

POTW PRETREATMENT COMPLIANCE INSPECTION CHECKLIST

PCI CHECKLIST CONTENTS

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CA name and address: Permit: TN0064611 City of Camden WWTP PO Box 779 Camden, TN 38320 Physical: 397 Hildon King Rd. Camden, TN 38320	Date(s) of PCI 5/25/23 Period covered by PCI 10/21/21 – 5/25/23 Prev. Audit 10/21/21
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PIRT / DSS incorporated in NPDES permit?	Yes	No

INSPECTOR (S)		
Name	Title/Affiliation	Telephone Number
John Lay	Env. Protection Specialist, TDEC	731-571-0440

CA REPRESENTATIVE (S)		
Name	Title/Affiliation	Telephone Number
David Tuck	PT Coordinator WW Plant Supervisor	cityofcamden2@bellsouth.net 731-584-7986

*Identified program contact

SECTION I: IU EVALUATION (Continued)

File —	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					G. OTHER	

Comments

Note: No IU files to review. No permitted IUs for this facility.

SECTION I COMPLETED BY:	DATE:
TITLE:	TELEPHONE:

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW

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

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

	Yes	No
1. Did the CA make substantial changes to the pretreatment program that were not approved by the Approval Authority (e. g., definitions, limits)?		X

If yes, describe.

	Yes	No
2. Is the CA in the process of modifying any approved pretreatment program component (including legal authority, local limits, DSS requirements, etc.)?		X

If yes, describe.

	YES	NO
3. a. Has the CA adopted the 3 required components of the streamlining regulations (slug control requirements referenced in the control mechanisms, definition of SNC, and modification to sampling requirements)?		

If not, when?

	YES	NO
b. Does the CA plan to adopt any of the non-mandatory aspects of the streamlining regulations?		

If yes, describe.

SECTION II: SUPPLEMENTAL DATA REVIEW/INTERVIEW (Continued)

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

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

Once per permit cycle / every 5 years.

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

a.	0	SIUs (as defined by the CA) [WENDB - SIUS]
		CIUs [WENDB - CIUS]
		Zero-discharging SIUs
		Noncategorical SIUs**

b. Other regulated noncategorical IUs (specify)

c. 0 TOTAL

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

List NSCIUs:

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

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

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 Camden WWTP](#)

2. a. Pretreatment contact David Tuck	b. Mailing address PO Box 779 Camden, TN 38320
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c. Title PT Coordinator	d. Telephone number: 731-584-7986
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3. Date of last CA report to Approval Authority [May 2, 2023 \(SAR 10/1/22 – 3/31/23\)](#)

4. Is the CA currently operating under any pretreatment - related consent decree, Administrative Order, compliance schedule, or other enforcement action?	Yes	No
		<input checked="" type="checkbox"/>

5. Effluent and sludge quality

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

Parameters Violated	Cause(s)

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

[None](#)

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

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

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
			N/A
			N/A
			N/A
			N/A
			N/A
			N/A
3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit, (whichever is most recent)			
Name of SIU in SNC	Compliance Status	Source	
4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.			
			SNC Evaluation Period <input style="width: 100px;" type="text"/>
0	%	Applicable pretreatment standards and reporting requirements	*SNC defined by:
0	%	Self - monitoring requirements	POTW <input style="width: 50px;" type="text"/>
0	%	Pretreatment compliance schedules	EPA <input style="width: 50px;" type="text"/>
5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program None			

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

II. WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name	City of Camden WWTP		
NPDES number	TN0064611		
Date of audit	May 25, 2023 (PCI)		
	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	0
• Number of CIUs	CIUS	II.C.4.a	0
- Number of SIUs without control mechanism	NOCM	II.D.1.A	0
- Number of SIUs not inspected or sampled	NOIN	II.F.2.a	0
- Number of SIUs in SNC** with standards or reporting	PSNC	Attach A.B.4	0
- Number of SIUs in SNC with self - monitoring	MSNC	Attach A.B.4	0
- Number of SIUs in SNC with self - monitoring and not inspected or sampled	SNIN	II.G.5	0
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."			
**As defined in 40 CFR 403.8(f)(2)(viii).			

WENDB DATA ENTRY WORKSHEET	DATE:
COMPLETED BY:	
TITLE:	TELEPHONE:

RNC WORKSHEET

III. RNC WORKSHEET																		
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.																		
CA name	City of Camden WWTP																	
NPDES number	TN0064611																	
Date of audit	May 25, 2023																	
n/a	Failure to enforce against pass through and / or interference	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e0e0e0;"> <th style="width: 15%;">Level</th> <th style="width: 85%;">Checklist Reference</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">I</td> <td style="text-align: center;">II.G.6</td> </tr> <tr> <td style="text-align: center;">I</td> <td style="text-align: center;">Attach A.B.2.b</td> </tr> <tr> <td style="text-align: center;">I</td> <td style="text-align: center;">Attach A..B.2.c</td> </tr> <tr> <td style="text-align: center;">II</td> <td style="text-align: center;">II.D.1.b</td> </tr> <tr> <td style="text-align: center;">II</td> <td style="text-align: center;">II.F.2.a</td> </tr> <tr> <td style="text-align: center;">II</td> <td style="text-align: center;">I.C.1; II.G.2</td> </tr> <tr> <td style="text-align: center;">II</td> <td></td> </tr> </tbody> </table>	Level	Checklist Reference	I	II.G.6	I	Attach A.B.2.b	I	Attach A..B.2.c	II	II.D.1.b	II	II.F.2.a	II	I.C.1; II.G.2	II	
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II	II.F.2.a																	
II	I.C.1; II.G.2																	
II																		
n/a	Failure to submit required reports within 30 days																	
n/a	Failure to meet compliance schedule milestone date within 90 days																	
n/a	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months																	
n/a	Failure to inspect or sample 80% of SIUs within the last 12 months																	
n/a	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)																	
n/a	Other (specify)																	
SNC																		
n/a	CA in SNC for violation of any Level I criterion																	
n/a	CA in SNC for violation of two or more Level II criterion																	
<p>For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements</u></p>																		

RNC WORKSHEET COMPLETED BY:	DATE:
TITLE:	TELEPHONE: