

# POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

## PCI CHECKLIST CONTENTS

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CA name and address:

City of Bells, Lagoon System  
P.O. Box 760  
Bells, TN 38002

Date(s) of PCI  
April 9, 2024

Period covered by PCI  
TAV done on 6/14/2024  
To 4/9/2024

PIRT / DSS incorporated in NPDES permit?	Yes	No
		X

### INSPECTOR (S)

Name	Title/Affiliation	Telephone Number
Kaylee Sabo	EPS / JEFO TDEC	731 -676 -6604
Johen Bowling	EPS / JEFO TDEC	

### CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Angel West	Lab Tech	(731) 663 -2383 – Lab Phone #
Marlon Jordan, Jr.	Superintendent	(731) 663 – 2334 – City Hall #
	bellsw@bellsouth.net	

\*Identified program contact

## ACRONYM LIST

### Acronym

### Term

BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
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
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
<b>NSCIU</b>	<b>Nonsignificant Categorical Industrial User</b>
O&G	Oil and grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical review criteria
TTO	Total toxic organics
WENDB	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.*

<b>NARRATIVE COMMENTS</b>			
FILE <u>  A  </u> Industry name and address  The Pictsweet Company  Address:	Total flow (gpd) Maximum monthly average = 1.640 GPD from SAR	Process flow (gpd)	
	Type of industry (products manufactured)  Frozen Vegetables		
Industry visited during PCI  Yes <input checked="" 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  Only one Industry in Bells.  SAR for April 2023 to October 2023 notes a E.coli violation.			

## SECTION I: IU EVALUATION (Continued)

Industry Name					<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>	
File	File	File	File	File		
<a href="#">A</a>	___	___	___	___	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
<b>A. CA NOTIFICATION OF IU</b>						
X					1. Notification of classification or change in classification	403.8(f)(2)(iii)
X					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
<p>Comments</p>  <p>1. No change</p> <p>2. No Change</p>						

## SECTION I: IU EVALUATION (Continued)

File A	File	File	File	File	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>B. ISSUANCE OF IU CONTROL MECHANISM</b>	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
X					a. Individual control mechanism	
N/A					b. <b>General control mechanism</b>	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
X					a. Statement of duration (≤ 5 years)	
X					b. Statement of nontransferability	
X					c. Applicable effluent limits (local limits, categorical standards, <b>Best Management Practices</b> )	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
X					• Identification of pollutants to be monitored	
N/A					• <b>Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)</b>	
X					• Sampling locations/discharge points	
X					• Sample types (grab or composite)	
X					• Reporting requirements ( <b>including all monitoring results</b> )	
X					• Record-keeping requirements	
X					e. Statement of applicable civil and criminal penalties	
X					f. Compliance schedules	
X					g. Notice of slug loading	
X					h. Notification of spills, bypasses, upsets, etc.	
X					i. Notification of significant change in discharge	
X					j. 24-hour notification of violation/resample requirement	
X					k. <b>Slug discharge control plan, if determined by the POTW to be necessary.</b>	
<b>Comments</b>						
<p>2. a. March 18, 2022 – January 31, 2027 (Less than 5 years)</p> <p>2. c. Local Limits ... non- categorical industry</p> <p>2. d. Self-monitoring by Pictsweet from permit</p> <ul style="list-style-type: none"> <li>+ BOD - composite</li> <li>+ TSS - composite</li> <li>+ Temperature - grab</li> <li>+ pH - grab</li> <li>+ Organic Loading - composite</li> <li>+ Flow - composite</li> </ul> <p>Sampling Location: Sampler near before wastewater lagoon.</p>						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
A						
<b>B. ISSUANCE OF IU CONTROL MECHANISM (cont.)</b>						
					<b>3. Issuance of General Control Mechanisms</b>	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	
<p>Comments</p> <p>+ has individual control mechanism</p>						

## SECTION I: IU EVALUATION (Continued)

File A	File ___	File ___	File ___	File ___	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>C. CA APPLICATION OF IU PRETREATMENT STANDRDS</b>	
X					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. <b>Classification of nonsignificant CIU</b>	<b>403.3(v)(2)</b>
X					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
N/A					<b>4. Application of Best Management Practices</b>	<b>403.8(f)(1)(iii)(B)(4)</b>
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)
X					7. Application of most stringent limit	403.8(f)(1)(ii)
<p>Comments</p> <p>1. Non -Categorical</p> <p>3. Local Limits are from sewer use ordinance</p> <p>4. Most Stringent Limit is local</p>						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
A	—	—	—	—		
<b>D. CA COMPLIANCE MONITORING</b>						
Sampling						
X					1. Sampling (once a year, <b>except as otherwise specified</b> )	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)
X					4. Analysis for all regulated parameters	
X					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
Inspection						
X					6. Inspection (once a year, <b>except as otherwise specified</b> )	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)
X					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
<p>Comments</p> <p style="margin-left: 20px;">1. Sampling Semi – Annually for SAR</p> <p style="margin-left: 20px;">6. Inspection once a year</p>						



## SECTION I: IU EVALUATION (Continued)

File <a href="#">A</a>	File ___	File ___	File ___	File ___	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>E. CA ENFORCEMENT ACTIVITIES</b>	
See Note					1. Identification of violations	403.8(f)(2)(vii)
N/A					a. Discharge violations	
N/A					b. Monitoring/reporting violations	
N/A					c. Compliance schedule violations	
N/A					2. Calculation of SNC	403.8(f)(2)(vii)
N/A					3. Adherence to approved ERP	403.8(f)(5)
N/A					4. Escalation of enforcement	403.8(f)(5)
N/A					5. Publication for SNC	403.8(f)(2)(vii)
<p><b>Comments</b></p> <p style="margin-left: 20px;">1.</p> <p style="margin-left: 40px;">a. It was noted on the SAR that Picsweet recieved a verbal warning due to the E.Coli testing above the chart that Bells calculated it off of. It the Control Mechanism (the pretreatment permit) there is no mention of E. Coli. So it is not enforceable</p>						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
A	—	—	—	—	<b>F. IU COMPLIANCE STATUS</b>	
					<b>Self-Monitoring and Reporting</b>	
X					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
X					2. Analysis of all required pollutants	403.12(g)(1)&(h)
X					3. Submission of BMR/90-day report	403.12(b) &(d)
X					4. Periodic self monitoring reports	403.12(e)&(h)
X					5. Reporting all required pollutants	403.12(g)(1)&(h)
See Note					6. Signatory/certification of reports	403.12(l)
N/A					<b>7. Annual certification by NSCIUs</b>	<b>403.12(q)</b>
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)
N/A					• 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)
N/A					11. Notification of hazardous waste discharge	403.12(j)&(p)
X					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
N/A					13. Notification of significant changes	403.12(j)
<b>INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.</b>						
					<b>Discharge</b>	
See Note					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(viii)
N/A					a. Chronic violations	
N/A					b. TRC	
N/A					c. Pass through or interference	403.5(a)(1)
N/A					• Spill or slug load	403.12(f)
N/A					d. Other discharge violations (specify)	
					<b>Reporting</b>	
N/A					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(viii)
N/A					16. SNC with reporting requirements	403.8(f)(2)(viii)
<b>Comments</b>						
6. Pictsweet submits monthly reports - The monthly reports do not include a signature or date just the results. It is mentioned in the letter.						
13. It was noted on the SAR that Pictsweet recieved a verbal warning due to the E.Coli testing above the chart that Bells calculated it off of. It the Control Mechanism (the pretreatment permit) there is no mention of E. Coli. So it is not enforceable						

## SECTION I: IU EVALUATION (Continued)

File ___	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					<b>G. OTHER</b>	

Comments

SECTION I COMPLETED BY: <a href="#">Kaylee Sabo</a> TITLE: <a href="#">EPS</a>	DATE: <a href="#">4/12/2024</a> TELEPHONE: <a href="#">(731) 676 -6604</a>
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## 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]

	<b>Yes</b>	<b>No</b>
1. Did the CA make substantial changes to the pretreatment program that were not approved by the Approval Authority (e. g., definitions, limits)?		X

If yes, describe.

	<b>Yes</b>	<b>No</b>
2. Is the CA in the process of modifying any approved pretreatment program component (including legal authority, local limits, DSS requirements, etc.)?		X

If yes, describe.

	<b>YES</b>	<b>NO</b>
3. a. Has the CA adopted the 3 required components of the streamlining regulations (slug control requirements referenced in the control mechanisms, definition of SNC, and modification to sampling requirements)?		X

If not, when?

	<b>YES</b>	<b>NO</b>
b. Does the CA plan to adopt any of the non-mandatory aspects of the streamlining regulations?		X

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)]

The city of Bells updates the IWS every 5 year and goes to the industries in Bells personally. They know what industries are in Bells because the city is small and they can ask the mayor

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

a.	1	SIUs (as defined by the CA) [WENDB - SIUS]
	0	CIUs [WENDB - CIUS]
	0	Zero-discharging SIUs
	1	Noncategorical SIUs**
b.	0	Other regulated noncategorical IUs (specify)
c.	1	TOTAL

The Pictsweet Company is the only industrial user.

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)

<b>C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii) ]</b>	
1.	<p>a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism ? <span style="float: right; border: 1px solid black; padding: 2px 10px;">1</span></p> <p style="color: red; margin-left: 20px;">List SIUs:</p> <p style="color: blue; margin-left: 20px;">The Pictsweet Company</p>
	<p>b. How many SIUs (as defined by the CA) are required to be covered by a general control Mechanism? <span style="float: right; border: 1px solid black; padding: 2px 10px;">0</span></p> <p style="color: red; margin-left: 20px;">List SIUs:</p>
	<p>c. How many SIUs are not covered by an existing, unexpired permit or other control mechanism ? [WENDB - NOCM] [RNC - II] <span style="float: right; border: 1px solid black; padding: 2px 10px;">0</span></p> <p style="margin-left: 20px;">If any, explain.</p>
2.	<p>How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC - II] <span style="float: right; border: 1px solid black; padding: 2px 10px;">0</span></p> <p style="margin-left: 20px;">If any, explain.</p>

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)**

**D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS**

1. a. How many SIUs were not 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.

	N/A	Yes	No
2. Did the CA apply all applicable categorical standards and local limits to IUs whose wastes are hauled to the POTW ?			X

If yes, identify the industries.

If no, explain.

The CA has one hauled waste, and it is Maples Septic. It is a septic tank hauler so there is no categorical standards and the waste is dumped right before the lagoon and goes through all treatment processes with the rest of the waste.

	Yes	No
3. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]		X

If yes, identify and explain.

**SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)**

<b>E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>			
1. Identify the following.			
Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection			
• CIUs	N/A	N/A	
• NSCIUs	N/A	N/A	
• Other SIUs	Annually	Annually	
b. Sampling (by CA)			
• CIUs	N/A	N/A	
• NSCIUs	N/A	N/A	
• Other SIUs	Semi - Annual	Semi-Annual	
c. Self – Monitoring			
• CIUs	N/A	N/A	
• Other SIUs	Monthly	Monthly	
d. Reporting			
• CIUs	N/A	N/A	
• NSCIUs	N/A	N/A	
• Other SIUs	Monthly	Monthly	
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 or not inspected at least once [WENDB - NOIN]			0 %
b. Not sampled at least once			0 %
c. Not inspected at least once			0 %
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 any violation?			
N/A			
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?			
N/A			



## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

<b>F. ENFORCEMENT</b>															
1.	Which of the following enforcement actions did the CA use?														
		N/A	Yes												
	a. Notice or letter of violation		X												
	b. Administrative orders		X												
	c. Administrative fines		X												
	d. Show cause hearings		X												
	e. Compliance schedules		X												
	f. Permit revocation		X												
	g. Civil suits		X												
	h. Criminal suits		X												
	i. Termination of services		X												
	j. Other (specify)		X												
	X														
	<p>Explain if appropriate</p> <p>Verbal Warning for E. Coli. It was noted on the SAR that Picsweet recieved a verbal warning due to the E.Coli testing above the chart that Bells calculated it off of. It the Control Mechanism (the pretreatment permit) there is no mention of E. Coli. So it is not enforceable</p>														
2.	Did the CA comply with its approved ERP? [403.8(f)(5)] [RNC - II]	N/A	Yes												
		X													
3.	<p>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.</p> <p style="text-align: right; margin-right: 50px;">SNC Evaluation Period <input style="width: 150px;" type="text"/></p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; border: 1px solid black;"></td> <td style="width: 10%; border: 1px solid black; text-align: center;">0 %</td> <td style="width: 55%; border: 1px solid black;">Applicable pretreatment standards and reporting requirements</td> <td style="width: 20%; border: 1px solid black;">*SNC defined by:</td> </tr> <tr> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black; text-align: center;">0 %</td> <td style="border: 1px solid black;">Self - monitoring requirements</td> <td style="border: 1px solid black;">POTW</td> </tr> <tr> <td style="border: 1px solid black;"></td> <td style="border: 1px solid black; text-align: center;">0 %</td> <td style="border: 1px solid black;">Pretreatment compliance schedules</td> <td style="border: 1px solid black;">EPA</td> </tr> </table>		0 %	Applicable pretreatment standards and reporting requirements	*SNC defined by:		0 %	Self - monitoring requirements	POTW		0 %	Pretreatment compliance schedules	EPA		
	0 %	Applicable pretreatment standards and reporting requirements	*SNC defined by:												
	0 %	Self - monitoring requirements	POTW												
	0 %	Pretreatment compliance schedules	EPA												
3a.	<p>Indicate the number of SIUs that have been in 100% compliance with all pretreatment requirements?</p> <p>Evaluation Period: _____</p> <p>Number of SIUs: _____</p> <p>Names of SIUs:</p>														

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)			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) ]																																																																									
N/A																																																																										
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?	<table border="1" style="width: 100%; border-collapse: collapse; margin-left: 20px;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 10%; text-align: center;">Yes</th> <th style="width: 10%; text-align: center;">No</th> <th style="width: 10%; text-align: center;">Unk</th> <th style="width: 40%; text-align: center;">Explain</th> </tr> </thead> <tbody> <tr><td>• Interference</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Pass through</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Fire or explosions (flashpoint, etc.)</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Corrosive structural damage</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Flow obstruction</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Excessive flow rates</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Excessive pollutant concentrations</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Heat problems</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Interference due to O&amp;G</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Toxic fumes</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Illicit dumping of hauled wastes</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Worker health and safety</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td>• Other (specify)</td><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> </tbody> </table>				Yes	No	Unk	Explain	• Interference		X			• Pass through		X			• Fire or explosions (flashpoint, etc.)		X			• Corrosive structural damage		X			• Flow obstruction		X			• Excessive flow rates		X			• Excessive pollutant concentrations		X			• Heat problems		X			• Interference due to O&G		X			• Toxic fumes		X			• Illicit dumping of hauled wastes		X			• Worker health and safety		X			• Other (specify)		X		
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• Other (specify)		X																																																																								
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]																																																																										
			Yes	No																																																																						
N/A																																																																										

## 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).		
	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.	Yes	No
			X
9.	Did any SIUs return to compliance by any of the following? [RNC -I] a. Within 90 days b. Within the time specified in the ERP c. Through a compliance schedule component (including legal authority, local limits, DSS requirements, etc.) ?	Yes	No
	N/A		
<b>G. ADDITIONAL EVALUATIONS</b>			

SECTION II COMPLETED BY: TITLE: Kaylee Sabo, EPS	DATE: 4/12/2024 TELEPHONE: (731) 676 -6604
POTW REPRESENTATIVE PROVIDING RESPONSES: Angel West, Lab Tech, and Marlon Jordan, Jr., Operator	DATE: 4/12/2024 TELEPHONE: (731) 663 -2383

### SECTION III: EVALUATION AND SUMMARY

**INSTRUCTIONS:** Identify program components that the CA is recommended (Rec.) or required (Req.) to implement in order to effectively implement the pretreatment program and/or to meet its regulatory requirements. Specify the corrective action the CA needs to take.

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>A. CA PRETREATMENT PROGRAM MODIFICATION</b>				
1. Notify of program modification	403.18	II.A		
2. Modify the program to accommodate the streamlining regulations	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(viii), 403.12(g)	I.B.2.d; I.B.2.k; I.E.2; II.A.3		
<b>B. IU CHARACTERIZATION</b>				
1. Identify and locate all SIUs	403.8(f)(2)(i)	II.B		
2. Identify the character and volume of pollutants contributed to POTW by IUs	403.8(f)(2)(ii)	II.B.1; II.E.1		
<b>C. CONTROL MECHANISM EVALUATION</b>				
1. Issue individual or general control mechanisms to all SIUs	403.8(f)(1)(iii)	I.B.1; II.C.1 & 2		

### SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>C. CONTROL MECHANISM EVALUATION (Continued)</b>				
2. Ensure control mechanisms contents include: <ul style="list-style-type: none"> <li>a. A statement of duration</li> <li>b. A statement of nontransferability</li> <li>c. Effluent limits</li> <li>d. Self - monitoring requirements</li> <li>e. A statement of penalties</li> <li>f. Compliance schedules</li> <li>g. Notice of slug loading</li> <li>h. Notification of spills, bypasses, upsets, etc.</li> <li>i. Notification of significant change in discharge</li> <li>j. 24-hour notification of violation/resample requirement</li> </ul>	403.8(f)(1)(B)	I.B.2.a-j		
<b>D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS</b>				
1. Apply all applicable pretreatment standards	403.8(f)(1)(iii)	I.B.2.a-j		
2. Evaluate the need for SIUs to develop slug discharge control plans	403.8(f)(2)(vi); 403.5	I.C.1 - 6; II.D.2		
<b>E. COMPLIANCE MONITORING</b>				
1. Inspect and sample each SIU in accordance with approved program	Approved program	I.D.2 & 7; II.E.1		

### SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>E. COMPLIANCE MONITORING (Continued)</b>				
2. Inspect and sample each SIU once a year	403.8(f)(2)(v)	I.D.1 & 6; II.E.1 & 2		
3. Use proper sampling analysis (40 CFR Part 136) and inspection procedures	403.8(f)(2)(vii)	I.D.3, 5 & 8		
4. Require, receive, and analyze reports from SIUs	403.8(f)(2)(iv)	I.B.2.d; I.F.1-12; II.E.1		
5. Monitor to demonstrate continued compliance and resampling after violation(s)	403.8(f)(2)(vii)	I.F.3, 4 & 9		
6. Ensure CIUs report on all regulated pollutants at least once every 6 months	403.12(g)(1)&(2)	I.F.2 & 5		

### SECTION III: EVALUATION AND SUMMARY (Continued)

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>E. COMPLIANCE MONITORING (Continued)</b>				
7. Ensure noncategorical SIUs self-monitor and report all regulated pollutants at least once every 6 months	403.12(h)	I.F.2 & 5		
8. Require self-monitoring reports from CIUs to be signed and certified and reports from SIUs to be signed  . Pictsweet submits monthly reports - The monthly reports do not include a signature or date just the results. It is mentioned in the letter.	403.12(l); 403.6(a)(2)(ii)	I.F.6		X
9. Receive notification of hazardous waste discharges	403.12(j)&(p)	I.F.10; II.D.3		
<b>F. ENFORCEMENT</b>				
1. Implement approved ERP	403.8(f)(5)	I.E.3; II.F.2		
2. Annually publish a list of IUs in SNC	403.8(f)(2)(viii)	I.E.5; II.F.4		

**SECTION III: EVALUATION AND SUMMARY (Continued)**

Description	Regulatory Citation	Checklist Question(s)	Action	
			Rec.	Req.
<b>F. ENFORCEMENT (Continued)</b>				
3. Develop IU compliance schedules	403.8(f)(1)(iv)(A)	I.B.2.f; II.F.1, 7 & 9		
4. Ensure IU compliance within 3 years of standards effective date (or less than 3 years where required by standard)	403.6(b)	II.F.8		
5. Ensure new sources report on compliance with appropriate standards within first 90 days of discharge	403.12(d)	I.F.3		
<b>G. ADDITIONAL EVALUATIONS</b>				

SECTION III COMPLETED BY: <a href="#">Kaylee Sabo</a>	DATE: <a href="#">4/12/2024</a>
TITLE: <a href="#">EPS</a>	TELEPHONE: <a href="#">(731) 676 6604</a>



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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 <a href="#">City of Bells</a>		
2. a. Pretreatment contact <a href="#">Angel West &amp; Marlon Jordan, Jr.</a>	b. Mailing address <a href="#">P.O. Box 760 Bells, TN 38002</a>	
c. Title <a href="#">Angel – Lab Tech Junior – Wastewater Operator</a>	d. Telephone number <a href="#">(731) 663-2383 (Lab phone number)</a>	
3. Date of last CA report to Approval Authority <a href="#">11/1/2023 (SAR April 1, 2023 -September 30, 2023) Working on New SAR</a>		
4. Is the CA currently operating under any pretreatment - related consent decree, Administrative Order, compliance schedule, or other enforcement action ?	<b>Yes</b>	<b>No</b>
		<a href="#">X</a>
5. Effluent and sludge quality		
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)		
<b>Parameters Violated</b>	<b>Cause(s)</b>	
<a href="#">N/A</a>		
b. Has the treatment plant had any violations of biosolids regulations? <a href="#">N/A</a>		

### B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.			
	<b>Last PCI</b>	<b>Last Audit</b>	<b>Program Report</b>
	<b>Date: 6/9/2022</b>	<b>Date: 6/3/2021(was marked on last PCI form)</b>	<b>Date: 11/1/2023</b>
a. Program modification			
b. Legal authority		<a href="#">X</a>	
c. Local limits		<a href="#">X</a>	
d. IU characterization			
e. Control mechanism			
f. Application of pretreatment standards			
g. Compliance monitoring		<a href="#">X</a>	
h. Enforcement program			
i. Data management			
j. Program resources			
k. Other (specify)	<a href="#">X</a>		

[Other: pH analysis method](#)

## PRETREATMENT PROGRAM STATUS UPDATE

<b>B. PRETREATMENT PROGRAM STATUS</b>			
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 ]	<b>Data Source</b>	<b>Yes</b>	<b>No</b>
			X
			X
			X
			X
			X
			X
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)			
<b>Name of SIU in SNC</b>	<b>Compliance Status</b>	<b>Source</b>	
	N/A		
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 <input style="width: 100px;" type="text"/>
0	%	Applicable pretreatment standards and reporting requirements	*SNC defined by:
0	%	Self - monitoring requirements	<b>POTW</b> <input style="width: 50px;" type="text"/>
0	%	Pretreatment compliance schedules	<b>EPA</b> <input style="width: 50px;" type="text"/>
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program			

ATTACHMENT A COMPLETED BY: <span style="color: blue;">Kaylee Sabo</span>	DATE: <span style="color: blue;">4/12/2024</span>
TITLE: <span style="color: blue;">EPS</span>	TELEPHONE: <span style="color: blue;">(731) 676 - 6604</span>

## **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 - Permit Number 001  
 10 Pictsweet Drive  
 Bells, TN 38006

Date of visit            4/9/2023

Time of visit            10:30 am

Name(s) of inspector(s)

Kaylee Sabo, EPS, JEFO TDEC  
 John Bowling, EPC, JEFO TDEC

Marlon Jordan, Jr, Superintendent, City of Bells  
 Angel West, Lab Tech, City of Bells

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

Name	Title
Brett Lake (731) 267 -0153	Plant Manager
Dylan Cupples (731) 501-0048	West Plant Manager

1. What does this industry produce ?

Frozen Vegetables

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

Significant Non - Categorical  
 Yes- Classification is correct

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.)

1. Receive Raw Veggies
2. Raw Veggies go through processing equipment
  - a. Washing tanks
  - b. Color sorter and size sorter
  - c. Cutter
3. Blanch cycle
4. Freeze and Packaging
5. Storage and Shipping

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

Washer – well water  
Blanching – well water  
Sanitation – well water

City water for domestic waste. Company well water for production water.

7. Describe the processes that discharge wastewater.

Veggie washer  
Blancher  
Sanitation

## IU SITE VISIT REPORT FORM (CONTINUED)

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

Near Lagoon. Sampler.

Yes, CA and industry are using the same location.

9. Describe the treatment system which is in place.

Screen to screen vegetables out before water is discharged



# IU SITE VISIT REPORT FORM (CONTINUED)

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

Sanitation

+ locked cage

+ on spill containment

Perlox

+ on floor

+ on spill containment

All Floor Drains go to wastewater

11. Are any hazardous wastes stored or discharged ?

Not hazardous but vegetable waste is picked up by Taylor Brothers

Additional comments.

IU SITE VISIT REPORT FORM

COMPLETED BY: Kaylee Sabo

TITLE: EPS

DATE: 4/12/2024

TELEPHONE: (731) 676-6604

## WENDB DATA ENTRY WORKSHEET

<b>II. WENDB DATA ENTRY WORKSHEET</b>			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name <span style="color: blue;">City of Bells</span>			
NPDES number <span style="color: blue;">TN00026247</span>			
Date of audit <span style="color: blue;">4/9/2024</span>			
	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	1
• Number of CIUs	CIUS	II.C.4.a	0
- Number of SIUs without control mechanism	NOCM	II.D.1.A	0
- Number of SIUs not inspected or sampled	NOIN	II.F.2.a	0
- Number of SIUs in SNC** with standards or reporting	PSNC	Attach A.B.4	0
- Number of SIUs in SNC with self - monitoring	MSNC	Attach A.B.4	0
- Number of SIUs in SNC with self - monitoring and not inspected or sampled	SNIN	II.G.5	0
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."			
**As defined in 40 CFR 403.8(f)(2)(viii).			

WENDB DATA ENTRY WORKSHEET	DATE: <span style="color: blue;">4/12/2024</span>
COMPLETED BY: <span style="color: blue;">Kaylee Sabo</span>	
TITLE: <span style="color: blue;">EPS</span>	TELEPHONE: <span style="color: blue;">(731) 676 - 6604</span>

## RNC WORKSHEET

<b>III. RNC WORKSHEET</b>		
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.		
CA name <span style="color: blue;">City of Bells</span>		
NPDES number <span style="color: blue;">TN0002647</span>		
Date of audit <span style="color: blue;">4/9/2024</span>		
		Level
		Checklist Reference
0	Failure to enforce against pass through and / or interference	I
0	Failure to submit required reports within 30 days	I
0	Failure to meet compliance schedule milestone date within 90 days	I
0	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II
0	Failure to inspect or sample 80% of SIUs within the last 12 months	II
0	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II
0	Other (specify)	II
<b>SNC</b>		
0	CA in SNC for violation of any Level I criterion	
0	CA in SNC for violation of two or more Level II criterion	
For more information on RNC, please refer to EPA's 1990 <u><a href="#">Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements</a></u>		

RNC WORKSHEET COMPLETED BY: <span style="color: blue;">Kaylee Sabo</span>	DATE: <span style="color: blue;">4/12/2024</span>
TITLE: <span style="color: blue;">EPS</span>	TELEPHONE: <span style="color: blue;">(731) 676 - 6604</span>