

# POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

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CA name and address:

City of Rossville  
P.O. Box 27  
Rossville, TN 38066

Date(s) of PCI

April 27, 2023

Period covered by PCI

April 2022 - March 2023

Pretreatment Implementation Review Taskforce / Domestic Sewage Study incorporated in NPDES permit?

Yes

No

### INSPECTOR (S)

Name	Title/Affiliation	Telephone Number
Edy Bouzeid	EPS3-TRAC-DWR	(901) 573-1034

### CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Joseph Howell	Pretreatment Coordinator *	(901) 326-7807

\*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="font-family: cursive; font-size: 1.2em;">             The Eggo Company (Kellogg's)              585 Morrison Road              Rossville, TN 38066           </div>	Total flow (gpd)	Process flow (gpd)  <div style="font-family: cursive; font-size: 1.2em;">0.048761</div>	
Type of industry (products manufactured)  <div style="font-family: cursive; font-size: 1.2em;">Frozen Specialty Food Manufacturing Facility</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="font-family: cursive; font-size: 1.2em;">             Current permit: effective date: March 4, 2020                                               expiration date: February 28, 2024               previous permit: effective date: January 3, 2021                                               expiration date: October 24, 2017.           </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;">The Egg Company</div>						
File	File	File	File	File	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
✓					<b>A. CA NOTIFICATION OF IU</b>	
✓					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)
<div style="margin-bottom: 10px;">Comments</div>						

## SECTION I: IU EVALUATION (Continued)


File <u>1</u>	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					<b>B. ISSUANCE OF IU CONTROL MECHANISM</b>	
✓					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					a. Individual control mechanism	
					b. <b>General control mechanism</b>	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, <b>Best Management Practices</b> )	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
✓					• Identification of pollutants to be monitored	
					• <b>Info on waiver if allowing a waiver for pollutant not present or expected to be present (for CIUs only)</b>	
✓					• Sampling locations/discharge points	
✓					• Sample types (grab or composite)	
✓					• Reporting requirements ( <b>including all monitoring results</b> )	
✓					• 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. <b>Slug discharge control plan, if determined by the POTW to be necessary.</b>	
<div style="margin-bottom: 5px;">Comments</div>						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
1					<b>B. ISSUANCE OF IU CONTROL MECHANISM (cont.)</b>  <b>3. Issuance of General Control Mechanisms</b> 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"> <li>• Contact information</li> <li>• Production processes</li> <li>• Types of waste generated</li> <li>• Location for monitoring all wastes covered by the general permit</li> </ul> e. Documentation to support the POTW's determination	403.8(f)(1)(iii)(A)
<b>Comments</b>						



## SECTION I: IU EVALUATION (Continued)

File <u>1</u>	File _____	File _____	File _____	File _____	<b>IU FILE REVIEW</b>	<b>Reg. Cite</b>
					<b>C. CA APPLICATION OF IU PRETREATMENT STANDRDS</b>	
					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. <b>Classification of nonsignificant CIU</b>	<b>403.3(v)(2)</b>
					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					<b>4. Application of Best Management Practices</b>	<b>403.8(f)(1)(iii)(B)(4)</b>
					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)
<div style="display: flex;"> <div style="width: 150px; border-bottom: 1px solid black; margin-bottom: 5px;">Comments</div> <div style="flex-grow: 1;"></div> </div>						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					<b>D. CA COMPLIANCE MONITORING</b>	
					Sampling	
✓					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)
✓					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, <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)	
✓					7. Inspection at frequency specified in approved program	
✓					8. Documentation of inspection activities	403.8(f)(2)(vi)
✓					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
Comments						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
1					<b>E. CA ENFORCEMENT ACTIVITIES</b>	
✓					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)
1					5. Publication for SNC	403.8(f)(2)(vii)
<b>Comments</b> <div style="font-family: cursive; color: blue; font-size: 1.2em; margin-top: 20px;">             1. CA has 12 months to publish the IU in a local newspaper.           </div>						

## SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
<u>1</u>					<b>F. IU COMPLIANCE STATUS</b>	
					Self-Monitoring and Reporting	
<input checked="" type="checkbox"/>					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
<input checked="" type="checkbox"/>					2. Analysis of all required pollutants	403.12(g)(1)&(h)
<input checked="" type="checkbox"/>					3. Submission of BMR/90-day report	403.12(b) &(d)
<input checked="" type="checkbox"/>					4. Periodic self monitoring reports	403.12(e)&(h)
<input checked="" type="checkbox"/>					5. Reporting all required pollutants	403.12(g)(1)&(h)
<input checked="" type="checkbox"/>					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)
<input checked="" type="checkbox"/>					• 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)
<b>INSTRUCTIONS: Indicate the IU's noncompliance status by placing an "X" in the appropriate box.</b>						
					<b>Discharge</b>	
					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(viii)
<input checked="" type="checkbox"/>					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)	
					<b>Reporting</b>	
					15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(viii)
					16. SNC with reporting requirements	403.8(f)(2)(viii)
Comments 1. The IU was in SNC for the period from July 2022 to the 2022.						

## SECTION I: IU EVALUATION (Continued)

File <u>1</u>	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					<b>G. OTHER</b>	
✓/A						
Comments						

SECTION I COMPLETED BY: _____ <div style="text-align: right; margin-top: 10px;">TITLE: _____</div>	DATE: _____ <div style="text-align: right; margin-top: 10px;">TELEPHONE: _____</div>
---	---

## SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

### A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

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

Yes

No

b. Were the changes approved by TDEC?

Describe any recent changes that have been implemented.

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

Yes

No

If yes, describe.

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

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

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

The Rossville WWT NPAES permit becomes effective on June 1, 2023. The CA has 120 days from the effective date and submit the IWS.

Rossville is a small town and when ~~and~~ a new IU moves to town, a survey form is submitted to the IU to inquire about its process water.

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

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

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

List NSCIUs:

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

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

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

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

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

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

List SIUs:

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

*The Eggo Company has developed a slug discharge control plan after their permit issued.*

\* 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
<input checked="" type="checkbox"/>		

If yes, identify the industries.

*No wastes are hauled to POTW.*

If no, explain.

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

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

If yes, identify and explain.

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

### E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. Identify the following.			
Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection (by CA)			
• CIUs			
• NSCIUs			
• Other SIUs	1/year	2/year	
b. Sampling (by CA)			
• CIUs			
• NSCIUs			
• Other SIUs	1/year	1/year	
c. Self - Monitoring (by industry)			
• CIUs			
• Other SIUs	1/week	2/week	
d. Reporting (by industry)			
• CIUs			
• NSCIUs			
• Other SIUs	1/month	1/month	
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?			
NO			

## 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)

Explain if appropriate

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

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 - April 2023

<u>100</u>	<u>100</u>	%	Applicable pretreatment standards
<u>0</u>	<u>0</u>	%	Applicable reporting requirements
<u>0</u>	<u>0</u>	%	Pretreatment compliance schedules

\*SNC defined by:

POTW	
EPA	<input checked="" type="checkbox"/>

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

### F. ENFORCEMENT (Continued)

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	Yes	No
		✓

The SIU was in SNC during the period of July 2022 - October 2022 and the CA has 12 months to publish the IU in a local newspaper.

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?

- Interference
- Pass through
- Fire or explosions (flashpoint, etc.)
- Corrosive structural damage
- Flow obstruction
- Excessive flow rates
- Excessive pollutant concentrations
- Heat problems
- Interference due to O&G
- Toxic fumes
- Illicit dumping of hauled wastes
- Worker health and safety
- Other (specify)

Yes	No	Unknown	Explain
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		
	✓		

- b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]

Yes	No

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

### F. ENFORCEMENT (Continued)

7. a. How many SIUs are on compliance schedules?

0

b. List these SIUs by name and compliance schedule end dates (attach additional sheets as needed).

SIU	End Date
N/A	

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.

N/A

Yes

No

9.

a. Were any SIUs in noncompliance since the last pretreatment inspection by TDEC?

Yes

No

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:

TITLE:

DATE: 4-27-2023

TELEPHONE: 901-573-6034

POTW REPRESENTATIVE

PROVIDING RESPONSES:

DATE: 4-27-2023

TELEPHONE: 901-326-7807

*EPS3*  
*Joseph Howell*

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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 <u>City of Rossville</u>		
2. a. Pretreatment contact <u>Joseph Howell</u>	b. Mailing address <u>P.O. Box 27</u> <u>Rossville, TN 38066</u>	
c. Title	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?	Yes	No
		<input checked="" type="checkbox"/>
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>	
<u>None</u>		
b. Has the treatment plant had any violations of biosolids regulations?		
<u>None</u>		

### 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: <u>6-28-22</u>
		<input checked="" type="checkbox"/>
		<input checked="" type="checkbox"/>



## 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 ]			✓
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
The Tessa Company	Intake Corrective Actions	

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 April 2022 - November 2023

100	100 %	Applicable pretreatment standards
0	0 %	Applicable reporting requirements
0	0 %	Pretreatment compliance schedules

\*SNC defined by:

POTW	
EPA	✓

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

None

ATTACHMENT A COMPLETED BY:

Carol Bonner

TITLE:

EPS3

DATE: 4-27-2023

TELEPHONE: 901-573-1034

## **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

The Eggo Company  
Rossville

Date of visit

4-27-2023

Time of visit

1045 AM

Name(s) of inspector(s)

Eddy Bouzeid  
Brittany Gibson

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

Name

Title

Jonathan Frangenberg

Facility supervisor

1. What does this industry produce?

Frozen waffles

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

SIUS

yes

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

No

4. What raw materials are used?

Flour  
sugar

## IU SITE VISIT REPORT FORM (CONTINUED)

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

Mix → Cook → package

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

Mixing and cleaning

well water.

7. Describe the processes that discharge wastewater.

Mix tanks, floors and conveyor belts  
cleaning of

## IU SITE VISIT REPORT FORM (CONTINUED)

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

Effluent samples taken from the North pit

yes

9. Describe the treatment system which is in place.

DAF + pH adjustment

## IU SITE VISIT REPORT FORM (CONTINUED)

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

cleaning  
polymer  
caustic  
chlorine  
sulfuric acid

totes  
+  
secondary  
containment

yes

11. Are any hazardous wastes stored or discharged?

NO

Additional comments.

IU SITE VISIT REPORT FORM

COMPLETED BY:

Craig R. Bowers

TITLE:

EPSS

DATE:

4-27-2023

TELEPHONE:

901-573-1034

## WENDB DATA ENTRY WORKSHEET

### II. WENDB DATA ENTRY WORKSHEET

INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.

CA name City of Rossville  
 NPDES number TN00 64092  
 Date of audit 4-27-2023

	Checklist Reference	Data
• Number of SIUs*	II.B.2.a.	1
• Number of CIUs	II.B.2.a.	0
- Number of SIUs without control mechanism	II.C.1.a.	0
- Number of SIUs not inspected	II.E.2.b.	0
- Number of SIUs not sampled	II.E.2.a.	0
- Number of SIUs in SNC with Pretreatment Standards	II.F.3.	1
- 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

COMPLETED BY:

TITLE:

DATE: 4-27-2023

TELEPHONE: 901-573-1034

# 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 City of Roswell

NPDES number 720064092

Date of audit 4-27-2023

		Level	Checklist Reference
<input checked="" type="checkbox"/> None	Failure to enforce against pass through and / or interference	I	II.G.6
<input type="checkbox"/>	Failure to submit required reports within 30 days	I	Attach A.B.2.b
<input type="checkbox"/>	Failure to meet compliance schedule milestone date within 90 days	I	Attach A.B.2.c
<input type="checkbox"/>	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II	II.D.1.b
<input type="checkbox"/>	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.F.2.a
<input type="checkbox"/>	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II	I.C.1; II.G.2
<input type="checkbox"/>	Other (specify)	II	

### SNC

- ☐ 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 POTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY: Ross Rando  
TITLE: EPS3

DATE: 4-27-2023  
TELEPHONE: 401-573-1034