

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

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Control Authority (CA) name and address

Date(s) of audit

Lawrenceburg Utility Systems
110 E Zell Dr
Lawrenceburg, TN 38464

7/11/23

AUDITOR (S)

Name	Title/Affiliation	Telephone Number
Gordon Holcomb	Env Prot Spec II	615-339-9956
Dewitt Logsdon	Env Prot Spec III	931-407-0564

CA REPRESENTATIVE (S)

Name	Title/Affiliation	Telephone Number
Kevin Kelley	WWTP Operator / Pretreatment Coordinator	931-762-7161
Steve Summers	WWTP Chief Operator	931-762-7162
	Kevin Kelley direct line →	931-766-4744

*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 1 Industry name and address
 Hughes Parker Industry, LLC Plant #1
 1604 Mahr Ave
 Lawrenceburg, TN 38464

Type of industry
 Contract manufacturing for Stamping,
 Fabrication, Welding and Assembly

☒ CIU 40 CFR 433.15, _____, _____

Average total flow (gpd)

Average process flow
 (gpd)

1535

Category(ies) Metal Finishing Existing Source

☐ Other SIU

☐ Non SIU

Industry visited during audit

Yes ☒

No ☐

Comments

General Comments

SECTION I: IU EVALUATION

File 1	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM	
X					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					a. Individual control mechanism	
					b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Individual control mechanism contents	403.8(f)(1)(iii)(B)
X					a. Statement of duration (≤ 5 years)	
X					b. Statement of nontransferability	
X					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 <div style="background-color: yellow; padding: 5px; margin-top: 10px;"> 1 Sampling location not described, which could be due to missing information on the first page of Appendix A in the copy of the permit provided prior to the audit. </div> <div style="background-color: yellow; padding: 5px; margin-top: 10px;"> 2 Slug Discharge Plan Required in section G of Reporting Requirements. This section lacks detail of what needs to be included in a SDCP </div>						

SECTION I: IU EVALUATION (Continued)

File 1	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)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					e. Documentation to support the POTW's determination	
<p>Comments</p> <p>Not a General Permit</p>						

SECTION I: IU EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
1					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
X					a. Classification by category/subcategory	
1					b. Classification as new/existing source	
X					c. Application of limits for all regulated pollutants	
					d. Classification of nonsignificant CIU	403.3(v)(2)
2					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
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)
2					7. Application of most stringent limit	403.8(f)(1)(ii)

Comments

1 40 CFR 433.15 Metal Finisher, Existing

2 The permit limits for Cadmium, Chromium VI, Copper, Lead, Nickel, Silver (Daily Max), Cyanide, and Mercury do not agree with the local limits given final approval on 10/3/2022. The permit limits for Chromium Total should be from Metal Finishing 433.15.

Hughes Parker #1

Parameter	Permit		LL		MF Existing		Permit Agreement?	
	Daily Max	Monthly	Daily Max	Monthly	Daily Max	Monthly	Daily Max	Monthly
Cadmium	0.162	0.108	0.051399	0.034266	0.69	0.26	No	No
Chromium VI	1.39	0.9273	2.968763	1.979175			No	No
Chromium Total	1.29	0.8604	5.51925	3.6795	2.77	1.71	No	No
Copper	3.38	2.07	2.378385	1.58559	3.38	2.07	No	No
Lead	0.69	0.43	0.525623	0.350415	0.69	0.43	No	No
Nickel	3.51	2.34	1.359279	0.906186	3.98	2.38	No	No
Silver	0.43	0.24	0.3795		0.43	0.24	No	Yes
Zinc	2.61	1.48	4.68603	3.12402	2.61	1.48	Yes	Yes
Cyanide	0.25	0.1699	0.576	0.384	1.2	0.65	No	No
Mercury	0.01	0.0069	0.007335	0.00489			No	No
TTO	2.13				2.13			Yes
Total Phenols	8.94	5.96	8.945685	5.96379			Yes	Yes

SECTION I: IU EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
					Sampling	
					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
					2. Sampling at frequency specified in approved program	
					3. Documentation of sampling activities	403.8(f)(2)(vi)
					4. Analysis for all regulated parameters	
					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
					7. Inspection at frequency specified in approved program	
					8. Documentation of inspection activities	403.8(f)(2)(vi)
					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">Comments</div>						

SECTION I: IU EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
					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)

Comments

SECTION I: IU EVALUATION (Continued)

File 1	File 2	File	File	File	IU FILE REVIEW	Reg. Cite
E. IU COMPLIANCE STATUS						
Self-Monitoring and Reporting						
(A) *	**	(A) **			1. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
✓	✓				2. Analysis of all required pollutants	403.12(g)(1)&(h)
					3. Submission of BMR/90-day report	403.12(b) &(d)
					4. Periodic self monitoring reports	403.12(e)&(h)
✓	✓				5. Reporting all required pollutants	403.12(g)(1)&(h)
*	*				6. Signatory/certification of reports	403.12(l)
NA	NA				7. Annual certification by NSCIUs	403.12(q)
					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
NA	NA				11. Notification of hazardous waste discharge	403.12(j)&(p)
✓	✓				12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
NA	NA				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	NA				13. Noncompliance with discharge limits (but not SNC)	403.8(f)(2)(vii)
					14. SNC	
					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>* Need signature on pH & Flow submissions</p> <p>** permit 1 & 2 says monitor & test but semi annual is intent</p> <p>(A) NO 1ST & TR TESTING IN 2023 WAS AVAILABLE</p> <p>Lawrence W. TP 4/21/23</p> <p>Gm 41 2/8/22 1st 5th</p> <p>5/12/22 2nd</p> <p>10/25/22 3rd</p> <p>5/12/23 4th</p> <p>Missing Sample Found at Hughes Parker during site visit 201-7/11/23</p> <p>5/12/23 1st 5th</p> <p>2nd 5th</p>						

SECTION I: IU EVALUATION (Continued)

File 1	File	File	File	File	IU FILE REVIEW	Reg. Cite
					F. OTHER	
Comments						

SECTION I COMPLETED BY: Gordon Holcomb (typed comments) <i>D. Logsdon</i> TITLE: Env Prot Spec 2 <i>EPS 3</i>	DATE: 7/5/2023 <i>7/11/23</i> <i>931-401-0564</i> TELEPHONE: 615-339-9956
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SECTION I: IU EVALUATION (Continued)

IU IDENTIFICATION (Continued)

FILE 2 Industry name and address
 Hughes Parker Industry, LLC Plant #2
 200 Helton Drive
 Lawrenceburg, TN 38464

Type of industry
 Contract manufacturing for E-Coat, Powder Paint,
 Assembly and Warehouse

☒ CIU 40 CFR 433.17, _____, _____

Average total flow (gpd)

Average process flow
 (gpd)

6510

Category(ies) Metal Finishing New Source

☐ Other SIU

☐ Non SIU

Industry visited during audit

Yes ☒

No ☐

Comments

Oct 2022 SAR: HP2 was in SNC for Zinc and received a verbal NOV

Address in the April 2023 SAR is of Hughes Parker #1, 1604 Mahr Ave instead of 200 Helton Drive

General Comments

SECTION I: IU EVALUATION

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
2					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	
X					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 <div style="background-color: yellow; padding: 5px; margin: 5px 0;"> 1 Sampling location not described, which could be due to missing information on the first page of Appendix A in the copy of the permit provided prior to the audit. </div> <div style="background-color: yellow; padding: 5px; margin: 5px 0;"> 2 Slug Discharge Plan Required in section G of Reporting Requirements. This section lacks detail of what needs to be included in a SDCP </div>						

SECTION I: IU EVALUATION (Continued)

File <u>2</u>	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)
					a. Involve the same or similar operations	
					b. Discharge the same types of wastes	
					c. Require the same effluent limitations	
					d. Written request by the IU for coverage by a general control mechanism including:	
					• Contact information	
					• Production processes	
					• Types of waste generated	
					• Location for monitoring all wastes covered by the general permit	
					e. Documentation to support the POTW's determination	

Comments

Not a General Permit

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
2						
B. CA APPLICATION OF IU PRETREATMENT STANDARDS						
1					1. IU categorization	403.8(f)(1)(ii)
					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
X					a. Classification by category/subcategory	
1					b. Classification as new/existing source	
X					c. Application of limits for all regulated pollutants	
					d. Classification of nonsignificant CIU	403.3(v)(2)
2					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
					4. Application of Best Management Practices	403.8(f)(1)(iii)(B)(4)
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)
2					7. Application of most stringent limit	403.8(f)(1)(ii)

Comments

1 40 CFR 433.17 Metal Finisher, New

2 The permit limits for Cadmium, Chromium VI, Copper, Lead, Nickel, Silver (Daily Max), Cyanide, and Mercury do not agree with the local limits given final approval on 10/3/2022. The permit limits for Chromium Total should be from Metal Finishing 433.17

Hughes Parker #2

Parameter	Permit		LL		MF New		Permit Agreement?	
	Daily Max	Monthly	Daily Max	Monthly	Daily Max	Monthly	Daily Max	Monthly
Cadmium	0.162	0.108	0.051399	0.034266	0.11	0.07	No	No
Chromium VI	1.39	0.9273	2.968763	1.979175			No	No
Chromium Total	1.29	0.8604	5.51925	3.6795	2.77	1.71	No	No
Copper	3.38	2.07	2.378385	1.58559	3.38	2.07	No	No
Lead	0.69	0.43	0.525623	0.350415	0.69	0.43	No	No
Nickel	3.51	2.34	1.359279	0.906186	3.98	2.38	No	No
Silver	0.43	0.24	0.3795		0.43	0.24	No	Yes
Zinc	2.61	1.48	4.68603	3.12402	2.61	1.48	Yes	Yes
Cyanide	0.25	0.1699	0.576	0.384	1.2	0.65	No	No
Mercury	0.1	0.0069	0.007335	0.00489			No	No
TTO	2.13				2.13			Yes
Total Phenols	8.94	5.96	8.945685	5.96379			Yes	Yes

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
2						
					C. CA COMPLIANCE MONITORING	
					Sampling	
					1. Sampling (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has waived monitoring for CIU	
					• Sample waived pollutant(s) at least once during the term of the control mechanism	403.8(f)(2)(v)(A)
					2. Sampling at frequency specified in approved program	
					3. Documentation of sampling activities	403.8(f)(2)(vi)
					4. Analysis for all regulated parameters	
					5. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
					Inspection	
					6. Inspection (once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If a POTW has determined a discharger to be a NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year (verification of certification forms submitted by NSCIUs, compliance with pretreatment standards and requirements)	
					7. Inspection at frequency specified in approved program	
					8. Documentation of inspection activities	403.8(f)(2)(vi)
					9. Evaluation of need for slug discharge control plan	403.8(f)(2)(vi)
Comments						

SECTION I: IU EVALUATION (Continued)

File <u>2</u>	File ___	File ___	File ___	File ___	IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
					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)
<div style="margin-bottom: 10px;">Comments</div>						

SECTION I: IU EVALUATION (Continued)

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
2						
					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)
					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)
					7. Annual certification by NSCIUs	403.12(q)
					8. Submission of compliance schedule reports by required dates	403.12(c)
					9. Notification within 24-hours of becoming aware of violations	403.12(g)(2)
					• Discharge violation	
					• Slug load	
					• Accidental spill	
					10. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
					11. Notification of hazardous waste discharge	403.12(j)&(p)
					12. Submission/implementation of slug discharge control plan	403.8(f)(2)(v)
					13. Notification of significant changes	403.12(j)
INSTRUCTIONS: Indicate the IU's noncompliance status by placing and "X" in the appropriate box.						
					Discharge	
					13. Noncompliance with discharge limits (but not SNC)	403.8(f)(2)(vii)
					14. SNC	
					a. Chronic violations	
					b. TRC	403.5(a)(1)
					c. Pass through or interference	403.12(f)
					• Spill or slug load	
					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						

SECTION I: IU EVALUATION (Continued)

File <u>2</u>	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					F. OTHER	
Comments						

SECTION I COMPLETED BY: Gordon Holcomb (typed comments)	DATE: 7/5/2023
TITLE: Env Prot Spec 2	TELEPHONE: 615-339-9956

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
	X

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
	X

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

X

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

Ethridge

Not well versed. Nothing in the works

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

Yes

No

✓

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?

X

Explain

x No, but they said they would abide by Lawrenceburg

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

X

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?)

Yes, the same

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

Discuss any problems. *IWS, application, on site inspection*

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

Every NPDES permit

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

*Lab sample
communications, and required reports*

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 NPDES permit

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. | <table border="1"><tr><td>4</td></tr></table> | 4 | SIUs (as defined by the CA) [WENDB - SIUS] |
| 4 | | | |
| | <table border="1"><tr><td>3</td></tr></table> | 3 | CIUs |
| 3 | | | |
| | <table border="1"><tr><td>0</td></tr></table> | 0 | Zero-discharging SIUs |
| 0 | | | |
| | <table border="1"><tr><td>0</td></tr></table> | 0 | Noncategorical SIUs (including zero-discharging noncat. SIUs) |
| 0 | | | |
| b. | <table border="1"><tr><td>0</td></tr></table> | 0 | Other regulated noncategorical IUs (specify) |
| 0 | | | |
| c. | <table border="1"><tr><td>4</td></tr></table> | 4 | TOTAL |
| 4 | | | |
| | | | |
| d. | <table border="1"><tr><td>0</td></tr></table> | 0 | NSCIUs** (as defined by 40 CFR 403.3(v)(2)) |
| 0 | | | |

List Nonsignificant Categorical Industrial Users:

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

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

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

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

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

0	0	%
---	---	---

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

List SIUs:

c. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC - II]

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

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?

septic Haulers

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

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)]

Permit, Manifests, camera monitored 24/7

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)]

pH, not sampled

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

Training TAUD, PT listserv

* Kevin is not on list serv

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

- a. For what pollutants have local limits been set

metals and organics on PTLs
plus Arsenic, Moly, selenium

- b. How were these pollutants decided upon

PTL, Nitrification inhibition, Biosolids

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

PTL

- d. Which allocation method(s) were used?

Uniform

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

Yes	No
	X

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?

None

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
x	

in the Permit

F. COMPLIANCE MONITORING

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

Minimum set by program Development
More is determined by the presence of issues in the industry

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

Usually the same as there hasn't been issues in the plant

c. If the CA does all of the sampling in lieu of the industry, does the CA repeat the sample and analysis within 30 days of any violation? CA does not do sampling for industries

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

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

0	%
---	---

b. Not sampled at least once

0	%
---	---

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

0	%
---	---

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 1 2022 - March 31 2023

0	%	Applicable pretreatment standards and reporting requirements
8	%	Self-monitoring requirements
8	%	Pretreatment compliance schedule(s)

*SNC defined by:

POTW	✓
EPA	

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

Evaluation Period: Oct 1 2022 - March 31 2023

Number of SIUs: 4, 100%

Names of SIUs:

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)]

5. Who performs CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name

Waypoint out of Jackson

11

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)]

No

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.

No

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

Yes

No

X

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)]

Re-evaluated every inspection, once per year

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

0

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

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

No

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

G. ENFORCEMENT

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

Same as EPA

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

a. Status

Up to date with streamlines

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.

Yes

Craig didn't have 24 hr report in time. After
the NOV there hasn't been any issues
a.

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

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

Yes

No

✓

The Craig example above the next step would have
been a compliance step & schedule

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

G. ENFORCEMENT (Continued)

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

Yes

No

If yes, attach a copy.

If no, explain.

NA
non is SNC

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

X

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

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

Policy in place

locked up, shredded when destroy
↳ filing cabinet

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

can come in and take a look during office hours

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.

seems organized enough, but could be better

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

public notice in newspaper

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

No

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

Minium of 3 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)].

0.75 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.)?

stay the same

Discuss any changes in funding.

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

None

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

Training, IIS, EV, TAUD

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

Yes

No

✓

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	1	
2	2		
	1		
		1/5 years	

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

Less	Equal	More
	X	

Explain any differences.

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
	X
	X
	X
	X
	X

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.)

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

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

X

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

X

X

Oil & grease

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

None

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

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

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

Yes

No

Explain.

NA

K. ADDITIONAL EVALUATIONS/INFORMATION

* Permit Table's say quarterly in one spot, semi-annual in another. The new permits were changed to semi-annual. Need to be consistent. → all sampling found

* SVO needs to be updated to reflect new local limits
Permits not always have most stringent between LL & CIL

* Sampling location in permits - mentioned in permit as a photo in appendix A. in file but not in permit

monthly flow & pH report does not have signed statement for both
142

SECTION II COMPLETED BY: Gordon Holcomb

TITLE: Env Prot Spec II

DATE: 7/11/23

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 Lawrenceburg Utility Systems

2. a. Pretreatment contact
Kevin Kelley

b. Mailing address

110 Ezell Dr
Lawrenceburg, TN 38464

c. Title Pretreatment Coordinator

d. Telephone number 931-766-4744

3. Date of last CA report to Approval Authority 5/22/2023

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?

No

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.

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

Last PCI	Last Audit	Program Report
Date: 5/12/2021	Date: 6/19/2018	Date: 5/22/2023
	Ethridge MJA	

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
	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

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		10/1/22-3/31/23
	%	Applicable pretreatment standards and reporting requirements *SNC defined by:
	%	Self - monitoring requirements
	%	Pretreatment compliance schedules

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

ATTACHMENT A COMPLETED BY: Gordon Holcomb	DATE: 7/3/2023
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 Lawrenceburg Utility Systems

2. Program Approval Date 3/27/1985

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
Lawrenceburg STP	TN0022551	2/1/2022	12/31/2026

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?

Yes

No

X

If yes, provide the following information.

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants
Lawrenceburg STP	TDEC	1/24/22	12/31/26	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
1/19/2011	Final Approval Streamlining SUO and ERP
10/3/2022	Final Approval Protection Criteria and Local Limits

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 Lawrenceburg STP		2. Location address 110 Ezell Drive Lawrenceburg, TN 38464		
3. a. NPDES permit number TN0022551	b. Expiration date 12/31/2026	4. Treatment plant wastewater flows Design 4.5 MGD Actual 1.846 MGD		
5. a. Industrial contribution (MGD) <div style="border: 1px solid black; text-align: center; width: 100px; margin: 5px auto;">0.0109</div>	b. Number of SIUs discharging to plant <div style="border: 1px solid black; text-align: center; width: 100px; margin: 5px auto;">5</div>	c. Percent industrial flow to plant <div style="border: 1px solid black; text-align: center; width: 100px; margin: 5px auto;">0.59%</div>		
6. Level of treatment	Type of Process(es)			
a. Primary				
b. Secondary	Biological Treatment, Suspended Growth, Sequencing Batch Reactor			
c. Tertiary	Disinfection, Sodium Hypochlorite (liquid)			
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	1/year	
b. Organics		1/permit, 5 years		
c. Toxicity testing		1/year		
d. EP toxicity				
e. TCLP				
9. Effluent Discharge				
a. Receiving water name Shoal Creek at mile 55.4		b. Receiving water classification Domestic, Industrial, Fish & Aquatic Life, Recreation, Livestock & Wildlife, 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)

	N / A	Yes	No
10. Did the CA submit results of whole effluent biological toxicity as part of its NPDES permit application(s)? [122.21(j)(1)&(2)]		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 X	c. MSW landfill
b. Surface Disposal 	d. Other (specify)
c. Incineration 	

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

b. Date enacted / adopted 3/27/1985

c. Date of most recent revisions 1/19/2011

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
City of Ethridge	1 Craig Industry has an Ethridge address	0

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
Yes, but could be strengthened	

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

2007 MJA with Ethridge, which predates streamlining. The audit letter from 2018 said: *"If Ethridge has not modified their legal authority since Lawrenceburg's adoption of the streamlining changes, Lawrenceburg should take appropriate actions to ensure the Town modifies their legal authority accordingly. Furthermore, the agreement uses broad statements regarding how the pretreatment program will be implemented in Ethridge. A key element we look for in a MJA is the ability for the receiving municipality to deny the increase or introduction of wastewater."*

The 2007 MJA has language that *"Ethridge agrees to adopt and enforce any changes or modifications to the Sewer Use Ordinance or Pretreatment Program which may be adopted by LUS"*

A follow-up letter by the law office representing LUS dated 4/11/2019 gave an update and opinion that while the Ethridge SUO could be improved, LUS "can and will cut off service to any Ethridge customer if we feel their discharge is not meeting our required standards." The letter also said that there was a pending Resolution #81 for the City of Ethridge that would address the audit's concerns. But at the time of the letter, the position of Ethridge City Judge/Ethridge City Attorney was vacant.

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)

Lawrenceburg performs all functions

E. IU CHARACTERIZATION

1. Date of last IWS submitted to WPC.

5/16/2022

2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(v)(1)]

Yes	No
X	

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

PRETREATMENT PROGRAM PROFILE (Continued)

F. CONTROL MECHANISM

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

Permit

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 technically evaluated 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)?

	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)							
b. Cadmium (Cd)							
c. Chromium (Cr)							
d. Copper (Cu)							
e. Cyanide (CN)							
f. Lead (Pb)							
g. Mercury (Hg)							
h. Nickel (Ni)							
i. Silver (Ag)							
j. Zinc (Zn)							
k. Other (specify)							

See attached approved local limits

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	2 / year
• Other SIUs	2 / year	2 / year	2 / year	2 / year
d. Reporting by IU				
• CIUs	2 / year	2 / year	2 / year	2 / year
• Other SIUs	2 / year	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".

The SUO defines significant noncompliance in 2 places. In 18-307(10) it is consistent with EPA. In 18-302(48) it is consistent with EPA except for 18-302(48)(e) where it is more stringent than EPA using 45 days instead of 90 days in "Failure to meet, within 45 days after the due date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance."

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

- Civil \$ 10k /day/violator
- Criminal \$ 10k /day/violator
- Administrative \$ 1k /day/violator

L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY: Gordon Holcomb

DATE: 7/3/2023

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 Hughes Parker #1

Date of visit 7/11/2023

Time of visit 11:15

Name(s) of inspector(s)

Gordon Holcomb

Kevin Kelley Steve ~~Sumner~~ Dewitt Logsdon

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

Name	Title
<u>Shane Lawrence</u>	<u>General Manager</u>
<u>Glen Jones</u>	<u>Production</u>
<u>Butch McMasters</u>	<u>Maintenance</u>

Classification assigned by CA:

Provide the following documentation:

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:

- ① Brake presses, welding for heavy duty trucking, Radiator channels
metal stamping engine components for autos, HVAC frames
and brackets
- ② Here since 1977 ^{substantial} ~~no~~ changes to WWTP process
- ③ Process that generates waste water is used every couple months
- ④ Tank building - cleaning pre wash
Bath treatment
Aluminum

IU SITE VISIT DATA SHEET (Continued)

IU Name <u>HP #1</u>	Date <u>7/11/23</u>
Notes:	
<p>⑤ Beside the bath, both C&SILL sample at same location flow proportional composite sampling</p> <p>⑥ No treatment of waste water</p> <p>⑧ No hazardous waste</p> <p>⑦ oil for cutting oil hydraulic oil</p> <p>No drains under presses/pits</p> <p>wash line</p> <p>soap wash Rinse Over dry</p> <p style="text-align: right; margin-right: 100px;">No drains beyond domestic</p>	

IU SITE VISIT REPORT FORM COMPLETED BY: <u>Gordon Holcomb</u> TITLE: <u>Env Prot Spec II</u>	DATE: <u>7/12/23</u> TELEPHONE: <u>615-339-9956</u>
--	--

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 *Hughes Parker #2*

Date of visit *7/11/2023*

Time of visit *11:15*

Name(s) of inspector(s)

Gordon Holcomb, Kevin Kelley, Steve Summers, Dewitt Logsdon

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

Name	Title
<i>Shane Lawrence</i>	<i>General Manager</i>
<i>Ernie Hopper</i>	<i>Maint. Tech</i>
<i>Larry Preslar</i>	<i>Lab Tech</i>

Classification assigned by CA: *1*

Provide the following documentation:

- Describe the products manufactured or the services provided by the IU.
- Verify CA's classification or discuss any errors.
- Describe any significant changes in process or flow.
- 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.)
- Describe the sample location and any differences in CA and IU locations.
- Describe the treatment system which is in place.
- Identify the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discuss the adequacy of spill prevention.
- Discuss whether hazardous wastes are stored or discharged and any related problems.

Notes:

- ① ④ Final Assembly → shipping
- ② ⑤ Paint Epoxy Paint Assembly Shipping
(70% new painting) Powder Paint
- ③ New source Metal Finisher
- ④ No changes
- ⑤ Epoxy 2-stage process dipping, cleaning, drying - more detail to follow during walk through
Powder Paint Paint & Clean dip

IU SITE VISIT DATA SHEET (Continued)

IU Name <u>HP #2</u>	Date <u>7/11/2023</u>
Notes:	
<div style="display: flex; justify-content: space-between;"> <div style="width: 65%;"> <p>⑤ sampling location east side by bay doors flow meter flow proportional composite sampling</p> <p>⑥ Some re-use, no pretreat in discharge</p> <p>⑧ No Haz Waste</p> <p>⑦ Cleanly solutions Activator II Sbr e coat analyzer III Accelerator 96 Carak Carak 763</p> </div> <div style="width: 30%; font-size: small;"> <p>e Coat & Paint line ^(shave water line)</p> <p>① Cleaner</p> <p>② Rinse with conditioner</p> <p>③ Zn Phosphate</p> <p>④ City water rinse</p> <p>⑤ Non-ch sealant</p> <p>⑥ Rinse</p> <p>⑦ Rinse</p> <p>waste water overflow Rinse</p> </div> </div>	

IU SITE VISIT REPORT FORM COMPLETED BY: <u>Gordon Holcomb</u> TITLE: <u>Env Prot Spec II</u>	DATE: <u>7/12/23</u> TELEPHONE: <u>615-339-9956</u>
--	--

Pit

↓
Mixer Tank adjust pH

eq Tank another pH adjust

Flock Tank powdered polymer

add Ferric Chloride

Sludge to bottom

Filter Press with water to pit
solids haul off

Isco tubing checked at least annually

WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET

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

CA name Lawrenceburg

NPDES number TN0022551

Date of audit 7/11/2023

	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	<u>4</u>
• Number of CIUs	CIUS	II.C.4.a	<u>3</u>
- Number of SIUs without control mechanism	NOCM	II.D.1.A	<u>0</u>
- Number of SIUs not inspected or sampled	NOIN	II.F.2.a	<u>0</u>
- Number of SIUs in SNC** with standards or reporting	PSNC	Attach A.B.4	<u>0</u>
- Number of SIUs in SNC with self - monitoring	MSNC	Attach A.B.4	<u>0</u>
- Number of SIUs in SNC with self - monitoring and not Inspected or sampled	SNIN	II.G.5	<u>0</u>

*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: 7/13/2023

COMPLETED BY: Gordon Holcomb

TITLE: Env Prof Spec II

TELEPHONE: 615-339-9956

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 Lawrenceburg

NPDES number TN00 22551

Date of audit 7/11/2023

		Level	Checklist Reference
<input type="checkbox"/>	Failure to enforce against pass through and / or interference	I	II.G.6
<input type="checkbox"/>	Failure to submit required reports within 30 days	I	Attach A.B.2.b
<input type="checkbox"/>	Failure to meet compliance schedule milestone date within 90 days	I	Attach A..B.2.c
<input type="checkbox"/>	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II	II.D.1.b
<input type="checkbox"/>	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.F.2.a
<input type="checkbox"/>	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II	I.C.1; II.G.2
<input type="checkbox"/>	Other (specify)	II	

SNC

<input type="checkbox"/>	CA in SNC for violation of any Level I criterion
<input type="checkbox"/>	CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY: Gordon Holcomb
TITLE: Env Prot Spec II

DATE: 7/13/2023
TELEPHONE: 615-339-9956

NPDES ID(s): TN0022551

State: TN

Major/Minor Indicator:

Violation Date: 07/01/2020 - 07/05/2023

Violation Type(s): Effluent Violation

Environmental Protection Agency Integrated Compliance Information System Violations Report

TN0022551

Permittee Name: Lawrenceburg Utility Systems Permittee Address: 1607 N. Locust Ave. Lawrenceburg, TN 38464 Major/Minor Indicator: Major Compliance Track Status: On DMR Non Receipt Flag: On RNC Tracking Flag: On	Primary SIC Code: 4952 Primary SIC Desc: Sewerage Systems Primary NAICS Code: 221320 Primary NAICS Desc: Sewage Treatment Facilities Cognizant Official: Lisa Porter Cognizant Offcl. Ph.: 931-762-7161 Receiving Body: Tennessee-Pickwick Lake	Permit Issued: 01/24/2022 Permit Effective: 02/01/2022 Permit Expired: 12/31/2026 Permit Status: Effective
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Facility Information

Facility Name: LAWRENCEBURG STP Facility Location: 110 EZELL DRIVE LAWRENCEBURG, TN 38464	County: Lawrence Region: 04 State-Region:	FRS ID: 110005006518 Federal Facility Ownership: N Type of Ownership: Municipal or Water District
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Effluent Violations

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	4/30/2023	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	3/31/2023	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	6 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	2/28/2023	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	4 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	1/31/2023	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	1/31/2023	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	12/31/2022	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	2 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	12/31/2022	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	5 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	8/31/2022	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	2 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	3/31/2022	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	2 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	2/28/2022	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	4 occur/mo	2,147,483,65 0%	<= occur/mo		

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. **X**) indicate the NODI code will not automatically resolve RNC.
 Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

NPDES ID(s): TN0022551

State: TN

Major/Minor Indicator:

Violation Date: 07/01/2020 - 07/05/2023

Violation Type(s): Effluent Violation

Environmental Protection Agency

Integrated Compliance Information System

Violations Report

TN0022551**Effluent Violations**

Violation Code	Monitoring Period End Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	SNC Group	EA Identifier	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date
E90	1/31/2022	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	1/31/2022	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	8 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	12/31/2021	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	4 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	10/31/2021	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	10/31/2021	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	9/30/2021	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	2 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	8/31/2021	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	13 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	6/30/2021	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	3/31/2021	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	9 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	2/28/2021	001-G	51926 - SSO, Wet Weather	T	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	12/31/2020	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	1 occur/mo	2,147,483,65 0%	<= occur/mo		
E90	9/30/2020	001-G	51925 - SSO, Dry Weather	U	0			Q1 MO TOTAL	2 occur/mo	2,147,483,65 0%	<= occur/mo		

DMR Non-Receipt Violations: Asterisks around a NODI Code (e.g. **X**) indicate the NODI code will not automatically resolve RNC.
Schedule Violations: Schedule Type P - Permit, A - Administrative, J - Judicial

Plant Protection Limits

Parameter	Pass through Con ug/L	Act. Sludge % removal D	Plant Protection ug/L E	Criteria I	50% Criteria ug/L Cell cont. K	Sludge wasted lbs per Day L	Avg Flow M	O
	C		C/(1-(D/100))		(M24*S24)/(1000*V24*8.34*(D24/100))			

Pass Through Limits from TDEC date 2.22.22

ug/L								
Arsenic	44.59	45	185.79	EPA LL Act Sludge	100	6.403025	41	1055
Copper *	76	83		EPA LL Nit @ 50%	265	138.7048	1500	1055
Chromium III	83			EPA LL Act Sludge	10000	250		
Chromium VI	22.47	83	132.18	TN Guid Nitrification	250			
Chromium *	60	83	352.94	EPA LL Nitrification	250			
Nickel	180	47	339.62	EPA LL Nitrification	250	62.80062	420	1055
Cadmium	5	85	33.33	EPA LL Act Sludge	1000	3.224479	39	1055
Lead	22.61	82	125.61	TN Guid Act Sludge	100	25.71114	300	1055
Mercury *	0.05	88	0.42	EPA LL Act Sludge	100	1.357626	17	1055
Zinc *	200	73	740.74	EPA LL Nit @ 50%	290	289.556	2800	1055
Molybdenum	41					12.85557	75	1055
Selenium	73					9.627002	100	1055
Silver, daily max.	4.7	83	27.85	TN Guid Act Sludge	250			
Cyanide	10.62	62	27.95	EPA LL Act Sludge	100			
Toluene	15	93	214.29	EPA LL Act Sludge	200000			
Benzene	3	77	13.04	EPA LL Act Sludge	100000			
1,1,1-Trichloroethane	30	88	250.00					
Ethylbenzene	4	90	40.00	EPA LL Act Sludge	200000			
Carbon Tetrachloride	15	99	1500.00					
Chloroform	85	62	223.68		10000			
Tetrachloroethylene	25	82	136.89					
Trichloroethylene	10	90	100.00					
1,2 Transdichloroethylene	1.5	80	7.50					
Methylene chloride	50	48	96.15					
Phenol	50	89	454.55	EPA LL Nitrification	4000			
Naphthalene	1	82	12.50	EPA LL Act Sludge	500000			
Bis(2-ethyl hexyl) phthalate		62	0.00					
Butyl benzyl phthalate		94	0.00					
D-n-butyl phthalate		66	0.00					
Diethyl phthalate		91	0.00					
Total Phthalate	64.5	62	169.74					

* percent removal from SAR's

Parameter	Plant Protection Criteria ug/L B= lowest value of column E G J	Loading lbs/day @ Design Flow B/(1000*8.34*\$B\$3)	Residential Loading mg/l Flow	Load in lbs F*G*34	Available Loading D-K= lbs	Available Load after Reserve is Removed	Monthly Average Local Limit at Flow 0.27 MGD	Daily Maximum Mo Avg *	1.5
Arsenic	6.4	0.240192	0.005	4.23	0.176391	0.063801	0.057421	Arsenic	0.03825
Copper	138.7	5.205411	0.0351	4.23	1.238265	3.967146	3.570432	Copper	2.378385
Chromium III	250	9.3825	0.00025	4.23	0.00882	9.37368	8.436312	Chromium III	5.619713
Chromium VI	132.18	4.9607154	0.00025	4.23	0.00882	4.951896	4.456706	Chromium VI	2.988763
Chromium *	250	9.3825	0.005	4.23	0.176391	9.206109	8.285458	Chromium *	5.51925
Nickel	62.8	2.356884	0.00254	4.23	0.089607	2.267277	2.04055	Nickel	1.359279
Cadmium	3.2244	0.1210117	0.001	4.23	0.035278	0.085734	0.07716	Cadmium	0.051399
Lead	25.711	0.9649338	0.0025	4.23	0.088196	0.876738	0.789064	Lead	0.525623
Mercury	0.42	0.0157628	0.0001	4.23	0.003528	0.012235	0.011011	Mercury	0.007335
Zinc	269.556	10.116437	0.0652	4.23	2.300139	7.816296	7.034668	Zinc	4.68603
Molybdenum	12.855	0.4824482	0.0025	4.23	0.088196	0.394253	0.354827	Molybdenum	0.236363
Selenium	9.627	0.3613013	0.005	4.23	0.176391	0.18491	0.166419	Selenium	0.110858
Silver, Daily max	27.85	1.0377045	0.0025	4.23	0.088196	0.849509	0.854558	Silver, Daily Mx	0.3795
Cyanide	27.95	1.0489635	0.0025	4.23	0.088196	0.860798	0.864691	Cyanide	0.576
Toluene	214.29	8.0423037	0.001185	4.23	0.041805	8.000499	7.200448	Toluene	4.786462
Benzene	13.04	0.4893912	0.0005	4.23	0.017639	0.471752	0.424577	Benzene	0.282625
1,1,1-Trichloroethane	250	9.3825	0.0005	4.23	0.017639	9.364661	8.426375	1,1,1-Trichloroethane	5.614425
Ethylbenzene	40	1.5012	0.000414	4.23	0.014586	1.486612	1.337951	Ethylbenzene	0.891254
Carbon Tetrachloride	1500	56.295	0.0005	4.23	0.017639	56.27736	50.64962	Carbon Tetrachloride	33.73943
Chloroform	223.68	8.3947104	0.001735	4.23	0.061208	8.333503	7.500152	Chloroform	4.986105
Tetrachloroethylene	138.69	5.2125417	0.0005	4.23	0.017639	5.184903	4.675412	Tetrachloroethylene	3.11445
Trichloroethylene	100	3.753	0.0005	4.23	0.017639	3.735361	3.361825	Trichloroethylene	2.239425
1,2 Transdichloroethylene	7.5	0.281475	0.0005	4.23	0.017639	0.263836	0.237452	1,2 Transdichloroethylene	0.158175
Methylene chloride	96.15	3.6085095	0.0025	4.23	0.068196	3.520314	3.168283	Methylene chloride	2.1105
Phenol	454.55	17.059262	0.0608	4.23	2.137859	14.9214	13.42826	Phenol	8.945685
Naphthalene	12.5	0.469125	0.001375	4.23	0.048508	0.420617	0.378556	Naphthalene	0.252169
Bis(2-ethyl hexyl) phthalate			0.00715	4.23	0.252239	-0.252239	-0.227015	Bis(2-ethyl hexyl) phthalate	
Butyl benzyl phthalate			0.0015	4.23	0.052917	-0.052917	-0.047628	Butyl benzyl phthalate	
D-n-butyl phthalate			0.0015	4.23	0.052917	-0.052917	-0.047628	D-n-butyl phthalate	
Diethyl phthalate			0.0015	4.23	0.052917	-0.052917	-0.047628	Diethyl phthalate	
Total Phthalate	169.74	6.3703422	0.00715	4.23	0.252239	6.116103	5.506293	Total Phthalate	3.667928

PLANT PROTECTION DATA

Design Capital Exp	2.5	MGD
Design Flow	1.3	MGD
Sludge Wasted	1055	lbs/day
Pass Through Limit	2.22.22	
Notification Req	Y/N	

LOCAL LIMIT DATA

Residential Loading	0.005	MGD
Local Limit at Flow	0.27	MGD
Sludge Wasted	1055	MGD
Pass Through Limit	2.22.22	MGD
Notification Req	Y/N	

Local Limits
corrected
8.08.22

Local Limits
Enlarged
Copy for Audit
8.0f

Monthly Average
Local Limit at Flow
0.27 MGD

Daily Maxim
Mo Avg *

0.0255	Arsenic	0.03825
1.58559	Copper	2.378385
3.746475	Chromium III	5.6197125
1.979175	Chromium VI	2.9687625
3.6795	Chromium	5.51925
0.906186	Nickel	1.359279
0.034266	Cadmium	0.051399
0.350415	Lead	0.5256225
0.00489	Mercury	0.007335
3.12402	Zinc	4.68603
0.157575	Molybdenum	0.2363625
0.073905	Selenium	0.1108575
	Silver, Daily Mx	0.3795
0.384	Cyanide	0.576
3.1976415	Toluene	4.7964623
0.18855	Benzene	0.282825
3.74295	1,1,1-Trichloroethane	5.614425
0.59416965	Ethybenzene	0.8912545
22.49295	Carbon Tetrachloride	33.739425
3.3307365	Chloroform	4.9961048
2.0763	Tetrachloroethylene	3.11445
1.49295	Trichlorethylene	2.239425
0.10545	1,2 Transdichloroethyler	0.158175
1.407	Methylene chloride	2.1105
5.96379	Phenol	8.945685
0.1681125	Naphthalene	0.2521688
	Bis(2-ethyl hexyl) phathalate	
	Butyl benzyl phathalate	
	Di-n-butyl phathalate	
	Diethyl phathalate	
2.445285	Total Phathalate	3.6679275

LAWRENCEBURG INDUSTRIAL PRETREATMENT PROGRAM

ACTIVITY 7 - MONITORING PROGRAM

1. General

Lawrenceburg's program will utilize all four types of monitoring, i.e. scheduled, unscheduled, demand and self-monitoring. The types of monitoring are briefly defined as follows:

- a. Scheduled Monitoring - involves systematic sampling and comprehensive inspection of significant industrial contributors in accordance with a predetermined schedule.
- b. Unscheduled Monitoring - involves an unannounced (except to gain access if needed) check of industrial contributor during normal operation. Check may include flow measurement and sampling.
- c. Demand Monitoring - is conducted in response to upset, interference or other disruption of POTW operation which could be attributed to possible industrial discharges.
- d. Self-Monitoring - involves regular sampling, analysis and reporting by the industrial discharger and particularly applies to Federally regulated "Categorical Industries" and others who operate pretreatment facilities.

Lawrenceburg's IWS identified only one "Categorical Industry", that being Modine Manufacturing Company, which falls under the Electroplating category, 40 CFR 413. A second industry, now operating as Curtis Industries, may also fall under the Electroplating category. They have been so notified and requested to submit an updated industrial pretreatment questionnaire.

Other industries reported only domestic waste discharges ranging from as low as 250 GPD to 150,000 GPD for the Murray Ohio Manufacturing facility which discharges its process waste under its own NPDES permit. Swift and Company, who reported a process waste, has since closed its cheese plant in Lawrenceburg.

2. Proposed Monitoring Schedule

a. Scheduled Monitoring

Within six months of the adoption of the Pretreatment Program, Lawrenceburg will schedule a site inspection of those industries included in the Industrial Waste Survey plus any industries who

have begun operations since the IWS was conducted. An IWS Questionnaire will be sent to new industries for submission prior to the scheduled site inspection. All industries to be inspected will be sent a written notice at least one week prior to the scheduled inspection. The notice will also inform the industry, citing proper City, State and Federal Ordinances, Regulations and Laws, of the City's authority to conduct future scheduled, unscheduled and demand monitoring inspections.

Except for those industries covered by Categorical Standards or with known process waste, the initial inspection visit will be primarily for the purpose of verifying the information in the IWS Questionnaire and to familiarize the City's Pretreatment personnel with the plant layout. Observations will be made to determine if any process wastes exist and, if so, whether they are being or could be discharged into the City's system.

Generally, for small industries reporting only domestic waste, this inspection will be cursory and brief. However, the inspection of the larger plants, particularly Murray-Ohio will need to be rather extensive, requiring the assistance and cooperation of the Company plant engineering staff.

For Modine Manufacturing, and possibly Curtis Industries, if they prove to be discharging a categorical or process waste, the initial visit will include collection and analysis of a flow proportioned composite sample of their discharge in addition to the general facility inspection. The samples will be collected at the industry's in-plant discharge point if the inspector determines a true representative sample can be obtained there, or in the City's manhole at the point of discharge of the plant's service line. All samples will be split and shared with the industry which may have the samples analyzed independently.

Following these initial inspections, an annual monitoring inspection will be scheduled for Modine Manufacturing and Murray-Ohio, and Curtis Industries and/or any other industry which the initial inspection indicates has process wastes.

b. Unscheduled Monitoring

Unscheduled monitoring will be performed on all industries which have scheduled monitoring and any other industry which has the potential or is suspected of discharging wastes which could be classified as a "prohibited discharge" under 40 CFR 405.5. At least once a year, unscheduled monitoring will be performed at Modine Manufacturing and Murray-Ohio. If practical, flow measurement and flow-proportional sampling will be done at the City's

manhole or manholes to which the industry's service or services are connected. If sampling must be done inside the User's premises, then only the shortest notice practical will be given.

Other industries will be monitored on an unscheduled basis randomly as deemed appropriate by the City's Superintendent.

In all cases samples will be split and a portion offered to the industry for independent analysis.

c. Demand Monitoring

Whenever interference, upset or pass through which may be caused by an industrial user occurs at the POTW or whenever discharge of prohibited materials is suspected or confirmed, the City may conduct demand monitoring in an attempt to ascertain the source of the discharge. Demand monitoring would be initiated without notice except to gain access to the IU's premises if needed and may involve grab sampling in most cases in lieu of flow proportionate composite sampling since quick response could be the key element in locating a problem discharge.

d. Self-Monitoring

At the present time, only Modine Manufacturing Company has pretreatment facilities. It has already submitted its Baseline Effluent Report per 40 CFR 403.12. In addition, Modine will be required to submit to the City during June and December each year periodic reports in compliance with 40 CFR 403.12,e.

The same requirements will be placed on Curtis Industries if it is determined that it falls under the Categorical Standards and on any future industrial users who will be covered by Categorical Standards.

An updated IWS Questionnaire will be required annually in June from each industrial user to report any changes in the volume, strength or nature of their waste discharge.

3. Sampling Collection and Handling

Samples shall be collected by grab sampling, simple composite or flow proportioned composite method as is appropriate for type of monitoring being conducted. Portable flow metering and automatic proportionate samples will be obtained for use by the City's Pretreatment Program personnel.

Samples will be handled and preserved in accordance with Standard Methods, EPA's Chemical Methods Manual, and Appendix 4, Tennessee Department of Health and Environment Procedures Manual.

LAWRENCEBURG, TENNESSEE

MONITORING SCHEDULE

INDUSTRIAL USER	SCHEDULED		UNSCHEDULED	DEMAND	SELF-MONITORING	IWS QUESTIONNAIRE UPDATE
	INITIAL	ANNUAL				
MODINE MANUFACTURING	X	1 Year	1 Year	As Required	2 Year	1 Year
CURTIS MANUFACTURING *	X	1 Year	1 Year	As Required	2 Year	1 Year
MURRAY-OHIO MANUFACTURING	X	1 Year	1 Year	As Required	N/A	1 Year
B&S CONCRETE	X	N/A	N/A	As Required	N/A	1 Year
CRAZY HEAD LURE COMPANY	X	N/A	N/A	As Required	N/A	1 Year
DYNA-PAK CORPORATION	X	N/A	N/A	As Required	N/A	1 Year
HP TOOL & DIE COMPANY	X	N/A	N/A	As Required	N/A	1 Year
KAY WINDSOR MFG. COMPANY	X	N/A	N/A	As Required	N/A	1 Year
KIMBERLY MANUFACTURING	X	N/A	N/A	As Required	N/A	1 Year
LINDSEY MFG. COMPANY	X	N/A	N/A	As Required	N/A	1 Year
TENNESSEE STEEL MFG. CO.	X	N/A	N/A	As Required	N/A	1 Year
TRADERS PACKAGING CORP.	X	N/A	N/A	As Required	N/A	1 Year
WEBSTER INDUSTRIES, INC.	<u>X</u>	<u>N/A</u>	<u>N/A</u>	<u>As Required</u>	<u>N/A</u>	<u>1 Year</u>
TOTAL	13	3/Year	3/Year	As Required	4/Year	13/Year

* Subject to results of IWS Questionnaire

Chain of Custody forms and procedures will be used by the City's sampling personnel to insure the integrity of the samples from sampling point to laboratory.

In all cases sufficient volume of sample will be obtained to offer an adequate portion to the IU to allow for independent analysis to verify the results.

4. Laboratory Analysis

Laboratory analysis will be done at the POTW's own laboratory or by a private, independent laboratory. Generally, only basic parameters such as BOD₅, suspended solids, pH, COD, l, fecal coliform, will be analyzed at the City's laboratory. Metal and other parameters requiring atomic absorption spectrometer or gas chromatograph mass spectrometer will be done on a contract basis with a private laboratory. Laboratory work will be done in accordance with APHA's "Standard Methods for Examination of Water and Wastewater", EPA's "Manual of Methods for Chemical Analysis of Water and Wastes" or ASTM Annual Book of Standards, Part 31, Water Atmospheric Analysis.

The City presently contracts laboratory work to Environmental Science and Engineering Corporation. Other private laboratories, such as AWARE are also accessible and occasional split samples may be sent to two laboratories in order to verify the results.

5. Organization and Staffing

Because Lawrenceburg's Pretreatment Program presently involves a small number of significant industrial users, no new staff positions are anticipated. Rather, existing staff personnel will be assigned responsibility for the various tasks. The organization chart attached shows the various positions and persons assigned.

WORKSHEET P

Developing an Organization Plan

NOTE:

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

8-15

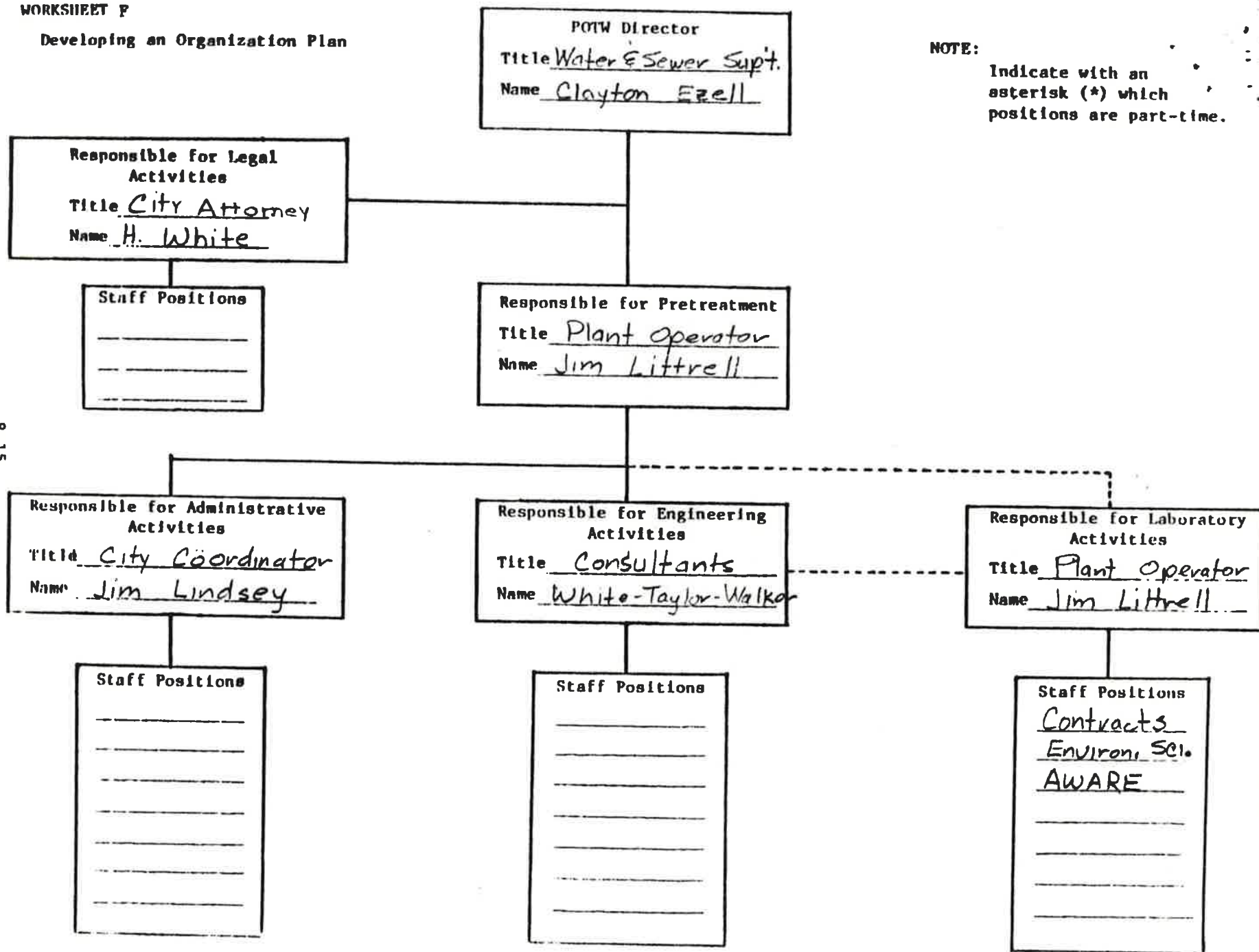


TABLE 7.1

LEVEL OF EFFORT ESTIMATE GUIDE FOR IMPLEMENTING LOCAL PRETREATMENT PROGRAMS

IU	Pretreatment Program Task						Total
	Monitoring*	Analyses	Records Management	Records Review	Enforcement	Administration	
MODINE	24	24	8	8	4	8	76
CURTIS	24	24	8	8	4	8	76
MURRAY-OHIO	24	24	8	8	4	8	76
OTHERS	<u>24</u>	<u>24</u>	<u>8</u>	<u>8</u>	<u>4</u>	<u>8</u>	<u>76</u>
Total	96	96	32	32	16	32	304

* Monitoring includes sampling and transportation

Received prior to audit
2024

Permit No. 06

INDUSTRIAL USER PERMIT

In accordance with the provisions of the Lawrenceburg, Tennessee Sewer Use Regulations,

Hughes Parker Industry, LLC
Plant #1
1604 Mahr Ave
Lawrenceburg, Tennessee 38464

is hereby authorized to discharge industrial wastewater from the above-identified facility located at 1604 Mahr Avenue into Lawrenceburg's Sewer System in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under local, State, and Federal laws, including any such regulation, standards, or requirements or laws that may become effective during the term of this permit. Noncompliance with any terms or conditions of this permit shall constitute a violation of Lawrenceburg's Sewer Use Regulations.

If the permittee wishes to continue to discharge after the expiration date of this permit, an applicant has the responsibility to file for a renewal permit in accordance with the requirements of Section 18.307 (7) (f) of the Sewer Use Regulations, a minimum of 90 days prior the expiration date.

This permit shall become effective on: October 1, 2022

This permit shall expire on: September 30, 2026

Issued date: September 22, 2022

BY:



Pretreatment Coordinator
Lawrenceburg Utility Systems

Hughes Parker 1

MONITORING REQUIREMENTS

A. Effluent Limitations

The permittee shall not discharge any waste water in excess of the concentration set forth in the table listed below:

Parameters	Daily Maximum mg/L	Monthly Average mg/L	Frequency	Type Sample
Cadmium	0.162	0.108	1/Quarter	24 hr. Composite
Chromium VI	1.39	0.9273	1/Quarter	24 hr. Composite
Chromium, Total	1.29	0.8604	1/Quarter	24 hr. Composite
Copper	3.38	2.07	1/Quarter	24 hr. Composite
Lead	0.69	0.43	1/Quarter	24 hr. Composite
Nickel	3.51	2.34	1/Quarter	24 hr. Composite
Silver	0.43	0.24	1/Quarter	24 hr. Composite
Zinc	2.61	1.48	1/Quarter	24 hr. Composite
Cyanide	0.25	0.1699	1/Quarter	Grab
Mercury	0.01	0.0069	1/Quarter	24 hr. Composite
pH	5.5 - 9.0		Continuous	Grab
TTO	2.13		1/Quarter	24 hr. Composite
Total Phenols	8.94	5.96	1/Quarter	Grab
Flow, gallons	Report Only		Daily	Continuous

Sample location is at the end of the wash line and is collected prior to discharge into the sewer system.

The permittee is required to notify the LUS's pretreatment coordinator if this discharge changes.

Composite samples must be flow proportional.

DISCHARGE REGULATIONS

A. General Prohibited Substances

The permittee shall not discharge wastewater containing any of the following substances in to the POTW as follows:

1. Pollutants which create a fire or explosion hazard in the POTW, including but not limited to, waste streams with a closed cup flashpoint of less than 140° F. (or 60° C) using the test methods specified in 40 CFR 261.21.

2. Solid or viscous substances which may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities such as, but limited to: grease, garbage with particles greater than one-half inch (½") in any dimension, paunch manure, animal body parts or waste from animal slaughter, feathers, ashes, cinders, sand, spent lime, stone or marble dust, 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 wastes. Unusual concentrations of inert suspended solids (such as, but not limited to, fullers earth, lime slurries, and lime residues) or of dissolved solids (such as, but not limited to, sodium chloride and sodium sulfate).

3. Any wastewater having a pH less than 5.5 or higher than 9.0 or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW.

4. Any wastewater containing any toxic pollutants, chemical elements, or compounds in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or to exceed the limitation set forth in a categorical pretreatment standard. A toxic pollutant shall include but not be limited to any pollutant identified pursuant to Section 307(a) of the Act.

5. Any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair.

6. Any substance which may cause the POTW's effluent or any other product of the POTW such as residues, sludges, or scums, to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case, shall a substance discharged to the POTW cause the POTW to be in non-compliance with sludge use or disposal criteria, guidelines or regulations developed under Section 405 of the Act; any criteria, guidelines, or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or state criteria applicable to the sludge management method being used.

7. Any substance which will cause the POTW to violate its NPDES permit or the receiving water quality standards.

8. Any wastewater causing discoloration of the wastewater treatment plant effluent to the extent that the receiving stream water quality requirements would be violated, such as, but not limited to, dye wastes and vegetable tanning solutions.

9. Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at the introduction into the POTW which exceed 40°C (104°F).

10. Any pollutants, including oxygen demanding pollutants (BOD, etc.) released at a flow rate and/or pollutant concentration which a user knows or has reason to know will cause interference to the POTW.

11. Any waters or wastes causing an unusual volume of flow or concentration of waste constituting "slug" as defined herein.

12. Any wastewater containing any radioactive wastes or isotopes of such half life or concentration as may exceed limits established by the local Administrative Officer in compliance with applicable state or federal regulations.

13. Any wastewater which causes a hazard to human life or creates a public nuisance.

14. Any waters or wastes containing fats, wax, grease, or oil, whether emulsified or not, in excess of one hundred (100) mg/l or containing substances which may solidify or become viscous at temperature between thirty-two (32) and one hundred fifty (150) degrees F (0° and 65° C).

15. Any stormwater, surface water, groundwater, roof runoff, subsurface drainage, uncontaminated cooling water, or unpolluted industrial process waters to any sanitary sewer. Stormwater and all other unpolluted drainage shall be discharged to such sewers as are specifically designated as storm sewers, or to a natural outlet approved by the local Administrative Officer and the Tennessee Department of Environment and Conservation. Industrial cooling water or unpolluted process waters may be discharged on approval of the local Administrative Officer and the Tennessee Department of Environment and Conservation, to a storm sewer or natural outlet.

16. Any discharge of wastestreams whose vapors ignite and burn at less than 140° F.

17. Petroleum oil, non-biodegradable cutting oil or products of mineral oil origin in amounts that will cause interference or pass through.

18. Pollutants, which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that, may cause acute workers health and safety problems.

19. Any trucked or hauled pollutants that have not been permitted and/or approved by the local Administrative Officer, and discharging of trucked or hauled waste, except at designated discharge points.

All permittees shall comply with all other applicable laws, regulations, standards, and requirements contained in Lawrenceburg Utility Systems' Sewer Use Regulations and any applicable State and Federal pretreatment laws, regulation, standards and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this permit.

B. Monitoring Facilities

Permittee shall install a suitable control manhole together with such necessary meters and other appurtenances to facilitate observation, sampling and measurement of wastes. Such manhole, shall be accessibly and safely located, and shall be constructed in accordance with plans approved by the local Administrative Officer.

Monitoring facilities that are required to be installed shall be constructed and maintained at the

permittee's expense. The purpose of the facility is to enable inspection, sampling, and flow measurements of wastewater produced by the permittee. If sampling or metering equipment is also required by the local Administrative Officer, it shall be provided and installed at the permittee's expense.

C. Monitoring Results

Self-monitoring discharge reports must be signed and certified by a principal corporate executive of at least the level of vice-president, a general partner or proprietor, or a principal municipal executive officer or ranking elected official, or his duly authorized representative.

D. Sample Handling & Preservation

All handling and preservation of collected samples and laboratory analysis of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit. A picture of the sampling location (see Appendix A).

E. TTO Monitoring Requirements

The term "Total Toxic Organics (TTO)" shall refer to the summation of all quantifiable values greater than 0.01 milligrams per liter for the priority pollutants listed in Section 433.11(e). TTO's shall be tested once per life of permit. (40 CFR 403.12(e)(2).

In lieu of monitoring for TTOs and provided toxic organic compounds (TOCs) are not used in the manufacturing process, the permittee must make the following certification statement on each discharge monitoring report indicating that TOCs are not being used at the facility in any process that might cause such to be discharged to the sanitary sewer system as required in Section 433.12(a).

"Based on my inquiry of the person or persons 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 wastewater has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the control authority."

To request that no monitoring be required, the permittee shall submit a solvent management plan to the local Administrative Officer which specifies procedures for ensuring that toxic organics used do not routinely spill or leak into the wastewater and that there is no deliberate dumping of any of the solvents. The criteria for a toxic management plan include the following:

1. identification of toxic organics used,
2. the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration, etc.; and

3. the procedures for assuring that toxic organics do not spill or leak into wastewater
- REPORTING REQUIREMENTS**

A. Monitoring Reports

Monitoring results obtained shall be summarized and reported on a Monitoring Report form to the Lawrenceburg Utility Systems monthly. These reports are due on or before the 15th day of the first month following the sampling month. The months are as follows:

<u>Test Date</u>	<u>Due Date</u>
April 1 st - September 30 th	October 15 th
October 1 st - March 31 st	April 15 th

The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analysis were performed. It shall also include information showing the measured average daily flow in gallons per day to the POTW from regulated process streams.

If the permittee monitors any pollutants more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and shall be reported in the monthly report submitted to the Lawrenceburg Utility System.

B. Automatic Re-sampling

If sampling performed by the permittee indicates that a violation of this permit has occurred, the permittee must:

1. contact the Lawrenceburg Utility Systems WWTP at 931.201.1134 of the violation within 24 hours; and
2. repeat the sampling and pollutant analysis, and submit to the CA in writing, the results of the analysis within 30 days of the first violation.

C. Notification of Changed Discharge

The permittee shall notify the Lawrenceburg Utility Systems WWTP in advance of any of the following changes in the User's wastewater discharge to the POTW:

1. substantial changes in any characteristics of the User's wastewater discharge including volume of flow .
2. the amount of concentration of regulated (under categorical standards or local limits), or unregulated pollutants;
3. the discharge of new pollutants not previously reported to the Lawrenceburg Utility Systems.

D. Notification of Additional Change(s)

The permittee shall notify the Lawrenceburg Utility System of any change in the manufacturing and/or pretreatment process used by the permittee.

E. Accidental Discharge Report

The permittee shall notify the Lawrenceburg Utility Systems immediately upon the occurrence of an accidental discharge of substances prohibited in this permit (Discharge Regulations) or any slug loads, spills or unanticipated bypasses that may enter the public sewer. The wastewater treatment plant can be notified of any accidental discharge or bypass by calling 931.201.1134. The notification shall include location of discharge, date, and time thereof, type of waste including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.

Within 5 days following an accidental discharge or bypass, the permittee shall submit to the Lawrenceburg Utility Systems WWTP a detailed written report. The report shall specify:

1. description and cause of the upset, slug load, accidental discharge or bypass, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.
2. duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.
3. all steps taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, bypass or other conditions of noncompliance.

All reports required by this permit shall be submitted to the Lawrenceburg Utility Systems at the following address:

Lawrenceburg Utility Systems
Wastewater Treatment Plant
P.O. Box 649
Lawrenceburg, Tennessee 38464
Attention: Pretreatment Coordinator

F. Slug Control Plan

The permittee shall have a slug control plan outlining procedures necessary to prevent or minimize the potential for any accidental or slug discharge into the sewer system. It shall provide detailed plans of the facilities and operating procedures and be updated annually to

include any changes of procedures and contact information.

G. Notification of Hazardous Waste Discharge

If the permittee commences to discharge hazardous waste, the Lawrenceburg Utility Systems, EPA Regional Water Management Division Director, and State hazardous waste authorities shall be notified 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.

STANDARD CONDITIONS

A. Falsifying Information

Knowingly making any false statement on any report required by this permit or who tampers with, or knowingly renders inaccurate any monitoring device or method required, should, upon conviction be punished by a fine or by imprisonment as set out in the Sewer Use Regulations, Section 18.309(2)(c).

B. Re-opener Clause

This permit may be reopened and modified to incorporate any new or revised requirements developed by the Lawrenceburg Utility Systems as are necessary to ensure POTW compliance with applicable requirements promulgated by EPA.

C. Maintenance of Records

The Sewer Use Regulations, Section 18.308 (7) provides that any Industrial User subject to the reporting requirements shall maintain records of all information resulting from any monitoring activities required. Such records shall include for all samples;

1. the date, exact place, method, and time of sampling and the names of the person(s) taking the samples;
2. the date analysis was performed;
3. who performed the analysis;
4. the analytical techniques/methods used; and
5. the results of such analysis.

D. Retention of Records

The permittee shall retain records of all monitoring information and results for a period of at least three (3) years from date of sample, measurement, report or application, and shall make such records available for inspection and copying by the local Administrative Officer and/or his representative, Tennessee Department of Environment & Conservation, Division of Water Resources and EPA. This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Tennessee Department

of Conservation (TDEC) or EPA.

E. Entering, Inspection, and Sampling

The Lawrenceburg Utility System, TDEC and EPA shall have the right to have authorized representative(s) to:

1. have a right of entry to, upon or through any premises in which an effluent source is located, or which records required to be maintained by the permittee are located and;
2. at reasonable time, have access to and copy any records, inspect the monitoring equipment or methods, (required of the permittee) and sample any effluent which the owner or operator of such source is generating;
3. have the right to set up on the permittee's property such devices as are necessary to conduct sampling inspection, compliance monitoring and/or metering operations. The permittee shall make necessary arrangements with their security personnel to permit to enter such authorized representatives without delay, for the purposes of performing specific responsibilities.

F. Signatory Requirements

All applications, reports, or information submitted to the Lawrenceburg Utility Systems Department must contain the following certification statement and be signed as required in Section (1), (2), (3), or (4) below

"I certify under 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 properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons 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 possibilities of fine and imprisonment for knowing violations."

1. By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:
 - (a) a president, secretary, treasurer, or vice-president of the corporation in charge of a principle business function or any other person who performs similar policy or decision making functions for the corporation.
2. By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.
3. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.
4. by a duly authorized representative of the individual designated in paragraph (1), (2), or (3) of this section if:
 - (a) the authorization is made in writing by the individual described in paragraph (1), (2), or (3);
 - (b) the authorization specifies either an individual or a position having

- responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, a well field superintendent, or having overall responsibility for environmental matters for the company; and
- (c) the written authorization of submitted to Lawrenceburg Utility Systems.

5 If an authorization under paragraph (4) of this section is no longer accurate because a different individual or position has responsibility for the environmental matters for the company, a new authorization satisfying the requirements of paragraph (4) of this section must be submitted to Lawrenceburg Utility Systems prior to or together with any reports to be signed by an authorized representative.

G. Annual Publication

A list of all industrial users, which were subject to enforcement proceedings during the six (6) previous months, may be annually published by the Lawrenceburg Utility Systems in the largest daily newspaper within its service area. Accordingly, the permittee is apprised that noncompliance with this permit may lead to enforcement action and may result in publication of its name in an appropriate newspaper in accordance with this section.

H. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under Section 18.309 of the Sewer Use Regulations, or State or Federal laws or regulations.

I. Permit Transfer

Permits are issued to a specific User for a specific operation. Permits shall not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation with out the approval of Lawrenceburg Utility Systems. This permit may be transferred to a new owner, if the industrial process remains the same at the same location and is authorized by LUS with the following conditions:

1. the permittee must give a least thirty (30) days advance notice to LUS,
2. the notice must include a written certification by the new owner which:
 - a. states that the new owner has no immediate intent to change the facility's operations and processes,
 - b. identifies the specific date on which the transfer is to occur,
 - c. and, acknowledges full responsibility for complying with the existing permit

Upon approval by LUS, a copy of the existing permit shall be given to the new permit owner.

J. Permit Termination

Any permit issued under the provisions of Lawrenceburg Utility Systems' Sewer Use Regulations is subject to be modified, suspended, revoked in whole or in part during its term for cause including, but not limited to, the following:

1. falsifying self-monitoring reports.
2. tampering with monitoring equipment.
3. refusing to allow timely access to the facility and records.
4. failure to meet effluent limitations.
5. failure to pay penalties.
6. failure to pay sewer charges.
7. failure to meet compliance schedules.
8. violation of any term or condition of this permit or the Sewer Use Regulations, or other applicable Federal, State, or local law or regulation.

K. Cost of Monitoring and Testing

All permittees shall be required to pay the cost of any and all laboratory analysis for any monitoring of industrial discharge taken by a Lawrenceburg Utility Systems employee and/or persons designated by the local Administrative Officer. In addition, industrial users shall pay surcharges in the amount necessary to recover treatment costs incurred in treating extra-strength and non-compatible waste discharge over the permit level as set out in Section 18.310 of the Sewer Use Regulations.

L. Penalty

Any person who intentionally or negligently violates any provision of this permit or who discharges wastewater which causes pollution, or who violates any cease and desist order, prohibition, effluent limitation, or pretreatment standard shall, upon conviction, be punished by a penalty not to exceed \$10,000.00 per parameter per day. An Administrative penalty of a maximum of \$10,000.00 per violation per day may also be levied by the Lawrenceburg Utility Systems Sewer Division upon confirmation of such violations. Each day any violation of this permit continues shall constitute a separate offense.

CLASSIFICATION

Hughes Parker #1 is classified as being Categorical, Metal Finishing, Existing Source, 433.15

APPENDIX A

Definitions

1. Biochemical Oxygen Demand (BOD) – The quantity of oxygen utilized in biochemical oxidation of organic matter under standard laboratory procedures, five (5) days at 20 degrees centigrade expressed in terms of weight and concentration (mg/l).
2. Environmental Protection Agency, or EPA – The United States Environmental Protection Agency, or where appropriate the term may also be used as a designation for the Administrator or other duly authorized official of said agency.
3. Grab Sample – An individual sample collected over a period of time not exceeding 15 minutes.
4. Local Administrative Officer – The person designated by the LUS to supervise the operation of the Publicly Owned Treatment Works (POTW) and who is charged with certain duties and responsibilities by this article, or his duly authorized representative.
5. NPDES – (National Pollutant Discharge Elimination System) – The program for issuing, conditioning, and denying permits for the discharge of pollutants from point sources into navigable waters, the contiguous zone, and the oceans pursuant to section 402 of the Federal Water Pollution Control Act as amended.
6. pH – A measure of the hydrogen ion concentration; any pH below 7.0 is acidic and any pH above 7.0 is basic.
7. Pollutant – Any dredge soil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions chemical substances, biological materials, radioactive materials, heat, wrecked or discharged equipment, rock, sand, cellar dirt, and industrial, municipal, and agricultural waste discharged into water.
8. Pollution – The man-made or man-induced alteration of the chemical, physical, biological, and radioactive integrity of water.
9. Pretreatment or Treatment – 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 by physical, chemical, or biological processes, or process changes by other means, except as prohibited by 40 CFR Section 403.36 (d).
10. Pretreatment Requirements – Any substantive or procedural requirements related to pretreatment, other than a National Pretreatment Standard imposed on an Industrial User.

11. Publicly Owned Treatment Works (POTW) – A treatment works as defined by Section 212 of Clean Water Act which is owned in this instance by the Lawrenceburg Utility Systems. This definition includes any sewers that convey wastewater to the POTW treatment plant, but does not include pipes, sewers or other conveyances not connected to a facility providing treatment.
12. Shall is mandatory; May is permissive.
13. Twenty-Four (24) Hour Flow Proportional Composite Sample – A combination of not less than 8 influent or effluent portions, of at least 100 ml, collected over 24 hour period. Under certain circumstance a lesser time period may be allowed, but in no case, less than 8 hours.
14. User – Any person who contributes, causes or permits the contribution of wastewater in LUS's POTW.

Received prior to audit
2.9.1

Permit No. 07

INDUSTRIAL USER PERMIT

In accordance with the provisions of the Lawrenceburg, Tennessee Sewer Use Regulations,

Hughes Parker Industry, LLC
Plant #2
200 Helton Drive
Lawrenceburg, Tennessee 38464

is hereby authorized to discharge industrial wastewater from the above-identified facility located at 200 Helton Drive into Lawrenceburg's Sewer System in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under local, State, and Federal laws, including any such regulation, standards, or requirements or laws that may become effective during the term of this permit. Noncompliance with any terms or conditions of this permit shall constitute a violation of Lawrenceburg's Sewer Use Regulations.

If the permittee wishes to continue to discharge after the expiration date of this permit, an applicant has the responsibility to file for a renewal permit in accordance with the requirements of Section 18.307 (7) (f) of the Sewer Use Regulations, a minimum of 90 days prior the expiration date.

This permit shall become effective on: October 1, 2022
This permit shall expire on: September 30, 2026

Issued date: September 22, 2022

BY:


Pretreatment Coordinator
Lawrenceburg Utility Systems

Hughes Parker 2

MONITORING REQUIREMENTS

A. Effluent Limitations

The permittee shall not discharge any waste water in excess of the concentration set forth in the table listed below:

Parameters	Daily Maximum mg/L	Monthly Average mg/L	Frequency	Type Sample
Cadmium	0.162	0.108	1/Quarter	24 hr. Composite
Chromium VI	1.39	0.9273	1/Quarter	24 hr. Composite
Chromium, Total	1.29	0.8604	1/Quarter	24 hr. Composite
Copper	3.38	2.07	1/Quarter	24 hr. Composite
Lead	0.69	0.43	1/Quarter	24 hr. Composite
Nickel	3.51	2.34	1/Quarter	24 hr. Composite
Silver	0.43	0.24	1/Quarter	24 hr. Composite
Zinc	2.61	1.48	1/Quarter	24 hr. Composite
Cyanide	0.25	0.1699	1/Quarter	Grab
Mercury	0.10	0.0069	1/Quarter	24 hr. Composite
pH	5.5 - 9.0		Continuous	Grab
TTO	2.13		1/Quarter	24 hr. Composite
Total Phenols	8.94	5.96	1/Quarter	Grab
Flow, gallons	Report Only		Daily	Continuous

Sample is collected after the 7 stage DI process prior to discharge into the sewer system.

The permittee is required to notify the LUS's pretreatment coordinator if this discharge changes.

Composite samples must be flow proportional.

DISCHARGE REGULATIONS

A. General Prohibited Substances

The permittee shall not discharge wastewater containing any of the following substances in to the POTW as follows:

1. Pollutants which create a fire or explosion hazard in the POTW, including but not limited to, waste streams with a closed cup flashpoint of less than 140° F. (or 60° C) using the test methods specified in 40 CFR 261.21.
2. Solid or viscous substances which may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities such as, but not limited to: grease, garbage with particles greater than one-half inch (1/2") in any dimension, paunch manure, animal body parts or waste from animal slaughter, feathers, ashes, cinders, sand, spent lime, stone or marble dust, 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 wastes. Unusual concentrations of inert suspended solids (such as, but not limited to, fullers earth, lime slurries, and lime residues) or of dissolved solids (such as, but not limited to, sodium chloride and sodium sulfate).
3. Any wastewater having a pH less than 5.5 or higher than 9.0 or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW.
4. Any wastewater containing any toxic pollutants, chemical elements, or compounds in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or to exceed the limitation set forth in a categorical pretreatment standard. A toxic pollutant shall include but not be limited to any pollutant identified pursuant to Section 307(a) of the Act.
5. Any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair.
6. Any substance which may cause the POTW's effluent or any other product of the POTW such as residues, sludges, or scums, to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case, shall a substance discharged to the POTW cause the POTW to be in non-compliance with sludge use or disposal criteria, guidelines or regulations developed under Section 405 of the Act; any criteria, guidelines, or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act, or state criteria applicable to the sludge management method being used.
7. Any substance which will cause the POTW to violate its NPDES permit or the receiving water quality standards.
8. Any wastewater causing discoloration of the wastewater treatment plant effluent to the extent that the receiving stream water quality requirements would be violated, such as, but not limited to, dye wastes and vegetable tanning solutions.
9. Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature at

the introduction into the POTW which exceed 40°C (104°F).

10. Any pollutants, including oxygen demanding pollutants (BOD, etc.) released at a flow rate and/or pollutant concentration which a user knows or has reason to know will cause interference to the POTW.

11. Any waters or wastes causing an unusual volume of flow or concentration of waste constituting "slug" as defined herein.

12. Any wastewater containing any radioactive wastes or isotopes of such half life or concentration as may exceed limits established by the local Administrative Officer in compliance with applicable state or federal regulations.

13. Any wastewater which causes a hazard to human life or creates a public nuisance.

14. Any waters or wastes containing fats, wax, grease, or oil, whether emulsified or not, in excess of one hundred (100) mg/l or containing substances which may solidify or become viscous at temperature between thirty-two (32) and one hundred fifty (150) degrees F (0° and 65° C).

15. Any stormwater, surface water, groundwater, roof runoff, subsurface drainage, uncontaminated cooling water, or unpolluted industrial process waters to any sanitary sewer. Stormwater and all other unpolluted drainage shall be discharged to such sewers as are specifically designated as storm sewers, or to a natural outlet approved by the local Administrative Officer and the Tennessee Department of Environment and Conservation. Industrial cooling water or unpolluted process waters may be discharged on approval of the local Administrative Officer and the Tennessee Department of Environment and Conservation, to a storm sewer or natural outlet.

16. Any discharge of wastestreams whose vapors ignite and burn at less than 140° F.

17. Petroleum oil, non-biodegradable cutting oil or products of mineral oil origin in amounts that will cause interference or pass through.

18. Pollutants, which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that, may cause acute workers health and safety problems.

19. Any trucked or hauled pollutants that have not been permitted and/or approved by the local Administrative Officer, and discharging of trucked or hauled waste, except at designated discharge points.

All permittees shall comply with all other applicable laws, regulations, standards, and requirements contained in Lawrenceburg Utility Systems' Sewer Use Regulations and any applicable State and Federal pretreatment laws, regulation, standards and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this permit.

B. Monitoring Facilities

Permittee shall install a suitable control manhole together with such necessary meters and other appurtenances to facilitate observation, sampling and measurement of wastes. Such manhole, shall be accessibly and safely located, and shall be constructed in accordance with plans approved by the local Administrative Officer.

Monitoring facilities that are required to be installed shall be constructed and maintained at the

permittee's expense. The purpose of the facility is to enable inspection, sampling, and flow measurements of wastewater produced by the permittee. If sampling or metering equipment is also required by the local Administrative Officer, it shall be provided and installed at the permittee's expense.

C. Monitoring Results

Self-monitoring discharge reports must be signed and certified by a principal corporate executive of at least the level of vice-president, a general partner or proprietor, or a principal municipal executive officer or ranking elected official, or his duly authorized representative.

D. Sample Handling & Preservation

All handling and preservation of collected samples and laboratory analysis of samples shall be preformed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit. A picture of the sampling location (see Appendix A).

E. TTO Monitoring Requirements

The term "Total Toxic Organics (TTO)" shall refer to the summation of all quantifiable values greater than 0.01 milligrams per liter for the priority pollutants listed in Section 433.11(e). TTO's will be tested once per life of permit. (40 CFR 403.12(e)(2).

In lieu of monitoring for TTOs and provided toxic organic compounds (TOCs) are not used in the manufacturing process, the permittee must make the following certification statement on each discharge monitoring report indicating that TOCs are not being used at the facility in any process that might cause such to be discharged to the sanitary sewer system as required in Section 433.12(a).

"Based on my inquiry of the person or persons 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 wastewater has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the control authority."

To request that no monitoring be required, the permittee shall submit a solvent management plan to the local Administrative Officer which specifies procedures for ensuring that toxic organics used do not routinely spill or leak into the wastewater and that there is no deliberate dumping of any of the solvents. The criteria for a toxic management plan include the following:

1. identification of toxic organics used,
2. the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration, etc.; and

3. the procedures for assuring that toxic organics do not spill or leak into wastewater
- REPORTING REQUIREMENTS**

A. Monitoring Reports

Monitoring results obtained shall be summarized and reported on a Monitoring Report form to the Lawrenceburg Utility Systems monthly. These reports are due on or before the 15th day of the first month following the sampling month. The months are as follows:

<u>Test Date</u>	<u>Due Date</u>
April 1 st - September 30 th	October 15th
October 1 st - March 31 st	April 15th

The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analysis were performed. It shall also include information showing the measured average daily flow in gallons per day to the POTW from regulated process streams.

If the permittee monitors any pollutants more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and shall be reported in the monthly report submitted to the Lawrenceburg Utility System.

B. Automatic Re-sampling

If sampling performed by the permittee indicates that a violation of this permit has occurred, the permittee must:

1. contact the Lawrenceburg Utility Systems WWTP at 931.201.1134 of the violation within 24 hours; and
2. repeat the sampling and pollutant analysis, and submit to the CA in writing, the results of the analysis within 30 days of the first violation.

C. Notification of Changed Discharge

The permittee shall notify the Lawrenceburg Utility Systems WWTP in advance of any of the following changes in the User's wastewater discharge to the POTW:

1. substantial changes in any characteristics of the User's wastewater discharge including volume of flow .
2. the amount of concentration of regulated (under categorical standards or local limits), or unregulated pollutants;
3. the discharge of new pollutants not previously reported to the Lawrenceburg Utility Systems.

D. Notification of Additional Change(s)

The permittee shall notify the Lawrenceburg Utility System of any change in the manufacturing and/or pretreatment process used by the permittee.

E. Accidental Discharge Report

The permittee shall notify the Lawrenceburg Utility Systems immediately upon the occurrence of an accidental discharge of substances prohibited in this permit (Discharge Regulations) or any slug loads, spills or unanticipated bypasses that may enter the public sewer. The wastewater treatment plant can be notified of any accidental discharge or bypass by calling 931.201.1134. The notification shall include location of discharge, date, and time thereof, type of waste including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.

Within 5 days following an accidental discharge or bypass, the permittee shall submit to the Lawrenceburg Utility Systems WWTP a detailed written report. The report shall specify:

1. description and cause of the upset, slug load, accidental discharge or bypass, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration, and volume of waste.
2. duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.
3. all steps taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, bypass or other conditions of noncompliance.

All reports required by this permit shall be submitted to the Lawrenceburg Utility Systems at the following address:

Lawrenceburg Utility Systems
Wastewater Treatment Plant
P.O. Box 649
Lawrenceburg, Tennessee 38464
Attention: Pretreatment Coordinator

F. Slug Control Plan

The permittee shall have a slug control plan outlining procedures necessary to prevent or minimize the potential for any accidental or slug discharge into the sewer system. It shall provide detailed plans of the facilities and operating procedures and be updated annually to include any changes of procedures and contact information.

G. Notification of Hazardous Waste Discharge

If the permittee commences to discharge hazardous waste, the Lawrenceburg Utility Systems, EPA Regional Water Management Division Director, and State hazardous waste authorities shall be notified 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.

STANDARD CONDITIONS

A. Falsifying Information

Knowingly making any false statement on any report required by this permit or who tampers with, or knowingly renders inaccurate any monitoring device or method required, should, upon conviction be punished by a fine or by imprisonment as set out in the Sewer Use Regulations, Section 18.309(2)(c).

B. Re-opener Clause

This permit may be reopened and modified to incorporate any new or revised requirements developed by the Lawrenceburg Utility Systems as are necessary to ensure POTW compliance with applicable requirements promulgated by EPA.

C. Maintenance of Records

The Sewer Use Regulations, Section 18.308 (7) provides that any Industrial User subject to the reporting requirements shall maintain records of all information resulting from any monitoring activities required. Such records shall include for all samples;

1. the date, exact place, method, and time of sampling and the names of the person(s) taking the samples;
2. the date analysis was performed;
3. who performed the analysis;
4. the analytical techniques/methods used; and
5. the results of such analysis.

D. Retention of Records

The permittee shall retain records of all monitoring information and results for a period of at least three (3) years from date of sample, measurement, report or application, and shall make such records available for inspection and copying by the local Administrative Officer and/or his representative, Tennessee Department of Environment & Conservation, Division of Water Resources and EPA. This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Tennessee Department of Conservation (TDEC) or EPA.

E. Entering, Inspection, and Sampling

The Lawrenceburg Utility System, TDEC and EPA shall have the right to have authorized representative(s) to:

1. have a right of entry to, upon or through any premises in which an effluent source is located, or which records required to be maintained by the permittee are located and;
2. at reasonable time, have access to and copy any records, inspect the monitoring equipment or methods, (required of the permittee) and sample any effluent which the owner or operator of such source is generating;
3. have the right to set up on the permittee's property such devices as are necessary to conduct sampling inspection, compliance monitoring and/or metering operations. The permittee shall make necessary arrangements with their security personnel to permit to enter such authorized representatives without delay, for the purposes of performing specific responsibilities.

F. Signatory Requirements

All applications, reports, or information submitted to the Lawrenceburg Utility Systems Department must contain the following certification statement and be signed as required in Section (1), (2), (3), or (4) below

"I certify under 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 properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons 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 possibilities of fine and imprisonment for knowing violations."

1. By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:
 - (a) a president, secretary, treasurer, or vice-president of the corporation in charge of a principle business function or any other person who performs similar policy or decision making functions for the corporation.
2. By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.
3. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.
4. by a duly authorized representative of the individual designated in paragraph (1), (2), or (3) of this section if:
 - (a) the authorization is made in writing by the individual described in paragraph (1), (2), or (3);
 - (b) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial

- discharge originates, such as the position of plant manager, operator of a well, a well field superintendent, or having overall responsibility for environmental matters for the company; and
- (c) the written authorization of submitted to Lawrenceburg Utility Systems.

5 If an authorization under paragraph (4) of this section is no longer accurate because a different individual or position has responsibility for the environmental matters for the company, a new authorization satisfying the requirements of paragraph (4) of this section must be submitted to Lawrenceburg Utility Systems prior to or together with any reports to be signed by an authorized representative.

G. Annual Publication

A list of all industrial users, which were subject to enforcement proceedings during the six (6) previous months, may be annually published by the Lawrenceburg Utility Systems in the largest daily newspaper within its service area. Accordingly, the permittee is apprised that noncompliance with this permit may lead to enforcement action and may result in publication of its name in an appropriate newspaper in accordance with this section.

H. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under Section 18.309 of the Sewer Use Regulations, or State or Federal laws or regulations.

I. Permit Transfer

Permits are issued to a specific User for a specific operation. Permits shall not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation with out the approval of Lawrenceburg Utility Systems. This permit may be transferred to a new owner, if the industrial process remains the same at the same location and is authorized by LUS with the following conditions:

1. the permittee must give a least thirty (30) days advance notice to LUS,
2. the notice must include a written certification by the new owner which:
 - a. states that the new owner has no immediate intent to change the facility's operations and processes,
 - b. identifies the specific date on which the transfer is to occur,
 - c. and, acknowledges full responsibility for complying with the existing permit

Upon approval by LUS, a copy of the existing permit shall be given to the new permit owner.

J. Permit Termination

Any permit issued under the provisions of Lawrenceburg Utility Systems' Sewer Use Regulations is subject to be modified, suspended, revoked in whole or in part during its term for cause including, but not limited to, the following:

1. falsifying self-monitoring reports.
2. tampering with monitoring equipment.
3. refusing to allow timely access to the facility and records.
4. failure to meet effluent limitations.
5. failure to pay penalties.
6. failure to pay sewer charges.
7. failure to meet compliance schedules.
8. violation of any term or condition of this permit or the Sewer Use Regulations, or other applicable Federal, State, or local law or regulation.

K. Cost of Monitoring and Testing

All permittees shall be required to pay the cost of any and all laboratory analysis for any monitoring of industrial discharge taken by a Lawrenceburg Utility Systems employee and/or persons designated by the local Administrative Officer. In addition, industrial users shall pay surcharges in the amount necessary to recover treatment costs incurred in treating extra-strength and non-compatible waste discharge over the permit level as set out in Section 18.310 of the Sewer Use Regulations.

L. Penalty

Any person who intentionally or negligently violates any provision of this permit or who discharges wastewater which causes pollution, or who violates any cease and desist order, prohibition, effluent limitation, or pretreatment standard shall, upon conviction, be punished by a penalty not to exceed \$10,000.00 per parameter per day. An Administrative penalty of a maximum of \$10,000.00 per violation per day may also be levied by the Lawrenceburg Utility Systems Sewer Division upon confirmation of such violations. Each day any violation of this permit continues shall constitute a separate offense.

CLASSIFICATION

Hughes Parker #2 is classified as being Categorical, Metal Finishing, New Source, 433.17

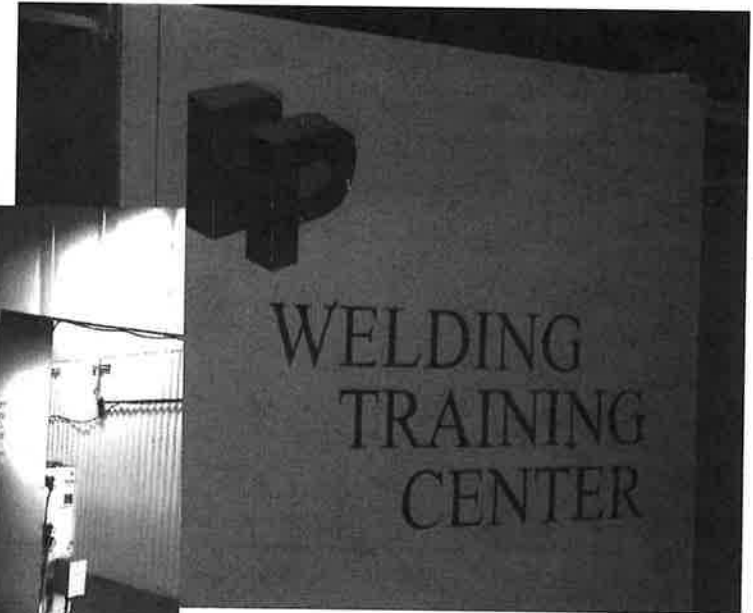
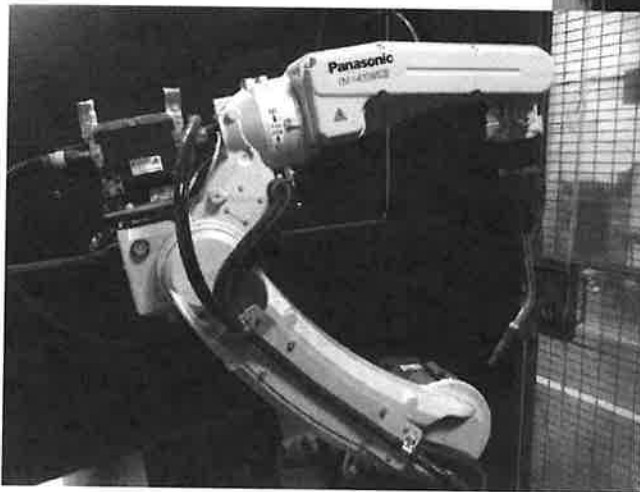
APPENDIX A

Definitions

1. Biochemical Oxygen Demand (BOD) – The quantity of oxygen utilized in biochemical oxidation of organic matter under standard laboratory procedures, five (5) days at 20 degrees centigrade expressed in terms of weight and concentration (mg/l).
2. Environmental Protection Agency, or EPA – The United States Environmental Protection Agency, or where appropriate the term may also be used as a designation for the Administrator or other duly authorized official of said agency.
3. Grab Sample – An individual sample collected over a period of time not exceeding 15 minutes.
4. Local Administrative Officer – The person designated by the LUS to supervise the operation of the Publicly Owned Treatment Works (POTW) and who is charged with certain duties and responsibilities by this article, or his duly authorized representative.
5. NPDES – (National Pollutant Discharge Elimination System) – The program for issuing, conditioning, and denying permits for the discharge of pollutants from point sources into navigable waters, the contiguous zone, and the oceans pursuant to section 402 of the Federal Water Pollution Control Act as amended.
6. pH – A measure of the hydrogen ion concentration; any pH below 7.0 is acidic and any pH above 7.0 is basic.
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8. Pollution – The man-made or man-induced alteration of the chemical, physical, biological, and radioactive integrity of water.
9. Pretreatment or Treatment – 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 by physical, chemical, or biological processes, or process changes by other means, except as prohibited by 40 CFR Section 403.36 (d).
10. Pretreatment Requirements – Any substantive or procedural requirements related to pretreatment, other than a National Pretreatment Standard imposed on an Industrial User.

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12. Shall is mandatory; May is permissive.
13. Twenty-Four (24) Hour Flow Proportional Composite Sample – A combination of not less than 8 influent or effluent portions, of at least 100 ml, collected over 24 hour period. Under certain circumstance a lesser time period may be allowed, but in no case, less than 8 hours.
14. User – Any person who contributes, causes or permits the contribution of wastewater in LUS's POTW.

Hughes Parker Industries, LLC



Manual & Robotic Welding

Copy for Audit
2.9.19

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** Licensed in TN & Mississippi
Rule 31 Listed Family Mediator

Division of Water Resources

APR 15 2019

April 11, 2019

State of Tennessee
Department of Environment and Conservation
Division of Water Resources
ATTN: Ms. Ariel Wessel-Fuss
Environmental Protection Specialist
William R. Snodgrass-Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

TN Dept. of Env. & Conservation

APR 15 2019

Division of Water Resources

Re: June 22, 2018 Certified Letter to Lawrenceburg Utility Systems
Pretreatment Audit Inspection
Lawrenceburg Pretreatment Program
NPDES # TN0022551
Lawrence County
STATUS UPDATE

Dear Ms. Ariel Wessel-Fuss:

Our office represents Lawrenceburg Utility Systems in Lawrenceburg, TN. We have spoken several times and had a few email exchanges dealing with your June 22, 2018 Certified Letter to Lawrenceburg Utility Systems regarding the Pretreatment Program for the Town of Ethridge, TN. I am writing this letter to update your office on these concerns and to present my legal opinion of these issues in regards to Lawrenceburg Utility Systems.

In my first letter I stated that I had contacted both the legal counsel and the City Recorder for the City of Ethridge, TN. At that time I was informed that the City of Ethridge, TN had a pending Resolution #81 which we hoped would address your concerns regarding the Pretreatment Program. Resolution #81 was set for a vote by the City Commission of Ethridge, TN on August 20, 2018. But it was removed from the City Commission agenda and to my knowledge it has not been formally adopted by the City of Ethridge, TN since that time. One additional reason for the delay in action by the Ethridge City Commission might be the recent appointment by Governor Haslam of the Ethridge City Judge/Ethridge City Attorney Christopher Sockwell as Circuit Judge of our 22nd Judicial District. Judge Sockwell's appointment has left a vacancy in the position of Ethridge City Judge/Ethridge City Attorney that has not yet been filled.

However, the delay may not be as damaging as it may first appear. You previously stated the pending Resolution #81 had several details which required revision and you provided several helpful suggested revisions. You stated in your previous email that:

"The fundamental question is "does the agreement provide the legal authority for LUS to implement, enforce and operate the pretreatment program in Ethridge." The key thing we look for is that the agreement allows the receiving municipality to deny a new or increased contribution from a user in the other jurisdiction. Other than that we depend on the municipality's attorney to make the determination that the agreement is legally adequate. A statement that the multijurisdictional agreement is adequate would resolve this issue. That is assuming it is adequate, if you find any deficiencies, I would expect those to be resolved first."

I would love to be able to tell you that in my legal opinion, the current "multijurisdictional agreement is adequate" but unfortunately that is not quite the case at this time, at least until the City Commission of Ethridge, TN meets to pass a revised Resolution.

However, after investigating the matter I can state my legal opinion on the following points:

1. The original InterLocal Agreement between Lawrenceburg Utility Systems and the City of Ethridge, TN (i.e.; Resolution #60) was signed in 2007.
2. The original InterLocal Agreement did grant Lawrenceburg Utility Systems the power to "implement, enforce and operate the pretreatment program in Ethridge, TN".
3. The City of Ethridge, TN currently has no employees operating the water/sewer system, and since 2007 Lawrenceburg Utility Systems employees have exclusively operated all facets of the program.
4. Since taking over the Ethridge sewer system in 2007, Lawrenceburg Utility Systems has been operating and maintaining the system using the same "rules and regulations" as set forth by the Lawrenceburg Sewer Use Ordinance.
5. This includes performing cut-offs to customers that operate outside of the parameters set forth in the Lawrenceburg Sewer Use Ordinance.
6. This also means that the current InterLocal Agreement signed between Lawrenceburg Utility Systems and the City of Ethridge, TN in 2007 (i.e.; Resolution #60) does give Lawrenceburg Utility Systems the power to deny contribution from industrial dischargers and implement their pretreatment program, including the power to implement enforcement measures.

While certain changes have occurred since 2007 which should best be addressed by a Revised Agreement (i.e.; to correct municipality and division name changes and State of Tennessee Rule number revisions in a suitably Revised Resolution #81 which can then be publicly noticed and approved as a substantial modification to the pretreatment program in accordance with Tennessee Rule 0400-40-14-.18(3)), I can comfortably assure you that Lawrenceburg Utility Systems can and will cut off service to any Ethridge customer if we feel their discharge is not meeting our required standards. Lawrenceburg Utility Systems will also continue to work with the City of Ethridge, TN to assist the City of Ethridge, TN in passing a revised Resolution (drafted along the lines of your prior suggestions) which will be acceptable to the State of Tennessee and to your office.

Please do not hesitate to contact me if you have any questions or if I may provide any additional information. Thank you.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "William J. Eledge", written over the typed name.

William J. Eledge

DOERFLINGER AND ELEDGE PLLC

Cc: Vic Pusser, General Manager, Lawrenceburg Utility Systems
Lisa Porter, Pretreatment Coordinator, Lawrenceburg Utility Systems

Received
during
audit from SVO
7/11/2023
B.H.

Any person found to be violating any provision of this chapter except §18-306(2)(b) shall be served by LUS with a written notice or a phone call stating the nature of the violation and providing a reasonable time limit for the satisfactory correction thereof according to the provisions of §18-309. The offender shall, within the period of time stated in such notice, permanently cease all violations.

Any person violating any of the provisions of this chapter shall become liable to LUS for any expense, loss, or damage occasioned LUS by reason of such violation. (Ord. #618, Dec. 1973)

(3) Protection of treatment plant influent. The local Administrative Officer shall monitor the treatment works influent for each parameter in Table A (Plant Protection Criteria). Industrial users shall be subject to reporting and monitoring requirements regarding these parameters as set forth in this chapter. In the event that the influent at the POTW reaches or exceeds the levels established by this table, the local Administrative Officer shall initiate technical studies to determine the cause of the influent violation and shall recommend to LUS the necessary remedial measures, including, but not limited to, recommending the establishment of new or revised pretreatment levels for these parameters. The local Administrative Officer shall also recommend changes to any of these criteria in the event that:

- (a) The POTW effluent standards are changed;
- (b) There are changes in any applicable law or regulation affecting same; or
- (c) Changes are needed for more effective operation of the POTW.

(4) Local Limits. In addition to the general and specific prohibitions listed in this section, users permitted according to §18.307 may be subject to numeric and best management practices as additional restrictions to their wastewater discharge in order to protect the POTW from interference or protect the receiving waters from pass-through contamination. Discharge Permits shall limit concentrations of discharge pollutants to those levels that are established as Local Limits, Table B or other applicable State and Federal pretreatment rules.

TABLE B – LOCAL LIMITS

Parameter	Monthly Avg. Maximum Conc. (mg/L)	Daily Maximum Concentration (mg/L)
Arsenic	0.160	0.321
Cadmium	0.082	0.164
Chromium (Total)	2.94	5.88
Copper	1.49	2.98
Cyanide	0.307	0.615
Lead	0.85	1.71
Mercury	0.008	0.016

Nickel	2.93	5.86
Total Phenols	4.67	9.34
Selenium	0.367	0.735
Silver	0.213	0.427
Zinc	1.40	2.79
pH		5.5-9.0
*TTO		2.13

* once/life of permit if ND

(5) Federal categorical pretreatment standards. Upon the promulgation of the federal categorical pretreatment standards for a particular industrial subcategory, the federal standard, if more stringent than limitations imposed under the chapter for sources in that subcategory shall immediately supersede the limitations imposed under this chapter. The Pretreatment Coordinator shall notify all affected industrial users of the applicable reporting requirements under 40 CFR, Section 403.12.

(6) Right to establish more restrictive criteria. No statement in this chapter is intended or may be construed to prohibit the local Administrative Officer from establishing specific wastewater discharge criteria more restrictive where wastes are determined to be harmful or destructive to the facilities of the POTW or to create a public nuisance, or to cause the discharge of the POTW to violate effluent or stream quality standards, or to interfere with the use of or handling of sludge, or to pass through the POTW resulting in a violation of the NPDES permit, or to exceed industrial pretreatment standards for discharge to municipal wastewater treatment systems as imposed or as may be imposed by the Department of Environment and Conservation and/or the United States Environmental Protection Agency.

(7) Special agreements. Nothing in this section shall be construed so as to prevent any special agreement or arrangement between LUS and any user of the wastewater treatment system whereby wastewater of unusual strength or character is accepted into the system and specially treated subject to any payments or user charges as may be applicable. The making of such special agreements or arrangements between LUS and the user shall be strictly limited to the capability of the POTW to handle such wastes without interfering with unit operations or sludge use and handling or allowing the pass through of pollutants which would result in a violation of the NPDES permit. No special agreement or arrangement may be made without documentation by the industry of the use of good management practice in the reduction of wastewater volume and strength.

(8) Exceptions to discharge criteria.

(a) Application for exception. Non-residential users of the POTW may apply for a temporary exception to the prohibited and restricted wastewater discharge criteria listed in §§18-306(1) and 18-306(2). Exceptions can be granted according to the following guidelines: The local Administrative Officer shall allow applications for temporary exceptions at any time. However, the local Administrative Officer shall not accept an application if the applicant

Lawrenceburg Review/Summary for 2023 Audit

Permit Effective 2/1/2022 – 12/31/2026

Program Approved 3/27/1985

NPDES #TN0022551

Prepared by GRH 6/30/2023

Audit 6/19/2018, letter dated 6/22/2018

- The City of Lawrenceburg accepts wastewater from outside the City's jurisdiction from the Town of Ethridge. Lawrenceburg must have the authority to implement and enforce its pretreatment program per Tennessee Rule 0400-40-14-.08(6). The Control Authority (Lawrenceburg) must establish the legally binding procedures that ensure that the industrial users outside Lawrenceburg's jurisdiction are subject to enforceable pretreatment standards and requirements. During the audit, Lawrenceburg produced a copy of the MJA with Ethridge. The MJA states "Ethridge has adopted the SUO and Pretreatment Program of LUS ... Ethridge agrees to adopt and enforce any changes or modification to the SUO or Pretreatment program." Lawrenceburg adopted the streamlining changes into the sewer use ordinance in 2011. This took place after the initial agreement went into effect. Please provide a copy of the adopted program, ordinance, and ERP from Ethridge. If Ethridge has not modified their legal authority since Lawrenceburg's adoption of the streamlining changes, Lawrenceburg should take appropriate actions to ensure the Town modifies their legal authority accordingly. Furthermore, the agreement uses broad statements regarding how the pretreatment program will be implemented in Ethridge. A key element we look for in a MJA is the ability for the receiving municipality to deny the increase or introduction of wastewater. The City should review the MJA to ensure it adequately protects the collection system, wastewater facility, biosolids and receiving stream. Considering the legal complexity, we strongly recommend that the city's attorney complete a legal review.
 - A follow-up letter by the law office representing LUS dated 4/11/2019 gave an update and opinion that while the Ethridge SUO could be improved, LUS "can and will cut off service to any Ethridge customer if we feel their discharge is not meeting our required standards."
- Part B of industrial user permits indicates in one sentence that the installation of a sampling manhole is required. The subsequent sentence indicates that a sampling manhole may be required. We recommend that this requirement be clarified as to the actual requirement.
- We recommend clarifying the definition of 24-hour composite sample. For reference, composite sample is defined in Tennessee Rule 0400-40-05-.02(21) as "a combination of not less than 8 influent or effluent portions, of at least 100 ml, collected over a 24-hour period. Under certain circumstances a lesser time period may be allowed, but in no case, less than 8 hours."
- Part A of the permit states "The permittee is required to notify Lawrenceburg Utility System if volume of discharge changes." We recommend clarifying that notification is required in advance of any substantial change in the volume or character of pollutants in their discharge in accordance with Tennessee Rule 0400-40-14-.12(10). In general, a substantial change in flow is $\pm 20\%$, however, the municipality is free to choose a different amount.
- Audit conducted by AEWf

PCI 4/16/2019, letter dated 4/17/2019

- An industrial user inspection was conducted at Hughes Parker #2, classified as an existing metal finisher. Conversations with Hughes Parker #2 management indicated the process started at a point after 8/31/1982, which would change their classification to New. The actual date needs to be confirmed.
- In reviewing the chain of custody for Hughes Parker #2 sample shipment receipts, there were at least 2 occasions where the receiving lab indicated the samples arrived with no ice. It is suggested that the receiving lab indicate the temperature at which future samples are received.
- A review was made of items from the PT audit. Only one item remained open, and that was the MJA. A letter dated 4/11/2019 should close this item.
- PCI conducted by DAL

TAV 4/13/2020 (remote), letter dated 4/13/2020

- Nothing to note.
- TAV conducted by DAL

PCI 5/12/2021, letter dated 5/12/2021

- Nothing to note.
- PCI conducted by DAL

TAV 6/2/2022, letter dated 6/2/2022

- The SUO uses the 1200 series of TN rules. The current rules were renumbered as the 0400 rules.
- As a reminder, even though an industry uses “in-lieu of” option for testing of TTO, TTO must be analyzed and reported at least once in the life of the current CIU permit issuance.
- TAV conducted by DAL

OCT 2020 SAR

- Craig Manufacturing was in SNC for failing to submit reports and required plans. 2 NOVs issued.
- Protection Criteria exceedance for Zinc. Retesting was within limits.

APR 2021 SAR

- Advance Design Solutions was in SNC for failure to collect and analyze a sample. 1 NOV issued.

OCT 2021 SAR

- Advance Design Solutions was in SNC for Zinc. Verbal Warning. A retest was done but they are still in violation.
- Protection Criteria exceedance for Zinc. Retesting was within limits.

APR 2022 SAR

- Started using MyTDEC Forms for the SAR.
- Mity received a verbal warning for sample submitted to laboratory not received within the required temperature range. By the time the report was submitted to LUS the quarter ended and not allowing time to re-test.

OCT 2022 SAR

- Hughes Parker #2 was in SNC for Zinc and received a verbal NOV.

APR 2023 SAR

- Nothing of note

SUO and ERP final approval

Streamlining SUO and ERP final approval on 1/19/2011

Tech evaluation of local limits submitted

Final Approval of Protection Criteria and Local Limits on 10/3/2022

Latest IWS

5/16/2022