

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

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Control Authority (CA) name and address

City of Union City
1507 Lynch Ln
Union City, TN 38261

Date(s) of audit

9/21/2022

AUDITOR (S)

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CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
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*Identified program contact

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 EVALUATION (Continued)

IU IDENTIFICATION (Continued)		
FILE <u> 10 </u> Industry name and address Williams Country Sausage Company 5132 Old Troy-Hickman Rd Union City, TN 38261	Type of industry Sausage	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd) Maximum monthly Average Process Flow 179,358
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments APR 2022 SAR: SNC in Jan, Feb, Mar for not reporting pH APR 2022 SAR: Subject to an enforceable compliance schedule APR 2022 SAR: Verbal warning 2/14/2022 for pH 5.74, pH limits are 6.0-9.0 APR 2022 SAR: There will be a violation issued for not reporting monthly flows and pH's OCT 2021 SAR: No enforcement actions or exceedances		
General Comments Typed comments were made prior to the audit visit.		

SECTION I: IU EVALUATION

File 10	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)
x					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)
x					a. Statement of duration (≤ 5 years)	
x					b. Statement of nontransferability	
LL					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	
					• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
1					• Sampling locations/discharge points	
x					• Sample types (grab or composite)	
x					• Reporting requirements (including all monitoring results)	
x					• Record-keeping requirements	
x					e. Statement of applicable civil and criminal penalties	
x					f. Compliance schedules	
x					g. Notice of slug loading	
x					h. Notification of spills, bypasses, upsets, etc.	
x					i. Notification of significant change in discharge	
x					j. 24-hour notification of violation/resample requirement	
2					k. Slug discharge control plan, if determined by the POTW to be necessary.	
Comments						
<p>1 Sampling location refers to Attachment A. Attachment A refers to “at a location at the attached exhibit”, but nothing was attached to the permit sent to the Division on 8/4/2022.</p> <p>2 The requirements of a SDCP are listed. All “SIC users” (SIUs?) are required to have a SDCP.</p>						

SECTION I: IU EVALUATION (Continued)

File 10	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
NP					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 General Control Mechanisms not used						

SECTION I: IU EVALUATION (Continued)

File 10	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDRDS	
1					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
na					a. Classification by category/subcategory	
na					b. Classification as new/existing source	
na					c. Application of limits for all regulated pollutants	
na					d. Classification of nonsignificant CIU	403.3(v)(2)
na					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
na					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
na					5. Calculation and application of production based standards	403.6(c)
na					6. Calculation and application of CWF or FWA	403.6(d)&(e)
na					7. Application of most stringent limit	403.8(f)(1)(ii)
Comments						
SIU, not a CIU						

SECTION I: IU EVALUATION (Continued)

File 10	File ___	File ___	File ___	File 10	IU FILE REVIEW	Reg. Cite
C. CA COMPLIANCE MONITORING						
Sampling						
1				✓	1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
na					a. If a POTW has waived monitoring for CIU <ul style="list-style-type: none"> • Sample waived pollutant(s) at least once during the term of the control mechanism 	
				✓	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						
1				✓	6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
na					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) 	
1				✓	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

1 Once per year, as per approved program and NPDES permit

Sampling Records: 2019, 2020, 2021, 2022

2/14/22 CBOD5 parameter: 1800 lb/day
 CBOD5 Sample: 1948 lb/day
~~1/6/22 CBOD5 Sample: 1248 lb/day~~
~~12/8/21 CBOD5 Sample: 1042 lb/day~~
~~11/10/21 CBOD5 Sample: 469 lb/day~~
~~6/8/21 CBOD5 Sample: 984 lb/day~~

Williams Sausage was under administrative order. Due to this order Nov's and other compliance orders were waived. Administrative order became effective on May 01, 2019, and it is still effective.

SECTION I: IU EVALUATION (Continued)

File 10	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>Williams Sausage has been under administrative order effective on May 01, 2019, and it is still effective. Due to this administrative order NOV's and other compliance schedules were waived.</p> <p>Other notes: Flow was elevated compared to their average</p> <p>6/8/22 : 216,354</p> <p>7/12/22 : 278,000</p>						

SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)		
FILE <u> 12 </u> Industry name and address ECM of Ridgely 3145 Chandlers Mill Road Ridgley, TN 38080	Type of industry Landfill Leachate	
<input type="checkbox"/> CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd) 21,000	Average process flow (gpd)
<input checked="" type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	Industry visited during audit Yes <input type="checkbox"/> No <input type="checkbox"/>	
Comments APR 2022 SAR: No enforcement actions or exceedances OCT 2021 SAR: On March 2, 2021, ECM's permit was suspended for 3 high pH readings. After strict conditions being issued, they are allowed to dump again.		
General Comments Class 1 Landfill, 2 nd Largest permitted landfill in TN, with more than 22,000,000 cubic yards of airspace available Solid waste disposal facility. A pump and haul system to dispose of leachate from an industrial landfill collection system		

SECTION I: IU EVALUATION

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
12					A. ISSUANCE OF IU CONTROL MECHANISM	
X					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
NA					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)
X					a. Statement of duration (≤ 5 years)	
X					b. Statement of nontransferability	
X (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	
X (b)					• Process for seeking a waiver for pollutant not present or expected to be present (for CIUs only)	
X					• Sampling locations/discharge points	
X					• Sample types (grab or composite)	
X					• Reporting requirements (including all monitoring results)	
X					• Record-keeping requirements	
X					e. Statement of applicable civil and criminal penalties	
X					f. Compliance schedules	
X					g. Notice of slug loading	
X					h. Notification of spills, bypasses, upsets, etc.	
X					i. Notification of significant change in discharge	
X					j. 24-hour notification of violation/resample requirement	
X (a)					k. Slug discharge control plan, if determined by the POTW to be necessary.	
<p>Comments</p> <p>* Permit received skips from page 7 to page 14. unsure, but it appears nothing is missing. Ignore, printing error SD</p> <p>(a) - Includes requirements for SDCP but does not contain a statement that requires a SDCP be maintained/developed. (pg 16) Correction requirement is mentioned in cover letter.</p> <p>(b) - several areas of the permit contain aspects only applicable to CIUs which EUM is not. (i.e. pg 7, 16)</p> <p>(c) Limits for cadmium, chromium VI, copper, cyanide, lead, nickel, ^{so} zinc listed do not match LL we have on file. It appears they are still listed as the 2010 limits rather than 2015 approved limits. Additionally mercury is listed as 0.0004. The 2015 limit is 0.006 and the 2010 is 0.004.</p>						

SECTION I: IU EVALUATION (Continued)

File 12	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (cont.)	
					3. Issuance of General Control Mechanisms	403.8(f)(1)(iii)(A)
NA					<ul style="list-style-type: none"> 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 	
<p>Comments</p> <div style="border: 1px solid black; background-color: #e0f7fa; padding: 10px; margin: 10px 0;"> <p>All parameters require grab samples rather than composite. TN Rules 0400-40-14-.07(2)(b)(4) states grab samples should be obtained when comp. sampling is not appropriate. Should reasoning for this be included in permit?</p> </div>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
12					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
X					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
NA					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)
X					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
NA					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)
(a)					7. Application of most stringent limit	403.8(f)(1)(ii)
<p>Comments</p> <p>(a) - see section A comment (c)</p>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
C. CA COMPLIANCE MONITORING						
					Sampling	
①					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	403.8(f)(2)(v)(A)
NA					• Sample waived pollutant(s) at least once during the term of the control mechanism	
✓					2. Sampling at frequency specified in approved program	403.8(f)(2)(vi)
✓					3. Documentation of sampling activities	403.8(f)(2)(vi)
✓					4. Analysis for all regulated parameters	403.8(f)(2)(vi)
✓					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
②					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)
NA					• 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	403.8(f)(2)(vi)
✓					8. Documentation of inspection activities	403.8(f)(2)(vi)
③					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
<p>Comments</p> <p>① CA Sampling dates: 6/22/22 ; 1/4/22 ; 1/4/21 ; 1/6/20 ; 1/2/19</p> <p>② CA Inspection dates: 12/2/21 ; 4/20/21 ; 9/25/19 ; 1/7/19 * No inspections in 2020 due to Ecam permit being suspended (2/3/20 - 1/20/21)</p> <p>③ SDCP Evaluation is present on Inspection form. Method is not required on all Inspection forms</p>						

SECTION I: IU EVALUATION (Continued)

File 12	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
①					1. Identification of violations	403.8(f)(2)(vi)
NA					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)
Comments						
<p>ECM permit was suspended from 2/3/20 - 1/20/21 due to a discharge with extremely high TSS that caused issues at the plant. ECM was granted a 6 month IU permit from 1/20/21 - 7/31/21 and then an extended permit from (New IU permit) from 7/31/21 - 1/31/24)</p>						

SECTION I: IU EVALUATION (Continued)

File 12	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)
NA					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)
NA					7. Annual certification by NSCIUs	403.12(q)
NA					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
NA					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					11. Notification of hazardous waste discharge	403.12(j)&(p)
					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
					Discharge	
NA					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>Self monitoring dates: 8/3/22; 7/27/22; (1/22/22); 5/26/22; 4/28/22; 3/21/22; 2/14/22; 1/24/22; 12/20/21; 11/17/21; 10/20/21; 9/16/21; 8/25/21; 7/22/21; 6/17/21; 5/25/21; 4/27/21; 3/29/21; 3/2/21;</p>						

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
		✓

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
		✓

If yes, describe.

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
	✓	

If not, when?

d. Does the CA plan to adopt any of the non-mandatory aspects of the streamlining regulations?	Yes	No
		✓

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

B. LEGAL AUTHORITY [403.8(f)(1)]

1. Are there any contributing jurisdictions discharging wastewater to the POTW?

Yes	No
✓	

If yes, explain how the legal authority addresses the contributing jurisdictions.

*Woodland Mills
 Interlocal agreement
 Follow Union City's SUO
 Williams Sausage*

2. a. Has the CA updated its legal authority (e.g., SUO) to reflect changes in the General Pretreatment Regulations ?

Yes	No
✓①	
✓	
N/A	

b. Has the CA updated its legal authority to reflect the streamlining changes?

c. Did all contributing jurisdictions update their SUOs in a consistent manner?

Explain ① *Not since 2013 with streamlining*

3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?

Yes	No
	✓

If yes, explain.

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?)

Same as Regulations. Found in SUD

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

Discuss any problems. *site visits*
Industrial surveys

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

* *Redid IWS "2 years ago". Found no changes since the prior IWS and so did not send a report to the Division. Upon checking files further, the date of the last one was 2018 during application process. Informed them that a NOV would be issued unless they were able to find a record that it was sent into the division.*

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

- samples & samplings
- application
- permit - notification of changes
- Union City does IWS for Woodland Mills

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?

Every 5 years or new industry

Visual checks
Industrial Development Board
Site visits

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. | <input type="text" value="7"/> | SIUs (as defined by the CA) [WENDB - SIUS] |
| | <input type="text" value="3"/> | CIUs |
| | <input type="text" value="0"/> | Zero-discharging SIUs |
| | <input type="text" value="4"/> | Noncategorical SIUs (including zero-discharging noncat. SIUs) |
| b. | <input type="text" value="0"/> | Other regulated noncategorical IUs (specify) |
| c. | <input type="text" value="7"/> | TOTAL |
| d. | <input type="text" value="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/IO 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

	Yes	No
3. a. Does the CA accept any waste by truck, rail, or dedicated pipe?	✓	
b. Is any of the waste hazardous as defined by RCRA?		✓

2 Landfills bring their Leachate
2 Septic Haulers

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)]

Only allowed to discharge at one manhole near entrance to POTW.
behind locked gate & video surveillance
Manifest - a load log with time & date
Landfills are permitted
Landfills are samples
septics have visual check and occasional sampling

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)]

Permitted Landfills have local limits and amount is limited.

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

Training TDEC, TAVD
clean water professionals classes/conferences
List serv

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

a. For what pollutants have local limits been set

metals
Nutrients
pH
Flows
organics

b. How were these pollutants decided upon

NPDES, Pass Through Limits

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

Harm to the plant

d. Which allocation method(s) were used?

Uniform except BOD.TSS lower in Williams Food Wats
higher in Williams Sausage

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

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

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
Consultant JR Whalford, Engineering

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"/>

Permit, direct communication (written)

F. COMPLIANCE MONITORING

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

CA Samples 2/year (required 4/year)
IU self Monthly or quarterly (required 2/Y)
Inspect 2/year (required 4/Y)
Reporting Monthly (required 2/Y)

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

see above

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?

N/A

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 9/2021 to 9/2022.)

- a. Not sampled or not inspected at least once [WENDB - NOIN]
- b. Not sampled at least once
- c. Not inspected at least once (all parameters) ?

<i>0</i>	<i>0</i>	%
<i>0</i>	<i>0</i>	%
<i>0</i>	<i>0</i>	%

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

SECTION II: DATA REVIEW/IU 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 Oct
~~Oct~~ Nov 2021 - Mar 2022

0	%	Applicable pretreatment standards and reporting requirements
0	%	Self-monitoring requirements
0	%	Pretreatment compliance schedule(s)

*SNC defined by:

POTW	
EPA	

NW Tenn Disp Corp DL too high

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

Evaluation Period: last SAR

Number of SIUs: 5/7

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

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)]

All checked

5. Who performs CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name
<i>Waypoint</i>
"
"

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)]

None

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.

None

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

Yes

No

If yes, summarize.

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 larger industries are required to have a plan or some statement of slug reporting

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

Landfills do not have SDCP as they truck in waste

* 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 Federal Requirements. Found in SVO

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

a. Status *Approved, 2016 Final Approval*

b. Problems with implementation
No

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

- *NW not sampling every load, now they are*
- *ECM Silt overloading but mostly billing issues. Now allowed to discharge prohibited discharge (TSS) NOV for TSS*

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

↳ Not in file, will be sent to us

Yes	No
✓	
✓	

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

Williams Sausage, lowpH, NOV & compliance schedule to give a written report on what they think caused the lowpH and their plan to address the lowpH. And actions to prevent in the future

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

G. ENFORCEMENT (Continued)

	Yes	No
4. Did the CA publish all SIUs in SNC in the largest daily newspaper in the previous year? [403.8(f)(2)(vii)]		<i>X, N/A</i>
If yes, attach a copy.		
If no, explain.		

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
		<i>✓</i>	

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

Interference, ECM TSS (Silt)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]	<i>Don't have confidential information</i>
--	--

2. How are requests by the public to review files handled?	<i>A call or written request. would be handled by staff. Copies have a fee as per city schedule</i>
--	---

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.

was able to find some things when asked (NOV, correspondence)
but not others (IWS)

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

Council Meeting with reading and public comment period (special meeting)
Public Notice in Newspaper, The Messenger

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

N/A

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

Between 3 and 6 years

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)].

1/4 FTEs

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.

\$ 75,000

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

increase from inflation

Discuss any changes in funding.

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

N/A City Manager is said to provide what is asked for

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

Training, classes

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

Yes	No
✓	

Yes

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)

✓

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

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times were the following monitored by the CA during in the past year?

- Metals
- Priority pollutants
- Biomonitoring
- TCLP
- EP toxicity
- Other (specify)

Influent	Effluent	Sludge	Ambient (Receiving Water)
2	2	2	
	1/permit 1/year		
		2	

Less	Equal	More

b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Explain any differences. *"Same" as NPDES permit*

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on:

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality ?

Yes	No
✓	
✓	
✓	
	✓
	✓

b. Has the CA documented these findings ?

c. If they have been documented, what form does the documentation take?
Explain. (Attach a copy of the documentation, if appropriate.)

Not Reported, in house use

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.

No trends found

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
	<i>X</i>

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
<i>✓</i>	
	<i>✓</i>

*County leadership TOURS
 College Engineering TOURS*

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)?

City in partnership for free disposal of household haz waste.

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
	X

Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

TDEC Gordon Holcomb, NCO Env Prot spec II 9/21/22
 Adam Bonomo, NCO PTC coordinator
 John Bowling, Jackson FO 731-571-8146 - cell

Union City

Jason Moss, Utilities Director, 731-504-1497
 Tony Lane, Foreman, 731-446-6483

* Need to
 Find Final Approval Letter for local limits. Preliminary approval was 11/25/2015
 Find Need to modify LL after NPDES in 2020

ECM: LL in permit from 2010, not 2016
 SDCP Requirements in permit, but not required

Williams: Sample location sketch was with permit at CA.

SECTION II COMPLETED BY: Gordon Holcomb <i>Gordon Holcomb</i>	DATE: 9/21/22
TITLE: Environmental Protection Specialist II	TELEPHONE: 615-339-9956

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 City of Union City

2. a. Pretreatment contact
Jason Moss

b. Mailing address
PO Box 9, Union City, TN 38261

c. Title Wastewater Director

d. Telephone number 731-885-1341

3. Date of last CA report to Approval Authority 4/26/2022

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)

*See attached report violations report from ICIS.

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

None from SARs from Oct 2019 through Apr 2022

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

	Last PCI	Last Audit	Program Report
	Date: 9/3/2021	Date: 5/3/2018	Date: 4/26/2022
		Union City was unable to provide a copy of the PC and LL calculations during the inspection. To be legally defensible, Union City must have documentation showing how the limits were developed.	
		Permits have language stating that "the Control Authority shall..." Including requirements that	

- f. Application of pretreatment standards
- g. Compliance monitoring

- h. Enforcement program
- i. Data management
- j. Program resources
- k. Other (specify)

	Union City must meet may cause the permits to be interpreted as a contract. Recommend not including requirements that Union City must meet.	
		Will be violations issued to Williams Food Works for not sampling in March 2022, and to Williams Sausage and Williams Food Service for not reporting monthly flows and pH.

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
	QNCR report		X
	QNCR report		X
	QNCR report		X
	QNCR report		X
	QNCR report		X
	QNCR report		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	
Northwest Tennessee Disposal Corporation	TRC Violations for Chromium Daily Maximum and Chromium Monthly Average in Jan-Mar 2022. Sampled once per quarter. The results of a second sample were not reported (as of the April SAR).	Apr 2022 SAR	
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 10/1/21-3/31/22
1	14 %	Applicable pretreatment standards and reporting requirements	*SNC defined by:
	%	Self - monitoring requirements	POTW X
	%	Pretreatment compliance schedules	EPA
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program None found			

ATTACHMENT A COMPLETED BY: Gordon Holcomb <i>G. Holcomb</i>	DATE: 7/19/2022
TITLE: Environmental Protection Specialist 2	TELEPHONE: 615-339-9956

ATTACHMENT B
PRETREATMENT PROGRAM PROFILE

PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. This background information should be obtained from the original, approved pretreatment program submission and modifications and the NPDES permit. The profile should be updated, as appropriate, in response to approved modifications and revised NPDES permit requirements.

A. CA INFORMATION

1. CA name City of Union City
2. Program Approval Date 5/2/1986
3. Required frequency of reporting to Approval Authority Semi-annually
4. Specify the following CA information

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date
Union City STP aka A.L. Strub Wastewater Treatment Plant	TN0021580	11/1/2020	10/31/2025

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?
If yes, provide the following information.

Yes	No
X	

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants
Union City STP aka A.L. Strub Wastewater Treatment Plant	TDEC	9/6/2020	10/31/2025	Same as 40 CFR 503

B. PRETREATMENT PROGRAM MODIFICATIONS

1. Does the CA's NPDES permit have pretreatment language? [WENDB - PTIM] Yes
2. Identify any recent substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]

Date Approved	Description of Modification
11/25/2015 Final Approval <i>Preliminary</i>	Protection Criteria and Local Limits
11/12/2014 Final Approval	SUO and ERP (with streamlining)

PRETREATMENT PROGRAM PROFILE (Continued)

C. TREATMENT PLANT INFORMATION				
INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.				
1. Treatment plant name Union City STP aka A.L. Strub Wastewater Treatment Plant		2. Location address 1507 Lynch Lane, Union City, TN 38261		
3. a. NPDES permit number TN0021580	b. Expiration date 10/31/2025	4. Treatment plant wastewater flows 5.0(s) 6.5(w) Design <input type="text" value="5.0"/> MGD Actual <input type="text" value="5.2"/> MGD		
5. a. Industrial contribution (MGD) <input type="text" value="0.36"/>	b. Number of SIUs discharging to plant <input type="text" value="7"/>	c. Percent industrial flow to plant <input type="text" value="7.0%"/>		
6. Level of treatment		Type of Process(es)		
a. Primary	Preliminary	Grit Removal (including FOG Removal)		
b. Secondary	Biological	Sequencing Batch Reactor		
c. Tertiary	Disinfection Dichlorination	Chlorine (gas) Sulfur Dioxide		
7. Indicate required monitoring frequencies for pollutants identified in NPDES permit.				
	Influent (Times / Year)	Effluent (Times / Year)	Sludge (Times / Year)	Receiving Stream (Times / Year)
a. Metals	2/year	2/year	Ssampled and analyzed at a frequency dependent on the amount used annually	
b. Organics		Once/permit		
c. Toxicity testing		1/quarter since there are SIUs		
d. EP toxicity				
e. TCLP				
9. Effluent Discharge				
a. Receiving water name North Fork Obion River at mile 8.2		b. Receiving water classification Fish & Aquatic, Recreation, Livestock Wtr & Wlufe, Irrigation		
d. If effluent is discharged to any location other than the receiving water, indicate where.				

PRETREATMENT PROGRAM PROFILE (Continued)

C. TREATMENT PLANT INFORMATION (Continued)			
10. Did the CA submit results of whole effluent biological toxicity as part of its NPDES permit application(s)? [122.21(j)(1)&(2)]	N / A	Yes	No
		X	
a. If yes, did the CA use EPA - approved methods? [122.21(j)(3)]		X	
b. Has there been a pattern of toxicity demonstrated?			X
11. Indicate methods of biosolids use or disposal.			
a. Land application <input style="width: 60px; height: 15px;" type="text"/>		c. MSW landfill <input style="width: 60px; height: 15px; text-align: center;" type="text" value="X"/>	
b. Surface Disposal <input style="width: 60px; height: 15px;" type="text"/>		d. Other (specify) <input style="width: 60px; height: 15px;" type="text"/>	
c. Incineration <input style="width: 60px; height: 15px;" type="text"/>			
If not land applying biosolids, list reason why.			
D. LEGAL AUTHORITY			
1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority). SUO/ERP			
Available on-line here: file:///C:/Users/bg34326/Downloads/147-15-Sewer-Use-Amendment.pdf			
b. Date enacted / adopted 5/2/1986	c. Date of most recent revisions 11/12/2014		
2. Does the CA's legal authority enable it to do the following? [403.8(f)(1)(i - vii)]			
		Yes	No
a. Deny or condition pollutant dischargers [403.8(f)(1)(i)]		X	
b. Require compliance with standards [403.8(f)(1)(ii)]		X	
c. Control discharges through permit or similar means [403.8(f)(1)(iii)]		X	
d. Require compliance schedules and IU reports [403.8(f)(1)(iv)]		X	
e. Carry out inspection and monitoring activities [403.8(f)(1)(v)]		X	
f. Obtain remedies for noncompliance [403.8(f)(1)(vi)]		X	
g. Comply with confidentiality requirements [403.8(f)(1)(vii)]		X	
3. a. How many contributing jurisdictions are there?		1	
List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.			
Jurisdiction Name	Number of CIUs	Number of Other SIUs	
Woodland Mills State Operating Permit No SOP-14019 Effective 7/1/2022 to 6/30/2027, Issued 6/6/2022		SOP permit references one industrial customer in Woodland Hills (236,000 gpd). None of the industries in the SAR have a Woodland Hills address or flows this high. Likely is Williams Country Sausage which is also north of Union City	

PRETREATMENT PROGRAM PROFILE (Continued)

D. LEGAL AUTHORITY (Continued)

3. b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

Yes	No

If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).

SOP-14019 states:

“This permit does not relieve the permittee from any requirements of the municipality or utility where the sewage is ultimately disposed. The permittee must obtain approval for the connection from that municipality or utility and must comply with all their requirements including pretreatment regulations, the exclusion of storm and other extraneous water, etc.”

4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform.

a. IWS update

b. Permit issuance

c. Inspection and sampling

d. Enforcement

e. Notification of IUs

f. Receipt and review of IU reports

g. Analysis of samples

h. Other (specify)

E. IU CHARACTERIZATION

1. Date of last IWS submitted to WPC.

6/20/2013 last audit

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(v)(1)] Definition found in SUO but if approved it should be consistent.

Yes	No
X	

If no, provide the CA's definition of "significant industrial user."

NSCIU provision is included

PRETREATMENT PROGRAM PROFILE (Continued)

F. CONTROL MECHANISM

1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).	Permit
b. What is the maximum term of the control mechanism?	5 years

G. APPLICATION OF STANDARDS

1. If there is more than one treatment plant, were local limits established specifically for each plant?	N / A	Yes	No
	X		
2. Has the CA <u>technically evaluated</u> the need for local limits for all pollutants listed below? [WENDB - EVLL] [403.5(c)(1); 403.8(f)(4)]			X
Partial Technical Evaluation (not all 10 pollutants evaluated)?		X	

	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)						X	
b. Cadmium (Cd)	X		X		X		0.028 mg/L
c. Chromium (Cr) III & VI			X		VI		0.055 mg/L
d. Copper (Cu)	X		X		X		2.225 mg/L
e. Cyanide (CN)	X		X		X		0.514 mg/L
f. Lead (Pb)	X		X		X		0.242 mg/L
g. Mercury (Hg)	X		X		X		0.006 mg/L
h. Nickel (Ni)	X		X		X		2.616 mg/L
i. Silver (Ag)	X		X		X		0.033 mg/L
j. Zinc (Zn)	X		X		X		3.412 mg/L
k. Other (specify)							

See attached Protection Criteria and Local Limits Correspondence from 2015

H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
a. Inspections				
• CIUs	1 / year	1 / year	1 / year	1 / year
• Other SIUs	1 / year	1 / year	1 / year	1 / year
b. Sampling by POTW				
• CIUs	1 / year	1 / year	1 / year	1 / year
• Other SIUs	1 / year	1 / year	1 / year	1 / year
c. Self - monitoring				
• CIUs	2 / year		2 / year	2 / year
• Other SIUs	2 / year		2 / year	2 / year
d. Reporting by IU				
• CIUs	2 / year		2 / year	2 / year
• Other SIUs	2 / year		2 / year	2 / year

PRETREATMENT PROGRAM PROFILE (Continued)

I. ENFORCEMENT

1. Does the CA's program define "significant noncompliance"?
 If yes, is the CA's definition of "significant noncompliance" consistent with EPA's?
 [403.8(f)(2)(viii)]

Yes	No
X	
X	

If no, provide the CA's definition of "significant noncompliance".

2. Does the CA have an approved, written ERP? [403.8(f)(5)]

Yes	No
X	

3. Indicate the compliance / enforcement options that are available to the POTW in the event of IU noncompliance.
 [403.8(f)(1)(vi)]

- a. Notice or letter of violation
- b. Compliance schedule
- c. Injunctive relief
- d. Imprisonment
- e. Termination of service

X
X
X
X
X

- f. Administrative Order
- g. Revocation of permit
- h. Fines (maximum amount)

X
X
X

- Civil \$ 10k /day/violation
- Criminal \$ _____ /day/violation
- Administrative \$ 10k /day/violation

L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY: Gordon Holcomb *G. Holcomb*

DATE: 7/19/2022

TITLE: Environmental Protection Specialist 2

TELEPHONE: 615-339-9956

IU SITE VISIT DATA SHEET

I. IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry <i>Williams Sausage 5132 Old-Troy-Hickman Rd</i>	
Date of visit <i>9/21/22</i>	Time of visit <i>2:30 pm</i>
Name(s) of inspector(s) <i>Gordon Holcomb, Adam Bonomo, John Bowling, TDEC</i> <i>Jason Moss, Tony Lane Union City</i>	
Provide name(s) and title(s) of industry representative(s).	
Name	Title
<i>Hunter Galloway</i>	<i>Assist Complex Manager</i>
<i>Jim Horner</i>	<i>Maintenance Manager</i>
Classification assigned by CA:	
Provide the following documentation:	
<ol style="list-style-type: none"> 1. Describe the products manufactured or the services provided by the IU. 2. Verify CA's classification or discuss any errors. 3. Describe any significant changes in process or flow. 4. Identify the raw materials and processes used. (Include discussion of where wastewater is produced and discharged and attach a step - by - step diagram if possible.) 5. Describe the sample location and any differences in CA and IU locations. 6. Describe the treatment system which is in place. 7. Identify the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discuss the adequacy of spill prevention. 8. Discuss whether hazardous wastes are stored or discharged and any related problems. 	
Notes:	
<p><i>① Raw sausage & fully cooked sausage & intact pork products (ribs)</i> <i>~100,000 lb per day</i></p> <p><i>② No significant process flow changes</i></p> <p><i>Raw Product - Major Product</i></p> <p><i>Slaughter the hog, held live. Stunned & Killed → sanguination blood, hide removed</i> <i>organs removed, carcass wash system. Recirculated 180° F water</i> <i>De Boned. Skeleton Removed. Ground, blended with seasonings. Packed into tub.</i> <i>Goes through glycol chiller. Boxed for sale - Slices sent to patty room for</i> <i>Slicing</i></p> <p><i>Water: Rinse down, constantly rinse down, including on the floors</i> <i>: Pre evis shower</i> <i>just water during production</i></p> <p style="text-align: right;"><i>tan case. Don pro industries picks it up</i></p>	

IU SITE VISIT DATA SHEET (Continued)

IU Name Williams Sausage

Date 9/21/22

Notes:

Full sanitation between shifts

Alkali cleaner/soap

1/2-7% dilution 1/2

Heavy duty Sodium Hydroxide cleaner

~~35%~~ " 1/2-3%

Chlorine-based

~~1/2 3%~~ " 200ppm

Quat Ammonium

600ppm Max

Lots of floor drains, then goes to treatment
↳ except for blood

⑤ Sampler in effluent vault for both IU & CA

Water treatment system → in progress in consent order - partially in use now

Main sump → screen to take out some solids → EQ tank ~80,000gal or more → Heat with steam 100°F → Anaerobic Digester constantly mixing methane generated
→ Heat with recovered heat from generator (methane)

→ Andaf (DAF) system and polymer & air to flocculent → Byproduct is either wasted or returned ↳ has potential for land application

↓
Clean water to lagoon → A
3.6 MG with Aeration

IU SITE VISIT REPORT FORM

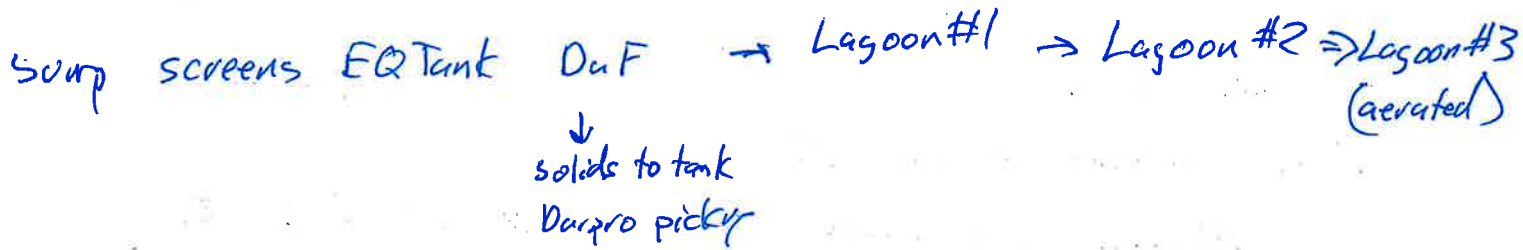
COMPLETED BY: Gordon Holcomb *Sam*

DATE: 9/21/22

TITLE: Environmental Prot Spec II

TELEPHONE: 615-339-9956

old system



⇒ Effluent samples Flow measured with Mag meter

⑦ Cleaning list from above

Vinegar
Potassium Lactate
Magnesium Hydroxide
Polymer
Oils

} 285 gal totes

some in chemical storage
some at point of use

Sodium Hydroxide
Alkali Soap

} 2000 gal tanks

- Asked for SDCP (located and a copy given) (currently in place)
- At time of inspection, the admin order_n was not able to be found. Asked to be sent a signed copy

Propyl Glycol small amount at end of shift
going to floor Drain

Industry & City should sample right now.

EQ tank & digester being bypassed. Only happening for a few days

Inlet to 3rd Lagoon is near outlet

Need to notify city during start of bypass

Some elements of bypass not communicated to city

New system being on has not been officially started

* Last Wednesday (Sept 14) the digester was put out of service due to methane build up. Methane is being collected, but not being feed to the generator. A repair crew is expected as soon as Thursday (Sept 22) to fix the digester issues. During this time, an abbreviated 'old treatment' system is being used, except that the DAF is not operational and the inlet to lagoon 3 is very near the outlet (which bypasses the aeration portions of lagoon 3). * The city was not notified of this temporary bypass of the treatment system. Sample locations were very full of algae & what looked to be oil & grease. Photos were taken of the lagoon 3 and sampling locations. Recommended the City undertake immediate sampling.

September 21, 2022 at 3:59:35 PM
+36.480603,-89.160383



September 21, 2022 at 3:59:46 PM
+36.480603,-89.160383



IU SITE VISIT DATA SHEET

I. IU SITE VISIT REPORT FORM

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.

Name and address of industry *ECM of Ridgely, 3145 Chancellors Mill Road, Ridgely, TN 38080* *

Date of visit *9/21/22* Time of visit *1:30pm*

Name(s) of inspector(s) *Gordon Holcomb, Adam Bonomo, John Bowling TDEC
Jason Moss, Tony Lane Union City*

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

Name	Title
<i>Stanley Dean</i>	<i>Landfill Manager</i>
<i>Matthew Butler</i>	<i>Muc Driver</i>

Classification assigned by CA:

Provide the following documentation:

1. Describe the products manufactured or the services provided by the IU. ** office address. The landfill is at 2633 Inman Hollow Rd, Obion, TN 38240*
2. Verify CA's classification or discuss any errors.
3. Describe any significant changes in process or flow.
4. Identify the raw materials and processes used. (Include discussion of where wastewater is produced and discharged and attach a step - by - step diagram if possible.)
5. Describe the sample location and any differences in CA and IU locations.
6. Describe the treatment system which is in place.
7. Identify the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discuss the adequacy of spill prevention.
8. Discuss whether hazardous wastes are stored or discharged and any related problems.

Notes:

① *Take Trash, Municipal Solid Waste 100-125 tons per day
No HAZ Waste*

③ *Leachate is a function of Rain fall
3 Trucks per day*

*Rain, through trash, pipes at bottom of Lined systems collect water, the pump sends it to 400,000 gal tank. Tank then fills the trucks.
~ 3 ft clay then plastic ~*

Monitor level & pH, collect samples every month

No treatment

IU SITE VISIT DATA SHEET (Continued)

IU Name ECM	Date 9/21/22
Notes: No chemicals No Haz Materials stored Truck sampled prior to truck leaving (pH) Tank is sampled by Way-Point, grab samples, once per month 22' deep collection pit with pump to tank. Tank is well contained	

IU SITE VISIT REPORT FORM COMPLETED BY: Gordon Holcomb	DATE: 9/21/22
TITLE: AA Environmental Protection Specialist	TELEPHONE: 615-339-9956

WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name	<i>City of Union City</i>		
NPDES number	<i>TN0021580</i>		
Date of audit	<i>9/21/2022</i>		
	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	<i>7</i>
• Number of CIUs	CIUS	II.C.4.a	<i>3</i>
- Number of SIUs without control mechanism	NOCM	II.D.1.A	<i>0</i>
- Number of SIUs not inspected or sampled	NOIN	II.F.2.a	<i>0</i>
- Number of SIUs in SNC** with standards or reporting	PSNC	Attach A.B.4	<i>1</i>
- Number of SIUs in SNC with self - monitoring	MSNC	Attach A.B.4	<i>0</i>
- Number of SIUs in SNC with self - monitoring and not Inspected or sampled	SNIN	II.G.5	<i>0</i>
*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)(vii).			

WENDB DATA ENTRY WORKSHEET	DATE: <i>10/20/2022</i>
COMPLETED BY: <i>Gordon Holcomb</i>	
TITLE: <i>Environmental Protection Specialist II</i>	TELEPHONE: <i>615-339-9956</i>

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	9/21/2022	
	Level	Checklist Reference
<input type="checkbox"/>	Failure to enforce against pass through and / or interference	I II.G.6
<input checked="" 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 checked="" type="checkbox"/>	CA in SNC for violation of any Level I criterion	
<input type="checkbox"/>	CA in SNC for violation of two or more Level II criterion	
For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements</u>		

Gordon Holcomb

RNC WORKSHEET COMPLETED BY: Gordon Holcomb	DATE: 6/2/2023
TITLE: Env Prot Spec II	TELEPHONE: 615-339-9956

NPDES ID(s): TN0021580
State: TN
Major/Minor Indicator:
Violation Date: 08/01/2019 - 08/04/2022
Violation Type(s): Effluent Violation

**Environmental Protection Agency
Integrated Compliance Information System
Violations Report**

Created Date: 09/15/2010
Refresh Date: 08/04/2022
Report Version 1.5, Modified: 1/4/2017

TN0021580

Permittee Name:	City of Union City	Primary SIC Code:	4952	Permit Issued:	09/06/2020
Permittee Address:	2507 Lynch Lane Union City, TN 38281	Primary SIC Desc:	Sewerage Systems	Permit Effective:	11/01/2020
Major/Minor Indicator:	Major	Primary NAICS Code:		Permit Expired:	10/31/2025
Compliance Track Status:	On	Primary NAICS Desc:		Permit Status:	Effective
DMR Non Receipt Flag:	On	Cognizant Official:	Jason Moss		
RNC Tracking Flag:	On	Cognizant Offcl. Ph.:	731-885-9144		
		Receiving Body:	Obion		

Facility Information

Facility Name:	UNION CITY STP AKA A.L. STRUB WASTEWATER TREATMENT PLANT	County:	Obion	FRS ID:	110064624401
Facility Location:	LYNCH LANE UNION CITY, TN 38261	Region:	04	Federal Facility Ownership:	N
		State-Region:		Type of Ownership:	Municipal or Water District

Copy for Audit
2.9.15



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

November 25, 2015

Ms. Kathy Dillon
City Manager
City of Union City
P.O. Box 9
Union City, TN 38281

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
RECEIPT # 7010 1870 0003 4359 2662

Re: Protection Criteria and Local Limits Preliminary Approval
Union City Pretreatment Program
NPDES Permit No. TN0021580
Obion County

Dear Ms. Dillon:

The Division of Water Resources acknowledges receipt, on November 24, 2015, of Union City's proposed Plant Protection Criteria (PC) and Local Limits (LLs) calculations for the A.L. Strub wastewater treatment plant. The calculations and proposed limits are acceptable and appear to adequately protect both the POTW and the environment. Therefore, the division grants preliminary approval for the limits.

The definition of substantial modification in Tennessee Rule 0400-40-14-.18(2) includes "modifications that relax local limits." Should Union City relax any of the local limits, you must proceed with the public notification requirements in Tennessee Rule 0400-40-14-.18. The City should proceed as follows. If the Sewer Use Ordinance (SUO) is to be changed, the same public notice requirements apply.

1. Union City shall publish a notice, in a newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the A.L. Strub WWTP, indicating that the previously approved pretreatment program is being amended. The notice should include:
 - A. A brief description of the proposed changes
 - B. The length of time for public review, not less than thirty (30) days
 - C. An invitation to comment on the change
2. Following the comment period, Union City is to submit to this office the following:
 - A. A notarized statement from the newspaper publisher, attesting that the notice was published (the notice needs to be published only once)
 - B. A copy of the notice
 - C. A copy of all comments and any responses by Union City

Following the receipt of the information in No. 2 above, this Division will give final approval of the modifications, provided that public comments have been dealt with satisfactorily. If you have any questions, please do not hesitate to contact me at (615) 532-8786 or Laurel.Rognstad@tn.gov.

Sincerely,



Laurel Rognstad
Environmental Protection Specialist
Compliance and Enforcement Unit

cc: Mr. Dan Hatch – Division of Water Resources, Jackson EFO
Mr. Dwayne Hensley – City of Union City, A.L. Strub WWTP
Mr. Scott Daniel – J.R. Wauford and Company

rec'd via email from Scott Dantrel 11/24/15

PROPOSED LOCAL LIMITS FOR THE CITY OF UNION CITY
 WWTP 5.0 MGD CAPACITY, NPDES PERMIT NO. TN0021580
 SEPTEMBER 2015

PARAMETER	PLANT PROTECTION CRITERIA			INDUSTRIAL DISCHARGE LIMITS		
	2015 CALC. LIMIT mg/L	2010 CALC. LIMIT mg/L	PROPOSED LIMIT FOR S.U.O. mg/L	2015 CALC. LIMIT mg/L	2010 CALC. LIMIT mg/L	PROPOSED LIMIT FOR S.U.O. mg/L
Benzene	0.015	0.60	0.015	0.135	4.454	0.135
Cadmium	0.004	0.004	0.004	0.028	0.023	0.028
Carbon Tetrachloride	0.015	0.015	0.015	0.135	0.108	0.135
Chloroform	0.258	0.258	0.258	2.407	1.910	2.40
Chromium III	Report	Report	Report	Report	Report	Report
Chromium VI	0.038	0.038	0.038	0.055	0.078	0.055
Copper	0.258	0.303	0.258	2.225	2.182	2.225
Cyanide	0.058	0.068	0.058	0.514	0.484	0.514
Ethylbenzene	0.029	0.029	0.029	0.262	0.209	0.262
Lead	0.029	0.022	0.029	0.242	0.143	0.242
Mercury	0.001	0.001	0.001	0.006	0.004	0.006
Methylene Chloride	0.132	0.132	0.132	1.206	0.959	1.206
Naphthalene	0.005	0.005	0.005	0.016	0.016	0.016
Nickel	0.291	0.356	0.291	2.616	2.575	2.575
Phenols, Total	0.169	0.137	0.169	0.725	0.435	0.725
Phthalates, Total	0.190	0.202	0.190	1.766	1.490	1.766
Silver	0.004	0.002	0.004	0.033	0.009	0.033
Tetrachloroethylene	0.125	0.125	0.125	1.165	0.925	1.165
Toluene	0.214	0.123	0.214	1.600	0.638	1.600
Trichloroethylene	0.091	0.091	0.091	0.846	0.672	0.846
Zinc	0.426	0.357	0.426	3.412	2.260	2.260
1,1,1 Trichloroethane	0.200	0.200	0.200	1.868	1.482	1.868
1,2 Transdichloroethylene	0.005	0.005	0.005	0.037	0.030	0.037

Preliminary approval 11/25/15
Final approval 10/20/16

LSR 10/28/16
JLR 10/31/16

Laurel Rognstad

File: Union City, PT, Dev.

From: Scott Daniel <scottd@JRWAUFORD.COM>
Sent: Tuesday, November 24, 2015 11:44 AM
To: Laurel Rognstad
Subject: Union City Pretreatment
Attachments: Local Limits Table - September 2015 revised 11-24-15.doc

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. - STS-Security*****

Laurel, attached is the revised table that we spoke about today.

Thanks,
Scott Daniel, P.E.
J. R. Wauford and Company,
Consulting Engineers, Inc.
529 Old Hickory Blvd., Suite A
Jackson, Tennessee 38305
731/668-1953
www.jrwauford.com

Influent Protection Criteria and Local Discharge Limitations
A.L. Strub Wastewater Treatment Plant
 Union City, Tennessee
 NPDES Permit No. TN0021580
 JRWCO 3012

Permitted Waste Flow (MGD)	Current Waste Flow (MGD)	Total Average Industrial Flow (MGD)	Safety Factor (%)
5.000	3.440	18.394	20%

rec'd viz email 10/7/15
from Scott Daniel

Effluent Characteristic	1	2	3	4	5	6	7	8		9	10	11
	Allowable Headworks Loading Pass Through			Allowable Headworks Loading Inhibition		Maximum Allowable Headworks Loading (MAHL)	Influent Protection Criteria	Pollutant Background Information		Maximum Allowable Industrial Loading (MAIL)	Local Discharge Limitation	
	Pass Through Limitation ⁽¹⁾	Percent Removal ⁽²⁾	Allowable Headworks Loading (AHL _{PT})	Inhibition ⁽³⁾	Allowable Headworks Loading (AHL _{inh})			Background Concentration ⁽⁴⁾	Background Loading			
	(mg/L)	(%)	(lb/day)	(mg/L)	(lb/day)	(lb/day)	(mg/L)	(mg/L)	(lb/day)	(lb/day)	(mg/L)	
Copper	0.049340	80.9%	7.41	1	28.69	7.41	0.258	0.0182	0.478	5.45	2.225	
Chromium, III	REPORT	---	---	30	860.69	---	REPORT	---	---	---	REPORT	
Chromium, VI ⁽⁵⁾	0.037900	---	1.09	1	28.69	1.09	0.038	0.0280	0.735	0.14	0.055	
Nickel	0.180000	38.1%	8.34	1.75	50.21	8.34	0.291	0.0100	0.262	6.41	2.616	
Cadmium	0.001150	67%	0.10	5.5	157.79	0.10	0.004	0.0005	0.013	0.07	0.028	
Lead	0.012610	56.1%	0.82	3.0	86.07	0.82	0.029	0.0025	0.066	0.59	0.242	
Mercury	0.000310	60.0%	0.02	0.55	15.78	0.02	0.001	0.0001	0.003	0.02	0.006	
Silver ⁽⁶⁾	0.001020	75.0%	0.12	---	---	0.12	0.004	0.0005	0.013	0.08	0.033	
Zinc	0.260000	53.0%	12.21	2.65	76.03	12.21	0.426	0.0536	1.406	8.36	3.412	
Cyanide	0.017910	69.0%	1.66	2.55	73.16	1.66	0.058	0.0025	0.066	1.26	0.514	
Toluene	0.015000	93.0%	6.15	---	---	6.15	0.214	0.0380	0.997	3.92	1.600	
Benzene	0.003000	80.0%	0.43	300	8,606.88	0.43	0.015	0.0005	0.013	0.33	0.135	
1,1,1 Trichloroethane	0.030000	85%	5.74	---	---	5.74	0.200	0.0005	0.013	4.58	1.868	
Ethylbenzene	0.004000	86%	0.82	200	5,737.92	0.82	0.029	0.0005	0.013	0.64	0.262	
Carbon Tetrachloride ⁽⁵⁾	0.015000	---	0.43	---	---	0.43	0.015	0.0005	0.013	0.33	0.135	
Chloroform	0.085000	67%	7.39	---	---	7.39	0.258	0.0005	0.013	5.90	2.407	
Tetrachloroethylene	0.025000	80%	3.59	---	---	3.59	0.125	0.0005	0.013	2.86	1.165	
Trichloroethylene	0.040000	89%	2.61	---	---	2.61	0.091	0.0005	0.013	2.07	0.836	
1,2 trans Dichloroethylene	0.001500	67%	0.13	---	---	0.13	0.005	0.0005	0.013	0.09	0.037	
Methylene Chloride	0.050000	62%	3.77	---	---	3.77	0.132	0.0025	0.066	2.95	1.206	
Phenols, Total	0.050000	70.4%	4.85	120	3,442.75	4.85	0.169	0.0800	2.099	1.78	0.725	
Naphthalene	0.001000	78%	0.13	500	14,344.80	0.13	0.005	0.0025	0.066	0.04	0.016	
Phthalates, Total	0.064500	66%	5.44	---	---	5.44	0.190	0.0010	0.026	4.33	1.766	

Footnotes

- (1) Pass Through Limitations obtained from the Tennessee Department of Environment and Conservation, Division of Water Pollution Control on August 14, 2015
- (2) Percent Removal Data obtained from actual data (in red) Due to lack of reliable data, all other percent removal data is reported median book values taken from Appendix R EPA 833-R-04-002B
- (3) Literature Inhibition values taken from Appendix G of EPA 833-R-04-002B
- (4) Background Concentration values obtained from local background data except for Chromium VI The background concentration for Chromium VI is taken as the difference between Chromium III and Total Chromium from Appendix V of EPA 833-R-04-002B
- (5) The AHL_{PT} for Carbon Tetrachloride and Chromium VI are based on the pass through criteria See footnote (1)
- (6) The pass through limit, influent protection criteria, and local discharge limitation for silver is a daily maximum All other parameters are monthly averages

Background Concentrations				
Sampled On				
January 29, 30, and 31, 2008				
Pollutant	29-Jan-08	30-Jan-08	31-Jan-08	Average
Cadmium	< 0.001	< 0.001	< 0.001	0.0005
Chromium	< 0.005	< 0.005	< 0.005	0.0025
Copper	0.0213	0.0214	0.0119	0.0182
Lead	< 0.005	< 0.005	< 0.005	0.0025
Mercury	< 0.0002	< 0.0002	< 0.0002	0.0001
Nickel	< 0.01	0.0125	0.0125	0.0100
Silver	< 0.001	< 0.001	< 0.001	0.0005
Zinc	0.0577	0.0516	0.0516	0.0536
Cyanide	< 0.005	< 0.005	< 0.005	0.0025
Toluene	0.0116	0.0104	0.0919	0.0380
Benzene	< 0.001	< 0.001	< 0.001	0.0005
1,1,1 Trichloroethane	< 0.001	< 0.001	< 0.001	0.0005
Ethylbenzene	< 0.001	< 0.001	< 0.001	0.0005
Carbon Tetrachloride	< 0.001	< 0.001	< 0.001	0.0005
Chloroform	< 0.001	< 0.001	< 0.001	0.0005
Tetrachloroethylene	< 0.001	< 0.001	< 0.001	0.0005
Trichloroethylene	< 0.001	< 0.001	< 0.001	0.0005
1,2 Transdichloroethylene	< 0.001	< 0.001	< 0.001	0.0005
Methylene Chloride	< 0.005	< 0.005	< 0.005	0.0025
Total Phenols	0.08	0.08	0.08	0.0800
Napthalene	< 0.005	< 0.005	< 0.005	0.0025
Total Phthalates	< 0.002	< 0.002	< 0.002	0.0010
Arsenic	< 0.01	< 0.01	< 0.01	0.0050

**If the sample resulted in a BDL, half of the BDL was used to calculate the background concentration

Percent Removal Data for the A.L. Strub Wastewater Treatment Plant															
Effluent Characteristic	25-Jul-07	12-Mar-08	16-Sep-08	17-Mar-09	30-Jul-09	17-Mar-10	19-Aug-10	11-Mar-11	18-Jan-12	11-Jul-12	30-Jan-13	12-Aug-13	12-Jan-14	9-Jul-14	Average
Copper	86%	72%	86.4%		79.4%	86.1%	92.3%	88%	96.5%	75.7%	83.3%	80.3%	30.0%	95.7%	80.9%
Chromium, III									---	---	---	---	---	---	---
Chromium, VI									---	---	---	---	---	---	---
Nickel	40%	34%		82.6%		41.2%		49.7%	---	---	32.4%	12.9%	---	12.3%	38.1%
Cadmium									---	---	---	---	---	---	---
Lead	30%		91.7%	33.3%		12%			---	---	41.6%	44.2%	99.0%	97.1%	56.1%
Mercury	42%		79.3%				20%		---	---	---	---	---	---	47.1%
Silver			57.8%	42.9%		20.5%			---	---	---	---	---	---	40.4%
Zinc	53%	14%	38%	52.5%	31.5%	48.2%	70.1%	56%	55.9%	33.6%	75.6%	44.1%	82.1%	87.8%	53.0%
Cyanide			88.6%				58.3%		---	---	---	---	---	---	73.5%
Toluene	94%	99.7%	69%	99.5%	71.2%	99.2%	82.3%		---	---	---	---	---	---	87.8%
Benzene		99.5%							---	---	---	---	---	---	---
1,1,1 Trichloroethane									---	---	---	---	---	---	---
Ethylbenzene									---	---	---	---	---	---	---
Carbon Tetrachloride									---	---	---	---	---	---	---
Chloroform									---	---	---	---	---	---	---
Tetrachloroethylene									---	---	---	---	---	---	---
Trichloroethylene									---	---	---	---	---	---	---
1,2 trans Dichloroethylene									---	---	---	---	---	---	---
Methylene Chloride									---	---	---	---	---	---	---
Phenols, Total	72%	30.5%	63.6%	59.2%	83.5%	56.5%	78.2%	59%	50.6%	71.9%	96.9%	93.6%	89.6%	80.6%	70.4%
Naphthalene									---	---	---	---	---	---	---
Phthalates, Total									---	---	---	---	---	---	---

Inaccurate data using book value

Effluent Characteristic	RDL (mg/L)
Copper	0.001
Chromium, III	0.001
Chromium, VI	0.01
Nickel	0.01
Cadmium	0.001
Lead	0.001
Mercury	0.002
Silver	0.001
Zinc	0.001
Cyanide	0.005
Toluene	0.001
Benzene	0.001
1,1,1 Trichloroethane	0.001
Ethylbenzene	0.001
Carbon Tetrachloride	0.001
Chloroform	0.005
Tetrachloroethylene	0.005
Trichloroethylene	0.001
1,2 trans Dichloroethylene	0.001
Methylene Chloride	0.001
Phenols, Total	---
Naphthalene	---
Phthalates, Total	---

Average Industrial Flow Data Reported in Semi-Annual Reports							
Significant Industrial User	Oct-07	Apr-08	Oct-08	Apr-09	Oct-09	Apr-10	Oct-10
ECM of Ridgely	6,479	14,846	14,887	9,500	9,500	950	950
Goodyear Tire & Rubber Company	85,277	78,944	81,447	83,180	31,680	82,080	82,080
Kohler Corporation	167,548	156,108	102,896	147,000	205,316	331,000	331,000
Lennox Hearth Products	1,568	669	449	2,500	4,700	3,000	3,000
Northwest Tennessee Disposal Corporation	8,919	8,603	9,500	1,500	9,346	6,154	6,154
Williams Country Sausage Company	239,267	54,413	86,438	85,750	74,961	82,000	82,000
Total Industrial Flow (MGD)	0.509	0.314	0.296	0.329	0.336	0.505	0.505

Average Total Industrial Flow	0.399
--------------------------------------	--------------

MGD

Average Industrial Flow Data Reported in Semi-Annual Reports								
Significant Industrial User	Apr-12	Oct-12	Apr-13	Oct-13	Apr-14	Oct-14	Apr-15	Average Total
ECM of Ridgely	1319	1213	1556	1342	3000	3000	7000	
Titan Tire Corporation of Union City	0	7949	10944	11026	12563	11000	12552	
Kohler Corporation	182688	149872	138933	150078	115733	155078	85700	
Lennox Hearth Products	0	0	0	0	0	0	0	
Northwest Tennessee Disposal Corporation	10516	5367	6907	6440	9000	9000	9000	
Williams Country Sausage Company	158000	76556	150000	94854	136000	186666	136000	
Total Industrial Flow (MGD)	352523	240957	308340	263740	276296	364744	250252	293836

Development of a Monitoring Program

A. General

40 CFR, Part 403.8 requires that sewer systems providing service to significant industrial users set up a program to monitor the discharges from these significant industrial users. From information gathered during Activity 1, five industries discharging wastewater to the Union City publicly owned treatment works (POTW) were identified as potential significant industrial users. Significant industrial users are defined as any industry that discharges more than 25,000 gallons per day to the POTW, or any industry which discharges detectable amounts of any of the 129 priority pollutants or any industry which discharges any waste to the POTW which could have an adverse effect on the POTW.

The five potential significant industrial users identified include:

- 1) Brown Shoe Company
- 2) Reelfoot Packing Company
- 3) Goodyear Tire and Rubber Company
- 4) Vaughn Electric Company
- 5) Sta-Rite Industries

Any new significant industrial users that begin discharging to the Union City sewer system in the future will be added to the list.

B. Monitoring Schedule

The first year's monitoring program for the Union City Pretreatment Program will be based on self-monitoring reports, one annual scheduled plant visit to inspect industrial processes and pretreatment facilities, and one annual unscheduled sampling of the industries' wastewater discharge.

Within 90 days of receiving a permit and each June and December, all significant industrial users will be required to submit self-monitoring reports including flow information and analyses of the pollutants listed in their permit.

In addition to self-monitoring, the City will institute an unscheduled compliance monitoring program designed to provide an unannounced check of industrial users. The City will conduct a minimum of one (1) unscheduled monitoring visit per year for each significant industrial user. If requested by the industrial user, the City will take enough sample for the industrial user to have and obtain a parallel analysis. Confidentiality of the visit

will be maintained to insure proper results of the samples taken. All samples will be taken with the industries at normal operation. The City will also conduct one scheduled visit to each listed industrial facility to inspect industrial processes and pretreatment facilities. In addition to these monitoring activities, any of the above listed significant industrial users, along with any other industrial user of the Union City sewer system, will be subject to demand monitoring in response to an upset or disruption of system operation which may have been caused by an industrial user.

A monitoring schedule for the above listed significant industrial users and pollutants to be monitored is attached as Exhibit 7-A.

C. Sampling

When samples are collected for self-monitoring, unscheduled monitoring, or demand monitoring, time composite samples collected by an automatic sampler or manual grab samples taken at 2 hour intervals at normal operation during working hours will be sufficient. Time composite samples should be collected over an eight to 24 hour period depending on the industry's normal working hours and consist of equal volume samples taken at not more than two hour intervals. All samples will be placed

in suitable containers and preserved or stabilized with appropriate chemicals. Flow proportional composite sampling will be used if deemed necessary by the City Manager. Samples will be taken from a location that provides a well mixed representation of the wastestreams being monitored.

Once an accurate sample has been obtained, several steps will be taken to assure that the validity of the operation is maintained. All samples will be properly preserved and kept cool until the laboratory receives them for analysis. Once a sample is obtained and properly stabilized, it will be properly documented through chain-of-custody procedures using the form attached as Exhibit 7-B. Information collected from all monitoring sampling and analysis procedures will be reduced to a standard form kept on file in the City Manager's office. Information on the form will include time, date, location, type of sample, how the sample was collected and preserved, who collected the sample and any necessary comments. All laboratory data should be bound with numbered pages to assure continuity and proper sequence.

D. Program Organization

Organization of the monitoring program is outlined on Worksheet F, attached as Exhibit 7-C.

E. Safety Considerations

The general safety procedures normally followed by Union City sewer system personnel will be followed during industrial discharge monitoring.

During any sampling of an industrial discharge which requires the inspector to enter a manhole, an assistant will accompany the inspector.

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EXHIBIT 7-A
MONITORING RESULTS REPORT FORM

Monitoring Results Report Form
Union City, Tennessee

Industry	Pollutants Monitored in Discharge	Discharge ¹ Limits (mg/l)	Analytical Results (mg/l)	Unscheduled Monitoring Visit	Self-Monitoring Report June	Self-Monitoring Report December
Brown Shoe Company	Toluene	1.0		Date:	Date:	Date:
	Methane, tri-chloroflouro	1.0		Type:	Type:	Type:
Reelfoot Packing Co.	BOD ₅	300		Flow:	Flow:	Flow:
	Suspended Solids	300				
	Ammonia Nitrogen	200				
	Oil & Grease	100				
Goodyear Tire & Rubber Co.	Suspended Solids	300				
	Oil & Grease	100				
	Arsenic	2.0				
	Cadmium	2.0				
	Lead	1.0				
	Zinc	5.0				
	Phenol	3.0				
	Benzene	1.0				
Vaughn Electric Co.	Toluene	1.0				
	Copper	5.0				
	Propane, 1,2-dichloro	1.0				
Sta-Rite Industries	Propene, 2,4-dichloro	1.0				
	Chromium	8.0				
	Copper	5.0				
	Lead	1.0				
	Nickel	5.0				
	Ethane, 1,1,1-Trichloro	1.0				
Napthalene	1.0					

Notes

1. Based on composite sample requirements of new wastewater treatment plant.

7-A - 1

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EXHIBIT 7-B
CHAIN OF CUSTODY RECORD FORM

EXHIBIT 7-B

City of Union City, Tennessee
Wastewater Treatment Plant

CHAIN OF CUSTODY RECORD

Location of Sampling: _____ Producer _____ Hauler _____ Disposal Site
_____ Other: _____

Company's Name _____ Tele: (____) _____

Address _____
Number Street City State Zip

Collector's Name _____ Tele: (____) _____
Signature

Date Sampled _____ Time Sampled _____ Hours

Type of Process Producing Waste _____

Field Information _____

Sample Allocation:

1. _____
Name of Organization
2. _____
Name of Organization
3. _____
Name of Organization

Chain of Possession

- | | | |
|-----------------------|-------------|-----------------------|
| 1. _____
Signature | _____ Title | _____ Inclusive dates |
| 2. _____
Signature | _____ Title | _____ Inclusive dates |
| 3. _____
Signature | _____ Title | _____ Inclusive dates |

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EXHIBIT 7-C
WORKSHEET F
ORGANIZATIONAL PLAN

WORKSHEET F

Developing an Organization Plan

NOTE:

Indicate with an asterisk (*) which positions are part-time.

POTW Director
Title City Manager
Name Don Thornton

Responsible for Legal Activities
Title City Attorney
Name James M. Glasgow, Sr.

Staff Positions

Responsible for Pretreatment Director of Water and Wastewater Control
Title and Wastewater Control
Name Lenard Lynch

7-C-1

Responsible for Administrative Activities
Title Secretary
Name Ruthene Arrington

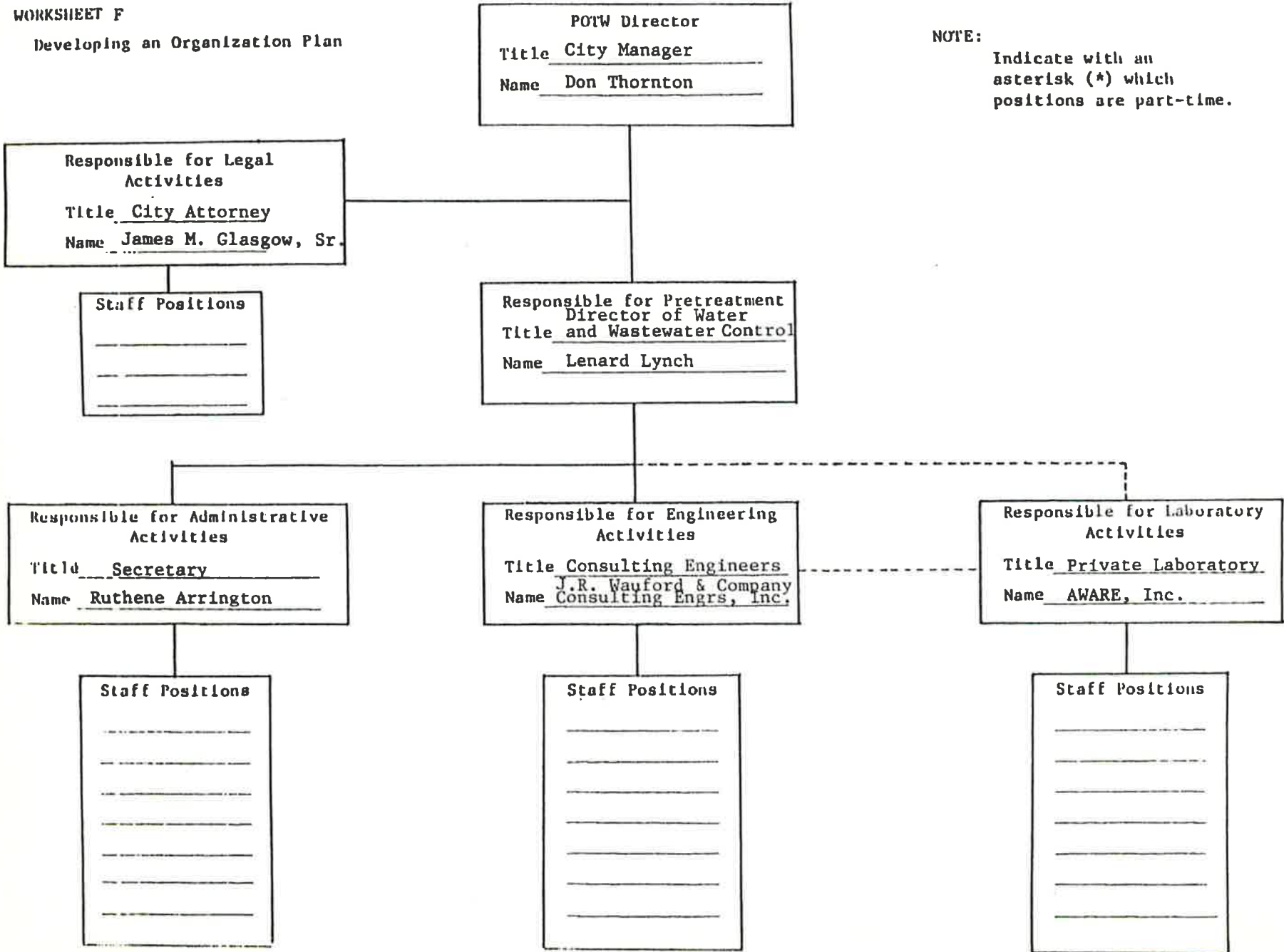
Staff Positions

Responsible for Engineering Activities
Title Consulting Engineers
Name J.R. Wauford & Company Consulting Engrs, Inc.

Staff Positions

Responsible for Laboratory Activities
Title Private Laboratory
Name AWARE, Inc.

Staff Positions



Copy Rec Audit
B.N.



January 19, 2021
Tommy Ray
Williams Country Sausage Company
5132 Old Troy Hickman Rd
Union City TN, 38261

RE: Industrial Permit No 10

Dear Mr. Tommy Ray

Enclosed is the signed Industrial wastewater discharge permit (IWP) No 10. There are a few changes at the recommendation of the state of Tennessee TDEC. Make sure that you read and understand all changes so that you will be in compliance with the effective date of January 31, 2021. Slug Control (Spill Response) plans MUST be turned in no later than 30 days from the permit effective date. Failure to submit these plans will result in an NOV along with potential fines up to sewage termination. Previous compliance schedules are still in place and active

Enclosed is also a copy of the Chain of custody form and acknowledgment page. Please be certain that this form is used when collecting, and transporting samples. Please also make sure that a copy of the chain of custody is attached with the sample results that are submitted to the city of Union City.

If you have any questions call me Jason Moss City of Union City Water and Wastewater Director at (731)885-9144.

Sincerely,
City of Union City

A handwritten signature in black ink, appearing to read 'Jason Moss', is written over the printed name and title.

Jason Moss
Wastewater Director

CC: Kathy Dillon, City Manager

POST OFFICE BOX 9 – UNION CITY, TENNESSEE 38281
TELEPHONE 731-885-1341 – FAX NUMBER 731-885-7598

CITY OF UNION CITY INDUSTRIAL DISCHARGE PERMIT

Permit No. 10

Authorization to discharge into the
Union City POTW

Issued by

The City of Union City

Under authority of the City of Union City Sewer Use Ordinance,

Williams Country Sausage Company (SIC 2013/NAICS 311612)

SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER

is authorized to discharge:
hailed from a facility located at:

Pretreated Process Wastewater

5132 Old Troy Hickman Road

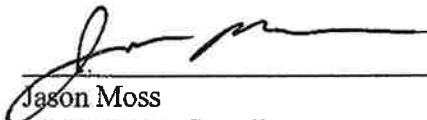
Union City, Tennessee 38261

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on: January 31, 2021

This permit shall expire on: January 31, 2024

Revision Date: January 15, 2021



Jason Moss
Pretreatment Coordinator
A L Strub Waste Water Treatment Plant
Union City, Tennessee

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PART I

A. Wastewater Strength and Facility Discharge Limitations and Monitoring Requirements^{(1), (7)}

Parameter	Sampling Procedure ⁽²⁾		Limitations Shall Not Exceed		Sampling ⁽³⁾ Frequency
	Grab	Flow Proportional Composite	Monthly Average	Maximum for any One Day	
Ammonia – Nitrogen		X	--	300 lb/day ⁽⁶⁾	1/Month
CBOD		X	--	1800 lb/day ⁽⁶⁾	1/Month
Free Oil & Grease	X		--	200 mg/l	1/Month
Total Suspended Solids		X	--	900 lb/day ⁽⁶⁾	1/Month
pH ⁽⁴⁾	X		--	6.0 S.U. Min. 9.0 S.U. Max.	Daily
Temperature	X		--	40 °C Max.	Daily
Flow ⁽⁵⁾ (gpd)			Report	Report	Continuously

Footnotes:

1. See Monitoring Procedures – Paragraph E
2. Samples shall be collected on a day when the parameters listed for analysis are likely to be present in typical concentrations in order to provide a representative sample of the effluent being discharged. During each self-monitoring sampling event.
3. Sampling results shall be reported monthly.
4. pH is measured immediately upon grab sampling. The minimum and maximum shall be reported monthly.
5. The total flow for each month shall be reported using a continuous, automatic flow meter capable of indication flow rate in gallons per minute and totalizing flow in gallons. The flow from all monitored discharges shall be submitted monthly as “self-monitoring” results.
6. Results shall be reported in mg/l and lb/day. Report Mass-based value using: Mass (lb/day) = Total discharge volume (gallons) at time of sampling x analytical result (mg/l)/1,000,000 x 8.34.
7. Any exceedance of these limitations are subject to Enforcement as outlined in the City of Union City’s Enforcement Response Plan.

B. Conventional Pollutant Thresholds for Calculating Surcharges Fees⁽¹⁾

Parameter	Sampling Procedure ⁽²⁾		Thresholds ⁽³⁾	Sampling ⁽⁴⁾ Frequency
	Grab	Flow Proportional Composite	Monthly Average	
Ammonia – Nitrogen		X	150 lb/day ⁽⁵⁾	Monthly
CBOD5		X	900 lb/day ⁽⁵⁾	Monthly
Free Oil & Grease	X		100 mg/l (max. for any one day)	Monthly
Total Suspended Solids		X	450 lb/day ⁽⁵⁾	Monthly

Footnotes:

1. See Monitoring Procedures – Paragraph E
2. Samples shall be collected on a day when the parameters listed for analysis are likely to be present in typical concentrations in order to provide a representative sample of the effluent being discharged. During each self-monitoring sampling event.
3. The noted concentrations of Ammonia-Nitrogen, CBOD5, Free Oil & Grease, and Total Suspended Solids are thresholds for calculating the appropriate surcharge if the Monthly Average (max. for any one day for Free Oil & Grease) is exceeded based on flow for the day of the sample was collected. The permittee may sample and report more than once during a month using State approved methods to calculate a true average. Refer to Appendix A for the corresponding surcharge formula.
4. Sampling results shall be reported monthly.
5. Results shall be reported in mg/l and lb/day. Report Mass-based value using: Mass (lb/day) = Total discharge volume (gallons) at time of sampling x analytical result (mg/l)/1,000,000 x 8.34.

C. Process Discharge Limitations and Monitoring Requirements

Not Applicable

D. Prohibited Discharge Standards

1. General Prohibitions. No User shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes Pass Through or Interference. These general prohibitions apply to all Users of the POTW whether or not the User is subject to Categorical Pretreatments Standards or any other National, State or local Pretreatment Standards or Requirements.
2. Specific Prohibitions. No User shall introduce or cause to be introduced into the POTW the following pollutants, substances or wastewater:
 - a) Any liquids, solids, or gases which, by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances to cause fire or explosion or be injurious in any other way to the POTW or to the operation of the POTW. At no time shall two successive readings on an explosion hazard meter at the point of discharge into the POTW system (or at any point in the POTW) be more than five percent (5%) nor any single reading over ten percent (10%) of the Lower Explosive Limit (LEL) of the meter or have a closed-cup flashpoint of less than 140 degrees Fahrenheit (60 degrees Celsius) using the test methods specified in 40 CFR 261.21;
 - b) Wastewater having a pH less than 6.0, or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW;
 - c) Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in Interference but in no cases solids greater than one-half inch(es) (1/2") in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshings, entrails, whole blood, and feathers from slaughter houses, ashes or cinders from sawmills, sand, spent lime, stone or marble dust from stone work facilities, metal, glass, straw, shavings, grass clippings, rags, spent grains, spent hops, waste paper, wood, plastics, gas, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud, or glass grinding or polishing waxes from any industry or agricultural facility; towels, rags, or sanitary wipes from facilities;
 - d) Pollutants, including oxygen-demanding pollutants (CBOD5, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause Interference with the POTW;
 - e) Wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in Interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104 degrees Fahrenheit (40 degrees Celsius);
 - f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause Interference with the POTW or Pass Through;
 - g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

- h) Trucked or hauled pollutants, except at discharge points designated by the Control Authority;
- i) Noxious or malodorous liquids, gases, or solids, or other non-domestic wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair;
- j) Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating the City's NPDES permit;
- k) Wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the Control Authority in compliance with applicable State or Federal regulations;
- l) Storm Water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, Noncontact Cooling Water, and unpolluted wastewater, unless specifically authorized by the Control Authority;
- m) Sludges, screenings, or other residues from the pretreatment of industrial wastes;
- n) Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test;
- o) Detergents, surface-active agents, or other substances that might cause excessive foaming in the POTW;
- p) Any wastewater which causes a hazard to human life or creates a public nuisance;
- q) Any Fats, Oils, or Grease of animal or vegetable origin and Waste Food and Sand that cause an upset, interference, or the POTW to violate its NPDES permit in concentrations greater than specified at Part I A. Wastewater Strength and Facility Discharge Limitations and Monitoring Requirements that may be subject to surcharge Refer to the specific guidelines for control at Section 2.10 of the City's Sewer Use Ordinance.

When the Control Authority determines that a User is contributing to the POTW any of the above enumerated substances in such amounts as to interfere with the operation of the POTW, the Control Authority shall: 1) advise the User(s) of the impact of the contribution on the POTW and 2) develop effluent limitations for such User(s) to correct the Interference with the POTW.

Pollutants, substances, or wastewater prohibited by this Section shall not be processed or stored in such a manner that they could be discharged to the POTW.

E. Monitoring Procedures

1. Representative Sampling.

Appropriate flow measuring devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed,

calibrated, and maintained to insure that the accuracy of the measurements is consistent with accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than plus or minus 10% from the true discharge rates throughout the range of expected discharge volumes.

Sampling and measurements taken in compliance with the monitoring requirements specified shall be representative of the volume and nature of the monitored discharge, and shall be taken at the location depicted on the attached exhibit, Attachment A. All samples that exceed the Monthly Average Limitation and/or exceed Maximum for Any One Day at Part I B. Conventional Pollutant Thresholds for Calculating Surcharge Fees will be surcharged appropriately. All other composite samples and grab samples that exceed the Monthly Average and/or Maximum for any One Day will be considered in violation of this permit and subject to action as stipulated in the City's Enforcement Response Plan.

2. Sampling Frequency. Where the permit requires sampling and monitoring of a particular effluent characteristic(s) at a frequency of less than 1/quarter the permittee is precluded from claiming "no discharge this month" if there has been any discharge from that particular facility during the period which coincides with the required monitoring frequency; i.e. if the required monitoring is once per quarter or 1/quarter, the monitoring period is one quarter, and if the discharge occurs during only one day in that period then the permittee must sample on that day and report the results of analyses accordingly.
3. Test Procedures. All pollutant analyses, including sampling techniques, to be submitted as part of this permit shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, unless otherwise specified in an applicable categorical Pretreatment Standard. If 40 CFR Part 136 does not contain sampling or analytical techniques for the pollutant in question, or where the EPA determines that the Part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other applicable sampling and analytical procedures, including procedures suggested by the Control Authority or other parties approved by the EPA.
4. Recording of Results. For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:
 - a) The name, address, and location of the facility;
 - b) The average and maximum daily flow;
 - c) The exact place, date, method and time of sampling;
 - d) The name of the person(s) collecting samples;
 - e) The date and times the analyses were performed;
 - f) The person(s) or laboratory who performed the analyses;
 - g) The analytical techniques or methods used; and
 - h) The results of all required analyses.
5. Records Retention. All records and information resulting from the monitoring activities required by this permit and all additional monitoring by the User shall be retained and made available for inspection and copying for a minimum of three (3) years after the expiration date of this permit. This period shall be automatically extended for the duration of any litigation concerning the User or the Control Authority, or where the

User has been specifically notified of a longer retention period by the Control Authority, Tennessee Department of Environment and Conservation, and/or EPA. Records include bench sheets, monitoring results, instrument calibration records, quality control records and any other records associated with sampling, monitoring, and analyses.

F. Reporting

1. Baseline Monitoring Reports

Not Applicable

2. Periodic Compliance Reports

- a) **Monitoring results shall be recorded daily, monthly, and results submitted monthly no later than 15 days after the completion of the reporting period, no later than the 10th day of the month. Quarterly reporting periods are between January 1 and March 31 and between April 1 and June 30 and between July 1 and September 30 and between October 1 and December 31. Semi-Annually Reporting periods are between April 1 and September 30 and October 1 and March 31. For reports, which are not mailed using the U.S. Postal Service, the date of receipt of the report shall govern. Two copies shall be submitted, and one copy shall be retained for the permittee's files.**

All self-monitoring sampling shall occur for the lifetime of the permit.

All self-monitoring reports (which consist of self-monitoring sampling results, flow data, **completed** Chain of Custody Record forms, etc.) and any communications regarding compliance with the conditions of this permit or the pretreatment program shall be submitted to:

Mr. Jason Moss
Pretreatment Coordinator
A L Strub Waste Water Treatment Plant
City of Union City
P. O. Box 9
Union City, Tennessee 38281

With a copy sent to:

Kathy Dillon
City Manager
City of Union of Union City
P. O. Box 9
Union City, Tennessee 38281

no later than 15 days following the ending date of each reporting period. Failure to submit reports by the required date will result in a notice of violation to the permittee and subject to the stipulations as set forth at Part II.C.

Monitoring reports, any correspondence, or any other report or information submitted to the Control Authority must be signed and certified by an Authorized Representative as defined at Part IV A.3.

b) Additional Monitoring by Permittee

If the permittee monitors any pollutant specifically limited by this permit more frequently than required at the location(s) designated, using approved analytical methods as specified herein, the results of such monitoring shall be included in the monthly report.

c) Falsifying Results and/or Reports

Knowingly making any false statement on any report required by this permit or falsifying any result may result in the imposition of criminal penalties as provided for by law. If the permittee becomes aware that he failed to submit any relevant facts in a permit application, or has submitted any incorrect information in a permit report or any report pursuant to this permit, he shall promptly inform the Control Authority of the correct facts or information.

d) Certification Statement

i. Certification of Permit Applications, User Reports, and Initial Monitoring Waiver – The following certification statement is required to be signed and submitted by Users submitting permit applications in accordance with Section 5.6 of the City's SUO; Users submitting baseline monitoring reports under Section 7.1 b)(v) of the City's SUO [40 CFR 403.12 (l)]; Users submitting reports on compliance with Categorical Pretreatment Standard deadlines under Section 7.3 of the City's SUO [40 CFR 403.12(d)]; Users submitting periodic compliance reports required by Section 7.4 a)-c) of the City's SUO [40 CFR 403.12 (e) and (h)] ; and Users submitting an initial request to forego sampling of a pollutant on the basis of Section 7.4 b)(iv) of the City's SUO [40 CFR 403.12 (e) (2) (iii)]. The following certification must be signed by an Authorized Representative as defined at Part IV A.3.

"I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or the person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of penalty and imprisonment for knowing violations."

ii. Certification of Pollutants not Present – Users that have an approved monitoring waiver based on Part I H. of this permit must certify on each report with the following statement that there has been no increase in the pollutant in its wastestream due to activities of the User.

"Based on my inquiry of the person(s) directly responsible for managing compliance with the Pretreatment Standard for 40 CFR Part(s) _____, I certify that, to the best of my knowledge and belief, there has been no increase in the level of _____ in the wastewaters due to activities at the facility since filing of the last periodic report under Section 7.4 a) of the City of Union City's Sewer Use Ordinance."

The above statement only applies if the blanks have the specific 40 CFR Part(s) and the specific pollutant(s).

e) A completed Chain of Custody form must be submitted with all periodic compliance reports.

f) Reports of Changed Conditions

The permittee shall notify the Control Authority of any significant changes to the permittee's operations or system which might alter the nature, quality, or volume of its wastewater at least one hundred eighty (180) days prior to the change.

g) Reporting Noncompliance/Violation

The permittee shall report ALL instances of noncompliance as required in Part II Section C of this permit. If noncompliance is anticipated for any reason notification to the City is required as soon as possible.

h) Reports of Potential Problems

(i) In the case of any discharge, including, but not limited to, accidental discharges, discharges of non-routine, episodic nature, an uncustomary batch discharge, a Slug Discharge or Slug Load, that might cause potential problems for the POTW, the permittee shall immediately telephone and notify the Control Authority of the incident. This notification shall include the location of the discharge, type of waste, concentration, and volume, if known, and corrective actions taken by the permittee. The Control Authority may request a sample for analysis be collected at the moment of the accidental discharge.

(ii) Within five (5) days following such discharge, the permittee shall, unless waived (in writing) by the Control Authority, submit a detailed written report describing the cause(s) of the discharge and the measures to be taken by the permittee to prevent similar future occurrences. Such notification shall not relieve the permittee of any expense, loss, damage, or other liability which may incur as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the permittee of any penalties or other liability which may be imposed pursuant to the SUO.

(iii) A notice shall be permanently posted on the permittee's bulletin board or other prominent place advising employees who to call in the event of a discharge described in paragraph (i), above. Employers shall ensure that all employees are advised of the emergency notification procedure.

(iv) The permittee is required to notify the Control Authority immediately of any changes at its facility affecting the potential for a Slug Discharge.

i) Reports of an Upset

The permittee shall submit the following information to the Wastewater Facility and the Control Authority within 24 hours of becoming aware of the Upset (if this information is provided orally, a written report must be submitted within 5 days):

(i) A description of the indirect discharge and cause of noncompliance;

(ii) The duration of noncompliance, including exact dates and times of noncompliance, and, if noncompliance is continuing, the time by which compliance is reasonably expected to be restored;

(iii) All steps taken or planned to reduce, eliminate and prevent recurrence of such an Upset.

j) Treatment Bypasses

Bypass of treatment units, facilities, or systems necessary for compliance with this permit is prohibited unless necessary to prevent the loss of life, personal injury, or severe property damage. Bypassing which does not cause violation of effluent limitations may be conducted in order to allow essential maintenance, provided the City is notified a minimum of ten (10) days prior to the bypass.

Bypass is prohibited, and the Control Authority may take enforcement action against the permittee for a bypass, unless;

- i. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- ii. There was no feasible alternative to the bypass, including the use of auxiliary treatment facilities, retention of untreated wastes, or maintenances during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
- iii. The permittee properly notified the Control Authority as required by Paragraph 13.3 c) of the City's SUO.

The Control Authority may approve an anticipated bypass, after considering its adverse effects, if the Control Authority determines that it will meet the three conditions listed above.

G. Reopener Clause

This permit may be modified by the City of Union City to comply with any new or amended pretreatment regulations or in the event that conditions in the POTW, including changes in sludge use and disposal regulations, require modification of the permit or permit limits.

H. Waiver from Monitoring

No waiver for the permit has been granted. The Control Authority may authorize an Industrial User subject to a categorical Pretreatment Standard (upon the Approval Authority's approval) to forego sampling of a pollutant by a categorical Pretreatment Standard if the Industrial User has demonstrated through sampling and other technical factors that the pollutant is neither present nor expected to be present in the Discharge, or is present only at background levels from intake water and without any increase in the pollutant due to activities of the Industrial User. [Tennessee Rule 1200-4-14-.12(5)(b). This authorization is subject to the conditions set forth in the City's SUO at Section 7.4 paragraph b)(i) through (ix).

PART II

A. General Provisions

1. Duty to Reapply

A User with an expiring individual discharge permit or general permit shall apply for permit reissuance by submitting a complete permit application in accordance with Section 5.5 of the City's SUO, a minimum of ninety (90) days prior to the expiration of the User's existing individual wastewater discharge permit or general permit.

2. Right of Entry: Inspection and Sampling

The Control Authority, Approval Authority, and/or EPA shall have the right to enter the premises of any User to determine whether the User is complying with all requirements of the City's SUO and any individual wastewater discharge permit or general permit or order issued hereunder. Users shall allow the Control Authority, Approval Authority, EPA, or their representative ready access at all reasonable times to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties.

- a) Where a User has security measures in force which would require proper identification and clearance before entry into its premises, the User shall make necessary arrangements with its security guard(s) so that, upon presentation of suitable identification, personnel from the Control Authority, Approval Authority, and EPA shall be permitted to enter, without delay, for the purposes of performing their specific responsibilities (40 CFR 403.12).
- b) The Control Authority, Approval Authority, and EPA shall have the right to set up on the Industrial User's property such devices as are necessary to conduct sampling inspection, compliance monitoring and/or metering of the User's operations.
- c) The Control Authority may require the User to install monitoring equipment as necessary. The facility's sampling, and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the User at its own expense. All devices used to measure wastewater flow and quality shall be calibrated annually, unless specified otherwise, to ensure their accuracy. The location of the monitoring facility shall provide ample room in or near the monitoring facility to allow accurate sampling and preparation of samples and on-site analysis (where necessary), whether constructed on public or private property. The monitoring facilities should be provided in accordance with the Control Authorities requirements and all applicable local construction standards and specifications, and such facilities shall be constructed and maintained in such manner as to enable the Control Authority to perform independent monitoring activities.
- d) Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the User at the written

or verbal request of the Control Authority and shall not be replaced. The costs of clearing such access shall be borne by the User.

- e) Unreasonable delays in allowing the Control Authority access to the User's premises shall be a violation of the City's SUO.

3. Confidential Information

Information and data on a User obtained from reports, surveys, permit applications, individual wastewater discharge or general permits and monitoring programs, and from the Control Authority's inspections and sampling activities, shall be available to the public or other governmental agency without restriction, unless the User specifically requests, and is able to demonstrate to the satisfaction of the Control Authority, that the release of such information would divulge information, processes or methods of production entitled to the protection as trade secrets of the User under applicable State law. Any such request must be asserted at the time of submission of the information or data.

When requested and demonstrated by the User furnishing the report, that such information should be held confidential, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, but shall be made available immediately upon written request to governmental agencies for uses related to the City's SUO, the National Pollution Discharge Elimination System (NPDES) Permit, and/or the State Pretreatment Program, and that such portions of a report shall be available for use by the State or any state agency in judicial review or enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics and other effluent data, as defined at 40 CFR 2.302, shall not be recognized as confidential information and shall be available to the public without restriction.

4. Proper Operation and Maintenance

Users shall provide wastewater treatment as necessary to comply with the City's SUO and shall achieve compliance with all Categorical Pretreatment Standards, Local Limits, and the prohibitions set out in Part I of this permit within the time limitations specified by EPA, the State, or the Control Authority and/or his designated representative, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the User's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the Control Authority for review, and shall be acceptable and to the Control Authority before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the User from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the City under the provisions of this permit, the City's SUO, or any other control mechanism.

Wastewater monitoring and flow measurement facilities shall be properly operated, kept clean, and maintained in good working order at all times. The failure of a User to keep its monitoring facility in good working order shall not be grounds for the User to claim that sample results are unrepresentative of its discharge. Failure to do so shall be a violation of this permit.

Upon the reduction, loss, or failure of any treatment process, facility, or system necessary for maintaining compliance with this permit, the User shall limit production, discharge or both in order to maintain compliance until the facility is restored or an alternate method of treatment is provided. This requirement would apply in such situations as loss or failure of the primary power source.

No User shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable Pretreatment Standard or Requirement. The Control Authority and/or his designated representative may impose mass limitations on Users who are using dilution to meet applicable Pretreatment Standards or Requirements or in other cases when the imposition of mass limitations is appropriate.

The use of dilution water in order to comply with the terms and conditions of this permit is prohibited.

5. Duty to Mitigate

An Industrial User (IU) which experiences an upset (an exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards because of factors beyond the reasonable control of the IU) which is not a result of operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation, shall inform the Control Authority thereof immediately upon becoming aware of the upset as set out in the City's SUO at SECTION 13 – AFFIRMATIVE DEFENSES TO DISCHARGE VIOLATIONS.

6. Severability

The provisions of this permit are severable. If any provision, paragraph, word, section, or article of this permit is held invalid for any reason, the remaining provisions, paragraphs, words, sections, or articles shall not be affected and shall continue in full force and effect.

B. Changes Affecting the Permit

1. Planned Changes

The permittee shall notify the Control Authority of any significant changes to the User's operations or system which might alter the nature, quality, or volume of its wastewater at least one hundred eighty (180) days before the change.

2. Permit Modification, Revocation or Termination

- a) This permit may be modified, revoked and reissued, or terminated for cause as described in the City's SUO at Sections 6.3, 6.5, and 6.6.
- b) The permittee shall furnish to the Control Authority, within a reasonable time, any information which the Control Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Control Authority, upon request, copies of records required to be kept by this permit.
- c) If any applicable Federal, State, or local Pretreatment Standard, Requirement or Prohibition is revised, the Control Authority shall modify or revoke and reissue the permit to conform to the prohibition, standard, or requirement, providing that the standard or requirement is more stringent than the limitation in the permit.
- d) The filing of a request by the permittee for a modification, revocation, reissuance, termination, or notification of planned changes or anticipated noncompliance does not halt any permit condition.

Individual wastewater discharge permits and general permits shall be subject to void upon cessation of operations or transfer of business ownership. All individual wastewater discharge and general permits issued to a User are void upon the issuance of a new individual wastewater discharge or general permit to that User.

3. Transferability

This permit is nontransferable without prior notification (written) including a written certification by the new owner or operator to the City in accordance with Section 6.4 of the City's SUO, and the new owner or operator shall be provided with a copy of the existing wastewater discharge permit for review for thirty (30) days prior to new ownership or operation. Failure to provide advance notice of transfer renders the permit void as of the date of facility transfer.

4. Change of Mailing Address

The permittee shall promptly provide the City written notice of any change of mailing address. In the absence of such notice, the original mailing address of the permittee will be assumed correct.

C. Noncompliance

1. Notice of Violation, Repeat Sampling, and Reporting

If sampling performed by a User indicates a violation, the User must notify the Control Authority within twenty-four (24) hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within thirty (30) days after becoming aware of the violation. Repeat sampling by the Industrial User is not required if the Control Authority performs sampling at the User's facility at least once a month, or if the Control Authority performs sampling at the User between the time

when the initial sampling was conducted and the time when the User or the Control Authority receives the results of this sampling, or if the Control Authority has performed the sampling and analysis in lieu of the Industrial User. If sampling performed by the Control Authority indicates a violation, the Control Authority may opt to notify the User of the violation and require the User to perform the repeat sampling and analysis [40 CFR 403.12 (g) (2)].

In the event of noncompliance which would cause a threat to human health or may adversely affect the operation of the POTW or POTW treatment plant, including the accidental discharge of any substance prohibited in Part I Section D of this permit, verbal notice of noncompliance shall be provided to the City immediately upon discovery of the noncompliance. The permittee shall give such notification to one of the following:

Jason Moss – Pretreatment Coordinator 731/885-9144
Kathy Dillon – City Manager 731/885-7598

Written notice shall be provided to the City within five (5) days of any incident of noncompliance. The notice shall contain a description of the circumstances and events causing the noncompliance, the period of noncompliance including the exact dates and times, and the measures to be taken to prevent further noncompliance.

A notice shall be permanently posted on the User's bulletin board or other prominent place advising employees whom to call in the event of a dangerous accidental discharge. Users shall insure that all employees who may cause or suffer such a dangerous discharge to occur are advised of the emergency notification procedure.

2. Reporting Bypasses

A User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Control Authority within twenty-four (24) hours from the time the User becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. The Control Authority may waive the written report on a case-by-case basis if the oral report has been received within twenty-four (24) hours.

3. Annual Publication

At least annually, in the local newspaper of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW, a list of Users, which at any time during the previous twelve months were in significant noncompliance with applicable pretreatment requirements, will be published. For the purposes of this provision, a significant industrial user (or any user which violates subparts (c), (d), or (h) of Section 10 of the City's SUO) is in significant noncompliance if its violation meets one or more of the criteria stated in the City's SUO at SECTION 10 – PUBLICATION OF USERS IN SIGNIFICANT NONCOMPLIANCE.

D. Liabilities

1. General

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. Notwithstanding this permit, the permittee shall remain liable for any damages sustained by the City of Union City as a result of the permittees discharge. Additionally, notwithstanding this permit, it shall be the responsibility of the permittee to conduct his discharge activities in such a manner that public or private nuisances, health hazards, or damage to the POTW will not be created.

Nothing in this permit shall be construed to preclude any legal action or relieve the permittee from any responsibility, liability, or penalties established pursuant to any applicable Local, State or Federal law.

2. Enforcement Procedures

All administrative enforcement actions taken against a Significant Industrial User, including procedures, orders, and complaints shall be in accordance with the Tennessee Water Quality Control Act of 1977 and its amendments, specifically TCA 69-3-123, and enforcement per the City of Union City's Enforcement Response Plan (ERP). Any User found to have violated, or continues to violate, any provision of the SUO, IWD permit or general permit, and/or orders issued hereunder, any other Pretreatment Standard or Requirement may be penalized up to Ten Thousand Dollars (\$10,000).

PART III
COMPLIANCE SCHEDULE

A. Local Standards

If after any self-monitoring event or after any compliance monitoring by the Control Authority, any pollutant concentration(s) is/are in violation of permit limitations, written notice of such violations will be made to the permittee by the Control Authority. If additional pretreatment and/or operation and maintenance (O&M) will be required to meet the Pretreatment Standards, the shortest schedule by which the User will provide such additional pretreatment and/or O&M must be provided. The completion date in this schedule shall not be later than the compliance date established for the applicable Pretreatment Standard.

The following conditions shall apply to the compliance schedule:

1. The schedule shall contain progress increments in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for the User to meet the applicable Pretreatment Standards (such events include, but are not limited to, hiring an engineer, completing the preliminary and final plans, executing contracts for major components, commencing and completing construction, and beginning and conducting routine operation);
2. No increment referred to above shall exceed nine (9) months;
3. The User shall submit a progress report to the Control Authority no later than fourteen (14) days following each date in the schedule and the final date of compliance including, as a minimum, whether or not it complied with the increment of progress, the reason for any delay, and if appropriate, the steps being taken by the User to return to the established schedule; and
4. In no event shall more than nine (9) months elapse between such progress reports to the Control Authority.

B. Categorical Standards

Within ninety (90) days following date for final compliance with applicable categorical Pretreatment Standards any User subject to such Pretreatment Standards and Requirements shall submit to the Control Authority a report containing the information described in Section 5.5 a) (vi) and (vii) and Section 7.1 b) (ii) of the City's SUO. For Users subject to equivalent mass or concentration limits, this report shall contain a reasonable measure of the User's long-term production rate. For all other Users subject to categorical Pretreatment Standards expressed in terms of allowable pollutant discharge per unit of production (or other measure of operation), this report shall include the User's actual production during the appropriate sampling period. All compliance reports must be signed and certified in

accordance with Section 7.14 a) of the City's SUO. All sampling will be done in compliance with Section 7.11 of the City's SUO.

C. Accidental Discharge/Slug Discharge Control Plans

An accidental discharge/slug discharge control plan shall address, at a minimum, the following:

1. Description of discharge practices, including non-routine batch discharges;
2. Description of stored chemicals (which shall include cleaning supplies);
3. Procedures for immediately notifying the Control Authority of any accidental or Slug Discharge, as required by Part I F 2.g); and
4. Procedures to prevent adverse impact from any incidental or Slug Discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.
5. All SIC users are required to submit and a Accidental Discharge/Slug Discharge Control Plan and updates submitted to The City of Union City pretreatment coordinator.

D. Hazardous Waste Notification

Any User who commences the discharge of hazardous waste shall notify the Control Authority, the EPA Regional Water Management Division Director, and State hazardous waste authorities, in writing, of any discharge to the POTW of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261. Refer to the City's SUO at Section 7.9 for further provisions.

E. Solvent Management Plan (Total Toxic Organics Plan)

TOTAL TOXIC ORGANICS DOES NOT APPLY TO THIS FACILITY.

PART IV

A. Definitions

- 1) Act or "the Act". The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. section 1251 et seq.
- 2) Approval Authority. The Tennessee Division of Water Pollution Control (Division of Water Resources) Director or the Director's representative.
- 3) Authorized or Duly Authorized Representative of the User.
 - a) If the User is a corporation:
 - (i) The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or
 - (ii) The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit or general permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - b) If the User is a partnership or sole proprietorship: a general partner or proprietor, respectively.
 - c) If the User is a Federal, State, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
 - d) The individuals described in paragraphs a) through c), above, may designate a Duly Authorized Representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the City.
- 4) Carbonaceous Biochemical Oxygen Demand (CBOD₅). method defined test measured by the depletion of dissolved oxygen by biological organisms in a body of water in which the

contribution from nitrogenous bacteria has been suppressed. CBOD5 is a method defined parameter is widely used as an indication of the pollutant removal from wastewater. The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure for five (5) days at 20° centigrade expressed in terms of weight (lbs) and/or concentration (mg/l).

- 5) Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 2.3 a) and b) [Tennessee Rule 1200-4-14-.05(1)(a) and (2)]. BMPs include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage. BMPs also include alternative means (i.e. management plans) of complying with, or in place of certain established categorical Pretreatment Standards and effluent limits.
- 6) Building Drain. The part of the lowest horizontal piping of a drainage system which receives the discharge from soil, waste, and other drainage pipes inside the walls of the building and conveys it to the building sewer beginning five (5) feet outside the inner face of the building wall.
- 7) Building Sewer. A sewer conveying wastewater from the premises of a User to the POTW.
- 8) Categorical Pretreatment Standard or Categorical Standard. Any regulation containing pollutant discharge limits promulgated by EPA in accordance with sections 307(b) and (c) of the Act (33 U.S.C. section 1317) that apply to a specific category of Users and that appear in 40CFR Chapter I, Subchapter N, Parts 405-471.
- 9) Categorical Industrial User. An Industrial User subject to a categorical Pretreatment Standard or categorical Standard.
- 10) Chemical Oxygen Demand (COD). A measure of the oxygen required to oxidize all compounds, both organic and inorganic, in water.
- 11) Chronic Violation. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period on a rolling quarterly basis exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including Instantaneous Limits.
- 12) City. City of Union City.
- 13) City Council. The persons elected Council of Mayor and Aldermen.
- 14) Combined Sewer. A sewer receiving both sewage and surface runoff from down spouts, storm sewers and surface or groundwater.
- 15) Control Authority. The Mayor of the City of Union City, Tennessee or a Duly Authorized Representative of the City of Union City.
- 16) Cooling Water. The water discharged from any use such as air conditioning, cooling or refrigeration, or to which the only pollutant added is heat.
- 17) Conventional Pollutants. Biochemical Oxygen Demand (CBOD5), Total Suspended Solids (TSS), Fecal Coliform bacteria, Oil and Grease, Flow, and pH (40 CFR 401.16).
- 18) Daily Maximum. The arithmetic average of all effluent samples for a pollutant (except pH) collected during a calendar day.

- 19) Daily Maximum Limit. The maximum allowable discharge limit of a pollutant during a calendar day. Where Daily Maximum Limits are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where Daily Maximum Limits are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- 20) Direct Discharge. The discharge of treated or untreated wastewater directly to the waters of the State of Tennessee.
- 21) Domestic Wastewater. Wastewater that is generated by a single family, apartment or other dwelling unit or dwelling unit equivalent containing sanitary facilities for the disposal of wastewater and used for residential purposes only and/or restroom wastes from commercial, institutional and Industrial Users.
- 22) Environmental Protection Agency or EPA. The U.S. Environmental Protection Agency, or where appropriate, the Regional Water Management Division Director, the Regional Administrator, or other duly authorized official of said agency.
- 23) Existing Source. Any source of discharge that is not a "New Source."
- 24) Grab Sample. A sample that is collected from a wastestream without regard to the flow in the wastestream and over a period of time not to exceed fifteen (15) minutes.
- 25) Grease Interceptor. An interceptor whose rated flow exceeds 50 gpm and is located outside the building.
- 26) Grease Trap. An interceptor whose rated flow is 50 gpm or less and is typically located inside the building.
- 27) Holding (Septic) Tank Waste. Any waste from holding tanks such as vessels, chemical toilets, campers, trailers, septic tanks, and vacuum-pump tank trucks.
- 28) Indirect Discharge or Discharge. The discharge or the introduction of non-domestic pollutants from any source regulated under Section 307(b), (c), or (d) of the Act, into the POTW (including holding tank waste discharged into the system).
- 29) Industrial User (IU) or User. A source of nondomestic waste. Any nondomestic source discharging pollutants to the POTW.
- 30) Individual Wastewater Discharge Permit or General Permit. As set forth in Section 5 of this Ordinance.
- 31) Instantaneous Maximum Limit. The maximum allowable concentration of a pollutant discharged at any time, determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and the duration of the sampling event.
- 32) Interceptor. A device designed and installed to separate and retain for removal, by automatic or manual means, deleterious, hazardous or undesirable matter from normal wastes, while permitting normal sewage or waste to discharge into the drainage system by gravity.
- 33) Interference. A discharge that, alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal, or exceeds the design capacity of the treatment works or collection system.

- 34) Local Limit. Specific discharge limits developed and enforced by the Control Authority upon industrial or commercial facilities to implement the general and specific discharge prohibitions listed in Tennessee Rule 1200-4-14-.05(1)(a) and (2).
- 35) Medical Waste. Isolation wastes, infectious agents, human blood and blood products, pathological wastes, sharps, body parts, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes, and dialysis wastes.
- 36) Monthly Average. The sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.
- 37) Monthly Average Limit. The highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.
- 38) National Pollutant Discharge Elimination System or NPDES Permit. A permit issued to a POTW pursuant to Section 402 of the Act.
- 39) National Pretreatment Standard or Pretreatment Standard or Standard. Any regulation containing pollutant discharge limitations promulgated by the EPA in accordance with Section 307 (b) and (c) of the Federal Clean Water Act which applies to Industrial Users. This term includes prohibitive discharge limitations established to 1200-4-14-.05.
- 40) National Prohibitive Discharges. Prohibitions applicable to all nondomestic dischargers regarding the introduction of pollutants into POTW's set forth in 40 CFR 403.5.
- 41) New Source.
 - a) Any building, structure, facility or installation from which there is or may be a discharge of pollutants, the construction of which commenced after the publication of proposed National Pretreatment Standards under Section 307 (c) of the Act which will be applicable to such source if such Standards are thereafter promulgated in accordance with that Section, provided that:
 - (i) The building, structure, facility or installation is constructed at a site at which no other source is located, or
 - (ii) The building, structure, facility or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source, or
 - (iii) The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant and the extent as to which the new facility is engaged in the same general type of activity as the Existing Source should be considered.
 - b) Construction on the site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility, or installation meeting the criteria of the aforementioned but otherwise alters, replaces, or adds to existing process or production equipment.
 - c) Construction of a new source as defined under this paragraph has commenced if the Owner or operator has:
 - (i) Begun, or caused to begin as part of a continuous on-site construction program:

- (a) Any placement, assembly or installation of facilities or equipment; or
 - (b) Significant site preparation work including clearing, excavation or removal of existing buildings, structures or facilities which is necessary for the placement, assembly or installation of new source facilities or equipment; or
 - (ii) Entered into a binding contractual obligation for the purchase of facilities or equipment, which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering and design studies do not constitute a contractual obligation under this paragraph.
- 42) Noncontact Cooling Water. Water used for cooling that does not come into direct contact with any raw material, intermediate product, waste product, or finished product.
- 43) North American Industry Classification System (NAICS). A classification pursuant to the North American Industrial Classification Manual issued by the Executive Office of the President, Office of Management and Budget, 2007.
- 44) Pass Through. A discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement or the City's NPDES permit, including an increase in the magnitude or duration of a violation.
- 45) Person. Any and all persons, including individuals, partnerships, co-partnerships, firms, companies, public or private corporations or officers thereof, associations, joint stock companies, trusts, estates, state and federal agencies, municipalities or political subdivisions, or officers thereof, departments, agencies, or instrumentalities organized or existing under the laws of this or any state or country. The masculine gender shall include the feminine, the singular shall include the plural where indicated by the context.
- 46) pH. The logarithm (base 10) of the reciprocal of the concentration of hydrogen ions expressed in grams per liter of solution which is the measurement of acidity or alkalinity of a solution.
- 47) Pollutant. Any dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, Medical Wastes, chemical wastes, biological materials, radioactive materials, heat, wrecked or discharge equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste and certain characteristics of wastewater (e.g., pH, temperature, TSS, turbidity, color, CBOD₅, COD, toxicity or odor).
- 48) Pollution. The man-made or man-induced alteration of the chemical, physical, biological, and radiological integrity of water.
- 49) Pretreatment. The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into a POTW. This reduction or alteration can be obtained by physical, chemical, or biological processes; by process changes; or by other means, except as prohibited by Tennessee Rule 0400-4-14-.06(4). Appropriate pretreatment technology includes control equipment, such as equalization tanks or facilities, for protection against surges or slug loadings that might interfere with or otherwise be incompatible with the POTW. However, where wastewater from a regulated process is mixed in an equalization facility with unregulated wastewater or with wastewater from another regulated process, the effluent from the equalization

- facility must meet an adjusted pretreatment limit calculated in accordance with Tennessee Rule 0400-4-14-.06(5).
- 50) Pretreatment Requirements. Any substantive or procedural requirement related to pretreatment, other than a Pretreatment Standard imposed on a User, including but not limited to discharge, sampling requirements, analytical requirements, reporting requirements, and compliance schedules.
- 51) Pretreatment Standards or Standards. Pretreatment Standards shall mean prohibited discharge standards, categorical Pretreatment Standards, and Local Limits.
- 52) Process Waste Water. Any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product, or waste product.
- 53) Process Waste Water Pollutants. Pollutants present in process waste water.
- 54) Prohibited Discharge Standards or Prohibited Discharges. Absolute prohibitions against the discharge of certain substances; these prohibitions appear in Part I of this permit.
- 55) Publicly Owned Treatment Works (POTW). A treatment works as defined by Section 212 of the Act (33 U.S.C. section 1292), which is owned by the City of Union City, Tennessee. This definition includes any devices or systems used in collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature and any conveyances, which convey wastewater to a treatment plant. For the purposes of this Ordinance, "POTW" shall also include any sewers that convey wastewaters to the POTW from persons outside the City, who are, by contract or agreement with the Control Authority, Users of the POTW.
- 56) POTW Treatment Plant, Wastewater Treatment Plant, or Treatment Plant. That portion of the POTW designed to provide treatment to wastewater.
- 57) Sanitary Sewer. A sewer pipeline that carries liquid and water-carried wastes from residences, commercial buildings, industrial plants, and institutions, together with minor quantities of ground-storm, and surface waters that are not admitted intentionally.
- 58) Shall is mandatory: May is permissive.
- 59) Significant Industrial User (SIU).
- Except as provided in paragraphs (c) and (d) of this Section, a Significant Industrial User is:
- a) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N; and
 - b) Any other industrial user that:
 - (i) Discharges an average of twenty-five thousand (25,000) gallons more per day or more of process wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater) to the POTW;
 - (ii) Contributes a process wastestream which makes up five percent (5%) or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or
 - (iii) Is designated as such by the Control Authority on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any

- Pretreatment Standard or Requirement (in accordance with TCA 1200-4-14-.08(6)(f).
- c) The Control Authority may determine that an Industrial User subject to categorical Pretreatment Standards under Tennessee Rule 1200-4-14-.06 and 40 CFR chapter I, subchapter N is a Non-Significant Categorical Industrial User rather than a Significant Industrial User on a finding that the Industrial User never discharges more than 100 gallons per day (gpd) of total categorical wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:
 - (i) The Industrial User, prior to the Control Authority's finding, has consistently complied with all applicable categorical Pretreatment Standards and Requirements;
 - (ii) The Industrial User annually submits the certification statement(s) required in Section 7.14 of the City's SUO[Tennessee Rule 1200-4-14-.12(17)], together with any additional information necessary to support the certification statement; and
 - (iii) The Industrial User never discharges any untreated concentrated wastewater.
 - d) Upon finding that a User meeting the criteria in Subsection (b) of this part has no reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or Requirement, the Control Authority may at any time, on its own initiative or in response to a petition received from an Industrial User, and in accordance with procedures in Tennessee Rule 1200-4-14-.08(6) (f), determine that such User is not a Significant Industrial User.
- 60) Significant Noncompliance (SNC). Any violation of pretreatment requirements which meet one or more of the following criteria:
- a) Violations of Wastewater Discharge Limits
 - (i) Chronic Violations,
 - (ii) Technical Review Criteria (TRC) Violations,
 - (iii) Any other violation(s) of an Industrial Wastewater Discharge Permit or General Permit effluent limit that the Control Authority believes has caused, alone or in combination with other discharges, interferences (e.g., slug loads) or pass-through; or endangered the health of the POTW personnel or the public, or
 - (iv) Any discharge of a pollutant that has caused imminent endangerment to human health/welfare or to the environment and has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
 - b) Violations of Compliance Schedule Milestones, contained in an enforcement order by 90 days or more after the schedule date. Milestones may include but not be limited to dates for starting construction, completing construction and attaining final compliance.
 - c) Failure to provide reports for compliance schedules, self-monitoring data or categorical standards (baseline monitoring reports, 90-day compliance reports and periodic reports) within 45 days from the due date.
 - d) Failure to accurately report noncompliance.
 - e) Violation or group of violations which the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.

- 61) Significant Violation. A violation which remains uncorrected 45 days after notification of noncompliance; which is part of a pattern of noncompliance over a twelve month period; or which involves a failure to accurately report noncompliance; or which resulted in the POTW exercising its emergency authority under CFR 403.8 (f) (2) (vi) (B) and 403.8 (f) (2) (vii).
- 62) Slug Control Plan. A plan to control slug discharges, which shall include, as a minimum:
- a) Description of discharge practices, including non-routine batch discharges;
 - b) Description of stored chemicals;
 - c) Procedures for immediately notifying the POTW of slug discharges, including any discharge that would violate a discharge prohibition under this Ordinance, or 40 CFR 403.5(b), with procedures for follow-up written notification within 5 days;
 - d) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents) and/or measures and equipment for emergency response.
- 63) Slug Load or Slug Discharge. Any discharge at a flow rate or concentration, which could cause a violation of the prohibited discharge standards in Section 2 of the City's SUO. A Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, Local Limits or Permit conditions.
- 64) Source. Any activity, operation, construction, building, structure, facility, or installation (permanent or temporary) from which there is or may be the discharge or pollutants.
- 65) State. State of Tennessee.
- 66) Storm Water. Any flow occurring during or following any form of natural precipitation and resulting therefrom.
- 67) Surcharge. A fee charged to Industrial Users in excess of the normal Sewer User Charge to cover the additional expenses incurred by the POTW for treating conventional pollutants of a higher concentration than the POTW treatment plant was designed to treat.
- 68) Technical Review Criteria (TRC) Violation. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of the wastewater samples taken for each pollutant parameter during a six month period equals or exceeds the product of the numeric Pretreatment Standard or Requirement including Instantaneous Limits, as defined by Section 1.2 of the SUO multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease and 1.2 for all other parameters except pH).
- 69) Total Suspended Solids or Suspended Solids. The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquids, and which is removable by laboratory filtering.
- 70) Toxic Pollutant. Any pollutant or combination of pollutants listed as toxic in regulations promulgated by the Administrator of the Environmental Protection Agency under the provision of Section 307 (a) of the Act (40 CFR 403 Appendix B).

- 71) Upset. An exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards because of factors beyond the reasonable control of the Industrial User. An Upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- 72) User or Industrial User. Any person(s), who contributes, causes or permits the contribution of wastewater into the City's POTW, including the owner of any private property having a building sewer connected to the POTW sewer system.
- 73) Wastewater. The liquid and water-carried industrial or domestic wastes from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, together with any groundwater, surface water and storm water that may be present, whether treated or untreated, which is contributed into or permitted to enter the POTW.
- 74) Waters of the State. All streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems and all other bodies or accumulations of water, surface or underground, natural or artificial, public or private, which are contained within, flow through or border upon the state of any portion thereof.

B. Abbreviations

The following abbreviations shall have the designated meanings:

◇ CBOD5	Carbonaceous Biochemical Oxygen Demand 5-day
◇ BMP	Best Management Practice
◇ BMR	Baseline Monitoring Report
◇ CFR	<i>Code of Federal Regulations</i>
◇ CIU	Categorical Industrial User
◇ COD	Chemical Oxygen Demand
◇ EPA	U. S. Environmental Protection Agency
◇ FOG	Fats, Oil and Grease
◇ gpd	Gallons per day
◇ IU	Industrial User
◇ l	Liter
◇ lb	pounds
◇ mg	Milligrams
◇ mg/l	Milligrams per liter
◇ NAICS	North American Industry Classification System
◇ NH ₃ -N	Ammonia Nitrogen
◇ NPDES	National Pollutant Discharge Elimination System
◇ NSCIU	Non-Significant Categorical Industrial User
◇ POTW	Publicly Owned Treatment Works
◇ RCRA	Resource Conservation and Recovery Act
◇ SIU	Significant Industrial User
◇ SNC	Significant Noncompliance
◇ SWDA	Solid Waste Disposal Act, 42 U.S.C. 6901, et. seq.
◇ TSS	Total Suspended Solids
◇ U.S.C.	United States Code

APPENDIX A: SEWER USE AND SURCHARGE FEES

The surcharge amounts for Parameters subject to Threshold, Ammonia-Nitrogen (NH₃-N), Biochemical Oxygen Demand (CBOD₅), Free Oil and Grease (O&G), and Total Suspended Solids (TSS) shall be determined as follows:

Additional billing (surcharge) for each parameter=

Only 1 sampling event during 1 month period pertains to O&G and NH₃-N:

$$\left[\begin{array}{l} \text{Base} \\ \text{Sewer} \\ \text{Bill for 1} \\ \text{Months} \\ \text{Usage} \end{array} \right] \times \frac{\text{Measured Parameter Concentration (lb/day or mg/l)}}{\text{Monthly Average Threshold (Part I B)}} = \left[\begin{array}{l} \text{Base} \\ \text{Sewer} \\ \text{Bill for 1} \\ \text{Months} \\ \text{Usage} \end{array} \right]$$

Surcharge for all Thresholds for any Monthly sampling event:

$$\left[\begin{array}{l} \text{Base} \\ \text{Sewer} \\ \text{Bill} \\ \text{Month} \\ \text{Usage} \end{array} \right] \times \frac{\text{Measured Parameter Concentration (lb/day or mg/l)}}{\text{Monthly Average Threshold (Part I B)}} = \left[\begin{array}{l} \text{Base} \\ \text{Sewer} \\ \text{Bill} \\ \text{Month} \\ \text{Usage} \end{array} \right]$$

If the first sample event for the three (1) month period does not indicate compliance with the Threshold, then the surcharge will be assessed each month until an analysis event indicates compliance with the Threshold or the next sampling event occurs. If more than one (1) sampling event occurs during the one month period, the last analysis will correspond to each consecutive discharge until another sampling and analysis has been performed. Therefore, if the first sample event for the three (1) month period indicates compliance of the Threshold then no surcharge will be assessed. (Each Quarterly Threshold Surcharge Calculation will be conducted in this same manner.)

Results of the sampling analyses shall be reported to the City of Union City's Director within fifteen (15) days of the last day of semi-annual period.

ATTACHMENT A: SAMPLING POINT LOCATION/DESCRIPTION

Sampling for the parameters described at Part I A. Wastewater Strength and Facility Discharge Limitations and Monitoring Requirements and Part I B. Conventional Pollutant Thresholds for Calculating Surcharge Fees shall be at the location at the attached exhibit.

Part 7 Acknowledgment

I acknowledge the receipt of the Wastewater Discharge Permit that applies to the noted facility effective on _____ and expiring _____.

Industry _____

Permit No. _____

Signed _____

Title _____

Date _____

Copy for audit
B.H.



ACCIDENTAL SPILL PREVENTION PLAN/SLUG CONTROL PLAN (ASPP/SCP)

GENERAL INFORMATION

Facility Name Williams Sausage Company
Facility Address 5132 Old Troy-Hickman Rd

ASPP Plan Contact Roger Williams Title President / Owner
Work Phone (731) 886-1340 After Hours Phone (731) 446-7956

Emergency Response Contact Thomas Ray Sr. Title Complex Manager
Work Phone (731) 886-1320 After Hours Phone (731) 446-7961

Secondary Contact Bret Williams Title Plant Manager
Work Phone 731-886-1327 After Hours Phone 731-592-1567

Type of Business/Manufacturer _____

Operating Schedule The facility operates a typical 5 day work week with a sixth day option if sales dictate.

Number Of Employees 1st shift 268 2nd shift 75 3rd shift 40

A. Description of discharge practices. (Circle one)

Batch discharger Continuous flow

Describe discharge practices including any non routine batch discharges your facility may produce.

Williams Sausage Company discharge is continuous during the hours of operation from the lagoon system. All discharge from the facility is discharged directly into the lagoon system prior to being discharged in the public sewer. The sources of this discharge come from the following sources. Sewage is discharged from restrooms located throughout the facility. Sanitary wash down procedures during production and sanitation produce a discharge containing cleaning agents, animal waste, meat, and animal fats.

B. Stored Chemicals. (Production, Cleanup, or Pretreatment)

Chemical Name	Chemical Use	Storage Location
1. <u>See attached List</u>	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____
5. _____	_____	_____

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(attach list if more space is required)

MSDS location(s) All SDS information is located in the binders in the employee break room.

C. Procedures for immediately notifying the City of any accidental spill or slug discharge.

In the event of an accidental spill or slug load that reaches the sanitary sewer or storm drain system, industries are required to immediately verbally notify one or both of the following.

Jason Moss - Pretreatment Coordinator (731) 885-9144
Kathy Dillon - City Manager (731) 885-7598

Describe your facilities procedures for immediate notification to the City and five day follow up report in the event of an accidental or slug discharge.

Immediate verbal notice is to be given to Pretreatment Coordinator and the City Manager at the numbers listed above in bold red type upon discovery of any noncompliance. Written notice shall be provided to the city within five (5) business days of the incident of noncompliance. The notice shall contain a description of the circumstances and events causing the noncompliance, the period of noncompliance including the exact dates and times, and the measures to be taken to prevent further noncompliances.

D. Slug load prevention procedures.

Slug discharge: Any pollutant, including BOD, released in a non-routine, episodic, or non-customary batch discharge at a flow rate or concentration which has the potential to cause an adverse impact on the municipal wastewater system or a violation of the specific discharge prohibitions in SRC 74.050 through SRC 74.100.

Describe procedures your facility has in place to prevent accidental and slug discharges by: (Reference any manuals or plans your facility uses to support these procedures.)

1. Employee training:

Regulations require that employees at all levels of responsibility be trained in the components and goals of the Accidental Spill and Slug Control Plan. Topics to be included in the training program for Accidental spill and slug control management will include basics of waste water pollution laws, good housekeeping, spill response, erosion control/prevention methods, materials management and waste water monitoring methodology. Training sessions will be held annually in conjunction with a monthly safety meeting in the first quarter of each year.

2: Containment structures:

Three waste water lagoons serve at the containment structures prior to waste water discharge into the municipal system. One grease trap and containment for grease produced from cooking process.

3. Measures for containing toxic organic pollutants including solvents:

Toxic organic pollutants including solvents are to be of limited use and application inside the facility. All containers are to be closed, with identifying labels and hazards associated with them. Only enough should be kept in the container to either complete the job and no more than what will be used in a standard 8 hour shift should ever be taken to the floor. All employees using such pollutants shall be well trained on the hazards and spill prevention and control. There are several spill kits located inside the plant as well as inflatable drain stoppers, and spill containment pallets with basins and grate coverings, submersible and hand or vacuum operated pumps, fire and chemical PPE including but not limited to fire extinguishers and hoses, respirators, ventilators, ammonia and fire alarms, sprinklers, and automatic ventilation and exhaust fans.

4: Loading and unloading operations:

Any loading and/or unloading of possible pollutants wherein there is a possibility of a spill will be carried out by someone who has had specific training on handling, storage, and transfer of pollutants as well as spill prevention and containment. Wherein there is the slightest possibility of a spill, the transfer is to be communicated to the spill prevention team and the path made clear from the point of unload to the point of storage. Spill team members should be on hand to help facilitate the task if possible and proper PPE and spill containment countermeasures should be on hand and in place.

5: Handling and transferring material:

Handling and transfer of material shall only be done by trained personnel. Materials shall always be transferred by trained personnel adhering to all HAZMAT and OSHA protocols for the safe handling of said material. Material shall never be over the amounts needed to complete the job or over the amount that will be used in a regular 8 hour shift. The container being transferred is to be properly labeled and The material container is to be of the right material to safely transfer the material without degradation. Materials should never be transferred in open containers, but should have the proper lid/cap for the container being used. Employee should be familiar with the hazards associated with the material. Refer to the SDS prior to any transfer of material. The use of a bonding cable may also be required.

6: Inspections and maintenance of storage areas:

The preventative maintenance program at the site will consist of quarterly inspections of all containment structures, drainage facilities, and on-site pumping, treatment and storage facilities, as well as periodic maintenance of all equipment and machinery, which could adversely affect waste water quality entering the sewer, due to breakdown or improper operation.

7. Controlling plant site runoff:

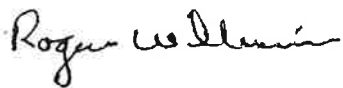
Storm water discharge is monitored according to the terms of the Storm Water Discharge Permit.

8. Measures and equipment for emergency response:

Employees responding to a spill or release of material which could pollute the Municipal Sewer System are to use any and all countermeasures on hand to prevent or control the hazard. This includes but is not limited to alarms, spill containment kits inflatable sewer plugs, pumps, and any other equipments needed. All PPE requirements as specified in the SDS Binder located in the employee break room. The proper authorities will be notified within the required time scales as stated in section C.

CERTIFICATION STATEMENT

I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or the person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of penalty and imprisonment for knowing violations.



Roger Williams
Owner/Operator
11-20-2020

WSC SDS List 5-3-2021

Chemical	Chemical Use	Storage Location
1. Anhydrous Ammonia	Refrigerant	Maintenance/Waster Water Shop
2. Carbon Dioxide	Refrigerant	Maintenance/Waster Water Shop
3. Domino Dater Ink Cartridge 4550BK	Labeling	Processing
4. Domino Dater Ink Cartridge BK4711	Labeling	Processing
5. Floor Patch	Maintenance	Maintenance/Waster Water Shop
6. ULD BP-100 Insecticide	Pest Control	Maintenance/Waster Water Shop
7. Acetic Acid	Flavoring	Box House
8. Glacial Acetic Acid	Reagent	QA Laboratory
9. Lite N' Foamy E2 Sanitizing Handwash	Handwash	Sanitaion Cage
10. Grub Scrub	Handwash	Sanitaion Cage
11. Solopol	Cleaner	Maintenance/Waster Water Shop
12. Eliminate V	Sanitizer	Sanitaion Cage
13. AW 46 Hydraulic Oil	Lubricant	Maintenance/Waster Water Shop
14. Busch R 590 Vacuum Pump Oil	Lubricant	Maintenance/Waster Water Shop
15. Forklift Batteries	Batteries	Maintenance/Waster Water Shop
16. Lactic Acid	Sanitizer	Processing
17. Jet-Lube WRL	Lubricant	Maintenance/Waster Water Shop
18. CRC QD Contact Cleaner	Cleaner	Maintenance/Waster Water Shop
19. CRC Food Grade Silicone	Lubricant	Maintenance/Waster Water Shop
20. CRC Food Grade Penetrating Oil	Lubricant	Maintenance/Waster Water Shop
21. CRC Dry PTFE Lube	Lubricant	Maintenance/Waster Water Shop
22. Schaeffer's Food Grade Grease	Lubricant	Maintenance/Waster Water Shop
23. Project 1 Silicone Sealant	Sealant	Maintenance/Waster Water Shop
24. RTV Silicone	Sealant	Maintenance/Waster Water Shop
25. Lub Gear Shield Extra Heavy	Lubricant	Maintenance/Waster Water Shop
26. Oatey All Purpose Clear Cement	Solvent	Maintenance/Waster Water Shop
27. Oatey PVC All Weather Clear Cement	Glue	Maintenance/Waster Water Shop
28. Conoco 80/90 White Oil	Lubricant	Maintenance/Waster Water Shop
29. Ultra-Pure PL-85 Potassium Lactate	Flavoring	Maintenance/Waster Water Shop
30. Propylene Glycol USP Kosher	Chilling Agent	Processing
31. Formula 3091	Biocide	Maintenance/Waster Water Shop
32. Formula 315	Biocide	Maintenance/Waster Water Shop
33. Formula 2007-LT	Water Treatment	Maintenance/Waster Water Shop
34. Formula 159	Oxygen Scavenger	Maintenance/Waster Water Shop
35. Formula 1100	Water Treatment	Maintenance/Waster Water Shop
36. Iodide-Iodate Reagent	Reagent	Sanitaion Cage
37. Versenate Solution	Reagent	Maintenance/Waster Water Shop
38. Total Hardness Indicator Buffer	Reagent	Sanitaion Cage
39. Starch-Acid Indicator	Reagent	Sanitaion Cage
40. Phenolphthalein Indicator	Reagent	Sanitaion Cage
41. Frick #3	Lubricant	Maintenance/Waster Water Shop
42. Stellar 717 HT	Lubricant	Maintenance/Waster Water Shop
43. PT-318	Refrigerant	Maintenance/Waster Water Shop
44. PT-1126CT	Lubricant	Maintenance/Waster Water Shop
45. Caustic Soda	Cleaner	Maintenance/Waster Water Shop
46. Hydrated Lime	Cleaner	Maintenance/Waster Water Shop
47. Sulfuric Acid 9%	Cleaner	Maintenance/Waster Water Shop
48. Centex Soy Flour	Flavoring	Box House
49. Thoriated Tungsten Electrode	Welding	Maintenance/Waster Water Shop
50. Aluminum Welding Wire and Metallizing Wire	Welding	Maintenance/Waster Water Shop
51. Argon	Welding Gas	Maintenance/Waster Water Shop
52. Scotchfil Electrical Insulating Putty	Insulating Putty	Maintenance/Waster Water Shop
53. Scotch Vinyl Electrical Color Coding Tape	Tape	Maintenance/Waster Water Shop
54. Thread Tape PTFE Tape	Tape	Maintenance/Waster Water Shop
55. Scotch Super 33+ Vinyl Electrical Tape	Tape	Maintenance/Waster Water Shop
56. Eye Wash	Cleaner	PPE Locations
57. Garlock Ceramic Packing	Packaging	Maintenance/Waster Water Shop
58. Chevron Rando Freezer Premium Oil	Lubricant	Maintenance/Waster Water Shop
59. Nitrogen	Welding Gas	Maintenance/Waster Water Shop

WSC SDS List 5-3-2021

Chemical	Chemical Use	Storage Location
60. <u>Oxygen</u>	Welding Gas	Maintenance/Waster Water Shop
61. <u>Clean on the Go NABC Concentrate</u>	Cleaner	Maintenance/Waster Water Shop
62. <u>Formula 410 (Bulk oil)</u>	Lubricant	Maintenance/Waster Water Shop
63. <u>NABC NON-Acid Disinfectant Bathroom Cleaner</u>	Sanitizer	Sanitaion Cage
64. <u>Crisco Shortening</u>	Lubricant	Processing
65. <u>Deb Instant Foam Complete</u>	Sanitizer	Sanitaion Cage
66. <u>Starch-Acid Indicator</u>	Reagent	Sanitaion Cage
67. <u>Great Value Shortening</u>	Lubricant	Processing
68. <u>Stoko Spray Instant Hand Sanitizer</u>	Sanitizer	Sanitaion Cage
69. <u>3M Quick Swabs</u>	Reagent	QA Laboratory
70. <u>3m Yeast and Mold Plate Count</u>	Reagent	QA Laboratory
71. <u>4.0 PH Calibration liquid</u>	Reagent	QA Laboratory
72. <u>7.0 PH Calibration liquid</u>	Reagent	QA Laboratory
73. <u>91 % Isopropyl Alcohol</u>	Reagent	QA Laboratory
74. <u>Aerobic Plate Count SDS</u>	Reagent	QA Laboratory
75. <u>Butterflied Buffer 9ml SDS</u>	Reagent	QA Laboratory
76. <u>Ecoli – Coliform SDS</u>	Reagent	QA Laboratory
77. <u>Sponge Stick with Lethen Broth</u>	Reagent	QA Laboratory
78. <u>Questar GPC</u>	Cleaner	Sanitaion Cage
79. <u>Quorum Brown</u>	Cleaner	Sanitaion Cage
80. <u>Quorum Green</u>	Cleaner	Sanitaion Cage
81. <u>Liquid K</u>	Cleaner	Sanitaion Cage
82. <u>Questar CAF</u>	Cleaner	Sanitaion Cage
83. <u>Whisper V</u>	Sanitizer	Sanitaion Cage
84. <u>DrySan Duo</u>	Sanitizer	Sanitaion Cage
85. <u>Liten Foamy Hand Soap</u>	Handwash	Sanitaion Cage
86. <u>Synergex</u>	Sanitizer	Sanitaion Cage
87. <u>BAC.STOP 3A</u>	Sanitizer	Sanitaion Cage
88. <u>UNIREX N 3</u>	Lubricant	Maintenance/Waster Water Shop
89. <u>Propylene Glycol USP</u>	Lubricant	Processing
90. <u>Lard oil</u>	Lubricant	Processing
91. <u>InSite Listeria</u>	Reagent	QA Laboratory
92. <u>UltraSnap</u>	Reagent	QA Laboratory
93. <u>AllerSnap</u>	Reagent	QA Laboratory
94. <u>AllerFlow Gluten</u>	Reagent	QA Laboratory
95. <u>MicroSnap Total (Enrichment & Detection Device)</u>	Reagent	QA Laboratory
96. <u>Universal Absorbent</u>	Absorbent	Maintenance/Waster Water Shop
97. <u>Extraction Buffer: phosphate buffered saline (0.1M PBS)</u>	Reagent	QA Laboratory
98. <u>Extraction Buffer: AlerTox Sticks Egg, Total Milk, Beta-Lactoglobulin, Casein</u>	Reagent	QA Laboratory
99. <u>70000-00031 Ink, Black</u>	Labeling	Processing
100. <u>77001-00030 (77001-00001) Solvent</u>	Solvent	Maintenance/Waster Water Shop
101. <u>Dawn Ultra Antibacterial- Apple Blossom</u>	Cleaner	Front Office
102. <u>Kaeser Sigma S-460</u>	Lubricant	Maintenance/Waster Water Shop
103. <u>Concentrated Denaturant Liquid, Green</u>	Denaturant	Processing
104. <u>ECOCARE 360</u>	Sanitizer	Sanitaion Cage
105. <u>CRC FOOD GRADE ANTI-SEIZE & LUBRICATING COMPOUND</u>	Lubricant	Sanitaion Cage
106. <u>FORMULA 3338</u>	Biocide	Maintenance/Waster Water Shop
107. <u>FOAMING E2 SANITIZER HAND SOAP</u>	Handwash	Sanitaion Cage
108. <u>EXELERATE TUFSOIL</u>	Cleaner	Sanitaion Cage
109. <u>Super Lube Silicone Dielectric Grease</u>	Lubricant	Maintenance/Waster Water Shop

Copy for Audit 9/21/22
S.D.



UNION CITY TENNESSEE

CITY OF UNION CITY, TENNESSEE
WASTEWATER DEPARTMENT

**IN THE MATTER OF:
INDUSTRIAL USER PERMIT #10
WILLIAM SAUSAGE COMPANY INC.
5132 OLD TROY HICKMAN ROAD
UNION CITY, TENNESSEE 38261**

CONSENT COMPLIANCE ORDER

WHEREAS, the City of Union City (City) Sewer Use Ordinance (Ordinance) provides that the City may take enforcement action against violators of the Union City Pretreatment program as set forth in the Ordinance; and

WHEREAS, Section 5 of the Ordinance provides for the issuance of Industrial User Permits and enforcement measures for violations of the Ordinance or any Industrial User Permit issued pursuant to the Ordinance; and

WHEREAS, Williams Sausage Company, Inc. (Williams) owns and operates a wastewater treatment plant at its facility located at 5132 Old Troy Hickman Road, Union City, Tennessee 38261, pursuant to a permit issued by the City known as Industrial User Permit #10 (IUP#10); and

WHEREAS, Williams has consistently failed to meet the conventional pollutants criteria set forth in Part 1.A and B of IUP#10 with the result being that Williams has paid large amounts in fines, penalties, and surcharges to the City under the Ordinance; and

WHEREAS, the City desires to allow Williams to make a good faith effort to correct the ongoing wastewater compliance issues.

IT IS THEREFORE ORDERED, BY AND WITH CONSENT OF WILLIAMS
AS FOLLOWS:

1. For a period of six months beginning on the 1st day of May, 2019, and ending on the 31st day of October, 2019 (the compliance period), the City will calculate and accrue all surcharges, fines, and penalties which would result from Williams being out of compliance with the pre-treatment program as prescribed by IUP#10 and the Ordinance during the compliance period, but shall not require payment of said fines, penalties, and surcharges by Williams, as they shall be held in abeyance pending other provisions of this Order. During the compliance period, Williams will take the actions necessary to bring its wastewater treatment plant into compliance with all provisions of IUP#10 and the ordinance.
2. In the event that Williams, at the end of the aforesaid six month period, has met all requirements and is fully compliant with IUP#10 and the Ordinance, the City shall conditionally waive payment of the accrued fines, penalties, and surcharges which may accrue or be levied during the compliance period.
3. After the six month period described above, for an additional period of one year beginning the 1st day of November, 2019, and ending on the 31st day of October, 2020, Williams must maintain full compliance with all requirements of the Ordinance and IUP#10 during that period. In the event that Williams remains in total compliance with IUP#10 and all other requirements of the Ordinance during this one year period, the conditionally waived payment of accrued fines, penalties, and surcharges described in paragraphs 1 and 2 shall be unconditionally and permanently waived. If at any point during the aforesaid one year period Williams fails to meet any requirement as set forth in either the Ordinance or IUP#10, the fines, penalties, and surcharges for the initial six month period shall be reinstated and shall be

owing, due and payable by Williams. Notwithstanding the foregoing, Williams Sausage may be out of compliance for a total of two months during the aforesaid one year period without penalty.

4. Compliance with this Order shall not be construed to relieve Williams of its obligations to comply with all other provisions of IUP#10 which shall remain in full force and effect. The City retains the right to pursue any and all remedies available under the enforcement provisions of the Ordinance for any violations of this Order. Further, violation of this Order shall constitute a further violation of the Ordinance and Williams shall be subject to all penalties described in the enforcement provisions of the Ordinance.


5. Nothing in this Order shall be construed to limit the authority of the City to issue any other orders or take any other action which it deems necessary to protect the wastewater plant, the environment, or public health and safety.

This 1st day of May, 2019.

COMPLIANCE ORDER AGREED TO BY:

City of Union City, Tennessee

By:


Jason Moss, Department Head,
Wastewater Department

By:


City Manager

Williams Sausage Company, Inc.

By:


PRESIDENT

Copy for Audit
G.H.

Gordon Holcomb

From: Jason Moss - UCWW Director <ucwwdirector@unioncitytn.gov>
Sent: Wednesday, September 28, 2022 11:39 AM
To: Gordon Holcomb
Subject: [EXTERNAL] FW: Williams Sausage Wastewater Pretreatment Upgrade
Attachments: 05-Exhibit E-Preliminary Schedule 2-12-21.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

***** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. *****

Attached is the approved time schedule for Williams sausage upgrades. We didn't update the actual consent order but used theirs schedule per the below emails.

Jason Moss
Union City Public Works/ Wastewater Director
ucwwdirector@unioncitytn.gov
731-885-9144 wwtp
731-885-9601 Public works p
731-504-1497 m
www.unioncitytn.gov

From: Jason Moss <ucwwdirector@unioncitytn.gov>
Sent: Thursday, February 18, 2021 10:13 AM
To: Roger Williams <roger@williams-sausage.com>
Cc: citymanager <citymanager@unioncitytn.gov>; 'Tommy Ray' <tommyray@williams-sausage.com>; bretwilliams@williams-sausage.com; 'Emily Billingsley' <emilybillingsley@williams-sausage.com>; 'Brian Jones' <brianjones@williams-sausage.com>; 'Shawn Veltman' <sveltman@hvconsultingcompany.com>
Subject: RE: Williams Sausage Wastewater Pretreatment Upgrade

Looks good and is good for now. Make sure to keep up with the update schedule and thank you.

Jason Moss
Union City Public Works/ Wastewater Director
ucwwdirector@unioncitytn.gov
731-885-9144 wwtp
731-885-9601 Public works p
731-504-1497 m
www.unioncitytn.gov

From: Roger Williams <roger@williams-sausage.com>
Sent: Thursday, February 18, 2021 9:46 AM

To: Jason Moss <ucwwdirector@unioncitytn.gov>

Cc: Kathy Dillon <citymanager@unioncitytn.gov>; 'Tommy Ray' <tommyray@williams-sausage.com>; bretwilliams@williams-sausage.com; 'Emily Billingsley' <emilybillingsley@williams-sausage.com>; 'Brian Jones' <brianjones@williams-sausage.com>; 'Shawn Veltman' <sveltman@hvconsultingcompany.com>; Roger Williams <roger@williams-sausage.com>

Subject: Williams Sausage Wastewater Pretreatment Upgrade

Jason:

Sorry for the delay on this, it took us much longer than I expected getting the work under contract. We now have a contract with RFW to do the work for the pretreatment upgrade. I have attached the preliminary schedule.

Please let me know if there is anything further you need at this time.

Thanks,



Roger Williams

4009 Greenfield Dr.

Union City, TN 38261

Office: 731-886-1340

Email: roger@williams-sausage.com

Copy for Audit
B.H.

CITY OF UNION CITY INDUSTRIAL DISCHARGE PERMIT

Permit No. 12

**Authorization to discharge into the
Union City POTW**

Issued by

The City of Union City

Under authority of the City of Union City Sewer Use Ordinance,

ECM of Ridgely (SIC 4953/NAICS 562212)

SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER

is authorized to discharge:

Landfill Leachate

hailed from a facility located at:

2669 Inman Hollow Road

Obion, Tennessee 38240

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on: July 31, 2021

This permit shall expire on: January 31, 2024

Issuance Date: July 31, 2021

Jason Moss
Pretreatment Coordinator
A L Strub Waste Water Treatment Plant
Union City, Tennessee

CITY OF UNION CITY INDUSTRIAL DISCHARGE PERMIT

Permit No. 12

Authorization to discharge into the
Union City POTW

Issued by

The City of Union City

Under authority of the City of Union City Sewer Use Ordinance,

ECM of Ridgely (SIC 4953/NAICS 562212)

SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER

is authorized to discharge:
hailed from a facility located at:

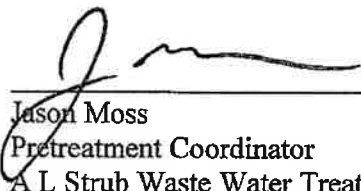
Landfill Leachate
2669 Inman Hollow Road
Obion, Tennessee 38240

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on: January 20, 2021

This permit shall expire on: July 31, 2021

Issuance Date: January 15, 2021



Jason Moss
Pretreatment Coordinator
A L Strub Waste Water Treatment Plant
Union City, Tennessee

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PART I

A. Wastewater Strength and Facility Discharge Limitations and Monitoring Requirements⁽¹⁾

Parameter	Sampling Procedure ⁽²⁾		Limitations Shall Not Exceed		Sampling ⁽⁵⁾ Frequency
	Grab	Composite ⁽³⁾	Monthly Average (mg/l)	Maximum for any One Day (mg/l)	
Cadmium	X		0.023	0.046	Monthly
Chromium VI	X		0.078	0.156	Monthly
Copper	X		2.183	4.366	Monthly
Cyanide	X		0.484	0.968	Monthly
Lead	X		0.143	0.286	Monthly
Mercury	X		0.0004	0.0008	Monthly
Nickel	X		2.575	5.15	Monthly
Zinc	X		2.26	4.52	Monthly
TTO	X		--	12.5	Monthly
pH ⁽⁶⁾	X			6.0 S.U. Min. 9.0 S.U. Max.	5/ per week
Temperature	X			40 °C Max.	5/ per week
Flow ⁽⁷⁾ (gpd)			Report	21,000 gallons per day	continuously

Footnotes:

1. See Monitoring Procedures – Paragraph E
2. Samples shall be collected on a day when the parameters listed for analysis are likely to be present in typical concentrations in order to provide a representative sample of the effluent being discharged. During each self-monitoring sampling event, the volume of the tank truck shall be recorded on the Chain of Custody Record form from the testing laboratory and reported on the analyses report of same.
3. The sampling frequency monitoring is Grab Sampling Methods due to pumping and hauling to WWTP. For all parameters, equal volume grab samples shall be obtained from the discharge of the tank truck used to haul leachate from storage tanks located at the ECM of Ridgely site to the city's POTW. Samples shall be taken from the tank truck without dilution.
4. The noted concentrations of CBOD₅, TSS, Free Oil and Grease, and Ammonia-Nitrogen are thresholds for calculating the surcharge amount. If only one sample is taken per 1 month period then that sample shall be considered the monthly average for each month during the one month period and shall be surcharged for each month in the reporting period. The permittee may sample and report more than once during a month using State approved methods to calculate a true average. Free Oil & Grease is subject to a Maximum for any One Day surcharge. Refer to Appendix A for the corresponding surcharge formula.
5. Sampling results shall be reported semi annually.
6. Report Monthly the minimum and maximum pH for the month. pH is measured immediately upon grab sampling.
7. The total flow for each month shall be reported either measured using a continuous, automatic flow meter capable of indication flow rate in gallons per minute and totalizing flow in gallons or by reporting the capacity of each tanker hauled and dumped into the Waste Water Treatment System. The flow from all monitored discharges shall be submitted monthly for each "self-monitoring" results.
8. Report Mass-based value using: Mass (lb/day) = Total discharge volume (gallons) at time of sampling x analytical result (mg/l)/1,000,000 x 8.34.

B. Conventional Pollutant Thresholds for Calculating Surcharge Fees

Parameter	Sampling Procedure ⁽²⁾		Thresholds ⁽⁴⁾	Sampling ⁽⁵⁾
	Grab	Composite	Monthly Average	Frequency
CBOD	X		1,500 lb/day ⁽⁸⁾	Monthly
Total Suspended Solids	X		300 lb/day ⁽⁸⁾	Monthly
Free Oil and Grease	X		100 mg/l (max. for any one day)	Monthly
Ammonia-Nitrogen	X		200 lb/day ⁽⁸⁾	Monthly

Footnotes:

1. See Monitoring Procedures – Paragraph E
2. Samples shall be collected on a day when the parameters listed for analysis are likely to be present in typical concentrations in order to provide a representative sample of the effluent being discharged. During each self-monitoring sampling event, the volume of the tank truck shall be recorded on the Chain of Custody Record form from the testing laboratory and reported on the analyses report of same.
3. The sampling frequency monitoring is Grab Sampling Methods due to pumping and hauling to WWTP. For all parameters, equal volume grab samples shall be obtained from the discharge of the tank truck used to haul leachate from storage tanks located at the ECM of Ridgely site to the city's POTW. Samples shall be taken from the tank truck without dilution.
4. The noted concentrations of CBOD₅, TSS, Free Oil and Grease, and Ammonia-Nitrogen are thresholds for calculating the surcharge amount. If only one sample is taken per 1 month period then that sample shall be considered the monthly average for each month during the period and shall be surcharged for each month in the reporting period. The permittee may sample and report more than once during a month using State approved methods to calculate a true average. Free Oil & Grease is subject to a Maximum for any One Day surcharge. Refer to Appendix A for the corresponding surcharge formula.
5. Sampling results shall be reported Monthly.
6. Report Monthly the minimum and maximum pH for each month. pH is measured immediately upon grab sampling.
7. The total flow for each month shall be reported either measured using a continuous, automatic flow meter capable of indication flow rate in gallons per minute and totalizing flow in gallons or by reporting the capacity of each tanker hauled and dumped into the Waste Water Treatment System. The flow from all monitored discharges shall be submitted monthly for each "self-monitoring" results.
8. Report Mass-based value using: Mass (lb/day) = Total discharge volume (gallons) at time of sampling x analytical result (mg/l)/1,000,000 x 8.34.

C. Process Discharge Limitations and Monitoring Requirements

Not Applicable

D. Prohibited Discharge Standards

1. **General Prohibitions.** No User shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes Pass Through or Interference. These general prohibitions apply to all Users of the POTW whether or not the User is subject to Categorical Pretreatments Standards or any other National, State or local Pretreatment Standards or Requirements.
2. **Specific Prohibitions.** No User shall introduce or cause to be introduced into the POTW the following pollutants, substances or wastewater:
 - a) Any liquids, solids, or gases which, by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances to cause fire or explosion or be injurious in any other way to the POTW or to the operation of the POTW. At no time shall two successive readings on an explosion hazard meter at the point of discharge into the POTW system (or at any point in the POTW) be more than five percent (5%) nor any single reading over ten percent (10%) of the Lower Explosive Limit (LEL) of the meter or have a closed-cup flashpoint of less

than 140 degrees Fahrenheit (60 degrees Celsius) using the test methods specified in 40 CFR 261.21;

- b) Wastewater having a pH less than 6.0, or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW;
- c) Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in Interference but in no cases solids greater than one-half inch(es) (1/2") in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshings, entrails, whole blood, and feathers from slaughter houses, ashes or cinders from sawmills, sand, spent lime, stone or marble dust from stone work facilities, metal, glass, straw, shavings, grass clippings, rags, spent grains, spent hops, waste paper, wood, plastics, gas, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud, or glass grinding or polishing waxes from any industry or agricultural facility; towels, rags, or sanitary wipes from facilities;
- d) Pollutants, including oxygen-demanding pollutants (CBOD₅, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause Interference with the POTW;
- e) Wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in Interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104 degrees Fahrenheit (40 degrees Celsius);
- f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause Interference with the POTW or Pass Through;
- g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- h) Trucked or hauled pollutants, except at discharge points designated by the Control Authority;
- i) Noxious or malodorous liquids, gases, or solids, or other non-domestic wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or a hazard to life, or to prevent entry into the sewers for maintenance or repair;
- j) Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating the City's NPDES permit;
- k) Wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the Control Authority in compliance with applicable State or Federal regulations;

- l) Storm Water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, Noncontact Cooling Water, and unpolluted wastewater, unless specifically authorized by the Control Authority;
- m) Sludges, screenings, or other residues from the pretreatment of industrial wastes;
- n) Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test;
- o) Detergents, surface-active agents, or other substances that might cause excessive foaming in the POTW;
- p) Any wastewater which causes a hazard to human life or creates a public nuisance;
- q) Any Fats, Oils, or Grease of animal or vegetable origin and Waste Food and Sand that cause an upset, interference, or the POTW to violate its NPDES permit in concentrations greater than specified at Part I B. Conventional Pollutant Thresholds for Calculating Surcharge Fees that may be subject to surcharge Refer to the specific guidelines for control at Section 2.10 of the City's Sewer Use Ordinance.

When the Control Authority determines that a User is contributing to the POTW any of the above enumerated substances in such amounts as to interfere with the operation of the POTW, the Control Authority shall: 1) advise the User(s) of the impact of the contribution on the POTW and 2) develop effluent limitations for such User(s) to correct the Interference with the POTW.

Pollutants, substances, or wastewater prohibited by this Section shall not be processed or stored in such a manner that they could be discharged to the POTW.

E. Monitoring Procedures

1. Representative Sampling.

Appropriate flow measuring devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure that the accuracy of the measurements is consistent with accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than plus or minus 10% from the true discharge rates throughout the range of expected discharge volumes.

Sampling and measurements taken in compliance with the monitoring requirements specified shall be representative of the volume and nature of the monitored discharge, and shall be taken from the tank truck hauling and dumping undiluted leachate into the City of Union City's POTW at the point of discharging into the POTW as described at APPENDIX B: SAMPLING POINT LOCATION/DESCRIPTION. All samples that exceed the Monthly Average Limitation and/or exceed Maximum for Any One Day at Part I B. Conventional Pollutant Thresholds for Calculating Surcharge Fees will be surcharged appropriately. All other composite samples and grab samples that exceed the Monthly Average and/or Maximum for any One Day will be considered in violation of this permit and subject to action as stipulated in the City's Enforcement Response

Plan.

2. Sampling Frequency. Where the permit requires sampling and monitoring of a particular effluent characteristic(s) at a frequency of less than 1/quarter the permittee is precluded from claiming "no discharge this month" if there has been any discharge from that particular facility during the period which coincides with the required monitoring frequency; i.e. if the required monitoring is once per quarter or 1/quarter, the monitoring period is one quarter, and if the discharge occurs during only one day in that period then the permittee must sample on that day and report the results of analyses accordingly.
3. Test Procedures. All pollutant analyses, including sampling techniques, to be submitted as part of this permit shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, unless otherwise specified in an applicable categorical Pretreatment Standard. If 40 CFR Part 136 does not contain sampling or analytical techniques for the pollutant in question, or where the EPA determines that the Part 136 sampling and analytical techniques are inappropriate for the pollutant in question, sampling and analyses shall be performed using validated analytical methods or any other applicable sampling and analytical procedures, including procedures suggested by the Control Authority or other parties approved by the EPA.
4. Recording of Results. For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:
 - a) The name, address, and location of the facility;
 - b) The average and maximum daily flow;
 - c) The exact place, date, method and time of sampling;
 - d) The name of the person(s) collecting samples;
 - e) The date and times the analyses were performed;
 - f) The person(s) or laboratory who performed the analyses;
 - g) The analytical techniques or methods used; and
 - h) The results of all required analyses.
5. Records Retention. All records and information resulting from the monitoring activities required by this permit and all additional monitoring by the User shall be retained and made available for inspection and copying for a minimum of three (3) years after the expiration date of this permit. This period shall be automatically extended for the duration of any litigation concerning the User or the Control Authority, or where the User has been specifically notified of a longer retention period by the Control Authority, Tennessee Department of Environment and Conservation, and/or EPA. Records include bench sheets, monitoring results, instrument calibration records, quality control records and any other records associated with sampling, monitoring, and analyses.

F. Reporting

1. Baseline Monitoring Reports

Not Applicable

2. Periodic Compliance Reports

- a) **Monitoring results shall be recorded daily, monthly and submitted monthly, postmarked no later than the 10th day of the month. For reports, which are not mailed using the U.S. Postal Service, the date of receipt of the report shall govern.** Two copies shall be submitted, and one copy shall be retained for the permittee's files.

All self-monitoring sampling shall occur for the lifetime of the permit.

All self-monitoring reports (which consist of self-monitoring sampling results, flow data, **completed Chain of Custody Record forms**, etc.) and any communications regarding compliance with the conditions of this permit or the pretreatment program shall be submitted to:

Mr. Jason Moss
Pretreatment Coordinator
A L Strub Waste Water Treatment Plant
City of Union City
P. O. Box 9
Union City, Tennessee 38281

With a copy sent to:

Kathy Dillon
City Manager
City of Union of Union City
P. O. Box 9
Union City, Tennessee 38281

no later than 10 days following the ending date of each reporting period. Failure to submit reports by the required date will result in a notice of violation to the permittee and subject to the stipulations as set forth at Part II.C.

Monitoring reports, any correspondence, or any other report or information submitted to the Control Authority must be signed and certified by an Authorized Representative as defined at Part IV A.3.

- b) Additional Monitoring by Permittee

If the permittee monitors any pollutant specifically limited by this permit more frequently than required at the location(s) designated, using approved analytical methods as specified herein, the results of such monitoring shall be included in the monthly report.

- c) Falsifying Results and/or Reports

Knowingly making any false statement on any report required by this permit or falsifying any result may result in the imposition of criminal penalties as provided for by law. If the permittee becomes aware that he failed to submit any relevant

facts in a permit application, or has submitted any incorrect information in a permit report or any report pursuant to this permit, he shall promptly inform the Control Authority of the correct facts or information.

d) Certification Statement

- i. Certification of Permit Applications, User Reports, and Initial Monitoring Waiver – The following certification statement is required to be signed and submitted by Users submitting permit applications in accordance with Section 5.6 of the City's SUO; Users submitting baseline monitoring reports under Section 7.1 b)(v) of the City's SUO [40 CFR 403.12 (l)]; Users submitting reports on compliance with Categorical Pretreatment Standard deadlines under Section 7.3 of the City's SUO [40 CFR 403.12(d)]; Users submitting periodic compliance reports required by Section 7.4 a)-c) of the City's SUO [40 CFR 403.12 (e) and (h)] ; and Users submitting an initial request to forego sampling of a pollutant on the basis of Section 7.4 b)(iv) of the City's SUO [40 CFR 403.12 (e) (2) (iii)]. The following certification must be signed by an Authorized Representative as defined at Part IV A.3.

"I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or the person(s) directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of penalty and imprisonment for knowing violations."

- ii. Certification of Pollutants Not Present – Users that have an approved monitoring waiver based on Part I H. of this permit must certify on each report with the following statement that there has been no increase in the pollutant in its waste stream due to activities of the User.

"Based on my inquiry of the person(s) directly responsible for managing compliance with the Pretreatment Standard for 40 CFR Part(s) _____, I certify that, to the best of my knowledge and belief, there has been no increase in the level of _____ in the wastewaters due to activities at the facility since filing of the last periodic report under Section 7.4 a) of the City of Union City's Sewer Use Ordinance."

The above statement only applies if the blanks have the specific 40 CFR Part(s) and the specific pollutant(s).

- e) A completed Chain of Custody form must be submitted with all periodic compliance reports.

f) Reports of Changed Conditions

The permittee shall notify the Control Authority of any significant changes to the permittee's operations or system which might alter the nature, quality, or volume of its wastewater at least one hundred eighty (180) days prior to the change.

g) Reporting Noncompliance/Violation

The permittee shall report ALL instances of noncompliance as required in Part II Section C of this permit. If noncompliance is anticipated for any reason notification to the City is required as soon as possible.

h) Reports of Potential Problems

- (i) In the case of any discharge, including, but not limited to, accidental discharges, discharges of non-routine, episodic nature, an uncustomary batch discharge, a Slug Discharge or Slug Load, that might cause potential problems for the POTW, the permittee shall immediately telephone and notify the Control Authority of the incident. This notification shall include the location of the discharge, type of waste, concentration, and volume, if known, and corrective actions taken by the permittee. The Control Authority may request a sample for analysis be collected at the moment of the accidental discharge.
- (ii) Within five (5) days following such discharge, the permittee shall, unless waived (in writing) by the Control Authority, submit a detailed written report describing the cause(s) of the discharge and the measures to be taken by the permittee to prevent similar future occurrences. Such notification shall not relieve the permittee of any expense, loss, damage, or other liability which may incur as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the permittee of any penalties or other liability which may be imposed pursuant to the SUO.
- (iii) A notice shall be permanently posted on the permittee's bulletin board or other prominent place advising employees who to call in the event of a discharge described in paragraph (i), above. Employers shall ensure that all employees are advised of the emergency notification procedure.
- (iv) The permittee is required to notify the Control Authority immediately of any changes at its facility affecting the potential for a Slug Discharge.

i) Reports of an Upset

The permittee shall submit the following information to the Wastewater Facility and the Control Authority within 24 hours of becoming aware of the Upset (if this information is provided orally, a written report must be submitted within 5 days):

- (i) A description of the indirect discharge and cause of noncompliance;
- (ii) The duration of noncompliance, including exact dates and times of noncompliance, and, if noncompliance is continuing, the time by which compliance is reasonably expected to be restored;
- (iii) All steps taken or planned to reduce, eliminate and prevent recurrence of such an Upset.

j) Treatment Bypasses

Bypass of treatment units, facilities, or systems necessary for compliance with this permit is prohibited unless necessary to prevent the loss of life, personal injury, or severe property damage. Bypassing which does not cause violation of effluent

limitations may be conducted in order to allow essential maintenance, provided the City is notified a minimum of ten (10) days prior to the bypass.

Bypass is prohibited, and the Control Authority may take enforcement action against the permittee for a bypass, unless;

- i. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- ii. There was no feasible alternative to the bypass, including the use of auxiliary treatment facilities, retention of untreated wastes, or maintenances during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
- iii. The permittee properly notified the Control Authority as required by Paragraph 13.3 c) of the City's SUO.

The Control Authority may approve an anticipated bypass, after considering its adverse effects, if the Control Authority determines that it will meet the three conditions listed above.

G. Reopener Clause

This permit may be modified by the City of Union City to comply with any new or amended pretreatment regulations or in the event that conditions in the POTW, including changes in sludge use and disposal regulations, require modification of the permit or permit limits.

H. Waiver from Monitoring

No waiver for the permit has been granted. The Control Authority may authorize an Industrial User subject to a categorical Pretreatment Standard (upon the Approval Authority's approval) to forego sampling of a pollutant by a categorical Pretreatment Standard if the Industrial User has demonstrated through sampling and other technical factors that the pollutant is neither present nor expected to be present in the Discharge, or is present only at background levels from intake water and without any increase in the pollutant due to activities of the Industrial User. [Tennessee Rule 1200-4-14-.12(5)(b). This authorization is subject to the conditions set forth in the City's SUO at Section 7.4 paragraph b)(i) through (ix).

PART II

A. General Provisions

1. Duty to Reapply

A User with an expiring individual discharge permit or general permit shall apply for permit reissuance by submitting a complete permit application in accordance with Section 5.5 of the City's SUO, a minimum of ninety (90) days prior to the expiration of the User's existing individual wastewater discharge permit or general permit.

2. Right of Entry: Inspection and Sampling

The Control Authority, Approval Authority, and/or EPA shall have the right to enter the premises of any User to determine whether the User is complying with all requirements of the City's SUO and any individual wastewater discharge permit or general permit or order issued hereunder. Users shall allow the Control Authority, Approval Authority, EPA, or their representative ready access at all reasonable times to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties.

- a) Where a User has security measures in force which would require proper identification and clearance before entry into its premises, the User shall make necessary arrangements with its security guard(s) so that, upon presentation of suitable identification, personnel from the Control Authority, Approval Authority, and EPA shall be permitted to enter, without delay, for the purposes of performing their specific responsibilities (40 CFR 403.12).
- b) The Control Authority, Approval Authority, and EPA shall have the right to set up on the Industrial User's property such devices as are necessary to conduct sampling inspection, compliance monitoring and/or metering of the User's operations.
- c) The Control Authority may require the User to install monitoring equipment as necessary. The facility's sampling, and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the User at its own expense. All devices used to measure wastewater flow and quality shall be calibrated annually, unless specified otherwise, to ensure their accuracy. The location of the monitoring facility shall provide ample room in or near the monitoring facility to allow accurate sampling and preparation of samples and on-site analysis (where necessary), whether constructed on public or private property. The monitoring facilities should be provided in accordance with the Control Authorities requirements and all applicable local construction standards and specifications, and such facilities shall be constructed and maintained in such manner as to enable the Control Authority to perform independent monitoring activities.
- d) Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the User at the written or verbal request of the Control Authority and shall not be replaced. The costs of clearing such access shall be borne by the User.
- e) Unreasonable delays in allowing the Control Authority access to the User's premises shall be a violation of the City's SUO.

3. Confidential Information

Information and data on a User obtained from reports, surveys, permit applications, individual wastewater discharge or general permits and monitoring programs, and from the Control Authority's inspections and sampling activities, shall be available to the public or other governmental agency without restriction, unless the User specifically requests, and is able to demonstrate to the satisfaction of the Control Authority, that the release of such information would divulge information, processes or methods of production entitled to the protection as trade secrets of the User under applicable State law. Any such request must be asserted at the time of submission of the information or data.

When requested and demonstrated by the User furnishing the report, that such information should be held confidential, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, but shall be made available immediately upon written request to governmental agencies for uses related to the City's SUO, the National Pollution Discharge Elimination System (NPDES) Permit, and/or the State Pretreatment Program, and that such portions of a report shall be available for use by the State or any state agency in judicial review or enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics and other effluent data, as defined at 40 CFR 2.302, shall not be recognized as confidential information and shall be available to the public without restriction.

4. Proper Operation and Maintenance

Users shall provide wastewater treatment as necessary to comply with the City's SUO and shall achieve compliance with all Categorical Pretreatment Standards, Local Limits, and the prohibitions set out in Part I of this permit within the time limitations specified by EPA, the State, or the Control Authority and/or his designated representative, whichever is more stringent. Any facilities necessary for compliance shall be provided, operated, and maintained at the User's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the Control Authority for review, and shall be acceptable and to the Control Authority before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the User from the responsibility of modifying such facilities as necessary to produce a discharge acceptable to the City under the provisions of this permit, the City's SUO, or any other control mechanism.

Wastewater monitoring and flow measurement facilities shall be properly operated, kept clean, and maintained in good working order at all times. The failure of a User to keep its monitoring facility in good working order shall not be grounds for the User to claim that sample results are unrepresentative of its discharge. Failure to do so shall be a violation of this permit.

Upon the reduction, loss, or failure of any treatment process, facility, or system necessary for maintaining compliance with this permit, the User shall limit production, discharge or both in order to maintain compliance until the facility is restored or an alternate method of treatment is provided. This requirement would apply in such situations as loss or failure of the primary power source.

No User shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a discharge limitation unless expressly authorized by an applicable Pretreatment Standard or Requirement. The Control Authority and/or his designated representative may impose mass limitations on Users who are using dilution to meet applicable Pretreatment Standards or Requirements or in other cases when the imposition of mass limitations is appropriate.

The use of dilution water in order to comply with the terms and conditions of this permit is prohibited.

5. Duty to Mitigate

An Industrial User (IU) which experiences an upset (an exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards because of factors beyond the reasonable control of the IU) which is not a result of operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventative maintenance, or careless or improper operation, shall inform the Control Authority thereof immediately upon becoming aware of the upset as set out in the City's SUO at SECTION 13 – AFFIRMATIVE DEFENSES TO DISCHARGE VIOLATIONS.

6. Severability

The provisions of this permit are severable. If any provision, paragraph, word, section, or article of this permit is held invalid for any reason, the remaining provisions, paragraphs, words, sections, or articles shall not be affected and shall continue in full force and effect.

B. Changes Affecting the Permit

1. Planned Changes

The permittee shall notify the Control Authority of any significant changes to the User's operations or system which might alter the nature, quality, or volume of its wastewater at least one hundred eighty (180) days before the change.

2. Permit Modification, Revocation or Termination

- a) This permit may be modified, revoked and reissued, or terminated for cause as described in the City's SUO at Sections 6.3, 6.5, and 6.6.
- b) The permittee shall furnish to the Control Authority, within a reasonable time, any information which the Control Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Control Authority, upon request, copies of records required to be kept by this permit.

- c) If any applicable Federal, State, or local Pretreatment Standard, Requirement or Prohibition is revised, the Control Authority shall modify or revoke and reissue the permit to conform to the prohibition, standard, or requirement, providing that the standard or requirement is more stringent than the limitation in the permit.
- d) The filing of a request by the permittee for a modification, revocation, reissuance, termination, or notification of planned changes or anticipated noncompliance does not halt any permit condition.

Individual wastewater discharge permits and general permits shall be subject to void upon cessation of operations or transfer of business ownership. All individual wastewater discharge and general permits issued to a User are void upon the issuance of a new individual wastewater discharge or general permit to that User.

3. Transferability

This permit is nontransferable without prior notification (written) including a written certification by the new owner or operator to the City in accordance with Section 6.4 of the City's SUO, and the new owner or operator shall be provided with a copy of the existing wastewater discharge permit for review for thirty (30) days prior to new ownership or operation. Failure to provide advance notice of transfer renders the permit void as of the date of facility transfer.

4. Change of Mailing Address

The permittee shall promptly provide the City written notice of any change of mailing address. In the absence of such notice, the original mailing address of the permittee will be assumed correct.

C. Noncompliance

1. Notice of Violation, Repeat Sampling, and Reporting

If sampling performed by a User indicates a violation, the User must notify the Control Authority within twenty-four (24) hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within thirty (30) days after becoming aware of the violation. Repeat sampling by the Industrial User is not required if the Control Authority performs sampling at the User's facility at least once a month, or if the Control Authority performs sampling at the User between the time when the initial sampling was conducted and the time when the User or the Control Authority receives the results of this sampling, or if the Control Authority has performed the sampling and analysis in lieu of the Industrial User. If sampling performed by the Control Authority indicates a violation, the Control Authority may opt to notify the User of the violation and require the User to perform the repeat sampling and analysis [40 CFR 403.12 (g) (2)].

In the event of noncompliance which would cause a threat to human health or may adversely affect the operation of the POTW or POTW treatment plant, including the

accidental discharge of any substance prohibited in Part I Section D of this permit, verbal notice of noncompliance shall be provided to the City immediately upon discovery of the noncompliance. The permittee shall give such notification to one of the following:

Jason Moss – Pretreatment Coordinator 731/885-9144
Kathy Dillon – City Manager 731/885-7598

Written notice shall be provided to the City within five (5) days of any incident of noncompliance. The notice shall contain a description of the circumstances and events causing the noncompliance, the period of noncompliance including the exact dates and times, and the measures to be taken to prevent further noncompliance.

A notice shall be permanently posted on the User's bulletin board or other prominent place advising employees whom to call in the event of a dangerous accidental discharge. Users shall insure that all employees who may cause or suffer such a dangerous discharge to occur are advised of the emergency notification procedure.

2. Reporting Bypasses

A User shall submit oral notice of an unanticipated bypass that exceeds applicable Pretreatment Standards to the Control Authority within twenty-four (24) hours from the time the User becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the User becomes aware of the bypass. The written submission shall contain a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass. The Control Authority may waive the written report on a case-by-case basis if the oral report has been received within twenty-four (24) hours.

3. Annual Publication

At least annually, in the local newspaper of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW, a list of Users, which at any time during the previous twelve months were in significant noncompliance with applicable pretreatment requirements, will be published. For the purposes of this provision, a significant industrial user (or any user which violates subparts (c), (d), or (h) of Section 10 of the City's SUO) is in significant noncompliance if its violation meets one or more of the criteria stated in the City's SUO at SECTION 10 – PUBLICATION OF USERS IN SIGNIFICANT NONCOMPLIANCE.

D. Liabilities

1. General

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. Notwithstanding this permit, the permittee shall remain

liable for any damages sustained by the City of Union City as a result of the permittees discharge. Additionally, notwithstanding this permit, it shall be the responsibility of the permittee to conduct his discharge activities in such a manner that public or private nuisances, health hazards, or damage to the POTW will not be created.

Nothing in this permit shall be construed to preclude any legal action or relieve the permittee from any responsibility, liability, or penalties established pursuant to any applicable Local, State or Federal law.

2. Enforcement Procedures

All administrative enforcement actions taken against a Significant Industrial User, including procedures, orders, and complaints shall be in accordance with the Tennessee Water Quality Control Act of 1977 and its amendments, specifically TCA 69-3-123, and enforcement per the City of Union City's Enforcement Response Plan (ERP). Any User found to have violated, or continues to violate, any provision of the SUO, IWD permit or general permit, and/or orders issued hereunder, any other Pretreatment Standard or Requirement may be penalized up to Ten Thousand Dollars (\$10,000).

PART III

COMPLIANCE SCHEDULE

A. Local Standards

If after any self-monitoring event or after any compliance monitoring by the Control Authority, any pollutant concentration(s) is/are in violation of permit limitations, written notice of such violations will be made to the permittee by the Control Authority. If additional pretreatment and/or operation and maintenance (O&M) will be required to meet the Pretreatment Standards, the shortest schedule by which the User will provide such additional pretreatment and/or O&M must be provided. The completion date in this schedule shall not be later than the compliance date established for the applicable Pretreatment Standard.

The following conditions shall apply to the compliance schedule:

1. The schedule shall contain progress increments in the form of dates for the commencement and completion of major events leading to the construction and operation of additional pretreatment required for the User to meet the applicable Pretreatment Standards (such events include, but are not limited to, hiring an engineer, completing the preliminary and final plans, executing contracts for major components, commencing and completing construction, and beginning and conducting routine operation);
2. No increment referred to above shall exceed nine (9) months;
3. The User shall submit a progress report to the Control Authority no later than fourteen (14) days following each date in the schedule and the final date of compliance including, as a minimum, whether or not it complied with the increment of progress,

the reason for any delay, and if appropriate, the steps being taken by the User to return to the established schedule; and

4. In no event shall more than nine (9) months elapse between such progress reports to the Control Authority.

B. Categorical Standards

Within ninety (90) days following date for final compliance with applicable categorical Pretreatment Standards any User subject to such Pretreatment Standards and Requirements shall submit to the Control Authority a report containing the information described in Section 5.5 a) (vi) and (vii) and Section 7.1 b) (ii) of the City's SUO. For Users subject to equivalent mass or concentration limits, this report shall contain a reasonable measure of the User's long-term production rate. For all other Users subject to categorical Pretreatment Standards expressed in terms of allowable pollutant discharge per unit of production (or other measure of operation), this report shall include the User's actual production during the appropriate sampling period. All compliance reports must be signed and certified in accordance with Section 7.14 a) of the City's SUO. All sampling will be done in compliance with Section 7.11 of the City's SUO.

C. Accidental Discharge/Slug Discharge Control Plans

An accidental discharge/slug discharge control plan shall address, at a minimum, the following:

1. Description of discharge practices, including non-routine batch discharges;
2. Description of stored chemicals (which shall include cleaning supplies);
3. Procedures for immediately notifying the Control Authority of any accidental or Slug Discharge, as required by Part I F 2.g); and
4. Procedures to prevent adverse impact from any incidental or Slug Discharge. Such procedures include, but are not limited to, inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents, and/or measures and equipment for emergency response.

D. Hazardous Waste Notification

Any User who commences the discharge of hazardous waste shall notify the Control Authority, the EPA Regional Water Management Division Director, and State hazardous waste authorities, in writing, of any discharge to the POTW of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261. Refer to the City's SUO at Section 7.9 for further provisions.

E. Solvent Management Plan (Total Toxic Organics Plan)

If the User is required to monitor Total Toxic Organics (TTO) at Part I Paragraph B. or C., and the User requests to submit the TTO certification statement in lieu of monitoring for TTO, a solvent management plan shall be submitted to the Control Authority. The solvent management plan must specify to the satisfaction of the Control Authority the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that the toxic organics do not routinely spill or leak (manner of containment) into the wastewater. **The Solvent Management Plan must be submitted and approved by the Control Authority to submit the TTO certification statement. If the Control Authority does not have the Solvent Management Plan, the User shall be considered in violation of this permit and subject to applicable enforcement action. The following certification statement must be included in all compliance monitoring reports:**

“Based on my inquiry of the person(s) directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the Control Authority.”

TOTAL TOXIC ORGANICS APPLIES TO THIS FACILITY DUE TO HISTORY OF THE PRESENCE OF TTO IN THE DISCHARGE.

PART IV

A. Definitions

- 1) Act or “the Act”. The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. section 1251 et seq.
- 2) Approval Authority. The Tennessee Division of Water Pollution Control (Division of Water Resources) Director or the Director’s representative.
- 3) Authorized or Duly Authorized Representative of the User.
 - a) If the User is a corporation:

- (i) The president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or
 - (ii) The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for individual wastewater discharge permit or general permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- b) If the User is a partnership or sole proprietorship: a general partner or proprietor, respectively.
 - c) If the User is a Federal, State, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
 - d) The individuals described in paragraphs a) through c), above, may designate a Duly Authorized Representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the City.
- 4) Carbonaceous Biochemical Oxygen Demand (CBOD₅). method defined test measured by the depletion of dissolved oxygen by biological organisms in a body of water in which the contribution from nitrogenous bacteria has been suppressed. CBOD is a method defined parameter is widely used as an indication of the pollutant removal from wastewater. The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure for five (5) days at 20° centigrade expressed in terms of weight (lbs) and/or concentration (mg/l).
 - 5) Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the prohibitions listed in Section 2.3 a) and b) [Tennessee Rule 1200-4-14-.05(1)(a) and (2)]. BMPs include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage. BMPs also include alternative means (i.e. management plans) of complying with, or in place of certain established categorical Pretreatment Standards and effluent limits.
 - 6) Building Drain. The part of the lowest horizontal piping of a drainage system which receives the discharge from soil, waste, and other drainage pipes inside the walls of the building and conveys it to the building sewer beginning five (5) feet outside the inner face of the building wall.
 - 7) Building Sewer. A sewer conveying wastewater from the premises of a User to the POTW.
 - 8) Categorical Pretreatment Standard or Categorical Standard. Any regulation containing pollutant discharge limits promulgated by EPA in accordance with sections 307(b) and (c)

of the Act (33 U.S.C. section 1317) that apply to a specific category of Users and that appear in 40CFR Chapter I, Subchapter N, Parts 405-471.

- 9) Categorical Industrial User. An Industrial User subject to a categorical Pretreatment Standard or categorical Standard.
- 10) Chemical Oxygen Demand (COD). A measure of the oxygen required to oxidize all compounds, both organic and inorganic, in water.
- 11) Chronic Violation. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of all of the measurements taken for the same pollutant parameter during a six (6) month period on a rolling quarterly basis exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including Instantaneous Limits.
- 12) City. City of Union City.
- 13) City Council. The persons elected Council of Mayor and Aldermen.
- 14) Combined Sewer. A sewer receiving both sewage and surface runoff from down spouts, storm sewers and surface or groundwater.
- 15) Control Authority. The Mayor of the City of Union City, Tennessee or a Duly Authorized Representative of the City of Union City.
- 16) Cooling Water. The water discharged from any use such as air conditioning, cooling or refrigeration, or to which the only pollutant added is heat.
- 17) Conventional Pollutants. Biochemical Oxygen Demand (BOD₅), Total Suspended Solids (TSS), Fecal Coliform bacteria, Oil and Grease, Flow, and pH (40 CFR 401.16).
- 18) Daily Maximum. The arithmetic average of all effluent samples for a pollutant (except pH) collected during a calendar day.
- 19) Daily Maximum Limit. The maximum allowable discharge limit of a pollutant during a calendar day. Where Daily Maximum Limits are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where Daily Maximum Limits are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- 20) Direct Discharge. The discharge of treated or untreated wastewater directly to the waters of the State of Tennessee.
- 21) Domestic Wastewater. Wastewater that is generated by a single family, apartment or other dwelling unit or dwelling unit equivalent containing sanitary facilities for the disposal of wastewater and used for residential purposes only and/or restroom wastes from commercial, institutional and Industrial Users.
- 22) Environmental Protection Agency or EPA. The U.S. Environmental Protection Agency, or where appropriate, the Regional Water Management Division Director, the Regional Administrator, or other duly authorized official of said agency.
- 23) Existing Source. Any source of discharge that is not a "New Source."
- 24) Grab Sample. A sample that is collected from a waste stream without regard to the flow in the waste stream and over a period of time not to exceed fifteen (15) minutes.

- 25) Grease Interceptor. An interceptor whose rated flow exceeds 50 gpm and is located outside the building.
- 26) Grease Trap. An interceptor whose rated flow is 50 gpm or less and is typically located inside the building.
- 27) Holding (Septic) Tank Waste. Any waste from holding tanks such as vessels, chemical toilets, campers, trailers, septic tanks, and vacuum-pump tank trucks.
- 28) Indirect Discharge or Discharge. The discharge or the introduction of non-domestic pollutants from any source regulated under Section 307(b), (c), or (d) of the Act, into the POTW (including holding tank waste discharged into the system).
- 29) Industrial User (IU) or User. A source of nondomestic waste. Any nondomestic source discharging pollutants to the POTW.
- 30) Individual Wastewater Discharge Permit or General Permit. As set forth in Section 5 of this Ordinance.
- 31) Instantaneous Maximum Limit. The maximum allowable concentration of a pollutant discharged at any time, determined from the analysis of any discrete or composited sample collected, independent of the industrial flow rate and the duration of the sampling event.
- 32) Interceptor. A device designed and installed to separate and retain for removal, by automatic or manual means, deleterious, hazardous or undesirable matter from normal wastes, while permitting normal sewage or waste to discharge into the drainage system by gravity.
- 33) Interference. A discharge that, alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal, or exceeds the design capacity of the treatment works or collection system.
- 34) Local Limit. Specific discharge limits developed and enforced by the Control Authority upon industrial or commercial facilities to implement the general and specific discharge prohibitions listed in Tennessee Rule 1200-4-14-.05(1)(a) and (2).
- 35) Medical Waste. Isolation wastes, infectious agents, human blood and blood products, pathological wastes, sharps, body parts, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes, and dialysis wastes.
- 36) Monthly Average. The sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.
- 37) Monthly Average Limit. The highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.
- 38) National Pollutant Discharge Elimination System or NPDES Permit. A permit issued to a POTW pursuant to Section 402 of the Act.
- 39) National Pretreatment Standard or Pretreatment Standard or Standard. Any regulation containing pollutant discharge limitations promulgated by the EPA in accordance with Section 307 (b) and (c) of the Federal Clean Water Act which applies to Industrial Users. This term includes prohibitive discharge limitations established to 1200-4-14-.05.

40) National Prohibitive Discharges. Prohibitions applicable to all nondomestic dischargers regarding the introduction of pollutants into POTW's set forth in 40 CFR 403.5.

41) New Source.

- a) Any building, structure, facility or installation from which there is or may be a discharge of pollutants, the construction of which commenced after the publication of proposed National Pretreatment Standards under Section 307 (c) of the Act which will be applicable to such source if such Standards are thereafter promulgated in accordance with that Section, provided that:
 - (i) The building, structure, facility or installation is constructed at a site at which no other source is located, or
 - (ii) The building, structure, facility or installation totally replaces the process or production equipment that causes the discharge of pollutants at an existing source, or
 - (iii) The production or wastewater generating processes of the building, structure, facility, or installation are substantially independent of an existing source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant and the extent as to which the new facility is engaged in the same general type of activity as the Existing Source should be considered.
- b) Construction on the site at which an existing source is located results in a modification rather than a new source if the construction does not create a new building, structure, facility, or installation meeting the criteria of the aforementioned but otherwise alters, replaces, or adds to existing process or production equipment.
- c) Construction of a new source as defined under this paragraph has commenced if the Owner or operator has:
 - (i) Begun, or caused to begin as part of a continuous on-site construction program:
 - (a) Any placement, assembly or installation of facilities or equipment; or
 - (b) Significant site preparation work including clearing, excavation or removal of existing buildings, structures or facilities which is necessary for the placement, assembly or installation of new source facilities or equipment; or
 - (ii) Entered into a binding contractual obligation for the purchase of facilities or equipment, which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering and design studies do not constitute a contractual obligation under this paragraph.

42) Noncontact Cooling Water. Water used for cooling that does not come into direct contact with any raw material, intermediate product, waste product, or finished product.

43) North American Industry Classification System (NAICS). A classification pursuant to the North American Industrial Classification Manual issued by the Executive Office of the President, Office of Management and Budget, 2007.

44) Pass Through. A discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges

from other sources, is a cause of a violation of any requirement or the City's NPDES permit, including an increase in the magnitude or duration of a violation.

- 45) Person. Any and all persons, including individuals, partnerships, copartnerships, firms, companies, public or private corporations or officers thereof, associations, joint stock companies, trusts, estates, state and federal agencies, municipalities or political subdivisions, or officers thereof, departments, agencies, or instrumentalities organized or existing under the laws of this or any state or country. The masculine gender shall include the feminine, the singular shall include the plural where indicated by the context.
- 46) pH. The logarithm (base 10) of the reciprocal of the concentration of hydrogen ions expressed in grams per liter of solution which is the measurement of acidity or alkalinity of a solution.
- 47) Pollutant. Any dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, Medical Wastes, chemical wastes, biological materials, radioactive materials, heat, wrecked or discharge equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste and certain characteristics of wastewater (e.g., pH, temperature, TSS, turbidity, color, BOD₅, COD, toxicity or odor).
- 48) Pollution. The man-made or man-induced alteration of the chemical, physical, biological, and radiological integrity of water.
- 49) Pretreatment. The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into a POTW. This reduction or alteration can be obtained by physical, chemical, or biological processes; by process changes; or by other means, except as prohibited by Tennessee Rule 1200-4-14-.06(4). Appropriate pretreatment technology includes control equipment, such as equalization tanks or facilities, for protection against surges or slug loadings that might interfere with or otherwise be incompatible with the POTW. However, where wastewater from a regulated process is mixed in an equalization facility with unregulated wastewater or with wastewater from another regulated process, the effluent from the equalization facility must meet an adjusted pretreatment limit calculated in accordance with Tennessee Rule 1200-4-14-.06(5).
- 50) Pretreatment Requirements. Any substantive or procedural requirement related to pretreatment, other than a Pretreatment Standard imposed on a User, including but not limited to discharge, sampling requirements, analytical requirements, reporting requirements, and compliance schedules.
- 51) Pretreatment Standards or Standards. Pretreatment Standards shall mean prohibited discharge standards, categorical Pretreatment Standards, and Local Limits.
- 52) Process Waste Water. Any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product, or waste product.
- 53) Process Waste Water Pollutants. Pollutants present in process waste water.
- 54) Prohibited Discharge Standards or Prohibited Discharges. Absolute prohibitions against the discharge of certain substances; these prohibitions appear in Part I of this permit.
- 55) Publicly Owned Treatment Works (POTW). A treatment works as defined by Section 212 of the Act (33 U.S.C. section 1292), which is owned by the City of Union City, Tennessee. This definition includes any devices or systems used in collection, storage, treatment,

recycling, and reclamation of sewage or industrial wastes of a liquid nature and any conveyances, which convey wastewater to a treatment plant. For the purposes of this Ordinance, "POTW" shall also include any sewers that convey wastewaters to the POTW from persons outside the City, who are, by contract or agreement with the Control Authority, Users of the POTW.

- 56) POTW Treatment Plant, Wastewater Treatment Plant, or Treatment Plant. That portion of the POTW designed to provide treatment to wastewater.
- 57) Sanitary Sewer. A sewer pipeline that carries liquid and water-carried wastes from residences, commercial buildings, industrial plants, and institutions, together with minor quantities of ground-storm, and surface waters that are not admitted intentionally.
- 58) Shall is mandatory: May is permissive.
- 59) Significant Industrial User (SIU).

Except as provided in paragraphs (c) and (d) of this Section, a Significant Industrial User is:

- a) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subchapter N; and
- b) Any other industrial user that:
- (i) Discharges an average of twenty-five thousand (25,000) gallons more per day or more of process wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater) to the POTW;
 - (ii) Contributes a process waste stream which makes up five percent (5%) or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or
 - (iii) Is designated as such by the Control Authority on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or Requirement (in accordance with TCA 1200-4-14-.08(6)(f).
- c) The Control Authority may determine that an Industrial User subject to categorical Pretreatment Standards under Tennessee Rule 1200-4-14-.06 and 40 CFR chapter I, subchapter N is a Non-Significant Categorical Industrial User rather than a Significant Industrial User on a finding that the Industrial User never discharges more than 100 gallons per day (gpd) of total categorical wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:
- (i) The Industrial User, prior to the Control Authority's finding, has consistently complied with all applicable categorical Pretreatment Standards and Requirements;
 - (ii) The Industrial User annually submits the certification statement(s) required in Section 7.14 of the City's SUO [Tennessee Rule 1200-4-14-.12(17)], together with any additional information necessary to support the certification statement; and
 - (iii) The Industrial User never discharges any untreated concentrated wastewater.
- d) Upon finding that a User meeting the criteria in Subsection (b) of this part has no reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or Requirement, the Control Authority may at any time, on its

own initiative or in response to a petition received from an Industrial User, and in accordance with procedures in Tennessee Rule 1200-4-14-.08(6) (f), determine that such User is not a Significant Industrial User.

- 60) Significant Noncompliance (SNC). Any violation of pretreatment requirements which meet one or more of the following criteria:
- a) Violations of Wastewater Discharge Limits
 - (i) Chronic Violations,
 - (ii) Technical Review Criteria (TRC) Violations,
 - (iii) Any other violation(s) of an Industrial Wastewater Discharge Permit or General Permit effluent limit that the Control Authority believes has caused, alone or in combination with other discharges, interferences (e.g., slug loads) or pass-through; or endangered the health of the POTW personnel or the public, or
 - (iv) Any discharge of a pollutant that has caused imminent endangerment to human health/welfare or to the environment and has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
 - b) Violations of Compliance Schedule Milestones, contained in an enforcement order by 90 days or more after the schedule date. Milestones may include but not be limited to dates for starting construction, completing construction and attaining final compliance.
 - c) Failure to provide reports for compliance schedules, self-monitoring data or categorical standards (baseline monitoring reports, 90-day compliance reports and periodic reports) within 45 days from the due date.
 - d) Failure to accurately report noncompliance.
 - e) Violation or group of violations which the Control Authority determines will adversely affect the operation or implementation of the local pretreatment program.
- 61) Significant Violation. A violation which remains uncorrected 45 days after notification of noncompliance; which is part of a pattern of noncompliance over a twelve month period; or which involves a failure to accurately report noncompliance; or which resulted in the POTW exercising its emergency authority under CFR 403.8 (f) (2) (vi) (B) and 403.8 (f) (2) (vii).
- 62) Slug Control Plan. A plan to control slug discharges, which shall include, as a minimum:
- a) Description of discharge practices, including non-routine batch discharges;
 - b) Description of stored chemicals;
 - c) Procedures for immediately notifying the POTW of slug discharges, including any discharge that would violate a discharge prohibition under this Ordinance, or 40 CFR 403.5(b), with procedures for follow-up written notification within 5 days;
 - d) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents) and/or measures and equipment for emergency response.
- 63) Slug Load or Slug Discharge. Any discharge at a flow rate or concentration, which could cause a violation of the prohibited discharge standards in Section 2 of the City's SUO. A

Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, Local Limits or Permit conditions.

- 64) Source. Any activity, operation, construction, building, structure, facility, or installation (permanent or temporary) from which there is or may be the discharge or pollutants.
- 65) State. State of Tennessee.
- 66) Storm Water. Any flow occurring during or following any form of natural precipitation and resulting therefrom.
- 67) Surcharge. A fee charged to Industrial Users in excess of the normal Sewer User Charge to cover the additional expenses incurred by the POTW for treating conventional pollutants of a higher concentration than the POTW treatment plant was designed to treat.
- 68) Technical Review Criteria (TRC) Violation. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of the wastewater samples taken for each pollutant parameter during a six month period equals or exceeds the product of the numeric Pretreatment Standard or Requirement including Instantaneous Limits, as defined by Section 1.2 of the SUO multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease and 1.2 for all other parameters except pH).
- 69) Total Suspended Solids or Suspended Solids. The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquids, and which is removable by laboratory filtering.
- 70) Toxic Pollutant. Any pollutant or combination of pollutants listed as toxic in regulations promulgated by the Administrator of the Environmental Protection Agency under the provision of Section 307 (a) of the Act (40 CFR 403 Appendix B).
- 71) Upset. An exceptional incident in which there is unintentional and temporary noncompliance with categorical Pretreatment Standards because of factors beyond the reasonable control of the Industrial User. An Upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- 72) User or Industrial User. Any person(s), who contributes, causes or permits the contribution of wastewater into the City's POTW, including the owner of any private property having a building sewer connected to the POTW sewer system.
- 73) Wastewater. The liquid and water-carried industrial or domestic wastes from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, together with any groundwater, surface water and storm water that may be present, whether treated or untreated, which is contributed into or permitted to enter the POTW.
- 74) Waters of the State. All streams, lakes, ponds, marshes, watercourses, waterways, wells, springs, reservoirs, aquifers, irrigation systems, drainage systems and all other bodies or accumulations of water, surface or underground, natural or artificial, public or private, which are contained within, flow through or border upon the state of any portion thereof.

B. Abbreviations

The following abbreviations shall have the designated meanings:

- ◇ CBOD₅ Carbonaceous Biochemical Oxygen Demand 5-day

◇ BMP	Best Management Practice
◇ BMR	Baseline Monitoring Report
◇ CFR	<i>Code of Federal Regulations</i>
◇ CIU	Categorical Industrial User
◇ COD	Chemical Oxygen Demand
◇ EPA	U. S. Environmental Protection Agency
◇ FOG	Fats, Oil and Grease
◇ gpd	Gallons per day
◇ IU	Industrial User
◇ l	Liter
◇ lb	pounds
◇ mg	Milligrams
◇ mg/l	Milligrams per liter
◇ NAICS	North American Industry Classification System
◇ NH ₃ -N	Ammonia Nitrogen
◇ NPDES	National Pollutant Discharge Elimination System
◇ NSCIU	Non-Significant Categorical Industrial User
◇ POTW	Publicly Owned Treatment Works
◇ RCRA	Resource Conservation and Recovery Act
◇ SIU	Significant Industrial User
◇ SNC	Significant Noncompliance
◇ SWDA	Solid Waste Disposal Act, 42 U.S.C. 6901, et. seq.
◇ TSS	Total Suspended Solids
◇ U.S.C.	United States Code

APPENDIX A: SEWER USE AND SURCHARGE FEES

The minimum Sewer User Rate for discharge is \$13.00 per 1,000 gallons; maximum discharge per day 28,000 gallons and calculated monthly.

The surcharge amounts for Carbonaceous Biochemical Oxygen Demand (CBOD₅), Total Suspended Solids (TSS), Free Oil and Grease (O&G), and Ammonia-Nitrogen (NH₃-N) shall be determined as follows:

Carbonaceous Biochemical Oxygen Demand 5 day

Carbonaceous Biochemical Oxygen Demand (CBOD₅) shall be grab sampling no less than once monthly. The monthly average value for CBOD₅, if greater than 1,500 lb/day, shall be used in the following formula to calculate a surcharge to the permittee's sewer bill:

Additional billing (surcharge) for CBOD₅=

Only 1 sampling event during 1 month period:

- $\$0.004 \times \text{total 1 month flow}/1,000 \text{ gallons} \times (\text{measured CBOD}_5 \text{ concentration}(\text{lb}/\text{day}) - 1,500 \text{ CBOD}_5 (\text{lb}/\text{day}) \text{ Threshold}) = \text{Total surcharge for 1 months}$

More than 1 sampling event during 1 month period:

- $\$0.004 \times ((\text{month (1) flow}/1,000 \text{ gallons} \times (\text{measured CBOD}_5 (1) \text{ concentration} (\text{lb}/\text{day}) - 1,500 \text{ CBOD}_5 (\text{lb}/\text{day}) \text{ Threshold}) + (\text{month(2)flow}/1,000 \text{ gallons} \times (\text{measured CBOD}_5 (2) \text{ concentration} (\text{lb}/\text{day}) - 1,500 \text{ CBOD}_5 (\text{lb}/\text{day}) \text{ Threshold}) + \dots (\text{month (6) flow}/1,000 \text{ gallons} \times (\text{measured CBOD}_5 (6) \text{ concentration} (\text{lb}/\text{day}) - 1,500 \text{ CBOD}_5 (\text{lb}/\text{day}) \text{ Threshold})) = \text{Total surcharge based on actual flow to actual concentration for the corresponding month(s)}$

If the first sample event for the one month period does not indicate compliance with the Threshold, then the surcharge will be assessed until an analysis event indicates compliance with the Threshold or the next semi-annual sampling event occurs. If more than 1 sampling event occurs during the 1 month period, the last analysis will correspond to each consecutive discharge until another sampling and analysis has been performed. Therefore, if the first sample event for the one month period indicates compliance of the Threshold then no surcharge will be assessed. (Each Threshold Surcharge Calculation will be conducted in the same manner.)

Results of the sample analysis for CBOD₅ shall be reported to the City of Union City's Pretreatment Coordinator within fifteen (15) days of the last day of monthly reporting.

Total Suspended Solids (TSS)

Total Suspended Solids shall be grab sampling no less than once monthly. The monthly average value for TSS, if greater than 300 lb/day, shall be used in the following formula to calculate a surcharge to the permittee's sewer bill:

Additional billing (surcharge) for TSS=

Only 1 sampling event during 1 month period:

- $\$0.002 \times \text{total 1 month flow}/1,000 \text{ gallons} \times (\text{measured TSS concentration}(\text{lb}/\text{day}) - 300 \text{ TSS} (\text{lb}/\text{day}) \text{ Threshold}) = \text{Total surcharge for 1 months}$

More than 1 sampling event during 1 month period:

- $\$0.002 \times ((\text{month (1) flow}/1,000 \text{ gallons} \times (\text{measured TSS(1) concentration} (\text{lb}/\text{day}) - 300 \text{ TSS} (\text{lb}/\text{day}) \text{ Threshold}) + (\text{month(2)flow}/1,000 \text{ gallons} \times (\text{measured TSS(2) concentration} (\text{lb}/\text{day}) - 300 \text{ TSS} (\text{lb}/\text{day}) \text{ Threshold}) + \dots (\text{month (6) flow}/1,000 \text{ gallons} \times (\text{measured TSS(6) concentration} (\text{lb}/\text{day}) - 300 \text{ TSS} (\text{lb}/\text{day}) \text{ Threshold})) = \text{Total surcharge based on actual flow to actual concentration for the corresponding month}$

Results of the sample analysis for TSS shall be reported to the City of Union City's Pretreatment Coordinator within fifteen (15) days of the last day of the monthly reporting period.

Oil and Grease (O & G)

Oil and grease amounts shall be grab sampling no less than once per month. The monthly average value for O&G, if greater than 100 mg/l, shall be used in the following formula to calculate a surcharge to the permittee's sewer bill:

Additional billing (surcharge) for O&G=

Only 1 sampling event during 1 month period:

- $\$0.002 \times \text{total 1 month flow}/1,000 \text{ gallons} \times (\text{measured O\&G concentration}(\text{mg/l}) - 100 \text{ O\&G (mg/l) Threshold}) = \text{Total surcharge for 1 month}$

More than 1 sampling event during 1 month period:

- $\$0.002 \times ((\text{month (1) flow}/1,000 \text{ gallons} \times (\text{measured O\&G(1) concentration (mg/l)} - 100 \text{ O\&G (mg/l) Threshold})) + (\text{month(2)flow}/1,000 \text{ gallons} \times (\text{measured O\&G(2) concentration (mg/l)} - 100 \text{ O\&G (mg/l) Threshold})) + \dots (\text{month (6) flow}/1,000 \text{ gallons} \times (\text{measured O\&G(6) concentration (mg/l)} - 100 \text{ O\&G (mg/l) Threshold}))) = \text{Total surcharge based on actual flow to actual concentration for the corresponding month(s)}$

Results of sample analyses for Oil and Grease shall be reported to the City of Union City's Pretreatment Coordinator within fifteen (15) days of the last day of the reporting period.

Ammonia-N (NH₃-N)

Ammonia-N amounts shall be grab sampling no less than once every month. The monthly average value for NH₃-N, if greater than 200 lb/day, shall be used in the following formula to calculate a surcharge to the permittee's sewer bill:

Additional billing (surcharge) for NH₃-N =

Only 1 sampling event during 1 month period:

- $\$0.004 \times \text{total 1 month flow}/1,000 \text{ gallons} \times (\text{measured NH}_3\text{-N concentration}(\text{lb/day}) - 200 \text{ NH}_3\text{-N (lb/day) Threshold}) = \text{Total surcharge for 1 month}$

More than 1 sampling event during 1 month period:

- $\$0.004 \times ((\text{month (1) flow}/1,000 \text{ gallons} \times (\text{measured NH}_3\text{-N (1) concentration (lb/day)} - 200 \text{ NH}_3\text{-N (lb/day) Threshold})) + (\text{month(2)flow}/1,000 \text{ gallons} \times (\text{measured NH}_3\text{-N (2) concentration (lb/day)} - 200 \text{ NH}_3\text{-N (lb/day) Threshold})) + \dots (\text{month (6) flow}/1,000 \text{ gallons} \times (\text{measured NH}_3\text{-N (6) concentration (lb/day)} - 200 \text{ NH}_3\text{-N (lb/day) Threshold}))) = \text{Total surcharge based on actual flow to actual concentration for the corresponding month(s)}$

APPENDIX B: SAMPLING POINT LOCATION/DESCRIPTION

Sampling for the parameters described at Part I A. Wastewater Strength and Facility Discharge Limitations and Monitoring Requirements and Part I B. Conventional Pollutant Thresholds for Calculating Surcharge Fees shall be from the discharge hose on the tank truck while discharging into the Union City POTW.

**CHAIN OF CUSTODY RECORD
 PRETREATMENT PROGRAM
 UNION CITY, TENNESSEE**

Discharger's Name: _____

Address: _____

Street Number/P.O. Box City State Zip

Collector's Name: _____ Telephone: _____

Print

Location of Sampling: _____

Field Information:

<u>Parameter</u>	<u>At Initiation of Composite Sample</u>	<u>At Completion of Composite Sample</u>
Temperature in Grab Sample	_____	_____
pH in Grab Sample	_____	_____
Wastewater Flow Indication	_____	_____
Time	_____	_____
Date	_____	_____

Note: Samples for cyanide, phenols, volatile organic compounds and oil and grease must be grab type samples.

Sample Allocation:

1. _____
 Name of Organization

2. _____
 Name of Organization

3. _____
 Name of Organization

Chain of Possession:

1. _____
 Signature of Sample Collector Title Inclusive Dates

2. _____
 Signature Title Inclusive Dates

3. _____
 Signature Title Inclusive Dates

Part 7 Acknowledgment

I acknowledge the receipt of the Wastewater Discharge Permit that applies to the noted facility effective on _____ and expiring _____.

Industry _____

Permit No. _____

Signed _____

Title _____

Date _____

Union City File Review/Summary for 2022 Audit

Permit Effective 11/1/2020 – 10/31/2025

Program Approved 5/2/1986

NPDES #TN0021580

Prepared by GRH 7/19/2022

Audit 5/3/2018, letter dated 6/6/2018

- Union City's protection criteria (PC) and local limits (LL) were given final approval 10/20/2016. Union City was unable to provide a copy of the PC and LL calculations during the inspection. To be legally defensible, Union City must have documentation showing how the limits were developed.
- A copy of Union City's approved pretreatment (PT) program was requested during the audit but could not be found.
- During the audit, the industrial user (IU) files and permits for Titan Wire (Titan) and Williams Country Sausage (Williams CS) were reviewed.
 - The permits do not explicitly state that the industries are required to have a slug discharge control plan (SDCP). During the interview, it was indicated that all significant IUs (SIUs) are required to have a SDCP.
 - Recommend that the permits reporting language requirements be made clearer.
 - The permits have language stating that "the Control Authority shall..." Including requirements that Union City must meet may cause the permits to be interpreted as a contract. Recommend not including requirements that Union City must meet.
- During the audit, oversite inspections were conducted at Titan and Williams CS.
 - At Williams CS, an open floor drain was observed in the chemical storage area, and no secondary containment was present. Union City should take appropriate actions to ensure the floor drain is plugged or adequate secondary containment is in place to prevent spills or slugs from reaching the sewer system.
 - At Williams CS, a large unmarked open container of liquid was observed. Industry representatives indicated the container contained sodium hydroxide. Union City should take actions to ensure the industry maintains proper chemical storage with appropriate labels.
- Reminded Union City that the IWS needs to be submitted to the division this year. The survey should include the contributing jurisdiction of Woodland Mills.
- Audit conducted by LR

PCI 4/11/2019, letter dated 4/17/2019

- Williams Sausage continues to struggle with controlling their effluent quality. They have hired an outside firm to study their treatment system and to suggest modifications. The City must adhere to the ERP should violations be encountered during the adjustment period.
- Union City has begun conducting two IU inspections per year for each facility as opposed to one conducted previously.
- During the visit to Kohler Corporation, it was noted that the process pH probe was relocated to improve effluent treatment response time. Modifications to the treatment process are scheduled in the near future. Please coordinate with plant personnel during that transition

- PCI conducted by DH

TAV 4/22/2020, letter dated 4/28/2020

- The discharge permit for ECM of Ridgely is currently under suspension due to lack of payment for a surcharge fee for excessive TSS.
- Williams Sausage continues to have issues maintaining compliance with its discharge permit. CBOD concentrations have exceeded both the 600 lb per day surcharge threshold and the 1200 lb per day limit. They have failed to meet the requirements of the Consent Order issued in May 2019 and violations are continuing. Consulting LLC performed a detailed evaluation of the PT system at Williams submitted recommendations for modifications to the system to achieve compliance.
- Recommend that Union City reviews the report generated by Consulting LLC and require that Williams Sausage develop a plan to implement changes to its PT system as recommended by Consulting LLC. Additional enforcement, as outlined in the City's ERP, may be necessary to encourage Williams Sausage to follow through with IU permit compliance.
- TAV conducted by DH

PCI 9/3/2021, no letter (comments below are from PCI forms)

- IU file evaluations of Williams Country Sausage and Tennessee Custom Mixing (Titan Tire).
- IU site visit to Titan Tire
- Williams Sausage is currently under a compliance schedule and is making efforts to improve their PT process
- TAV conducted by JGL

OCT 2019 SAR

- Williams Country Sausage is under a Consent Compliance Order beginning 5/1/2019 and ending 10/31/2019.

APR 2020 SAR

- Williams Country Sausage Co was issued a violation on 1/23/2020. They failed to meet all the requirements according to the consent order issued and agreed to on 5/1/2019. Therefore, they will be back billed for all permit exceedances to date and moving forward. Their CBOD threshold and daily allowance both exceeded limits.
- ECM of Ridgely's permit was suspended on 2/5/2020 for refusing to pay surcharge fees resulting from violating IUP limits, Union City SUO and causing interference with the treatment. They were caught discharging very high solids and mud and when sampled they were discharging waste with a value of 22817 lbs of TSS. This was a composite sample from 4 truckloads.

OCT 2020 SAR

- Williams Country Sausage put under a new Consent Compliance Order on 6/30/2020

APR 2021 SAR

- Williams Sausage Company still under Compliance Schedule

OCT 2021 SAR

- Williams Sausage Company still under Compliance Schedule
- Switched Titan, ECM and Kohler to monthly self-monitoring reporting

- On 3/2/2021 ECM's permit was suspended for 3 high pH readings. After strict conditions being issued, they are allowed to dump again.

APR 2022 SAR

- Verbal warnings given to Northwest Tennessee Disposal Corporation for Compliance Monitoring results for Chromium and Ammonia. SNC TRC for Chromium Daily Max and Chromium Monthly Average.
- Verbal warning given to Williams Sausage for low pH
- There will be violations issued to Williams Food Works for not sampling in March 2022, and to Williams Sausage and Williams Food Service for not reporting monthly flows and pH.

SUO and ERP final approval 11/12/2014

Tech evaluation of local limits submitted Submitted 11/24/2015, Final Approval on 10/20/2016

Latest IWS 6/20/2013 (Date listed on last Audit. No newer one's located in Waterlog or scanned documents)