

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

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Control Authority (CA) name and address

Date(s) of audit

*Humboldt Utilities
410 S. 3rd Avenue*

7/9/19

AUDITOR (S)

Name	Title/Affiliation	Telephone Number
<i>Laurel Rognstad</i>	<i>EC2 / TDEC</i>	<i>615-532-8786</i>
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CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
<i>Jane Leatherland</i>	<i>Supervisor w/ WWT / Humboldt</i>	<i>731-784-4301</i>
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ACRONYM LIST

Acronym

Term

AO	Administrative order
BMP	Best management practices
BMR	Baseline monitoring report
CA	Control authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical industrial user
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined wastestream formula
DMR	Discharge monitoring report
DSS	Domestic sewage study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement response plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-weighted average
Gpd	Gallons per day
IU	Industrial user
IWS	Industrial waste survey
MGD	Million gallons per day
MSW	Municipal solid waste
NA	Not applicable
ND	Not determined
NOV	Notice of violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and grease
PCI	Pretreatment compliance inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable noncompliance
SIU	Significant industrial user
SNC	Significant noncompliance
SUO	Sewer use ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic organic management plan
TRC	Technical review criteria
TRE	Technical review evaluation
TRIS	Toxics release inventory system
TSDF	Treatment, storage, and disposal facility
TTO	Total toxic organics
UST	Underground storage tank
WENDB	Water Enforcement National Data Base

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section I of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that he/she follows up on any and all violations noted in the previous inspection and annual report during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. 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.

IU IDENTIFICATION

FILE _____ Industry name and address BONGARDS 3001 45 W-Bypass Humboldt, TN 38343	Type of industry CHEESE PROCESSOR	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd) 47,700	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input checked="" type="checkbox"/> Non SIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments		
FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)			
FILE _____ Industry name and address	Type of industry		
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow (gpd)	
Category(ies) _____			
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Comments			
FILE _____ Industry name and address	Type of industry		
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow (gpd)	
Category(ies) _____			
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Comments			

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)

FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow (gpd)
Category(ies) _____	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU		
Comments		
General Comments		

SECTION I: IU EVALUATION

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
✓					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					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	
					• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
✓					• Sampling locations/discharge points	
✓					• Sample types (grab or composite)	
✓					• Reporting requirements (including all monitoring results)	
✓					• Record-keeping requirements	
✓					e. Statement of applicable civil and criminal penalties	
✓					f. Compliance schedules	
✓					g. Notice of slug loading	
✓					h. Notification of spills, bypasses, upsets, etc.	
✓					i. Notification of significant change in discharge	
✓					j. 24-hour notification of violation/resample requirement	
✓					k. Slug discharge control plan, if determined by the POTW to be necessary.	
Comments						
<p style="font-size: 1.2em;">- Existing slug discharge control plan on file. (JBL)</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms a. Involve the same or similar operations b. Discharge the same types of wastes c. Require the same effluent limitations d. Written request by the IU for coverage by a general control mechanism including: <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
N/A					B. CA APPLICATION OF IU PRETREATMENT STANDRDS	
					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
					a. Classification by category/subcategory	
					b. Classification as new/existing source	
					c. Application of limits for all regulated pollutants	
					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
C. 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. <u>Inspection</u> (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)
Comments						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
D. CA ENFORCEMENT ACTIVITIES						
N/A					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					b. Monitoring/reporting violations	
					c. Compliance schedule violations	
					2. Calculation of SNC	403.8(f)(2)(vi)
					3. Adherence to approved ERP	403.8(f)(5)
					4. Escalation of enforcement	403.8(f)(5)
					5. Publication for SNC	403.8(f)(2)(vi)
<p>Comments</p> <p>Per Inspection Report 7/13/18</p> <p>- New Pretreat System w/ DAF instituted. (JGL)</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
E. IU COMPLIANCE STATUS						
✓					Self-Monitoring and Reporting	
✓					1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
N/A					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)
N/A					6. Signatory/certification of reports	403.12(l)
✓					7. Annual certification by NSCIUs	403.12(q)
N/A *					8. Submission of compliance schedule reports by required dates	403.12(c)
N/A *					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
N/A					• Discharge violation	
N/A					• Slug load	
N/A					• Accidental spill	
N/A *					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
N/A					11. Notification of hazardous waste discharge	403.12(j)&(p)
✓					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
N/A					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
N/A					Discharge	
N/A					13. Noncompliance with discharge limits (but not SNC)	
					14. SNC	403.8(f)(2)(vii)
					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)(vii)
					16. SNC with reporting requirements	403.8(f)(2)(vii)
Comments						
<p>* PH VIOLATION WAS DETECTED BY STRIP CHART RECORDER AND WAS NOT IU WAS NOTIFIED BY COPY OF THE VIOLATION. VIOLATION WAS HIGH PH WAS CORRECTED ON FOLLOWING READING.</p>						

SECTION I: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. 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.

IU IDENTIFICATION

FILE _____ Industry name and address <i>WestRock 1720 Ninth Avenue Humboldt, TN 38343</i>	Type of industry <i>Non-categorical significant industrial user. Cardboard Manufacturer.</i>	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) <u><i>SIU</i></u>	Average total flow (gpd) <i>28,735</i>	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Comments		
FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments		

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)		
FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow (gpd)
Category(ies) _____		
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit	Yes <input type="checkbox"/> No <input type="checkbox"/>
Comments		
FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow (gpd)
Category(ies) _____		
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit	Yes <input type="checkbox"/> No <input type="checkbox"/>
Comments		

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)

FILE _____ Industry name and address	Type of industry	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____	Average total flow (gpd)	Average process flow (gpd)
Category(ies) _____		
<input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit	Yes <input type="checkbox"/> No <input type="checkbox"/>

Comments

General Comments

SECTION I: IU EVALUATION

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
				✓	A. ISSUANCE OF IU CONTROL MECHANISM	
				✓	1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					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	
				n/a	• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
				✓	• Sampling locations/discharge points	
				✓	• Sample types (grab or composite)	
				✓	• Reporting requirements (including all monitoring results)	
				✓	• Record-keeping requirements	
				✓	e. Statement of applicable civil and criminal penalties	
				✓	f. Compliance schedules	
				✓	g. Notice of slug loading	
				✓	h. Notification of spills, bypasses, upsets, etc.	
				✓	i. Notification of significant change in discharge	
				✓	j. 24-hour notification of violation/resample requirement	
				✓	k. Slug discharge control plan, if determined by the POTW to be necessary.	
<p>Comments</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms a. Involve the same or similar operations b. Discharge the same types of wastes c. Require the same effluent limitations d. Written request by the IU for coverage by a general control mechanism including: <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					<div style="font-family: cursive; font-size: 1.2em; color: blue;"> No General Control Mechanisms. </div>	

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDRDS	
					1. IU categorization	403.8(f)(1)(ii)
			<i>n/a</i>		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					<i>Significant Non-Categorical Industrial User.</i>	

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
C. 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> <p><i>4/16/19 Sample date: received 1/17/2019.</i></p> <p><i>2 inspections in June and July 2018.</i></p>						

SECTION I: IU EVALUATION (Continued)

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

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS	
					Self-Monitoring and Reporting	
				✓	1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
				✓	2. Analysis of all required pollutants	403.12(g)(1)&(h)
				n/a	3. Submission of BMR/90-day report	403.12(b) &(d)
				✓	4. Periodic self monitoring reports	403.12(e)&(h)
				✓	5. Reporting all required pollutants	403.12(g)(1)&(h)
				✓	6. Signatory/certification of reports	403.12(l)
				n/a	7. Annual certification by NSCIUs	403.12(q)
				✓	8. Submission of compliance schedule reports by required dates	403.12(c)
				n/a	9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
				n/a	10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
				n/a	11. Notification of hazardous waste discharge	403.12(j)&(p)
				n/a	12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
				n/a	13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
					Discharge	
				n/a	13. Noncompliance with discharge limits (but not SNC)	
				n/a	14. SNC	403.8(f)(2)(vii)
					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	
				n/a	15. Noncompliance with reporting requirements (but not SNC)	403.8(f)(2)(vii)
				n/a	16. SNC with reporting requirements	403.8(f)(2)(vii)
Comments						
<div style="display: flex; justify-content: space-between; margin-top: 100px;"> <div style="width: 30%; font-style: italic; color: blue;"> <p>8/13/12</p> <p>403.12(g)(2)</p> </div> <div style="width: 60%; font-style: italic; color: blue;"> <p>Annual certification by NSCIUs</p> <p>403.12(q)</p> </div> </div>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. OTHER	
<p>Comments</p>						

SECTION I COMPLETED BY: Rhett Lundy TITLE: Environmental Scientist 2	DATE: 7/9/19 TELEPHONE: 615-313-6630
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SECTION I: IU EVALUATION

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
1	2	—	—	—	A. ISSUANCE OF IU CONTROL MECHANISM 1. Issuance or reissuance of control mechanism a. Individual control mechanism b. General control mechanism 2. Individual control mechanism contents a. Statement of duration (≤ 5 years) b. Statement of nontransferability c. Applicable effluent limits (local limits, categorical standards, Best Management Practices) d. Self monitoring requirements • Identification of pollutants to be monitored • Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only) • Sampling locations/discharge points • Sample types (grab or composite) • Reporting requirements (including all monitoring results) • Record-keeping requirements e. Statement of applicable civil and criminal penalties f. Compliance schedules g. Notice of slug loading h. Notification of spills, bypasses, upsets, etc. i. Notification of significant change in discharge j. 24-hour notification of violation/resample requirement k. Slug discharge control plan, if determined by the POTW to be necessary.	403.8(f)(1)(iii)
✓	✓					403.8(f)(1)(iii)(A)
n/a	n/a					403.8(f)(1)(iii)(B)
✓	✓					
✓	✓					
⑦	⑧					
✓	✓					403.8(f)(1)(iii)(B)(4)
n/a	n/a					
✓	✓					
✓	✓					
②	②					
③	③					
n/a	✓					
✓	✓					
⑤	⑤					
✓	✓					
✓	✓					
Comments ① pH under daily max should be instantaneous. ② Missing. ③ Recommend specifying per day. ④ Needs Bypass. ⑤ Needs notification of significant change in discharge. ⑥ Who signs certification statements? ⑦ CBOD vs. BOD ₅ *Permits reviewed by Rhett Lundy 07/22/2019						

SECTION II: DATA REVIEW/IU SITE VISIT

INSTRUCTIONS: Complete this section based on CA activities to implement its pretreatment program. Answers to these questions may be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data may be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit; indicate the reason(s) why these items were not addressed (e.g., lack of time, appropriate CA personnel were not available to answer)
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

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

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, DSS requirements, multijurisdictional situation, etc.)?

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

If yes, describe.

*Will be making substantial changes in next two years due to plant upgrade & Tyron coming. SVO modification, local limits.
Dec 2020 - 3 basins 4th basin - 8-12 months after*

c. Has the CA adopted the 3 required components of the streamlining regulations (slug control requirements referenced in the control mechanism, definition of SNC, and Modification to sampling requirements)?

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

If not, when?

d. Does the CA plan to adopt any of the non-mandatory aspects of the streamlining regulations?

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

If yes, describe.

*NSCIU, pollutants not present, BHPs all LL, equivalent
ness for CIUS*

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

B. LEGAL AUTHORITY [403.8(f)(1)]			
<p>1. Are there any contributing jurisdictions discharging wastewater to the POTW?</p> <p>If yes, explain how the legal authority addresses the contributing jurisdictions.</p>		Yes	No
			✓
<p>2. a. Has the CA updated its legal authority (e.g., SUO) to reflect changes in the General Pretreatment Regulations ?</p> <p>b. Has the CA updated its legal authority to reflect the streamlining changes?</p> <p>c. Did all contributing jurisdictions update their SUOs in a consistent manner? n/a</p> <p>Explain</p>		Yes	No
		✓	
		✓	
<p>3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?</p> <p>If yes, explain.</p>		Yes	No
			✓

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

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

1. How does the CA define SIU? (Is it the same in contributing jurisdictions?)

25,000 +
sq. ft.

Anything declared
Categorical

Ms. Waterland was very familiar w/ definition.

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

Discuss any problems.

IWS, local knowledge, driving around, commercial & industrial customers,
customer service reps for new acct

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

Every five years - Full survey
Continuous updates

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

Inspections, self-monitoring reports, notifications.

c. Does the CA have procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

Yes	No
✓	

d. Indicate which methods are used to update the IWS.

- Review of newspaper / phone book
- Review of water billing records
- Review of plumbing / building permits

✓
✓
✓

- Onsite inspections
- Permit application requirements
- Citizens involvement
- Other (specify)

✓
✓

e. How often is the IWS to be updated?

- Customer service reps
- Social media
for new accts

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

C. IU CHARACTERIZATION (continued) [403.8(f)(2)(i)&(ii)]

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

- | | | | |
|----|---|---|--|
| a. | 4 | SIUs (as defined by the CA) [WENDB - SIUS] | |
| | 0 | CIUs | |
| | 0 | Zero-discharging SIUs | |
| | 4 | Noncategorical SIUs (including zero-discharging noncat. SIUs) | |
| b. | 0 | Other regulated noncategorical IUs (specify) | |
| c. | 4 | TOTAL | |
| d. | 0 | NSCIUs** (as defined by 40 CFR 403.3(v)(2)) | |

List Nonsignificant Categorical Industrial Users:

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

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

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

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

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism? [WENDB - NOCM] [RNC - II] 0 0 %

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

List SIUs:

c. 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.

2. a. Do any UST, CERCLA, RCRA corrective action sites and / or other contaminated ground water sites discharge wastewater to the CA? No

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

Discuss n/a

3. a. Does the CA accept any waste by truck, rail, or dedicated pipe?

Yes	No
	✓

b. Is any of the waste hazardous as defined by RCRA? n/a

CA does not accept any hauled waste & does not plan to accept any hauled waste in the future

c. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)]

n/a

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

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.8(f)(2)(iii)]

n/a

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

TDEC seminars, webinars, WPC (lab auditing presentation), consultant

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

Ms. Leatherland easily located files.

a. For what pollutants have local limits been set

PTL parameters
 SUO also has limits for conventional, but no calculations.
 Currently calculating / allocating ammonia MAIL.

b. How were these pollutants decided upon

PTL parameters

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

PT / inhibition

d. Which allocation method(s) were used?

Uniform allocation
 will be reallocating ammonia based on industrial need.

e. Has the CA identified any pollutants of concern beyond those in its local limits?
 If yes, how has this been addressed?

Yes	No
	✓

*CA in process of reallocating ammonia MAIL

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

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (Continued)

4. What problems, if any, were encountered during local limits development and/or implementation?

No issues noted

5. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA?

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

F. COMPLIANCE MONITORING

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

*CA samples 2/yr min
CA inspects 1/yr min
SIUs sample 2/yr min
SIUs report monthly*

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

CA meets/exceeds State/~~Federal~~ ^{Federal use} requirements. Humboldt has copy of approved program. Activity 7 states that "initially" 1 scheduled 11 non-scheduled monitoring per year. Discussed option to clarify/revise program.

c. If the CA does all of the sampling in lieu of the industry, does the CA repeat the sample and analysis within 30 days of any violation?

CA does not monitor in lieu of industries

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12 month period 7/9/18 to 7/9/19.)

a. Not sampled or not inspected at least once [WENDB - NOIN]

0	0	%
0	0	%
0	0	%

b. Not sampled at least once

c. Not inspected at least once (all parameters) ?

If any, explain. Indicate how percentage was determined (e.g. actual, estimated).

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

F. COMPLIANCE MONITORING (Continued)							
3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report ? [WENDB] [RNC - II]							
			SNC Evaluation Period <u>10/1/18 - 3/31/19</u>				
<u>1</u>	<u>25</u> %	Applicable pretreatment standards and reporting requirements	*SNC defined by:				
<u>0</u>	<u>0</u> %	Self-monitoring requirements	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center; padding: 5px;">POTW</td> <td style="width: 50%;"></td> </tr> <tr> <td style="text-align: center; padding: 5px;">EPA</td> <td style="text-align: center; padding: 5px;"><input checked="" type="checkbox"/></td> </tr> </table>	POTW		EPA	<input checked="" type="checkbox"/>
POTW							
EPA	<input checked="" type="checkbox"/>						
<u>0</u>	<u>0</u> %	Pretreatment compliance schedule(s) <u>Dana - ammonia</u>					
3a. Indicate the number of SIUs that have been in 100% compliance with all pretreatment requirements?							
Evaluation Period: <u>10/1/18 - 3/31/19</u>							
Number of SIUs: <u>0</u>							
Names of SIUs: <u>n/a</u>							
4. What does the CA's basic inspection include? (Process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous waste handling procedures, sampling procedures, laboratory procedures, and monitoring records.) [403.8(f)(2)(v)&(vi)]							
<u>Paperwork, permit, process, pretreatment, chemical storage, lab, haz waste storage, 2° containment / spill control, slug evaluation</u>							
5. Who performs CA's compliance monitoring analysis?							
<ul style="list-style-type: none"> • Metals • Cyanide • Organics • Other (specify) 	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center; padding: 5px;">Performed by: CA/Contract Laboratory Name</td> </tr> <tr> <td style="text-align: center; padding: 5px;"><u>Waypoint</u></td> </tr> <tr> <td style="text-align: center; padding: 5px;">↓</td> </tr> <tr> <td style="height: 20px;"></td> </tr> </table>			Performed by: CA/Contract Laboratory Name	<u>Waypoint</u>	↓	
Performed by: CA/Contract Laboratory Name							
<u>Waypoint</u>							
↓							
6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(vi)]							
<u>Phenol blanks</u> <u>CA occasionally splits with industries</u> <u>discussed</u>							

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

F. COMPLIANCE MONITORING (Continued)

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

Lab issues w/ phenols kits → Ms. Leatherland has addressed this issue w/ the lab.

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

Yes	No
	✓

If yes, summarize.

High pH identified at STP influent. Ms. Leatherland contacted Bongard's to gather information. The IU was not aware of their haz waste discharge until notified by Humboldt. May incident - working on AO with penicillins.
Nov 2018 & May 2019

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug control plan? [403.8(f)(2)(v)]

All SIUs have a SIDCP
CA continuously evaluates, check as part of inspection

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

0

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

10. Does the CA use Best Management Practices (BMPs) as a local limit? If yes, did they make necessary changes to their legal authority and the IU control mechanism? Do they have documentation of supporting rationale for each BMP?

No

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

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(vii)]

*Same as the state / federal definition
Ms. Leatherland easily located SUC.*

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

a. Status

Approved

b. Problems with implementation

None

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

*Ms. Leatherland has found it effective.
CA has fined Borgard's approx. \$49k → IU installed a DAF
as a result of enforcement*

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide examples.

DAF installation

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

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

G. ENFORCEMENT (Continued)

4. Did the CA publish all SIUs in SNC in the largest daily newspaper in the previous year?
[403.8(f)(2)(vii)]

Yes	No
-----	----

✓	
---	--

If yes, attach a copy.

If no, explain.

CA showed copy of Dana PN
CA will attach copy of next SAR
on LSR

5. How many SIUs are in SNC with self - monitoring requirements and were not inspected and / or sampled (in the four most recent full quarters)? [WENDB]

0

6. a. Has the CA experienced any problems since the last inspection (interference, pass through, collection system problems, illicit dumping of hauled wastes, or worker health and safety problems) caused by industrial discharges?

Unk	Yes	No
-----	-----	----

✓		
---	--	--

b. If yes, describe and explain the CA's enforcement action against the IUs causing or contributing to problems.
[RNC - I]

CA assessing whether there was damage to collection system from Bongard's high pH discharge. CA managed to prevent interference at plant, but with much operational work.

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

CA does not have confidential info. Would store in locked cabinet. Discussed requirements.

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

CA has not had a request. CA has procedure. Utility policy is that all requests have to go through Accounting Manager.

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

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

3. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

Appears effective. Ms. Leatherland easily located all requested files.

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

Public notice in the Humboldt Chronicle
Public board meetings w/ comment period.

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

None

6. How long are records maintained? [403.12(o)]

Ms. Leatherland does not throw files away

Over 3 yrs

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

1. Estimate the number of personnel (in FTEs) available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sample collection, sample analysis, data analysis, review and response, enforcement, and administration (including record keeping and data management)].

0.25 FTEs

+
+Waypoint Lab
+PG Environmental assistance

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

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

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

Yes	No
✓	

3. a. Estimate the annual operating budget for the CA's program.

\$ 14,000

b. Is funding expected to: stay the same, increase, decrease (note time frame; e.g., following year, next 3 years, etc.)?

Discuss any changes in funding.

with addition of Tyson

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

None noted

5. a. How does the CA ensure personnel are qualified and up - to - date with current program requirements?

Ms. Leatherland is the only HU employee that does PT. Ms. Leatherland has Level 1 Voluntary PT certification.

Yes	No
✓	

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

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

- a. POTW general operating fund
- b. IU permit fees
- c. Industry surcharges

✓

- d. Monitoring charges
- e. Other (specify)

✓

Base user fee

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

J. ENVIRONMENTAL EFFECTIVENESS / POLLUTION PREVENTION (Continued)

3. If the CA has historical data concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on pollutant - by - pollutant basis.

n/a

4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

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

If yes, what was found?

5. a. Has the CA attempted to implement any kind of public education program?
 b. Are there any plans to initiate such a program to educate users about pollution prevention?
 Explain.

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

*Flushable wipes education at nursing homes.
 WET material brochures handed out if issue is noticed.*

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs) ?

None

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

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

7. Does the CA have any documentation concerning successful pollution prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes	No
	✓

Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

Borgard's
 CIP - caustic, treated w/ H₂SO₄ at Borgard's
 In process of installing alarm system
 Humboldt & PGE working on enforcement assessment & actions
 Succession planning was discussed. Currently no plans for a successor for someone to take over pretreatment. Ms. Leatherland is training 1 water & 1 wastewater operator, but no PT coordinator

→ Send ltr to Alex

Tyson : Dec. 2020 scheduled

SECTION II COMPLETED BY: Laurel Rognstad
 TITLE: EC2

DATE: 7/9/19
 TELEPHONE: 615-532-8784

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 <i>Humboldt Board of Public Utilities</i>						
2. a. Pretreatment contact <i>Jane Leatherland</i>	b. Mailing address <i>410 S. 3rd Avenue</i>					
c. Title <i>PT Coordinator</i>	d. Telephone number <i>731-284-4307</i>					
3. Date of last CA report to Approval Authority <i>5/8/17</i>						
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>See attached ICIS Violations Report</i>						
b. Has the treatment plant had any violations of biosolids regulations? <i>n/a, landfill</i>						

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: <i>6/9/17</i>	Date: <i>6/18/17</i>	Date:
	<input checked="" type="checkbox"/>	