Audit**	11/29/17

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."

Includes NSCIU provision, otherwise same as state and fed definition

PRETREATMENT PROGRAM PROFILE (Continued)

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

	N / A	Yes	No
1. If there is more than one treatment plant, were local limits established specifically for each plant?	X		
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)]		X	
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)							
c. Chromium (Cr)							
d. Copper (Cu)							
e. Cyanide (CN)							
f. Lead (Pb)							
g. Mercury (Hg)							
h. Nickel (Ni)							
i. Silver (Ag)							
j. Zinc (Zn)							
k. Other (specify)							

See attached copy of LLs

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		1/yr	1/yr	1 / year
• Other SIUs		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

PRETREATMENT PROGRAM PROFILE (Continued)

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	
c. Injunctive relief	X	h. Fines (maximum amount)	X
d. Imprisonment	X	• Civil	$ 10K /day/violation
e. Termination of service	X	• Criminal	$ ____ /day/violation
		• Administrative	$ ____ /day/violation

L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY: **Adam Bonomo**	DATE: **11/28/22**
TITLE: **EC2**	TELEPHONE: **615-417-3728**

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: Mosco Landfill 320 Industrial Park Road

Date of visit: 11/29/22 | Time of visit:

Name(s) of inspector(s): Adam Burrows ; John Bowling ; Gordon Holcomb

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

Name	Title
Doren Smith	Maintenance Coordinator
Dustin Murdock	Maintenance Helper

Classification assigned by CA: SIU

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. Appears correct.
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:

(2) Closed industrial landfill that accepted industrial waste from AQUA Glass plant. Mainly accepted fiberglass waste. Closed in 2014.

(3) Discharge ~ 10,000 gallons at a time. Permit is to be revised to allow 3 discharges/day or 30,000 gallons per day.

(4) Rain water flows through the media & is then pumped to treatment.

(5) Time sampling is occurring every 2000 gallons during the 10000 gallon discharge.

Taken at sample point inside onsite water treatment buildings.

Note to update sample description in permit.

IU SITE VISIT DATA SHEET (Continued)

IU Name	Date

Notes:

(6) All waste water flows to 3 sumps throughout the landfill. All three wells pump to a lagoon & volume is tracked via a scada system. From the lagoon water is pumped to the treatment tanks 10,000 gallon at a time. into two 5000 gallon tanks. Bleach is injected into the tank I ~~tanks~~ & then pumped into tank 2. The waste water is circulated between ~~AJB.~~ the two tanks until the ammonia, nitrogen, temp, & pH are with in limits & can be discharged.

(7) Sodium Hypochlorite stored in IBC tote.

(8) NA.

IU SITE VISIT REPORT FORM COMPLETED BY: Dan Brown	DATE: 11/29/22
TITLE: ECJ	TELEPHONE: 615-417-3788

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: Dan's Polishing Shop 145 Duren Industrial Drive

Date of visit: 11/29/22	Time of visit: 1:30

Name(s) of inspector(s): Adam Bonamo & John Bowling & Gordon Holcomb

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

Name	Title
Steve Kiburn	Shop Manager
Barbara Kiburn	Office Manager,

Classification assigned by CA: 433 Metal Finishing

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. Appears correct.
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) Take antique car & motorcycle parts and re-chrome plate the parts.

(3) No major changes. Process & flow is consistent.

(4) Parts come in → the old plating is removed using an electro stripping process in a 1000 gal tank of 3% sulfuric acid. → parts are dipped into rinse tanks, & then to oil. → then parts are sand blasted → then there is a multi step polishing process. →
→ Next is chrome plating process (12 steps). (1) Alkaline cleaner (soap & water) → (2) rinse → (3) various

- see attached diagram for chrome plating process.

(5) Samples are taken from final treatment tank.

IU SITE VISIT DATA SHEET (Continued)

IU Name	Date

Notes:

(6) All waste water flows to a 1100 gallon holding tank. When it fills up it is pumped to an 1100 gallon treatment tank. pH is dropped to 3 s.u. → raise pH to 7 s.u. → add 2.5 gallons of coagulant TS → add 2.5 gallons of reel floc → raise pH to 11.5 s.u. → add 1/3 of 5 gallon bucket of hydrosulphide F. ——→ add polymer & coagulant as needed. Tank settles overnight (chrome neutralizer)

→ Then the first half ~ 400 gallons is discharged to the clean water discharge tank. → ~~Then 2nd tank ~ 700 gallons~~ AJBs Tested for Nickle & cyanide & chrome & the final pH adjustment & temps (pH) are recorded then tank is discharged. Final discharge tank is stirred & sample is pulled.

The remaining 700 gallons contains solids & clean waste water. flows through filter press & waste water flows into the final clean water discharge tank where the same testing occurs.

(7) Alkaline cleaners & Acids & caustic soda & sulfuric acid & TS polymer & coagulants & flocculants hypochlorite 12.5 % & sodium cyanide

(8) Large quantity generator. CA has designated site for Haz waste storage.

SDCP contains outdated information. Also does not contain all req elements

* Currently samples are being taken via grab sample from the final discharge tank. Recommendation to take 3 samples (Beginning, middle, end) during the batch discharge from the final outfall where waste water is pumped prior to discharge to Town.

~~IU is still sending reports~~ to AJBs 11/29/22

IU SITE VISIT REPORT FORM COMPLETED BY:	DATE:
TITLE:	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 Adamsville

NPDES number TN0064785

Date of audit 11/29/22

	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	2
• Number of CIUs	CIUS	II.C.4.a	1
- 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: [signature]

TITLE: EC-II

DATE: 9/14/23

TELEPHONE: 615-417-3727

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 Adamsville

NPDES number TN0164785

Date of audit 11/29/22

		Level	Checklist Reference
	Failure to enforce against pass through and / or interference	I	II.G.6
	Failure to submit required reports within 30 days	I	Attach A.B.2.b
	Failure to meet compliance schedule milestone date within 90 days	I	Attach A..B.2.c
	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II	II.D.1.b
X	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.F.2.a
	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II	I.C.1; II.G.2
	Other (specify)	II	

SNC

	CA in SNC for violation of any Level I criterion
	CA in SNC for violation of two or more Level II criterion

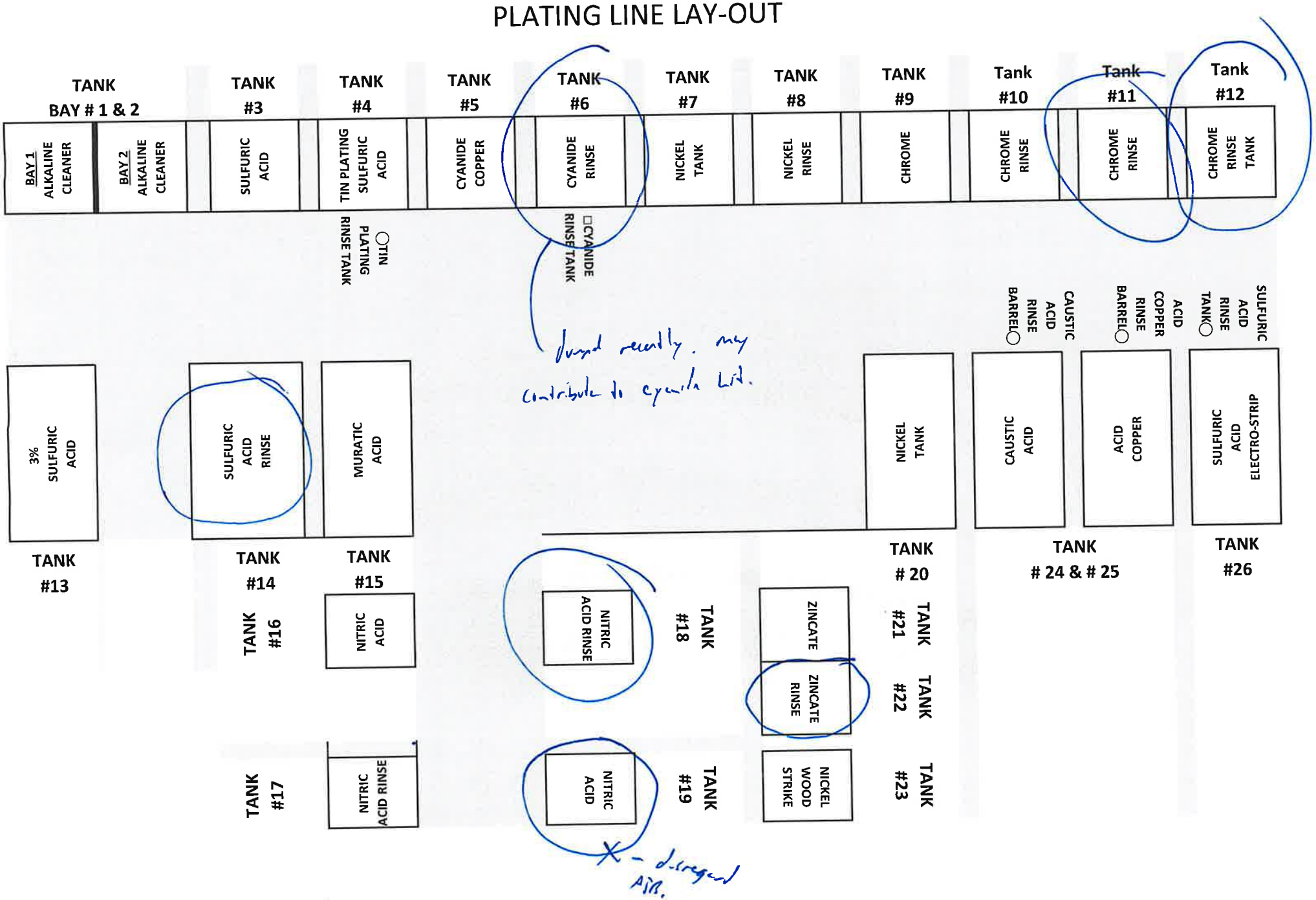
For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY: [signature] DATE: 9/14/23

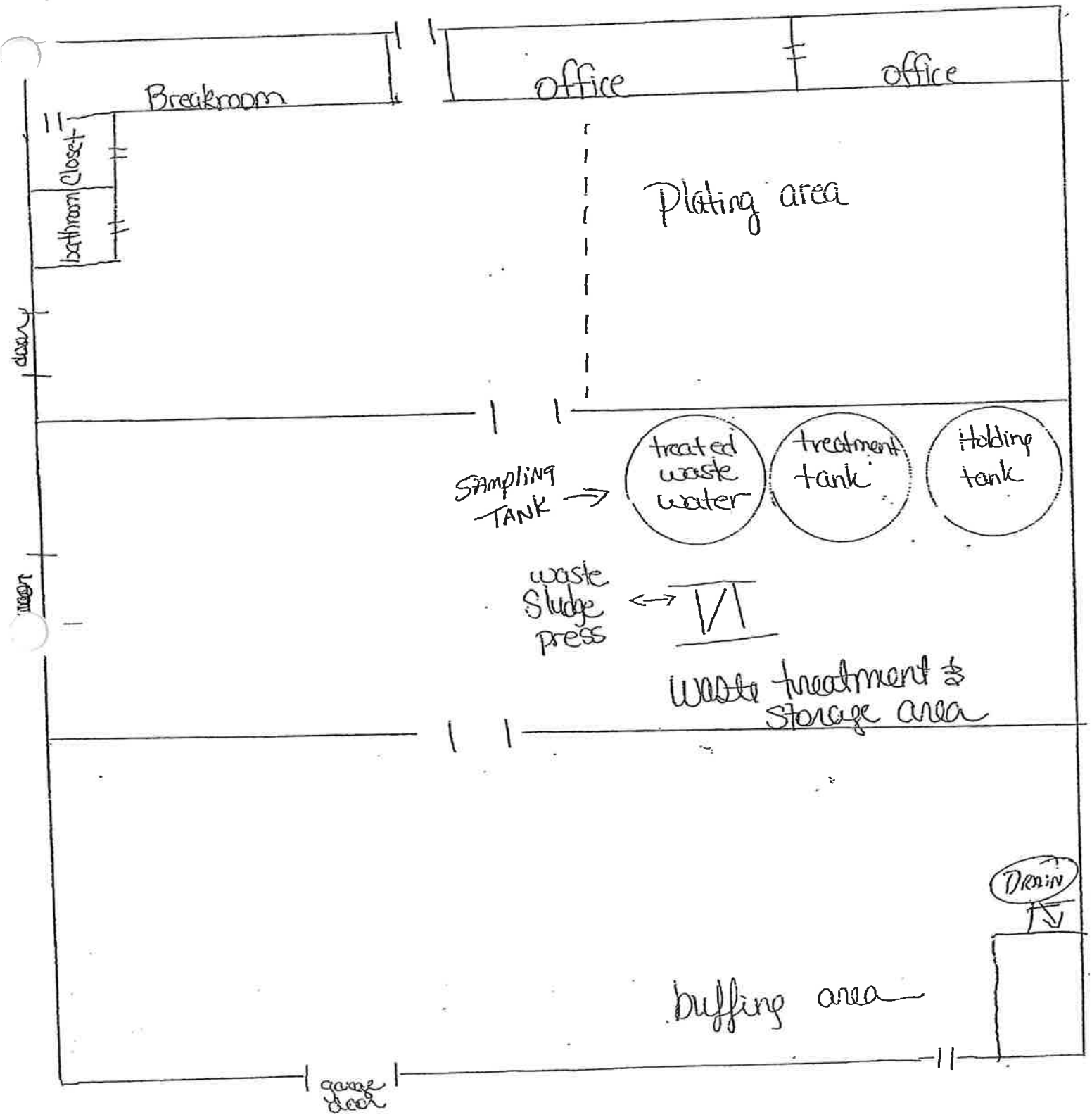
TITLE: EC-II TELEPHONE: 615-417-3727

DAN'S POLISHING SHOP

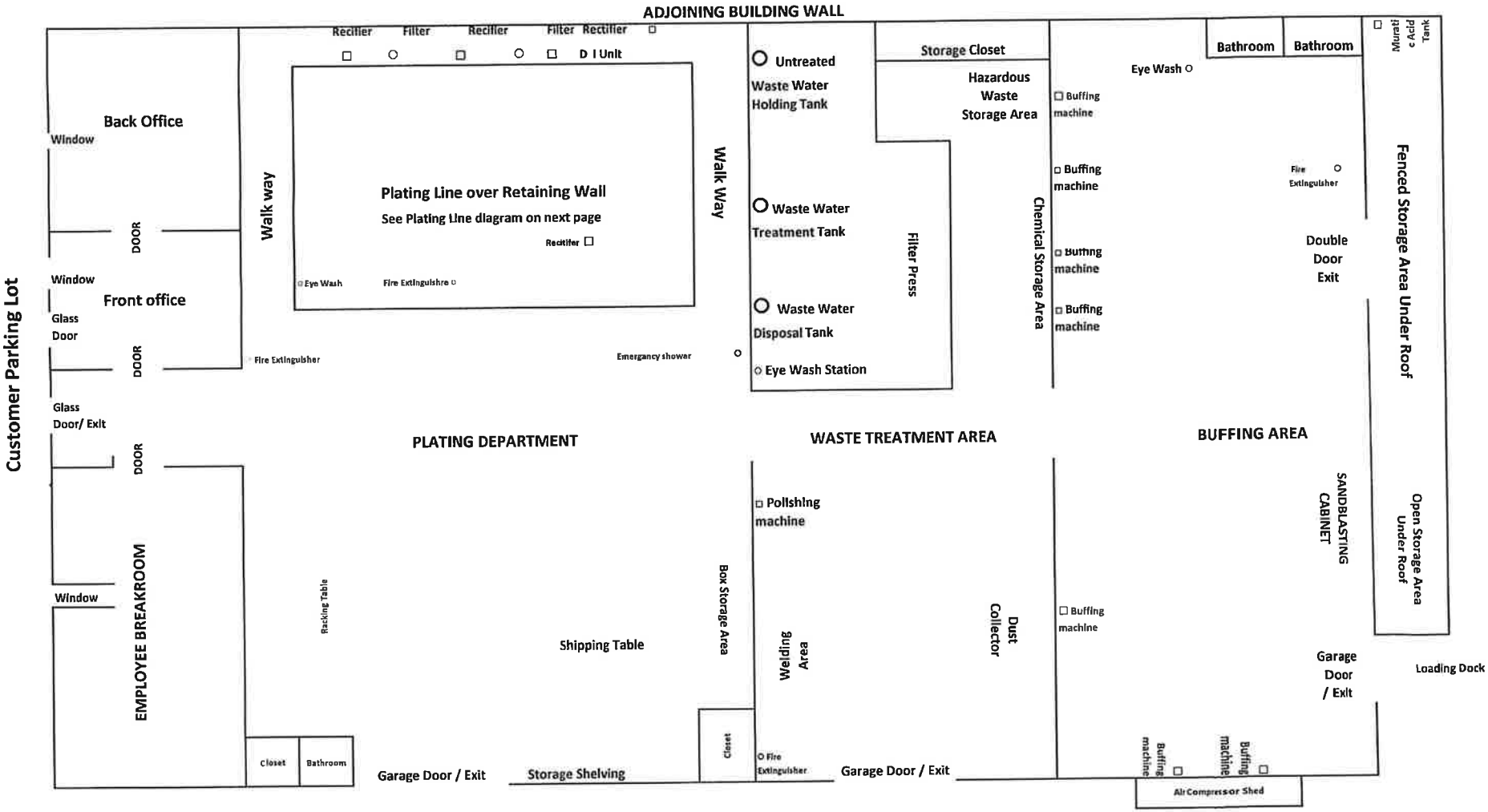
PLATING LINE LAY-OUT



front entrance



Dan's Polishing Shop Facility Diagram
145 Duren Industrial Drive
Adamsville, TN 38310
Phone: (731)632-0103 Fax: (731)632-1143
Email: danspolishing@yahoo.com



Received during audit
S.J. 11/29/22

Garrett Pettigrew

From: Scott Klinck
Sent: Tuesday, November 29, 2022 10:51 AM
To: Garrett Pettigrew
Subject: FW: Industrial User Inspection
Attachments: I.U. Inspcection Dan's Polishing Shop 8-06-20.pdf

From: Melissa Boner <melissab@JRWAUFORD.COM>
Sent: Thursday, October 15, 2020 8:43 AM
To: Danny Kilburn <danspolishing@yahoo.com>
Cc: c3waterandwastewater@gmail.com; Scott Klinck <sklinck@cityofadamsville.com>; 3320 <3320@jrwauford.com>
Subject: RE: Industrial User Inspection

Please see the attached corrected report.

Melissa Boner, E.I.
Permitting & Pretreatment Services Manager
2835 Lebanon Pike
Nashville, Tennessee 37214
(615)883-3243
www.jrwauford.com
WAUFORD
J. R. Wauford & Company, Consulting Engineers, Inc.

From: Melissa Boner
Sent: Thursday, October 15, 2020 8:26 AM
To: Danny Kilburn <danspolishing@yahoo.com>
Cc: c3waterandwastewater@gmail.com; Scott Klinck <sklinck@cityofadamsville.com>; 3320 <3320@jrwauford.com>
Subject: Industrial User Inspection

Danny/Barbara:

Please find the industrial user inspection report for your facility.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,
Melissa Boner, E.I.
Permitting & Pretreatment Services Manager
2835 Lebanon Pike
Nashville, Tennessee 37214
(615)883-3243
www.jrwauford.com
WAUFORD
J. R. Wauford & Company, Consulting Engineers, Inc.

Industrial User Inspection Report
City of Adamsville Utility Department

Date: August 06, 2020 Time: 2:24 p.m.

1. Company Name: Dan's Polishing Shop
2. Address: 145 Duren Industrial Drive, Adamsville, TN 38310
3. Contact Person/Title/Phone: Barbara Kilburn/Office Manager/731-632-0103
4. I.U. Permit No.: 5 Expiration Date: January 31, 2023 Category: Metal Finishing
5. Inspection/Type/Purpose: Scheduled _____ Unscheduled X
   PAI: _____ PCI: X New Company: _____ Complaint _____
6. Nature of Operation Metal Finishing/Chrome Plating
   Raw Materials Used in Processes: Plating agents
   Employees: 12 Shifts: 1 Hours of Operation: 6a.m.-3p.m. M- Fri
7. Source of Water: City
8. Wastestream Flow to POTW:
   Sanitary: X Process: X Combined: _____
9. Pretreatment System Type:
   Continuous: _____ Batch: X Other: _____
   Condition/Operation: Good _____ Fair X Poor: _____
   Comments: Flocculation Sedimentation & holding tanks prior to discharge
10. Process Area Description: Coating Tanks and Rinse
    Condition/Operation: Good _____ Fair X Poor: _____
    General Housekeeping: Good _____ Fair X Poor: _____
11. Chemical Storage Areas: _____
    Floor Drains: No Spill Control: Yes
    General Housekeeping: Good ___ Fair _____ Poor: _____
    Comments: _____
12. Hazardous Waste Drums/Labels/Manifests: OK? N/A
    Problems: _____

Industrial User Inspection Report
City of Adamsville Utility Department

13. Solid Waste Production: Heavy metal sludges

Disposal: Hauled by Heritage

14. Description of Sample Location: Sample is taken at discharge to the sanitary sewer after the batch holding tanks

Sample Method/Technique: grab due to batch discharge

15. Self Monitoring Data: Available: __ OK?

16. Analytical Work Performed By: Waypoint and self monitoring for pH

Comments:

17. Slug Control Evaluation: Slug Control Plan Required? Yes If so, submitted? Yes

PARTICIPANTS:

1. Danny Kilburn, Dan's Polishing Shop – Owner
2. Jim Cooper, City of Adamsville
3. Melissa Boner, WAUFORD

ANY ADDITIONAL COMMENTS:

Business has actually increased some due to Covid. A lot of people are doing projects at home.

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SGJ. 11/29/22

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Subject: Industrial User Inspection

Danny/Barbara:

Please find the industrial user inspection report for your facility.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,
Melissa Boner, E.I.
Permitting & Pretreatment Services Manager
2835 Lebanon Pike
Nashville, Tennessee 37214
(615)883-3243
www.jrwauford.com
WAUFORD
J. R. Wauford & Company, Consulting Engineers, Inc.

Industrial User Inspection Report
City of Adamsville Utility Department

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4. I.U. Permit No.: 5 Expiration Date: January 31, 2023 Category: Metal Finishing
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   PAI: _____ PCI: X New Company: _____ Complaint _____
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   Raw Materials Used in Processes: Plating agents
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   Sanitary: X Process: X Combined: _____
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    Condition/Operation: Good _____ Fair X Poor: _____
    General Housekeeping: Good _____ Fair X Poor: _____
11. Chemical Storage Areas: _____
    Floor Drains: No Spill Control: Yes
    General Housekeeping: Good ___ Fair _____ Poor: _____
    Comments: _____
12. Hazardous Waste Drums/Labels/Manifests: OK? N/A
    Problems: _____

Industrial User Inspection Report
City of Adamsville Utility Department

13. Solid Waste Production: Heavy metal sludges

    Disposal: Hauled by Heritage

14. Description of Sample Location: Sample is taken at discharge to the sanitary sewer after the batch holding tanks

    Sample Method/Technique: grab due to batch discharge

15. Self Monitoring Data: Available: __ OK?

16. Analytical Work Performed By: Waypoint and self monitoring for pH

    Comments:

17. Slug Control Evaluation: Slug Control Plan Required? Yes If so, submitted? Yes

PARTICIPANTS:

1. Danny Kilburn, Dan's Polishing Shop – Owner
2. Jim Cooper, City of Adamsville
3. Melissa Boner, WAUFORD

ANY ADDITIONAL COMMENTS:

Business has actually increased some due to Covid. A lot of people are doing projects at home.

NPDES ID(s): TN0064785
State: TN
Major/Minor Indicator:
Violation Date: 11/01/2019 - 11/28/2022
Violation Type(s): Effluent Violation

Environmental Protection Agency
Integrated Compliance Information System
Violations Report

Created Date: 09/15/2010
Refresh Date: 11/28/2022
Report Version 1.5, Modified: 1/4/2017

TN0064785

Permittee Name:	City of Adamsville	**Primary SIC Code:**	4952	**Permit Issued:**	08/01/2018
Permittee Address:	P O Box 301 Adamsville, TN 38310	**Primary SIC Desc:**	Sewerage Systems	**Permit Effective:**	09/01/2018
		Primary NAICS Code:		**Permit Expired:**	08/31/2023
Major/Minor Indicator:	Minor	**Primary NAICS Desc:**		**Permit Status:**	Effective
Compliance Track. Status:	On	**Cognizant Official:**	Scott Klinck		
DMR Non Receipt Flag:	On	**Cognizant Offcl. Ph.:**	731-632-4214		
RNC Tracking Flag:	On	**Receiving Body:**	Tennessee Western Valley-Beech		

Facility Information

Facility Name:	ADAMSVILLE STP	**County:**	McNairy	**FRS ID:**	110009706675
Facility Location:	203 SUNRISE DRIVE ADAMSVILLE, TN 38310	**Region:**	04	**Federal Facility Ownership:**	N
		State-Region:		**Type of Ownership:**	Municipal or Water District

Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	08/31/2022	001-G	51040 - E. coli	1	0			C2	2,420	1,821%	<=126		
E90	08/31/2022	001-G	51040 - E. coli	1	0			C3	>2,420	99,999%	<=941		
E90	01/31/2022	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	05/31/2021	001-G	51040 - E. coli	1	0			C2	1,986	1,476%	<=126		
E90	05/31/2021	001-G	51040 - E. coli	1	0			C3	1,986	111%	<=941		
E90	03/31/2021	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	03/31/2021	001-G	81010 - BOD, 5-day, percent removal	K	0	1		C1 MO AV MN	50 %	43%	>=65 %		
E90	02/29/2020	001-G	51040 - E. coli	1	0			C2	137	9%	<=126		
E90	02/29/2020	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	3 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	02/29/2020	001-G	81010 - BOD, 5-day, percent removal	K	0	1		C1 MO AV MN	59 %	17%	>=65 %		
E90	11/30/2019	001-G	81010 - BOD, 5-day, percent removal	K	0	1		C1 MO AV MN	58 %	20%	>=65 %		

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. **X**) indicate the NODI code will not automatically resolve RNC.
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

ACTIVITY 7

DEVELOPMENT OF MONITORING PROGRAMS

A monitoring program for industrial dischargers is essential to document compliance with the pretreatment regulations and to locate other discharges which are not in compliance and could disrupt normal operation of the sewer system. Monitoring results must be such as to enable the POTW to evaluate and update its pretreatment program and, when necessary, to assist the POTW in initiating enforcement action.

Four types of monitoring may be used by the Town in its pretreatment program. These are as follows:

Scheduled Monitoring - Each industrial discharger should be visited by the Superintendent or his designated representative at least twice per year. This visit will include contacting the responsible plant official as designated on the permit application, verifying the data as shown on the permit application, making a tour through the facility to observe the sources of industrial process wastes being discharged to the sewers along with pertinent waste conservation and treatment measures, and a discussion of any problems in regard to the waste discharge. A written record confirming the visit and the pertinent details shall be placed in the file containing the discharge permit. When appropriate, arrangements may also be made for collection of samples and for sharing such samples with the industrial user for analyses by an independent laboratory.

Unscheduled Monitoring - An essential part of the pretreatment program will be the unscheduled monitoring. Ordinance No.198604 requires each industrial user discharging process wastes of any description to install a suitable monitoring manhole which must be accessible to authorized representatives of the POTW at all times. The POTW will utilize these monitoring manholes to collect samples on an unannounced basis during normal operating hours at the industry. Sampling frequency may be variable, depending upon the nature of the waste, but shall be at least twice per year.

Demand Monitoring - In the event of evidence of prohibited discharges such as explosive or corrosive substances, slugs, or other discharges of an unusual nature which could cause operating problems or violation of discharge limits, the POTW will initiate samplings and analyses for the purpose of locating the offender and determining the nature of the violation. For this type of sampling, chain-of-custody records shall be maintained in order to document the integrity of the samples.

Self Monitoring - Each industry which has a pretreatment facility and/or which is subject to categorical limits shall provide self monitoring. This monitoring is necessary in order to assure that pretreatment facilities are being operated in the proper manner and that satisfactory results are being obtained. It is also necessary to show compliance with categorical pretreatment regulations. The industrial user shall be responsible for conducting the required self monitoring on a reliable basis and for reporting results to the POTW. Generally, monitoring of a pretreatment facility will be required on a daily basis, and results will be reported to the POTW monthly within 15 days following the end of the month. Monitoring of a categorical industry shall conform to the published requirements for the industry. Use of monitoring shall not eliminate the need for other forms of monitoring by the POTW.

It is anticipated that the normal frequency of monitoring would consist of one scheduled and one unscheduled monitoring event per year for each industrial discharger.

Since there is a chance of industrial dumping, it is proposed that the POTW plant influent be tested for heavy metals on a monthly basis for the first six months, and thereafter on a quarterly basis. Demand monitoring would be performed when and if required.

The POTW will request all industrial users to construct a suitable monitoring manhole. The monitoring manhole should be constructed according to the sketch shown as Attachment 1, Activity 7, or approved equivalent structure. It should be located on the building sewer serving the industry, and at a point readily accessible to representatives of the POTW at all times. A time period of not more than 90 days should be allowed for provision of the monitoring manholes.

It is proposed that a representative of the POTW visit the industry which will need a monitoring manhole. During this visit a sketch should be prepared to show the location of all wastewater effluent lines that flow into the public sewer, and the location of the monitoring manhole should be agreed upon and shown on the sketch. A copy of the sketch should be placed in the POTW file on the industrial user, and another copy should be left with the industry.

Other information to be obtained during this visit would include:

(1) Verification of product lines and processes at the industry.

(2) Description of any pretreatment facilities provided, including any available operating data.

(3) Listing of possible pollutants which may be present in the waste stream.

This information should be placed in the POTW file on the industry, and a copy should be furnished to personnel who will be responsible for the sampling operations.

A copy of a letter to be sent to the industrial users is included herewith as Attachment 2, Activity 7.

While the industries are providing monitoring manholes, the POTW should be assembling the equipment and personnel needed for the monitoring program. The equipment and personnel needed are covered in subsequent sections of this report.

Prior to the initiation of the actual sampling program, all sampling points should be visited by the sampling team in order to check on access, availability of electric power, and any special equipment that may be required. Since considerable coordination with the industrial user will be required the initiation of the program, it is proposed that the initial sampling be scheduled in advance with the industry.

Subsequent sampling periods should be unannounced, until time for the next annual scheduled sampling period. The unscheduled or unannounced sampling runs should be made during periods when the industry is in normal operation, but the days of the week on which sampling is done should be varied so as to obtain data under varying work conditions.

The sequence in which industries are visited should also be varied. For compliance monitoring to the effective and have the desired integrity, the routine should not be such that the industry will be able to consistently anticipate the date of sampling.

It is important that personnel actually installing the sampler and collecting the samples be familiar with the monitoring manhole location, provisions for mounting sampler, type of sample container to be used, and analyses to be performed, prior to the visit to install the sampler. Some of this information will be conatined on the industry data sheet to be furnished to sampling personnel, but the remaining data should be obtained prior to the actual time of sampling. Sampling personnel should be given the name of the industry representative to be contacted in case of difficulty.

When the visit is made to install the sampler, all the required accessories should be brought along. The sampler should be installed as expeditiously as possible, and placed in operation immediately. Generally, the sample will be collected over a 24 hour period, and will be a simple composite based on the collection of fixed amount of sample at hourly or other preselected time intervals, without regard to flow variations. The sampling interval and/or sampling period may be varied when justified by local conditions and approved by the POTW superintendent.

Samples will generally be collected in clean plastic containers of a size appropriate for the sampler to be used. Attachment 3, Activity 7 shows the form to be completed for each sample. Attachment 4, Activity 7 contains information in regard to sample preservation. In general it is not anticipated that preservatives will be added to sample containers prior to collection, although they may be added later in the laboratory if the analytical work cannot be undertaken immediately. Any preservatives used should be clearly indicated on the Sample Collection Data Sheet.

Since the POTW must maintain laboratory facilities and qualified personnel to perform compliance monitoring, it is anticipated that these facilities would be used for monitoring of industrial wastes as well. Testing for toxic organics and heavy metals would require more sophisticated equipment than is presently available. Initially it is contemplated that a commercial laboratory would be utilized for these analyses. Duplicate analyses by the industrial users laboratory would serve as a check on quality of work.

It is proposed that a bound notebook be provided at the POTW Laboratory for logging samples and recording data. A separate page would be used for each sample and would contain the following information:

(1) Sample identification No. _____

(2) Date collected _____

(3) Analyses by POTW Date _____

ANALYSIS	CONCENTRATION - mg/L
pH	_____
BOD	_____
TSS	_____
NH_3-N	_____
_____	_____
_____	_____
_____	_____
_____	_____

(4) Analyses by Other Laboratories

Date _____

ANALYSIS	CONCENTRATION mg/L
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

(5) Results Reported to Superintendent _____

_____ date _____

Industry _____

_____ date _____

(6) Comments _____

_____

_____

_____

(7) Data Entered By _____

Data entered on this log sheet, together with information on the Sample Collection Data Sheet, would provide a complete record in regard to the sample.

Laboratory personnel are subject to State certifications. Procedures as given in the following handbooks are followed:

(1) Manual of Methods for Chemical Analysis of Water and Wastes - EPA

(2) Standard Methods for the Examination of Water and Wastewater - APHA

(3) Annual Book of Standards, Part 31, Water, Atmospheric Analysis - ASTM

The organization plan shown on the following page indicates the staff involved in the Adamsville Pretreatment Program. The program will be the responsibility of Don Wilson.

It is anticipated that the bi-annual visits to industries will be made by Mr. Wilson. Sampling, analyses and data logging will be performed by personnel at the wastewater plant under Mr. Wilson's direction. All communications with industry representatives, including analytical data reporting will be handled by Mr. Wilson or his designated representative.

The level of effort which is expected to be required to carry out the pretreatment program is shown in Attachment 5, Activity 7.

Revision Date: 10/16/2008

Table 1: Industrial Wastewater Specific Pollutant Limitations

Pollutant	Monthly Average Maximum Concentration (mg/L)	Daily Average Maximum Concentration (mg/L)
Arsenic	0.542	1.084
Copper	1.104	2.208
Chromium, Total	1.899	3.798
Chromium III	Report	Report
Chromium VI	Report	Report
Nickel	1.422	2.844
Cadmium	0.109	0.218
Lead	0.324	0.648
Mercury	0.0004	0.0008
Silver	0.065	0.130
Zinc	2.954	5.908
Cyanide	1.395	2.790
Toluene	0.294	0.588
Benzene	0.044	0.088
1,1,1 Trichloroethane	1.809	3.618
Ethylbenzene	0.093	0.186
Carbon Tetrachloride	0.082	0.164
Chloroform	0.463	0.926
Tetrachloroethylene	0.136	0.272
Trichloroethylene	0.055	0.110
1,2 trans Dichloroethylene	0.065	0.130
Methylene Chloride	0.273	0.546
Total Phenols	0.973	1.946
Naphthalene	0.033	0.066
Total Phthalates	2.338	4.676
Threshold Limitations on Wastewater Strength Exceedances that may be subject to surcharge*		
CBOD	120	240
TSS	140	280
NH_3-N	15	30
Free Oil & Grease	100	200

*** Threshold Limitations on Wastewater Strength are not deemed a violation, but is open for review if the exceedance causes the POTW to violate its NPDES Permit. The Control Authority reserves the right to place limits on an Industrial User as stated at Section 13.4.**

Revision Date: 10/16/2008

Table 2: Criteria to Protect the POTW Treatment Plant Influent

Pollutant	Monthly Average Maximum Concentration (mg/L)	Daily Average Maximum Concentration (mg/L)
Arsenic	0.100	0.200
Copper	0.205	0.410
Chromium, III	Report	Report
Chromium, VI	Report	Report
Chromium, T	0.353	0.706
Nickel	0.265	0.530
Cadmium	0.020	0.040
Lead	0.063	0.126
Mercury	0.0001	0.0002
Silver	0.012	0.024
Zinc	0.588	1.176
Cyanide	0.258	0.516
Toluene	0.054	0.108
Benzene	0.008	0.016
1,1,1 Trichloroethane	0.333	0.666
Ethylbenzene	0.017	0.034
Carbon Tetrachloride	0.015	0.030
Chloroform	0.085	0.170
Tetrachloroethylene	0.025	0.050
Trichloroethylene	0.010	0.020
1,2 trans Dichloroethylene	0.012	0.024
Methylene Chloride	0.050	0.100
Total Phenols	0.179	0.358
Naphthalene	0.006	0.012
Total Phthalates	0.430	0.860

Calculation of Influent Protection Criteria and Local Discharge Limitations
Adamsville Public Works Department - Lagoon WWTP (NPDES Permit No. TN0064785)
July 19, 2018

WWTP Capacity	0.299	**MGD**	(Design Capacity as reported in NPDES Permit No. TN0064785)
WWTP Current Flow	0.417	**MGD**	(Average wastewater flow reported in Monthly Operating Report Data for the last 12 months)
Total Industrial Flow	0.001	**MGD**	(Average industrial flow reported in the Semi-Annual Reports for the last 6 months)
Factor of Safety	25%		**If the Local Discharge Limitation is negative, the Local Discharge Limitation is set equal to the RDL**

Parameter	Pass Through Criteria[1]	Percent Removal[2]	AHL (lb/day) (Pass-Through)	Inhibition[3] (mg/L)	AHL (lb/day) (Inhibition)	AHL LIMIT (lb/day)	Influent Protection Criteria (mg/L)	Background Concentration[4] (mg/L)	Background Mass (lbs)	Industrial Allocate (lbs)	Local Discharge Limitation (mg/L)
Cadmium	0.005	44.00%	0.031	5	17.389	0.031	**0.01**	0.00800	0.0278	0.002	**0.4900**
Chromium. III	Report										
Chromium, VI	0.114	**73.39%**	1.496	50	173.889	1.496	**0.43**	0.03400	0.1181	1.034	**206.5467**
Copper	0.0800	**86.67%**	2.087	1	3.478	2.087	**0.60**	0.14000	0.4862	1.200	**239.8784**
Lead	0.0450	**57.73%**	0.370	2.5	8.694	0.370	**0.11**	0.05800	0.2014	0.127	**25.3025**
Mercury	0.00040	**33.33%**	0.002	0.5	1.739	0.002	**0.0006**	0.00010	0.0003	0.001	**0.2607**
Nickel	0.18000	**25.00%**	0.835	2.5	8.694	0.835	**0.2400**	0.04700	0.1632	0.504	**100.6365**
Silver, Daily Max	0.00248	**80.00%**	0.043	0.25	0.869	0.043	**0.012**	0.00016	0.0006	0.032	**6.3802**
Zinc	0.200	**87.97%**	5.784	2.5	8.694	5.784	**1.66**	0.04490	0.1559	4.221	**843.5013**
Cyanide	0.00520	**28.50%**	0.025	2.5	8.694	0.025	**0.01**	0.00250	0.0087	0.012	**2.4897**
Toluene	0.015	89.00%	0.474	200	695.556	0.474	**0.14**	0.00250	0.0087	0.349	**69.7783**
Benzene	0.003	77.00%	0.045	100	347.778	0.045	**0.01**	0.00050	0.0017	0.033	**6.5387**
1,1,1 Trichloroethane	0.030	91.00%	1.159	---	---	1.159	**0.33**	0.00050	0.0017	0.868	**173.4898**
Ethylbenzene	0.004	83.00%	0.082	200	695.556	0.082	**0.02**	0.00200	0.0069	0.056	**11.2237**
Carbon Tetrachloride[6]	0.015	---	0.052	---	---	0.052	**0.02**	0.00050	0.0017	0.038	**7.5585**
Chloroform	0.085	67.00%	0.896	---	---	0.896	**0.26**	0.00150	0.0052	0.668	**133.4806**
Tetrachloroethylene	0.025	91.00%	0.966	---	---	0.966	**0.28**	0.00250	0.0087	0.718	**143.4904**
Trichloroethylene	0.010	97.00%	1.159	---	---	1.159	**0.33**	0.00100	0.0035	0.867	**173.2295**
1,2 Transdichloroethylene	0.00150	88.00%	0.043	---	---	0.043	**0.013**	0.00050	0.0017	0.031	**6.2554**
Methylene Chloride	0.050	96.00%	4.347	---	---	4.347	**1.25**	0.00250	0.0087	3.254	**650.2612**
Total Phenols	0.050	**61.91%**	0.456	125	434.723	0.456	**0.13**	0.05590	0.1941	0.197	**39.3185**
Napthalene	0.001	92.00%	0.043	500	1738.890	0.043	**0.01**	0.00077	0.0027	0.031	**6.1148**
Total Phthalates	0.0645	**55.30%**	0.502	---	---	0.502	**0.14**	0.00149	0.0052	0.372	**74.4384**
Arsenic[5]	---	45.00%	---	0.1	0.348	0.348	**0.10**	0.00200	0.0069	0.256	**51.0840**

Footnotes

(1) Pass Through Criteria obtained from the Tennessee Department of Environment and Conservation, Division of Water Resources on 6/19/2018.

(2) Percent Removal Data obtained from Semi-Annual Reports from 2005 to 2008 (in red). Due to lack of reliable data, all other percent removal data is reported book values taken from the "Tennessee Procedures Manual for Preparing a POTW Pretreatment Program Submission." or EPA 833-R-04-002B

(3) Literature Inhibition values taken from Appendix G of EPA 833-R-04-002B.

(4) Background Concentration values obtained from local background data.

(5) Influent Protection Criteria and Local Discharge Limitations based on an inhibition value of 0.1 for Arsenic.

(6) The AHL for Carbon Tetrachloride is based on the pass-through criteria

Adamsville File Review/Summary for 2022 Audit

Permit Effective 9/1/18 – 8/31/23

Program Approved 12/01/00

NPDES #TN0064785

Prepared by AJBo 11/28/22

Technical Evaluation of LLs 12/14/18; IWS Received during audit 11/29/17

Audit 11/29/17, letter dated 2/1/18

- Masco permit requires composite sampling for some parameters, and a footnote specifies that the composite sample should be made up of three grab samples taken from the beginning, middle, and end of discharge. Reminder to ensure flow proportional sampling is conducted unless three grabs are representative of discharge and documentation
- Part I.H. of the permit for Dan's Polishing Shop indicates that the industry has been given a waiver for monitoring total toxic organics (TTO) and specifies that Adamsville may authorize an industrial user subject to a categorical pretreatment standard to forego sampling when a pollutant is neither present nor expected to be present. This section also references Tennessee Rule 0400-40-14-.12(5)(b). However, in accordance with EPA's Pretreatment Streamlining Fact Sheet 6.0, a waiver for pollutants not present cannot be used in place of the certification process for TTO pollutants under the metal finishing regulations. To clarify, Adamsville may allow Dan's Polishing Shop to certify in lieu of monitoring for TTO as specified by 40 CFR 433.12. However, the specific waiver for pollutants not present described in 40 CFR 403 .12(e)(2) and Tennessee Rule 0400-40- l4-. l 2(5)(b) does not apply. Part I.H. of the permit should be removed or modified. Additionally, the TTO certification statement from 40 CFR 433.12 should be included in the permit. For your reference, a copy of EPA's Streamlining Fact Sheet 6.0 is enclosed.
- Masco is classified as a significant non-categorical industrial user. The Masco permit includes boilerplate language regarding monitoring waivers for categorical pretreatment standards and 90-day reports on compliance with categorical pretreatment standards. Because the industry is not categorical, we recommend removing this language.
- Part 11.D. of Masco's permit includes a provision for penalties "up to Ten Thousand Dollars," but does not specify that these penalties may be per violation per day. We recommend specifying that penalties may be assessed up to ten thousand dollars per violation per day.
- Included to revise references to 1200 rules
- Oversight inspections were conducted at Masco and Dan's Polishing Shop. At Dan's Polishing Shop, treated process wastewater is piped to an open discharge box. Compliance samples are taken from the batch treatment tank before the wastewater is piped to the discharge box. When asked if any other wastewater is discharged into this box, the industry representative indicated that parts with paint stripper are rinsed into this box. In an email dated November 30, 2017, Ms. Boner indicated that Dan's Polishing Shop has proposed lo collect the rinse water and add it to the pretreatment system.

PCI 10/23/18, letter dated 11/1/18

- During the file review, It appeared that the pH readings reported by Masco were taken from the pH probe that is used in the pretreatment process equipment. Compliance monitoring requires that pH be taken from a grab sample using an appropriate meter per 40 CFR 136 methods. Those methods require QA/QC procedures to be performed as well.

- Included reminder that NPDES permit recently became effective (9/1/18) so IWS and tech eval of LLs is due within 120 days

TAV 10/29/19, letter dated 11/1/19

- Mr. Lannie Hutton no longer PT coordinator. Veterans Management Services, LLC has been contracted to assist with wastewater operations and pretreatment.
- Plant PC exceedance for mercury in September 2019. Lab error suspected. Dentists have been notified of dental rule. Two of three dentists have installed amalgam separators.
- Dan's Polishing was issued a Notice of Violation (NOV) in April 2019 for pH violation and Masco Bath exceeded its ethylbenzene limit in April 2019. Neither violation was identified as significant. Industrial user inspections were conducted at both facilities in August 2019.

PCI 10/13/20, letter dated 10/19/20

- Heavy rains have resulted in Masco Landfill exceeding the 10,000 gallon per day discharge limit. This resulted in the need for Masco to haul wastewater to an alternate treatment facility. To alleviate this complication, the Town approved Masco's request for periodic increases in their wastewater discharge limits during heavy rain events.
- Ripley Industries, Inc. had submitted an industrial user survey form revealing that process wastewater was being discharged to the Town's sewer. This facility was visited during the inspection, and it was determined that wash tanks at three locations in the plant were being used to clean metal parts. The tanks were emptied periodically to the sewer via floor drains. No MSDS identification was available for the content of the tanks at the time of the inspection. It was unclear exactly how often the tanks were discharged and what the concentration of the liquid was at the time of discharge.

OCT 2022 SAR (In review)

- CA indicated that sampling of influent and effluent occurred 3/16/22. This date is outside of the reporting period for this SAR. If this is the only sampling conducted, then letter will result in an NOV for failure to sample during the reporting period.
- IU inspections at Dan's Polishing Shop and Masco Bath were conducted on July 27, 2021. Need to determine if any inspections have been conducted subsequently. Potential TYPO as Form lists inspections on July 27, 2022
- Detection limit for Mercury does not show compliance BDL:0.00013 mg/l PTL:0.000051 mg/l
- Cyanide PTL exceedance EFF:0.008 mg/l PTL:0.0052 mg/l NOT listed on Form 2
- Inf and Eff sampling 3/16/22 TYPO?
- Compliance monitoring for 3/16/22 for Dan's and 3/16/22 for Masco
- **Inspection for both IUs 7/27/22? *****

APR 2022 SAR

- Narrative Summary indicates influent and effluent sampling occurred on April 16, 2022, which is inconsistent with what was reported on the most recent SAR (Above)
- On October 15, 2021, a Notice of Violation was given to Dan's Polishing Shop for the exceedance of the monthly average and maximum for any one day of Cyanide. The violation was resolved, and all sampling has since been in compliance.
- Inf and Eff sampling on 4/16/22
- Compliance monitoring 3/16/22 for Dan's and 3/15/22 for Masco

OCT 2021 SAR

- Self-monitoring for Dan's Polishing indicates 2 TRC violations for cyanide. Both the daily max and the monthly average were exceeded. These 2 TRC violations resulted in IU being in SNC. They will be issued NOVs and published in newspaper during next reporting period.
- SAR did not indicate that Dan's Polishing was in SNC on Form 7. Need to request revision and also ensure that IU was published in newspaper for being in SNC.
- Inf and Eff sampling on 9/22/21
- Compliance monitoring 4/29/21 for Dan's and 4/23/21 for Masco
- Inspection for Dan's 7/27/21 and 7/21/21 for Masco

APR 2021 SAR

- Inf and Eff sampling on 10/29/20
- Compliance monitoring 3/17/20 for Dan's and 3/18/20 for Masco
- Inspection for both IUs on 8/6/20