

POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

PCI CHECKLIST CONTENTS

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CA name and address: <div style="text-align: center; margin-top: 10px;"> <i>Town of Collierville 500 Keough Road Collierville, TN 38017</i> </div>	Date(s) of PCI <div style="text-align: center; margin-top: 10px;"> <i>April 4, 2023</i> </div>
Period covered by PCI <div style="text-align: center; margin-top: 10px;"> <i>April 2022 - March 2023</i> </div>	

Pretreatment Implementation Review Taskforce / Domestic Sewage Study incorporated in NPDES permit?	Yes	No

INSPECTOR (S)		
Name	Title/Affiliation	Telephone Number
<i>Eddy Bouzeid</i>	<i>EPS3/TOEC/AWR/MEFO</i>	<i>901-573-1034</i>

CA REPRESENTATIVE (S)		
Name	Title/Affiliation	Telephone Number
<i>Donal Davis</i>	<i>Pretreatment Coordinator*</i>	<i>901-457-2833</i>

*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
NSCIU	Nonsignificant Categorical Industrial User
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.

NARRATIVE COMMENTS			
FILE <u> 1 </u> Industry name and address <div style="text-align: center;"> <p><i>Floratine</i> <i>355 East South Street</i> <i>Collierville, TN 38017</i></p> </div>	Total flow (gpd)	Process flow (gpd) <div style="text-align: center;"><i>500</i></div>	
Type of industry (products manufactured) <div style="text-align: center;"><i>Soil conditioning manufacturer</i></div>			
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 <div style="text-align: center;"> <p><i>new permit effective date: February 1, 2020</i> <i>Expiration date: January 31, 2021</i></p> <p><i>old permit expiration date: January 31, 2020</i></p> </div>			

SECTION I: IU FILE EVALUATION (Continued)

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

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

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS

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

Comments

NARRATIVE COMMENTS

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

Comments

SECTION I: IU EVALUATION (Continued)

Industry Name					<p><i>INSTRUCTIONS: Evaluate the contents of SIU files. If no problem exists for a particular question, mark the square with a check (✓). Use (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Where a problem is indicated, mark with a numerical value and provide a corresponding explanation in the comment area below. Comment on each problem identified. For example, if the file is missing a notification of classification, place a (1) in the square and a matching statement as to the nature of the problem that exists in the space below. The next problem would be marked as (2) and so on. Clearly indicate the file that each comment pertains to; also indicate where a comment applies to all the files.</i></p>	
<div style="writing-mode: vertical-rl; transform: rotate(180deg); font-family: cursive;">Florative</div>						
File	File	File	File	File	IU FILE REVIEW	Reg. Cite
+	—	—	—	—		
					A. CA NOTIFICATION OF IU	
✓					1. Notification of classification or change in classification	403.8(f)(2)(iii)
✓					2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
<p>Comments</p>						

SECTION I: IU EVALUATION (Continued)

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

SECTION I: IU EVALUATION (Continued)

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

SECTION I: IU EVALUATION (Continued)

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

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
✓					D. CA COMPLIANCE MONITORING	
					Sampling	
✓					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
✓					2. Sampling at frequency specified in approved program	
✓					3. Documentation of sampling activities	403.8(f)(2)(vi)
✓					4. Analysis for all regulated parameters	
✓					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
✓					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
✓					7. Inspection at frequency specified in approved program	
✓					8. Documentation of inspection activities	403.8(f)(2)(vi)
✓					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
<p>Comments</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
1					E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vii)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vii)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vii)
<p>Comments</p> <p>1. IU had 3 zinc violations and 1 copper violation for the evaluation period April 2022 - March 2023. NCV was issued</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
✓					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓					2. Analysis of all required pollutants	403.12(g)(1)&(h)
✓					3. Submission of BMR/90-day report	403.12(b) &(d)
✓					4. Periodic self monitoring reports	403.12(e)&(h)
✓					5. Reporting all required pollutants	403.12(g)(1)&(h)
✓					6. Signatory/certification of reports	403.12(l)
✓					7. Annual certification by NSCIUs	403.12(q)
✓					8. Submission of compliance schedule reports by required dates	403.12(c)
✓					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
✓					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					11. Notification of hazardous waste discharge	403.12(j)&(p)
					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
✓					Discharge	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(viii)
					a. Chronic violations	
					b. TRC	
					c. Pass through or interference	403.5(a)(1)
					• Spill or slug load	403.12(f)
					d. Other discharge violations (specify)	
					Reporting	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(viii)
					16. SNC with reporting requirements	403.8(f)(2)(viii)
Comments						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
1					G. OTHER	
NA						
Comments						

SECTION I COMPLETED BY:	DATE:
TITLE:	TELEPHONE:

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]

	Yes	No
1. a. Did the CA make substantial changes to the pretreatment program recently? (e. g., definitions, limits)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Were the changes approved by TDEC?	<input type="checkbox"/>	<input type="checkbox"/>

Describe any recent changes that have been implemented.

	Yes	No
2. Is the CA in the process of making any substantial changes to the pretreatment program (including legal authority, local limits, streamlining requirements, etc.)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 CA constantly checks water bills for commercial accounts, checks business permits for new facilities, tours industrial park and surveys new business. The CA periodically sends short forms to industries or makes site visits to determine if the IU needs a permit application. CA sends IWS when new permit is issued.

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

a.	<input type="text" value="2"/>	SIUs (as defined by the CA) [WENDB - SIUS]
	<input type="text" value="1"/>	CIUs [WENDB - CIUS]
	<input type="text" value="1"/>	Noncategorical SIUs**
b.	<input type="text" value="3"/>	Other permitted nonsignificant IUs
c.	<input type="text" value="5"/>	TOTAL

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

List NSCIUs:

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

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

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

C. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]	
1. a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism?	2
<i>= Carrier Corporation main plant (metal finishing)</i> <i>- Carrier Corporation ground water remediation plant # 2</i>	
b. How many SIUs (as defined by the CA) are required to be covered by a general control Mechanism?	0
List SIUs:	
c. How many SIUs are not covered by an existing, unexpired permit or other control mechanism ? [WENDB - NOCM] [RNC - II]	0
If any, explain.	
2. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC - II]	0
If any, explain.	

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

D. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

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

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

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

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

N/A	Yes	No
✓		

If yes, identify the industries.

If no, explain.

- The CA accepts only septic wastes from within Collierville.

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

Yes	No
	✓

If yes, identify and explain.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS			
1. Identify the following.			
Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection (by CA)			
• CIUs	1/year	2/year	
• NSCIUs			
• Other SIUs	1/year	2/year	
b. Sampling (by CA)			
• CIUs	1/year	2/year	
• NSCIUs			
• Other SIUs	1/year	2/year	
c. Self – Monitoring (by industry)			
• CIUs	1/month	1/month	
• Other SIUs	1/quarterly	1/quarterly	
d. Reporting (by industry)			
• CIUs	semi-annual		
• NSCIUs			
• Other SIUs	semi-annual		
2. In the past 12 months, how many, and what percentage of, SIUs were the following? [403.8(f)(2)(vi)] [WENDB - NOIN] [RNC - II]			
a. Not sampled at least once		0	%
b. 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 becoming aware of any violation?			
NA			
4. Does the CA use Best Management Practices (BMP) as a local limit? If yes, did they make necessary changes to their legal authority and the IU control mechanism? Do they have documentation of supporting rationale for each BMP?			
NA			

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT

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

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

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

Explain if appropriate

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

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

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the inspection.

SNC Evaluation Period April 2022 - Nov 2023

*SNC defined by:

<u>0</u>	%	Applicable pretreatment standards
<u>0</u>	%	Applicable reporting requirements
<u>0</u>	%	Pretreatment compliance schedules

POTW	
EPA	

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

F. ENFORCEMENT (Continued)		
7. a. How many SIUs are on compliance schedules?	<input style="width: 50px;" type="text" value="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
		<input checked="" type="checkbox"/>
9. a. Were any SIUs in noncompliance since the last pretreatment inspection by TDEC?	Yes	No
		<input checked="" type="checkbox"/>
b. If yes, what enforcement was taken?		
c. Have they returned to compliance?		
d. If not, what is the CA doing to bring the SIU back into compliance?		
G. ADDITIONAL EVALUATIONS		

SECTION II COMPLETED BY: <u>EMT BOORENS</u>	DATE: <u>4-6-2023</u>
TITLE: <u>INSP / RPS 3</u>	TELEPHONE: <u>901-572-1034</u>
POTW REPRESENTATIVE PROVIDING RESPONSES: <u>Donna Davis</u>	DATE: <u>4-4-2023</u>
<u>pretreatment Coordinator</u>	TELEPHONE: <u>901-457-2830</u>

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PRETREATMENT PROGRAM STATUS UPDATE

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

A. CA INFORMATION

1. CA name <i>Town of Collierville</i>						
2. a. Pretreatment contact <i>Donal Davis</i>	b. Mailing address <i>500 Keough Road Collierville, TN 38017</i>					
c. Title <i>Pretreatment Coordinator</i>		d. Telephone number				
3. Date of last CA report to Approval Authority						
4. Is the CA currently operating under any pretreatment - related consent decree, Administrative Order, compliance schedule, or other enforcement action?		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">Yes</td> <td style="width: 50%; text-align: center;">No</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Yes	No					
<input type="checkbox"/>	<input checked="" type="checkbox"/>					
5. Effluent and sludge quality						
a. List the NPDES effluent and sludge limits violated and the suspected cause(s)						
Parameters Violated	Cause(s)					
<i>None</i>						
b. Has the treatment plant had any violations of biosolids regulations?						
<i>NO</i>						

B. PRETREATMENT PROGRAM STATUS

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

- a. Program modification
- b. Legal authority
- c. Local limits
- d. IU characterization
- e. Control mechanism
- f. Application of pretreatment standards
- g. Compliance monitoring
- h. Enforcement program
- i. Data management
- j. Program resources
- k. Other (specify)

Last PCI	Last Audit	Program Report
Date:	Date:	Date:
<i>None</i>	<i>None</i>	<i>None</i>

ATTACHMENT A
PRETREATMENT PROGRAM STATUS UPDATE

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

Floraline
355 East South Street
Collierville, TN 38017

Date of visit

4-4-2023

Time of visit

10:00 AM

Name(s) of inspector(s)

Eddy Ruvinski

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

Name

Title

yoyle Hester

Lab Manager

1. What does this industry produce?

plant nutrient products

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

Non-SIU

yes

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

NO

4. What raw materials are used?

Micro Nutrients ingredient
macro Nutrients ingredient

IU SITE VISIT REPORT FORM (CONTINUED)

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

^{400-gal}
Mix tanks + Blend by adding water to form liquid

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

Blending city water is used

7. Describe the processes that discharge wastewater.

Rinsing the tank out for next product.

IU SITE VISIT REPORT FORM (CONTINUED)

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

Raw products

Bags
drums
Totes

yes

11. Are any hazardous wastes stored or discharged?

No

Additional comments.

IU SITE VISIT REPORT FORM

COMPLETED BY:

Chris Bourin

TITLE:

EPS3

DATE:

4-6-2023

TELEPHONE:

921-573-1034

IU SITE VISIT REPORT FORM (CONTINUED)

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

Final holding tank.

yes

9. Describe the treatment system which is in place.

pH neutralization in final tank if needed

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS																			
2. Is the CA presently in RNC for any of these violations? a. Failure to enforce against pass through and / or interference [RNC - I] [SNC] b. Failure to submit required reports within 30 days [RNC - I] [SNC] c. Failure to meet compliance schedule milestones within 90 days [RNC - I] [SNC] d. Failure to issue / reissue control mechanisms to 90 percent of SIUs within 6 months [RNC - II] e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC - II] f. Failure to enforce standards and reporting requirements [RNC - II] g. Other (specify) [RNC - II]	Data Source	Yes	No																
			✓																
			✓																
			✓																
			✓																
			✓																
			✓																
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)																			
Name of SIU in SNC	Compliance Status	Source																	
None																			
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. <div style="text-align: right; margin-right: 50px;">SNC Evaluation Period <u>April 2022 - April 2023</u></div> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;"><input type="radio"/></td> <td style="width: 10%; text-align: center;">%</td> <td style="width: 60%;">Applicable pretreatment standards</td> <td style="width: 20%;"></td> </tr> <tr> <td style="text-align: center;"><input type="radio"/></td> <td style="text-align: center;">%</td> <td>Applicable reporting requirements</td> <td></td> </tr> <tr> <td style="text-align: center;"><input type="radio"/></td> <td style="text-align: center;">%</td> <td>Pretreatment compliance schedules</td> <td></td> </tr> </table> <div style="text-align: right; margin-top: 5px;">*SNC defined by:</div> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 80%;">POTW</td> <td> </td> </tr> <tr> <td>EPA</td> <td style="text-align: center;">✓</td> </tr> </table>				<input type="radio"/>	%	Applicable pretreatment standards		<input type="radio"/>	%	Applicable reporting requirements		<input type="radio"/>	%	Pretreatment compliance schedules		POTW		EPA	✓
<input type="radio"/>	%	Applicable pretreatment standards																	
<input type="radio"/>	%	Applicable reporting requirements																	
<input type="radio"/>	%	Pretreatment compliance schedules																	
POTW																			
EPA	✓																		
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program <div style="font-size: 1.5em; margin-top: 20px;">NA</div>																			

ATTACHMENT A COMPLETED BY: <u>Chris Sanders</u> TITLE: <u>CEPS</u>	DATE: <u>6-6-2023</u> TELEPHONE: <u>906-573-1034</u>
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ATTACHMENT C

WORKSHEETS

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

WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET		
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.		
CA name	Town of Collierville	
NPDES number	TN02 57461	
Date of audit	4-4-2023	
	Checklist Reference	Data
• Number of SIUs*	II.B.2.a.	2
• Number of CIUs	II.B.2.a.	1
- Number of SIUs without control mechanism	II.C.1.a.	0
- Number of SIUs not inspected	II.E.2.b.	0
- Number of SIUs not sampled	II.E.2.a.	0
- Number of SIUs in SNC with Pretreatment Standards	II.F.3.	0
- Number of SIUs in SNC with Reporting Requirements	II.F.3.	0
- Number of SIUs in SNC with Pretreatment Schedule	II.F.3.	0
- Number of SIUs in SNC Published in the Newspaper	II.F.4.	0
- SIUs on Schedules	II.F.7.	0
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."		
**As defined in 40 CFR 403.8(f)(2)(viii).		

WENDB DATA ENTRY WORKSHEET	DATE: 4-4-2023
COMPLETED BY: <u>Chris Rameis</u>	
TITLE: <u>EPS3</u>	TELEPHONE: 901-578-1034

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	1 area of Collierville																	
NPDES number	No. 57461																	
Date of audit	4-4-2023																	
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="padding: 5px;">Level</th> <th style="padding: 5px;">Checklist Reference</th> </tr> </thead> <tbody> <tr> <td style="text-align: center; padding: 5px;">I</td> <td style="padding: 5px;">II.G.6</td> </tr> <tr> <td style="text-align: center; padding: 5px;">I</td> <td style="padding: 5px;">Attach A.B.2.b</td> </tr> <tr> <td style="text-align: center; padding: 5px;">I</td> <td style="padding: 5px;">Attach A..B.2.c</td> </tr> <tr> <td style="text-align: center; padding: 5px;">II</td> <td style="padding: 5px;">II.D.1.b</td> </tr> <tr> <td style="text-align: center; padding: 5px;">II</td> <td style="padding: 5px;">II.F.2.a</td> </tr> <tr> <td style="text-align: center; padding: 5px;">II</td> <td style="padding: 5px;">I.C.1; II.G.2</td> </tr> <tr> <td style="text-align: center; padding: 5px;">II</td> <td style="padding: 5px;"></td> </tr> </tbody> </table>	Level	Checklist Reference	I	II.G.6	I	Attach A.B.2.b	I	Attach A..B.2.c	II	II.D.1.b	II	II.F.2.a	II	I.C.1; II.G.2	II	
Level	Checklist Reference																	
I	II.G.6																	
I	Attach A.B.2.b																	
I	Attach A..B.2.c																	
II	II.D.1.b																	
II	II.F.2.a																	
II	I.C.1; II.G.2																	
II																		
<input checked="" type="checkbox"/> None	Failure to enforce against pass through and / or interference																	
<input type="checkbox"/>	Failure to submit required reports within 30 days																	
<input type="checkbox"/>	Failure to meet compliance schedule milestone date within 90 days																	
<input type="checkbox"/>	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months																	
<input type="checkbox"/>	Failure to inspect or sample 80% of SIUs within the last 12 months																	
<input type="checkbox"/>	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)																	
<input type="checkbox"/>	Other (specify)																	
SNC																		
<input checked="" type="checkbox"/>	CA in SNC for violation of any Level I criterion																	
<input type="checkbox"/>	CA in SNC for violation of two or more Level II criterion																	
<p>For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements</u></p>																		

RNC WORKSHEET COMPLETED BY: <u>Chris Rowley</u> TITLE: <u>EPS3</u>	DATE: <u>4-4-2023</u> TELEPHONE: <u>901-573-1034</u>
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