

POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

PCI CHECKLIST CONTENTS

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CA name and address: City of Union City Wastewater Treatment Plant Mailing: PO Box 9 Union City, TN 38281	Date(s) of PCI 05/18/2023 Period covered by PCI 09/21/2022 – 05/18/2023
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PIRT / DSS incorporated in NPDES permit?	Yes	No

INSPECTOR (S)		
Name	Title/Affiliation	Telephone Number
Johen Bowling	EPS 2	(731) 571-8146
Kaylee Sabo	EPS 1	(731) 676-6604
Elizabeth Williams	Volunteer/Intern	

CA REPRESENTATIVE (S)		
Name	Title/Affiliation	Telephone Number
Jason Moss	WW Treatment Plant Director	(731) 885-9144
Tony Lane	Foreman	(731) 446-6483

*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> A </u> Industry name and address Tennessee Custom Mixing (Titan Tire) SIC: 3011 / NAICS: 326211 3260 Goodyear Blvd. Union City, TN 38261	Total flow (gpd)	Process flow (gpd) <div style="text-align: center; color: blue;"> Max. Monthly Avg. Flow 9,900 GPD </div>	
		Type of industry (products manufactured) <div style="color: blue;"> Rubber Mixing </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="color: blue;"> Permit No. 3 Effective: January 31, 2021 Expire: January 31, 2024 Issuance: January 12, 2021 Plant Manager: Aaron Scott Email: aaron.scott@tcmix.com </div>			

SECTION I: IU FILE EVALUATION (Continued)

NARRATIVE COMMENTS			
FILE <u> B </u> Industry name and address Williams Country Sausage Co. SIC: 2013 / NAICS: 311612 5132 Old Troy Hickman Rd. Union City, TN 38261	Total flow (gpd) Max. Monthly Total Flow 196,493 GPD	Process flow (gpd)	
Industry visited during PCI Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Applicable Federal category Compliance status <input type="checkbox"/> SNC (period: _____) <input type="checkbox"/> Noncompliance/corrected <input type="checkbox"/> Noncompliance/continuing	
Comments Permit No. 10 Effective : January 31, 2021 Expiration : January 31, 2024 Revision : January 15, 2021			
NARRATIVE COMMENTS			
FILE _____ Industry name and address	Total flow (gpd)	Process flow (gpd)	
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					<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 <u>A</u>	File <u>B</u>	File ___	File ___	File ___		
IU FILE REVIEW					Reg. Cite	
A. CA NOTIFICATION OF IU						
<u>X</u>	<u>X</u>				1. Notification of classification or change in classification	403.8(f)(2)(iii)
<u>X</u>	<u>X</u>				2. Notification of applicable standards/requirements/RCRA	403.8(f)(2)(iii)
<p>Comments</p>						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	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)
X	X				a. Individual control mechanism	
N/A	N/A				b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
X	X				a. Statement of duration (≤ 5 years)	
X	X				b. Statement of nontransferability	
2.c.	2.c.				c. Applicable effluent limits (local limits, categorical standards, Best Management Practices)	
					d. Self monitoring requirements	403.8(f)(1)(iii)(B)(4)
X					• Identification of pollutants to be monitored	
N/A	N/A				• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
X	X				• Sampling locations/discharge points	
X	X				• Sample types (grab or composite)	
X	X				• Reporting requirements (including all monitoring results)	
X	X				• Record-keeping requirements	
X	X				e. Statement of applicable civil and criminal penalties	
X	X				f. Compliance schedules	
X	X				g. Notice of slug loading	
X	X				h. Notification of spills, bypasses, upsets, etc.	
X	X				i. Notification of significant change in discharge	
X	X				j. 24-hour notification of violation/resample requirement	
X	X				k. Slug discharge control plan, if determined by the POTW to be necessary.	
<p>Comments</p> <p><u>File A</u> 2.c. Local Limits are under revision and approval. Will update permits once approved.</p> <p>2. d. Sampling Location/Discharge Point. The permit sampling location is depicted on attached exhibit, Attachment A. Not observed on electronic version of the permit however, a copy was available at the time of visit.</p> <p><u>File B</u> 2.c. Local Limits are under revision and approval. Will update permits once approved.</p> <p>2.d. Sampling Location/Discharge Point. The permit sampling location is depicted on attached exhibit, Attachment A. Not observed on electronic version of the permit however, a copy was available at the time of visit.</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					e. Documentation to support the POTW's determination	
<p>Comments</p> <p>General Control Mechanism not used.</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA APPLICATION OF IU PRETREATMENT STANDRDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					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)
<p>Comments</p> <p style="color: blue; margin-top: 20px;">Significant Non-Categorical</p>						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA COMPLIANCE MONITORING	
					Sampling	
X	X				1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
N/A	N/A				<ul style="list-style-type: none"> • Sample waived pollutant(s) at least once during the term of the control mechanism 	403.8(f)(2)(v)(A)
X	X				2. Sampling at frequency specified in approved program	
X	X				3. Documentation of sampling activities	403.8(f)(2)(vi)
X	X				4. Analysis for all regulated parameters	
X	X				5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
X	X				6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
N/A	N/A				a. If a POTW has determined a discharger to be a NSCIU <ul style="list-style-type: none"> • Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements) 	403.8(f)(2)(v)(B)
X	X				7. Inspection at frequency specified in approved program	
X	X				8. Documentation of inspection activities	403.8(f)(2)(vi)
X	X				9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
Comments						

SECTION I: IU EVALUATION (Continued)

File <u>A</u>	File <u>B</u>	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					E. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vii)
N/A	N/A				a. Discharge violations	
N/A	N/A				b. Monitoring/reporting violations	
N/A	N/A				c. Compliance schedule violations	
N/A	N/A				2. Calculation of SNC	403.8(f)(2)(vii)
N/A	N/A				3. Adherence to approved ERP	403.8(f)(5)
N/A	N/A				4. Escalation of enforcement	403.8(f)(5)
N/A	N/A				5. Publication for SNC	403.8(f)(2)(vii)
Comments						
<p>Williams Sausage had under a compliance schedule for several months. During the last TDEC Pretreatment Audit they were continuing the compliance schedule. Williams Sausage is now in compliance with the Wastewater Treatment Plant and has been in compliance since approximately September 2022. Since Williams Sausage returned back to compliance no violataions have occurred. Williams Sausage had some operator error that caused issues with the loading limits instead of concentration limits. However, this was due to operator error and temperature conditions. No violations were issued.</p>						

SECTION I: IU EVALUATION (Continued)

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

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

	Yes	No
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.

	Yes	No
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.

Local Limits are under revision and approval.

	YES	NO
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?

	YES	NO
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)]

Once every permit cycle.

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

a.	7	SIUs (as defined by the CA) [WENDB - SIUS]
	3	CIUs [WENDB - CIUS]
	0	Zero-discharging SIUs
	4	Noncategorical SIUs**
b.	0	Other regulated noncategorical IUs (specify)
c.	7	TOTAL

d. 0 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.	<p>a. How many SIUs (as defined by the CA) are required to be covered by an individual control mechanism ? 7</p> <p style="color: red; margin-left: 20px;">List SIUs:</p> <p>b. How many SIUs (as defined by the CA) are required to be covered by a general control Mechanism? N/A</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] 0</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] 0</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 ?		2	

If yes, identify the industries.

ECM of Ridgley, Hauling Leachate
Northwest TN Disposal, Hauling Leachate

If no, explain.

	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)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS			
1. Identify the following.			
Program Aspect	Required Frequency	Actual Frequency	Explain Difference
a. Inspection			
• CIUs	Annually	Semi-Annually	
• NSCIUs			
• Other SIUs	Annually	Semi-Annually	
b. Sampling (by CA)			
• CIUs	Semi-Annually	Semi-Annually	
• NSCIUs	Semi-Annually		
• Other SIUs	Quarterly	Semi-Annually	
c. Self – Monitoring			
• CIUs	Semi-Annually		
• Other SIUs	Monthly		
d. Reporting			
• CIUs	Quarterly		
• NSCIUs			
• Other SIUs	Quarterly		
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]			%
b. Not sampled at least once			%
c. Not inspected at least once			%
If any, explain.			
<p>Quarterly: ECM & Northwest TN Disposal / Williams Foodservice. Monthly: Williams Sausage / Kohler / ICI / Titan Tire</p>			
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)

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
		X
		X
		X
		X
		X
		X
		X
		X
		X
		X

Explain if appropriate

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

N/A	Yes	No
	X	

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

	%	Applicable pretreatment standards and reporting requirements	*SNC defined by:
		Self - monitoring requirements	POTW
		Pretreatment compliance schedules	EPA

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

Evaluation Period: _____

Number of SIUs: 5/7

Names of SIUs: Titan Tire, Kohler, ECM, NW TN Disposal, ICI

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)]	Yes	No																																																												
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?																																																														
	<ul style="list-style-type: none"> • Interference • Pass through • Fire or explosions (flashpoint, etc.) • Corrosive structural damage • Flow obstruction • Excessive flow rates • Excessive pollutant concentrations • Heat problems • Interference due to O&G • Toxic fumes • Illicit dumping of hauled wastes • Worker health and safety • Other (specify) 	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Yes</th> <th style="width: 25%;">No</th> <th style="width: 25%;">Unk</th> <th style="width: 25%;">Explain</th> </tr> </thead> <tbody> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> <tr><td></td><td style="text-align: center;">X</td><td></td><td></td></tr> </tbody> </table>	Yes	No	Unk	Explain		X				X				X				X				X				X				X				X				X				X				X				X				X				X			
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	b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Yes</th> <th style="width: 50%;">No</th> </tr> </thead> <tbody> <tr> <td style="height: 20px;"></td> <td></td> </tr> </tbody> </table>	Yes	No																																																											
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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	
		Yes	No
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.	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.) ?	X	
	Williams Sausage was under a compliance schedule. They returned into compliance approximately in September 2022 through the compliance schedule.		
G. ADDITIONAL EVALUATIONS			

SECTION II COMPLETED BY: Johen Bowling TITLE: EPS 2	DATE: 05/18/2023 TELEPHONE: (731) 571-8146
POTW REPRESENTATIVE PROVIDING RESPONSES:	DATE: TELEPHONE:

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ATTACHMENT A
PRETREATMENT PROGRAM STATUS UPDATE

PRETREATMENT PROGRAM STATUS UPDATE

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

A. CA INFORMATION

1. CA name **Union City (A.L. Strub Wastewater Treatment Plant)**

2. a. Pretreatment contact
Jason Moss

b. Mailing address
PO BOX 9 Union City, TN 38281

c. Title **Plant Director**

d. Telephone number **(731) 885-9144**

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

X

5. Effluent and sludge quality

a. List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)

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

Unknown

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

- 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: 09/03/2021	Date: 04/26/22	Date:
	X	

PRETREATMENT PROGRAM STATUS UPDATE

B. PRETREATMENT PROGRAM STATUS			
2. Is the CA presently in RNC for any of these violations ? a. Failure to enforce against pass through and / or interference [RNC - I][SNC] b. Failure to submit required reports within 30 days [RNC - I][SNC] c. Failure to meet compliance schedule milestones within 90 days [RNC - I][SNC] d. Failure to issue / reissue control mechanisms to 90 percent of SIUs within 6 months [RNC - II] e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC - II] f. Failure to enforce standards and reporting requirements [RNC - II] g. Other (specify) [RNC - II]	Data Source	Yes	No
			X
			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)			
Name of SIU in SNC	Compliance Status	Source	
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.			
			SNC Evaluation Period <input style="width: 100px;" type="text"/>
	%	Applicable pretreatment standards and reporting requirements	*SNC defined by:
	%	Self - monitoring requirements	POTW <input style="width: 50px;" type="text"/>
	%	Pretreatment compliance schedules	EPA <input style="width: 50px;" type="text"/>
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program None			

ATTACHMENT A COMPLETED BY: <div style="text-align: center;">TITLE:</div>	DATE: TELEPHONE:
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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

Titan Tire

Date of visit 05/18/2023

Time of visit 11:00 a.m.

Name(s) of inspector(s)

Johen Bowling, TDEC EPS 2

Kaylee Sabo, TDEC EPS 1

Elizabeth Williams, TDEC Volunteer

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

Name

Title

John McAdoo

Environmental Coordinator

1. What does this industry produce ?

Rubber

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

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

No

4. What raw materials are used ?

Rubber compounds, carbon black, oils

IU SITE VISIT REPORT FORM (CONTINUED)

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

Raw materials go in the mixer, blender, extruder, and then rubber is produced. When the raw materials go into the mixer / blender rubber sheets come out and they run through coating process.

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

City water and well water for manufacturing. Water is used for cooling and heating machinery.

7. Describe the processes that discharge wastewater.

Wastewater comes from cooling and heating machinery. Cleaning and washing goes to sanitary.

IU SITE VISIT REPORT FORM (CONTINUED)

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

Manhole is by the entrance on the SW corner of property. Both IU and CA sample from the same location.

9. Describe the treatment system which is in place.

Oil and solids separator. Screens in settling tank are cleaned once a day.

IU SITE VISIT REPORT FORM (CONTINUED)

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

Cleaning products and some resins.

11. Are any hazardous wastes stored or discharged ?

No.

Additional comments.

IU SITE VISIT REPORT FORM

COMPLETED BY: **Johen Bowling**

TITLE: **EPS 2**

DATE: **05/18/2023**

TELEPHONE: **(731) 571-8146**

WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name Union City (A.L. Strub Wastewater Treatment Plant)			
NPDES number TN0021580			
Date of audit 05/18/2023 Pretreatment Compliance Inspection			
	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	7
• Number of CIUs	CIUS	II.C.4.a	2
- Number of SIUs without control mechanism	NOCM	II.D.1.A	
- Number of SIUs not inspected or sampled	NOIN	II.F.2.a	
- Number of SIUs in SNC** with standards or reporting	PSNC	Attach A.B.4	
- Number of SIUs in SNC with self - monitoring	MSNC	Attach A.B.4	
- Number of SIUs in SNC with self - monitoring and not Inspected or sampled	SNIN	II.G.5	
*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: 05/18/2023
COMPLETED BY: Johen Bowling	
TITLE: EPS 2	TELEPHONE: (731) 571-8146

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 Union City		
NPDES number TN0021580		
Date of audit 05/18/2023 Pretreatment Compliance Inspection		
	Level	Checklist Reference
<input type="checkbox"/> Failure to enforce against pass through and / or interference	I	II.G.6
<input type="checkbox"/> Failure to submit required reports within 30 days	I	Attach A.B.2.b
<input type="checkbox"/> Failure to meet compliance schedule milestone date within 90 days	I	Attach A..B.2.c
<input type="checkbox"/> Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II	II.D.1.b
<input type="checkbox"/> Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.F.2.a
<input type="checkbox"/> Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II	I.C.1; II.G.2
<input type="checkbox"/> Other (specify)	II	
SNC		
<input type="checkbox"/> CA in SNC for violation of any Level I criterion		
<input type="checkbox"/> CA in SNC for violation of two or more Level II criterion		
For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements		

RNC WORKSHEET COMPLETED BY: Johen Bowling	DATE: 05/18/2023
TITLE: EPS 2	TELEPHONE: (731) 571-8146