REPORT OF THE PRETREATMENT COMPLIANCE AUDIT

Johnson County Wastewater
11811 South Sunset Drive, Suite 1700
Olathe, Kansas 66061-7061

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
KS0088269

January 29-31, 2025

BY
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
WATER DIVISION
PERMITS AND LOANS BRANCH

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INTRODUCTION

A Pretreatment Compliance Audit (PCA) was conducted of the Johnson County, Kansas, approved pretreatment program on January 29-31, 2025. To direct the PCA, a checklist was used that evaluates all important elements of the pretreatment program. A copy of the checklist is included with this report (Attachment 1). In addition, an evaluation of the Johnson County Wastewater (JCW) Biosolids Management Program (Sludge) was conducted to determine the Pretreatment Program's effectiveness in protecting the Wastewater Treatment Plants (WWTP).

The PCA took place in this order:

1. Opening conference
2. Complete Audit Checklist
3. File Review
4. Control Authority Inspection
5. Approval Authority Inspection
6. Closing Conference

This narrative report presents the PCA findings. Documentation collected during the audit will be submitted to and retained in the EPA's facility files.

PARTICIPANTS

Johnson County Wastewater
David Becker, Pretreatment Coordinator
Stephen Briggs, Industrial Pretreatment Specialist
Dotty Harrison, Industrial Pretreatment Specialist

Kansas Department of Health and Environment
Steve Caspers, Pretreatment Specialist

U.S. Environmental Protection Agency, Region 7
Justin Kensinger, Pretreatment Coordinator
Naji Ahmed, Environmental Engineer

PROGRAM OVERVIEW

Johnson County, Kansas Wastewater (JCW) owns and operates six wastewater treatment plants. According to program staff, the WWTPs have a total design daily average flow of 79.4 million gallons per day, actual daily average flow of 55.4 MGD, and a design peak flow of 277.5 MGD. JCW currently regulates 21 significant industrial users. Four of the seven WWTPs receive industrial discharges from the 22 SIUs:

Middle Basin	Mill Creek	New Century	Tomahawk Creek
1. Central Biomedia, Incorporated 2. Lenexa, WWTP, LLC 3. SAFC Biosciences, Incorporated 4. **Simmons Gun Repair and Sales 5. **Cintas Corporation	1. Biomune Company 2. Deffenbaugh Industries, Incorporated 3. Disposable Instruments, Company 4. Flowers Baking Co. of Lenexa, LLC 5. Kocher + Beck USA LP 6. Sparhawk Laboratories Incorporated 7. Tapco Products Company	1. Sauer Brands, Incorporated 2. International Flavors and Fragrances, Incorporated 3. Heartland Precision Fasteners, Incorporated 4. Flora Food Sourcing US, Incorporated	1. Argenta US Manufacturing, LLC 2. Hennessy Research Associates, LLC 3. Inficon EDC, Incorporated 4. Ivy Animal Health Incorporated 5. TED Manufacturing Corporation 6. Universal Engraving, Incorporated

** City of Olathe SIU

LEGAL AUTHORITY

JCW sewer use ordinance Articles 4, was originally approved by KDHE and the EPA on December 11, 1992. The SUO was updated in 2002 and approved on January 17, 2003. The ordinance is currently undergoing another revision. An ordinance evaluation was performed by the EPA and KDHE on February 25, 2021, and comments were provided to JCW. JCW pretreatment staff have completed the ordinance and are now waiting on JCW legal to finalize the rest of it. The ordinance gives JCW the authority to implement and enforce its pretreatment program, such as issuing permits for a duration of five years or less; requires the submittal of permit renewal applications a minimum of 90 days prior to the expiration date; and the right to inspect, sample, enforce, and to conduct enforcement activities including the collection of fines or penalties.

During the PCA, I discussed with JCW staff the penalty structure included in the JCW SUO to determine if it complied with the general pretreatment regulation penalty structure established in 40 CFR 403.8(f)(1)(vi) that reads, *"Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement. All POTW's shall be able to seek injunctive relief for noncompliance by Industrial Users with Pretreatment Standards and Requirements. All POTWs shall also have authority to seek or assess civil or criminal penalties in at least the amount of $1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements."*

I pointed out JCW staff that the current JCW ordinance does not comply the 40 CFR 403.8(f)(1)(vi).

LOCAL LIMITS

The EPA and KDHE assisted JCW in the development of its current local limit calculations for each WWTP. The EPA approved the local limits for 12 metals, total suspended solids, ammonia, and biochemical oxygen demand on April 7, 2017. JCW submitted a local limits re-evaluation for the Tomahawk WWTP on February 13, 2025, and concluded that local limits will not be needed for the plant at this time. JCW is currently working on revaluating local limits for the other WWTPs.

SIGNIFICANT INDUSTRIAL USERS

There are currently 21 industrial users discharging to the county's WWTPs. This includes 13 categorical industrial users subject to categorical pretreatment standards. Of the 13 categorical industrial users, seven are subject to the Pharmaceutical Manufacturing Categorical Standard 40 Code of Federal Regulation Part 439, five are subject to the Metal Finishing Categorical Standard 40 CFR Part 433, and one is subject to the Electrical and Electronic Components Categorical Standard 40 CFR Part 469.

Gill Studios, Incorporated's permit was terminated due to no reasonable potential for adversely affecting the POTW's operation or violating pretreatment standards. Excelligence Learning Corp. has changed its name to ELC Distribution Center, LLC. TriRx Shawnee, LLC was purchased and is now called Argenta US Manufacturing, LLC. Upfield Sourcing US has changed its name to Flora Food Sourcing US, Inc. IRCA New Century's permit was cancelled due to the facility shutting down.

The city of Olathe and the JCW entered into an inter-jurisdictional agreement to ensure the pretreatment requirements are adequately enforced for two SIUs that are in the city of Olathe, but discharge into the JCW collection system. The two SIUs are Cintas Corporation and Simmons Gun, and both are regulated by the city of Olathe.

INDUSTRIAL WASTE SURVEY

JCW is performing a continuous review of the industrial/commercial customers in Johnson County to identify potential SIUs. This includes a monthly review of all industrial/commercial customers using over 25,000 gallons per day of potable water, reviewing emails from local Chambers of Commerce welcoming new businesses to the area, and researching the EPA's Enforcement and Compliance History Online website for hazardous waste generators and toxic release inventory reports. In addition, JCW requires sanitary sewer connection permits to be obtained by property owners for new commercial buildings in the service area. Also, for building expansions or tenant finish of existing building spaces, JCW requires the property owner and/or tenant to complete an application and submit construction plans for review by JCW. When a new potential significant industrial user is identified, JCW will send out an industrial waste form to characterize the wastestream and process to determine if a permit is necessary.

INDUSTRIAL USER PERMITS

Permits are issued with a five-year duration or less and contain the required elements in accordance with 40 CFR 403.8(f)(1)(iii) that should be included in a well written and enforceable permit. Permits include industrial process descriptions, provisions on accidental discharge, sampling and analysis procedures, self-monitoring and reporting frequencies. Local limits have not been incorporated into the CIU permits as it appears the categorical limits are more stringent. Local limits are included for NCSIUs.

SLUG/ACCIDENTAL SPILL CONTROL PLANS

The need for an SIU to have a slug/accidental spill control plan is determined during routine annual inspections of the facility. If it is deemed that there is reasonable potential for the SIU to cause interference, pass through, or in any way disrupt operations at the POTW, then a slug/accidental spill control plan will be required. Careful examination and identification of the chemicals used and stored onsite, containment practices, location of floor drains, potential for spills are critical when assessing the need for a slug control plan.

INDUSTRIAL INSPECTIONS

All industries have been inspected during the last calendar year by JCW staff. Inspections are performed at least annually using a checklist that is similar to the EPA R7 *Industrial User Inspection Checklist* and include a narrative conclusion of the visit. Inspection reports appeared to be adequate, thorough, and well documented. Inspections consist of completing the checklist, records review, evaluation of the industry's need for a slug control plan, evaluation of the spill control plan (SCP) when applicable, and a facility walkthrough. Sampling may or may not be performed during the inspection but is performed by the JCW at least annually.

COMPLIANCE MONITORING, SELF-MONITORING, and REPORTING

Based on the industrial load, nature of the waste stream, pollutants concentration, and compliance history, self-monitoring frequencies vary from semiannually, monthly, weekly, and daily. Self-monitoring criteria is described in detail in the SIU permits. Reporting requirements also vary from one industry to another based on monitoring frequency, nature of discharge, etc. Reporting frequencies can vary from semi-annually to monthly.

The general pretreatment regulations allow industries that are subject to 40 CFR Part 433 to develop and implement a toxic organic management plan (TOMP) or solvent management plan in lieu of routine monitoring and allow certain CIUs to demonstrate compliance with total toxic organic requirements by certifying that the facility is adhering to the plan. Periodic monitoring reports are signed by the industry's responsible official and include the correct certification statement. Semi-annual reports required by the metal finishing categorical standard are signed by the industry's responsible official and include the correct Total Toxic Organics (TTO) certification statement.

NET/GROSS ALLOWANCES

Biomune Company, Hennessy Research Associates, LLC, and Argenta US Manufacturing are categorical pharmaceutical manufacturers limited to a maximum monthly average of 0.03 mg/L for chloroform. The public water supply (WaterOne) for these companies routinely generates chloroform concentrations within the drinking water system in excess of 0.03 mg/L. These three pharmaceutical companies do not use or generate chloroform in their process. The historical high levels of chloroform in the public water supply have caused them to exceed their pretreatment permit limits for chloroform. Therefore, these companies have been granted a net/gross calculation credit adjustment for chloroform at their facilities by JCW. The net/gross credit was jointly approved by KDHE and EPA.

ENFORCEMENT

The JCW *Enforcement Response Plan* (ERP) was originally approved by the EPA and KDHE on January 15, 1991, and was revised June 2012. The ERP includes a series of procedures to deal with non-compliance and steps to escalate or elevate enforcement. These start with a phone/email notification, resampling, a compliance meeting, issuing a notice of violation and possible compliance schedule, and an increase in severity of enforcement actions which may include administrative, civil and/or criminal monetary penalties. During the file review, it appeared that most enforcement activities, such as telephone logs and written communications were taken in accordance with the guidelines of the ERP and were included in the individual industry files.

When violations occur, JCW will call or email a notification to the industrial user. Records indicate that there were three industrial users in significant non-compliance during 2024. These three industries will be published in a newspaper of general circulation sometime in February 2025. There were 10 instances of infrequent non-compliance reported for 2024, these were for late reporting and permit limit exceedances.

In calendar year 2024, a total of 62 notices of violations were issued. The top two industries representing 44 of the 62 of the notices of violations were Lenexa WWTP (27 NOVs) and Tapco Products (17 NOVs). Lenexa WWTP was placed on a compliance schedule which was completed on October 15, 2024. However, Lenexa WWTP still has infrequent non-compliance for biological oxygen demand (BOD) in the second half of the 2024 reporting period. Tapco Products was placed on a compliance schedule with a scheduled compliance date of August 12, 2025. Tapco remains in infrequent non-compliance for pH for the second half of the 2024 reporting period.

Three SIUs were in significant non-compliance for calendar year 2024 including Flowers Baking Company of Lenexa, LLC, International Flavors and Fragrances, Inc., and Lenexa WWTP. No fines were collected from any of the SIUs who received an NOV or that were in Significant Noncompliance (SNC).

OVERSIGHT INSPECTIONS

Tapco Products Company

An industrial user inspection was performed by JCW during the PCA at Tapco Products Company to evaluate the effectiveness, reliability, and completeness of the JCW inspection procedures and the administration of their approved pretreatment program. Tapco Products Company is an industrial laundry facility and is regulated as a significant industrial user. The facilities wastewater pretreatment system is designed as a constant flow treatment system with 2 pH probes. One pH probe is used as a controller to automatically add in chemicals to adjust the pH and is located directly into the treatment tank. The other probe is used for compliance and is located at the outfall. The pH controller probe is calibrated monthly, and the compliance pH probe is calibrated weekly.

This SIU was selected for an oversight inspection because of recent non-compliance. EPA does this to try and understand and determine the reason for non-compliance and provide any possible solutions and suggestions to help the industry become compliant. Stephen Briggs led the inspection. He utilized their industrial pretreatment inspection report form and thoroughly covered all aspects of an industrial user inspection.

The first part of the inspection included questions to complete the inspection report form and complete the file review. Mr. Briggs then conducted visual observations of the facility led by Brad Pepin (President of Tapco). Mr. Pepin showed us the treatment system and explained how the system operates. The treatment system seemed to be operating properly at the time of the inspection. However, a main reason why Tapco has had recent non-compliance was due to the short duration of visual and audio alarms that sounds for the drum when there is a pH spike. It was confirmed during the inspection that the alarm system is not suitable for the working environment as it is not effective in warning workers that there is a problem with their treatment system.

Mr. Pepin discussed the industry's efforts to adhere to the compliance schedule and figure out a solution to their continued pH limitation exceedances. The final date of their compliance schedule is May 29, 2025.

Flowers Baking Company of Lenexa

An industrial user inspection was conducted by EPA during the PCA to demonstrate to JCW staff how EPA conducts industrial user inspections. Flowers Baking Company was selected for an inspection because of the recent SNC for reporting and infrequent non-compliance with permit limit violations for oil and grease and pH. Flowers baking Company is an industrial bakery that produces many different types of bread products and is regulated as a significant industrial user.

The first part of the inspection included questions and information gathering for the industrial user checklist and conducting a file review of facility documentation. We then conducted visual observations of the facility, led by Tim Kay (environmental safety and sustainability manager). The facility's treatment system utilizes pH neutralization and microfiltration to treat their industrial wastestream. Their microfiltration process is unique in that it utilizes ceramic filters made in Germany that must be replaced every 4 to 5 years. The treatment system utilizes two different holding tanks, one tank is batch discharged and the other one is hauled off. At the time of the inspection the treatment system was operating properly, and the system was in compliance with its permit limits.

Mr. Kay explained that the reason for the SNC for reporting, was due to a problem with their contracted lab (Pace Laboratories). He explained that the reason for the exceedances for oil and grease was due to improper cleaning practices and mentioned they retrained staff to ensure they were cleaning properly. He also clarified that the reason why they were having problems with pH was because they needed to update the probe on their treatment system.

HAULED WASTE

JCW accepts domestic septic hauled waste at any of their treatment plants. Fats, oil and grease are accepted at the Middle Basin WWTP. Both septic and FOG waste haulers are required to apply for and obtain an annual license from the Johnson County Health and Environment Department. JCW personnel will randomly sample hauled waste for flashpoint and pH as a check for hazardous constituents. JCW also accepts special waste on a case-by-case bases if it was generated from within the county service area. Special waste can be accepted at any of the WWTPs, but they do not accept hauled waste from industries that are subject to categorical pretreatment standards.

SLUDGE MANAGEMENT (Attachment 2)

As mentioned above, JCW owns and operates six (6) WWTPs:

1. Tomahawk Creek NPDES No. KS0055484)
2. Douglas L. Smith Middle Basin (NPDES No. KS0119601)
3. Mill Creek Regional Treatment Plant (NPDES No. KS0088269)
4. Nelson Complex (NPDES No. KS0055492)
5. Blue River Main (NPDES No. KS0092738)
6. New Century Air Center (NPDES No. KS0119296)

The County generates Class B sludge from all six WWTPs. Most of the sludge is land applied and some is hauled off to the landfill.

The County entered in an agreement with a third-party contractor to haul/transport and manage land application (Attachment 2).

In 2024, generated sludge from the New Century and the Blue River WWTPs was trucked to the Nelson Complex WWTP. Sludge generated at the Nelson WWTP, combined with the trucked sludge, was sent to the landfill. In 2024, 4,272 dry metric tons (dmt) of combined sludge was sent to the landfill. No annual reports from those three facilities were required in 2024.

Sludge generated from the Tomahawk Creek, the Douglas L. Smith Middel Basin, and the Mill Creek WWTPs was all land applied in 2023 and 2024.

Below are the tables that compare the JCW produced sludge's (at the Tomahawk Creek, the Douglas L. Smith Middel Basin, and the Mill Creek WWTPs) peak observed metals level against the statutory ceiling and the average level against the exceptional quality (EQ) sludge level specified by the 40 CFR Part 503 Sludge regulations.

Mill Creek WWTP, sewage sludge from the lagoon cells is usually removed and land applied during the last quarter of each year. The volume removed usually triggers the bimonthly (once per 60 days) sampling frequency required by 40 CFR § 503.16. While the correct number of samples was taken (six times/per year) by JCW. It was taken during the period while they were land applying sludge. Under 40 CFR 503.16, JCW should have sampled their sludge once per 60 days (bimonthly period) as stated in Table 1 of § 503.16. However, JCW needs to meet the minimum sample numbers required by the regulation. The timeframe does not need to meet the suggestion of every 60-days, but to be representative samples of the actual disposal period, instead of an old sample taken some time before the disposal event happens. This practice ensures that sampling is conducted of the biosolids being disposed and samples are collected at the time of the disposal event in accordance with 40 CFR 503.16.

In 2024, sludge from the lagoon cells at the Mill Creek Regional WWTF was removed and land applied during the period of November 4, 2023, to December 21, 2023. The amount applied during that period totaled 4,775.9 dmt. JCW appropriately sampled the biosolids six times during the application period instead of a bi-monthly schedule.

Table 1, JCW Mill Creek Regional WWTP 2024 Sludge Quality (mg/kg)

Pollutant	Ceiling	EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic, As	75	41	8.6	8.6	11.47%	20.98%
Cadmium, Cd	85	39	3.2	3.2	3.76%	8.21%
Copper, Cu	4300	1500	135	135	3.14%	9.00%
Lead, Pb	840	300	20.7	20.7	2.46%	6.90%
Mercury, Hg	57	17	0.5	0.5	0.88%	2.94%
Molybdenum , Mo	75	----	12.8	12.8	17.07%	
Nickel, Ni	420	420	23.3	23.3	5.55%	5.55%
Selenium, Se	100	36	9.6	9.6	9.60%	26.67%
Zinc, Zn	7500	2800	499	499	6.65%	17.82%

The table above indicates that sludge generated from the Mill Creek WWTP is well below the ceiling limits for all metals.

Douglass Smith Middle Basin (DSMB) WWTP, in 2024 produced 1,487.82 dmt of Class B sludge through anaerobic digestion. All generated sludge was hauled, and land applied by a third-party hauler. Staff of the JCW indicated that the Middle Basin WWTF staff and laboratory expected to land apply more sludge in 2024 than what ended up being disposed of. As such, JCW took six (6) bi-monthly samples, which ended up being 2 more than were required by 40 CFR 503.16 based on the sludge quantity. After typing in the total land applied sludge volume for 2024, there were not enough "compliance monitoring event" rows shown in the webform. In the past, JCW was instructed to average the pollutant concentrations so that the information would be able to fit into the form. In order to maintain a certain level of accuracy in reducing 6 samples down to 4 entries, JCW staff calculated a weighted average. For example, in the first quarter (Compliance Monitoring Event No. 1) JCW weighted the first bi-monthly sample (Jan - Feb) at two thirds since it represented two out of three months in the quarter and weighted the second bimonthly sample (Mar - Apr) at one third since it represented one out of three months in the quarter. This same methodology was used for all entries.

Table 2, DSMB WWTP 2024 Sludge Quality (mg/kg)

Pollutant	Ceiling	EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic, As	75	41	5	5	6.67%	12.20%
Cadmium, Cd	85	39	4	4	4.71%	10.26%
Copper, Cu	4300	1500	312	312	7.26%	20.80%
Lead, Pb	840	300	76	76	9.05%	25.33%
Mercury, Hg	57	17	0.8	0.8	1.40%	4.71%
Molybdenum , Mo	75	----	19	19	25.33%	
Nickel, Ni	420	420	48	48	11.43%	11.43%
Selenium, Se	100	36	11	11	11.00%	30.56%
Zinc, Zn	7500	2800	858	858	11.44%	30.64%

The table above indicates that sludge generated from the DSMB WWTP is well below the ceiling limits

for all metals.

Tomahawk Creek WWTP, in 2024 produced **1,903.68** dmt of Class B sludge through anaerobic digestion. All generated sludge was hauled, and land applied by a third-party hauler. JCW staff took six (6) bi-monthly samples.

The table 3 below indicates that sludge generated from the Tomahawk Creek WWTP is well below the ceiling limits for all metals.

Table 3, Tomahawk Creek WWTP 2024 Sludge Quality (mg/kg)

Pollutant	503 Ceiling	503 EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic, As	75	41	5	5	6.67%	12.20%
Cadmium, Cd	85	39	3	3	3.53%	7.69%
Copper, Cu	4300	1500	301	301	7.00%	20.07%
Lead, Pb	840	300	9	9	1.07%	3.00%
Mercury, Hg	57	17	0.4	0.4	0.70%	2.35%
Molybdenum , Mo	75	----	11	11	14.67%	
Nickel, Ni	420	420	24	24	5.71%	5.71%
Selenium, Se	100	36	10	10	10.00%	27.78%

RECORDS MANAGEMENT

JCW has done an exceptional job maintaining and managing industrial files and records. Files were found to be well maintained for at least three years. Files are kept at the program office/laboratory and are available to the public. During the file review, I observed that industrial files have all the necessary documentation. Each industrial file consists of at least 20 categories such as facility updated engineering plans, 90-day compliance reports, current permits, permit applications, inspection reports, compliance sampling and self-monitoring reports, correspondence/meeting notes, enforcement documentation, slug control plans, etc.

CONCLUSION, EXPECTATIONS and RECOMMENDATIONS

Overall, JCW continues to appropriately implement its approved pretreatment program. JCW's base for its program allows the pretreatment staff to effectively monitor the industrial waste streams and take necessary enforcement actions. The pretreatment staff appear to be well-trained and capable of running their approved program

However, the following items are provided to ensure federal regulatory requirements applicable to the JCW pretreatment program are met:

1. During the last EPA audit, David Pratt requested that JCW continue to update their sewer use ordinance, and the enforcement response plan and with the expectation that the JCW finalize it one year from the audit which would have been January of 2023. JCW still has not submitted a final ERP or SUO to EPA and KDHE for review and comment. It is understood that much of the ERP is

complete (with the exception for a few modifications to the fine language) and much of the pretreatment aspects of the SUO is also complete. However, this has been an ongoing request that has yet to be completed.

2. The JCW should revise its current ordinance to comply with the general pretreatment regulation penalty structure under 40 CFR 403.8(f)(1)(vi) to ensure that JCW has the authority to seek or assess civil or criminal penalties in at least the amount of $1,000 a day for each violation by Industrial Users of Pretreatment Standards and Requirements.

3. In accordance with 40 CFR Part 122.44(j)(2)(ii), JCW must perform a written technical evaluation of the need to revise local limits under 40 CFR Part 403.5(c)(1) following NPDES permit reissuance for each WWTP. This technical evaluation is required to be done within one year of NPDES permit reissuance unless the NPDES permit identifies a separate time frame to complete the evaluation. Reviews should continue throughout the permit cycle as deemed necessary to protect the WWTPs from harmful contributions. The EPA's *Local Limits Development Guidance,* Chapter 7 (located on the EPA website), provides a detailed explanation of how and when to perform technical reevaluations. JCW must maintain the evaluation records so that those records can be reviewed during future PCAs, Pretreatment Compliance Inspections, or when requested by the EPA and/or KDHE.

4. The JCW continues to have a well-managed Biosolids Program.

<u>The following are recommendations provided to enhance the JCW pretreatment program:</u>

1. Mass balance calculations should be performed separately for each WWTP by routinely collecting sewage sludge samples for metals concentrations (even if not required by 40 CFR Part 503) and tracking the amount of sludge generated (not disposed) each year. This information can help focus efforts to identify specific areas where potential unknown metal finishing type industrial users may exist or could help identify that existing users are potentially exceeding their categorical standards in between compliance sampling events.

JUSTIN KENSINGER
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Date: 2025.03.12 07:59:45 -05'00'

Justin Kensinger
Pretreatment Coordinator, WD

NICOLE MORAN
Digitally signed by NICOLE MORAN
Date: 2025.03.12 11:18:25 -05'00'

Nicole Moran
Supervisor, WB/DWIS

ATTACHMENTS

1. PCA Checklist (17 pages)
2. Biosolids documents

Audit

Approved Pretreatment Program

Date(s) of Pretreatment Compliance Audit (Audit)*: January 29-31, 2025

* The applicable sections of this form may be used to complete a Pretreatment Compliance Inspection.

Control Authority: Address:	Johnson County Wastewater 11811 S. Sunset Drive, Suite 1700 Olathe, KS 66061-7062	Date of Last PCI/Audit: December 6-8, 2021 NPDES Permit Number*: KS0088269 (Mill Creek) State Permit Number*:
Contact: Title: Phone: Fax: Email:	David Becker Environmental Technologist (913) 715-6956 (913) 645-1879 David.Becker@jcw.org	Permit Expiration Date*: January 31, 2025

*Include permit numbers for primary wastewater treatment plant if the CA has more than one treatment plant.

Participants

CA: David Becker Stephen Briggs Dotty Harrison	Name of Auditors/Inspectors: Justin Kensinger (EPA), Naji Ahmed (EPA), Steve Caspers (KDHE)
Time period covered by this PCI/audit: 2024-2025	

Publicly Owned Treatment Works Information

For Primary Treatment Plant (Flows in Million Gallons Per Day)			
Design Daily Average 79.4	Actual Daily Average 55.4	Design Peak 277.5	Percent Industrial Flow 1.3%
Number of Plants 7	% Combined Sewers 0	Type of Treatment at Principal Plant 2TF, 5AS, 1 Lagoon	
Sludge Disposal Method Land apply/Landfill	Quantity (dry tons/year) 14,998	Receiving Stream Multiple	

PART I: PROGRAM BACKGROUND INFORMATION

I.A. Approved Modifications to the Original Program

1.

Date of last NPDES permit modification:	Date of original program approval:	01/18/1984
	Date NPDES permit originally modified to require implementation **[PTIM]**:	

2. Significant Pretreatment Program Modifications:

PROGRAM MODIFICATIONS	APPROVAL DATE	OTHER APPROVED MODIFICATIONS	APPROVAL DATE
Sewer Use Ordinance*	12/11/1992	SUO Update	01/17/2003
List of SIUs [403.8(f)(6)]	Continuous		
Enforcement Response Plan	01/15/1991	ERP Minor Update	01/17/2012
Local Limits	04/07/2017		

*Includes required streamlining provisions.

3. Is the CA presently working on any program modifications? ☒ Yes ☐ No If yes, please describe:
   ERP, SUO, Local Limits reevaluation

4. Does the CA have any significant program modifications currently being reviewed by the Approval Authority?
   ☐ Yes ☒ No If yes, please list those documents that are under review:

I.B. Approved Program Contents

5. Describe the mechanism the program uses to give them the legal authority to enforce pretreatment requirements:
Article 4 of SUO

6. Provide the date the legal authority was enacted or adopted: December 10, 1992; Updated December 19, 2002

7. Describe the control mechanism (e.g., permits, agreements, etc.) the program uses to enforce pretreatment standards:
Permits

Note: Italicized question numbers indicate that the question is required ICIS data elements supported.

8. Identify current program practices and any changes that have occurred from the original program approval:

Activity	Noncategorical SIUs	Categorical SIUs*	Changes from Original Program
CA sampling of:	1-4 Times/year	1-4 Times/year	
CA inspection of:	Annual	Annual	
SIU self-monitoring:	Daily/semi-annual	Daily/semi-annual	
SIU reporting:	Varies	Semi-annual	

* For categorical pollutants

9. What types of enforcement options are available through the program (place an X in each applicable box). Have there been any changes from the original approval? ☐ Yes ☒ No If yes, please explain:

Y	Notice of Violation
Y	Administrative Order
Y	Show Cause Hearing
Y	Establishment of Compliance Schedules
Y	Revocation of Permit
Y	Injunctive Relief
Y	Administrative Penalties
N	Civil Penalties; At Least $1,000/Day/Violation
Y	Criminal Penalties
Y	Termination of Service

10. Comments:

PART II: INTERVIEW QUESTIONS

II.A. Legal Authority and Jurisdiction

11. Have any pretreatment modifications been made to the current sewer use ordinance since the last PCI/audit that have not been approved by the AA? ☐ Yes ■ No

12. List by name and location any significant industrial users that discharge to the CA from outlying jurisdictions. Indicate which of the listed SIUs are not covered by a contract/agreement requiring them to abide by the CA's legal authority: N/A ☐

    Cintas
    Simmons Guns

13. Does the CA have the authority to seek civil or criminal fines of at least $1,000 per day per violation? [403.8(f)(1)(vi)] ☐Yes ■ No

14. Does the control authority feel they need to update their Enforcement Response Plan? ■ Yes ☐ No If yes, please explain:

    Need to update the fine language and structure in accordance with 403.8(f)(1)(vi) to at least $1,000 per day per violation. They will be revising several other sections as well.

15. Comments:

    For Question 13: The SUO currently says that the maximum fine amount per violation per day is $2,000. There are several violations with fine amounts below $1,000.

II. B. Control Mechanism Issued to SIUs

16. General Information:

Type (e.g., permits/agreements):	Permits
Duration (i.e., in years):	5 years

17. Do all SIUs have a current (unexpired) control mechanism? **{NOCM}** ■ Yes ☐ No

18. List by name those SIUs that do not have a control mechanism and indicate which SIUs have not had a current control mechanism for 180 days or more. **{RNC/SNC}** ■ N/A

    SIUs without a control mechanism:
    None

    SIUs without a control mechanism for more than 180 days:
    None

II.C. Hauled Wastes

19. Does the CA accept hauled waste? ■ Yes ☐ No (If no, go to question 25)

a. If yes, describe (include approximate number of loads per month):
700

b. How does the CA ensure that it does not accept hazardous waste?
Flash-point & pH testing

20. Does the CA have a control mechanism for regulating waste haulers, and if so, describe? ■ Yes ☐ No ☐ N/A
Licenses issued by the health department.

21. Does the CA have a designated discharge point (or points) for waste haulers? [DSS: 403.5(b)(8)]
■ Yes ☐ No ☐ N/A If yes, describe the location:

22. Are all applicable categorical standards and local limits applied to IUs whose wastes are hauled to the CA?
■ Yes ☐ No ☐ N/A

23. Describe the method used to apply (enforce) local limits to a hauled waste:
They do not accept any categorical hauled wastes.

24. Comments:

II.D. Industrial User Characterization

25. How often does the CA update its Industrial Waste Survey to identify new SIUs or changes to wastewater discharges?

1) Continuously update surveillance logs 2) New development team sends out form to new users 3) Send out industrial waste forms when they find a suspicious user

a. When was the last formal update? Continuous

26. What is the CA's current industrial base?

Current Number of SIUs	Industrial User Type	Last Reported Number of SIUs
13	Categorical SIUs **{CIUS}**	13
8	Non-Categorical SIUs	8
21	Total all SIUs **{SIUS}**	21

II.E. Local Limits

27. Does the CA have numerical limits for metals in its National Pollutant Discharge Elimination System permit?
☐ Yes ■ No If yes, list the metals and the limits (or attach list to this checklist):

28. Identify any numerical NPDES permit violations that have occurred in the last 12 months at any of the treatment plants? ☐ None

Nelson Complex Wastewater Treatment Facility - Effluent violations

a. Were any of the numerical NPDES violations, identified above, a result of interference or pass through?
☐ Yes ■ No

1. If yes, was the interference traceable to an industrial user? ☐ Yes ☐ No

2. If yes, was action taken that led to elimination within 90 days of the interference or pass through? **{SNC}**
☐ Yes ☐ No

3. If yes, was the responsible industry placed on an enforceable compliance schedule within 90 days of discovery? **{SNC}** ☐ Yes ☐ No ☐ N/A If no, why was IU not placed on a schedule?

29. How many times per year does the CA regularly sample its principal treatment plant for the following?

Parameter	Influent	Effluent	Sludge
Metals	4/yr	1	6/yr
Toxic Organics	0	0	Every 2 years
Biomonitoring		1	
TCLP			HW every 2 yrs

30. List below the numerical value for the local limits derived by technical analysis. If a technical analysis was performed, but the limit was not adopted, enter DNA (did not adopt) in the block. (Values assumed to be mg/L unless otherwise noted.) **{EVLL} {ADLL}**

POLLUTANT	DAILY MAX	POLLUTANT	DAILY MAX
Varies for each WWTP			

31. Are the CA's biochemical oxygen demand, total suspended solids, and ammonia local limits technically derived (i.e., based on plant capacity)? ■ Yes ☐ No ☐ N/A

32. Are BOD, TSS and ammonia permit limit exceedances treated as violations of technically based local limits? ■ Yes ☐ No ☐ N/A If no, please explain:

33. If there is more than one treatment plant, were local limits established specifically for each plant? ■ Yes ☐ No ☐ N/A If no, please explain:

34. Has the CA made any changes to its local limits which have not been approved by the AA? [403.18] ☐ Yes ■ No If yes, provide details?

35. Has the CA granted any waivers to IUs such as net/gross allowances, pollutants not present, middle tier CIUs, etc., or has the CA applied for removal credits? ■ Yes ☐ No If yes, please describe:

1) Argenta - US Manufacturing 2) Biomune Company 3) Hennessy Research Associates, LLC

36. Has a local limits reevaluation been performed following renewal of the NPDES permit? ☐ Yes ■ No If no:

II.F. Standards and Requirements for IUs

37. Does the CA compare local limits against federal categorical standards and apply the most stringent standards to categorical IUs? [403.4] ■ Yes ☐ No

    a. Are any IUs required to implement best management practices in lieu of monitoring for pollutants? ☐ Yes ■ No If yes, please describe:

38. Did the CA notify its IUs of possible Resource Conservation Recovery Act obligations? [403.8(f)(2)] ■ Yes ☐ No

39. Does the CA allow categorical users to use total toxic organics management plans/certification or surrogate test procedures to meet TTO requirements if allowed under the categorical standard? ■ Yes ☐ No

II.G. CA Compliance Monitoring and Inspections

40. What is the current frequency for:

Activity	Noncategorical SIUs	Categorical SIUs*
CA sampling of:	1/yr	Varies
CA inspection of:	1/yr	1/yr
SIU self-monitoring:	Varies	Varies
SIU reporting:	12/yr & 2/yr	2/yr

* For categorical pollutants

41. List exceptions:

42. List those SIUs below that were not sampled by the CA within the last 12 months: [DSS: 403.8(f)(2)(v)]
None

43. List those SIUs below that were not inspected within the last 12 months: [DSS: 403.8(f)(2)(v)]
None

44. How many industries were neither sampled nor inspected within the last 12 months? [DSS: 403.8(f)(2)(v)]
{NOIN}{RNC/SNC} None

45. Does the CA sample its SIUs for all regulated pollutants at least once annually? [403.8(f)(2)(v)] ■ Yes ☐ No

46. Sample/Analysis Procedures:

Chain-of-Custody always used? ■ Yes ☐ No	Sampling method, metals: Grab
Ability to sample on short notice? ■ Yes ☐ No	Sampling method, cyanide: Grab
In-house analysis of toxic pollutants? ■ Yes ☐ No	Sampling method, oil and grease: Grab
Do in-house analytical methods conform to 40 CFR part 136 (including pH)? ■ Yes ☐ No	
Notes:	

47. How does the CA document its industrial user inspections?
Checklist and narrative format

48. Does the CA evaluate all SIUs to determine the need for a slug discharge/spill control plan? [DSS: 403.8(f)(2)(v)]
■ Yes ☐ No

a. Describe the method used by the CA to evaluate the need for a slug control plan:
Asses during inspections

II.H. IU Self-Monitoring and Reporting

49. Are all significant categorical IUs required to self-monitor for all pollutants regulated by the respective categorical standard at least twice per year? [403.12(e)] ■ Yes ☐ No

a. If nonsignificant categorical IUs have been identified, are they meeting all the monitoring and reporting requirements as established by the CA? ■ Yes ☐ No ☐ N/A If no, please explain:

50. Were any baseline monitoring reports or 90 day compliance reports due within the past 12 months?
☐ Yes ■ No If yes, from which IU and were the reports submitted as required?

51. Are IUs required to report spills, slug discharges, etc. to the CA? [403.12(f)] ■ Yes ☐ No

52. Are IUs required to report violations within 24 hours of knowledge of the violation? [403.12(g)(2)] ■ Yes ☐ No

53. Are IUs required to resample and submit results within 30 days following a violation? [403.12(g)(2)] ■ Yes ☐ No

II.I. Data Management

54. Are files/records in ☐ electronic formats or are they in ☐ paper form, or ■ both?

55. Are all records maintained for at least three years? [403.12(o)] ■ Yes ☐ No

56. Are program records available to the public? [403.14(b)] ■ Yes ☐ No

57. Does the CA have provisions to address confidential business information? [403.14(a)] ■ Yes ☐ No

58. How is compliance status (e.g., SNC) calculated? Describe the procedure used in determining SNC as defined in 403.8(f)(2)(viii) and by the SUO?

Utilize spreadsheets and it is defined in their SUO and ordinance.

a. Is method used to calculate SNC appropriate? ■ Yes ☐ No

II.J. Program Resources

59. What percent of the pretreatment coordinator's time is spent on pretreatment? 40%

59. What computer programs are used to document program activities:

Word Processing:	MS Word
Spreadsheet:	Excel
Database:	Lablite

61. Does the CA believe its annual budget is adequate in order to implement their program? ■ Yes ☐ No

a. If no, does the CA need to devote more resources to adequately implement their program? ☐ Yes ☐ No
If no, please explain:

b. What is the annual operating budget? $1,351,485.00

II.K. Special Questions

62. Are there any issues that the CA would like to discuss? ☐ Yes ■ No If so, please discuss below:

PART III: FILE AND RECORDS REVIEW DEFINITIONS

Following is a table containing the CA's SIU inventory regulated by its pretreatment program. Please verify that all information in the table is correct and current. For those industries no longer regulated, draw a line through the entry. Add all new industries and provide the information sought by the table. Below is a guide to the information requested by the table with suggested abbreviations.

INDUSTRY:

Provide the name of each industrial user regulated under the pretreatment program.

CAT STND:

Provide the categorical standard code number. For example, industries subject to the metal finishing regulation should be designated "433." For noncategorical industries, indicate "N/A" in this column.

REG PROCESS:

Indicate what process the industry performs to qualify for inclusion in the pretreatment program. For example, if an industry is subject to metal finishing regulations because it performs zinc and chromium plating, indicate with "ZnCrPL" or a similar abbreviation.

TMT:

If the facility treats its wastestream(s) indicate "Y." If no treatment is provided indicate "N."

TYPE:

Indicate the type of pretreatment system (if applicable) the industry has. Suggested abbreviations: "precip" for precipitation/clarification; "precp/flt" for precipitation followed by filtration; "DAF" for dissolved air flotation; etc.

REG FLOW:

Provide the industry's average daily flow for its regulated processes in gallons per day. The abbreviation "K" stands for 1,000.

TOT FLOW:

Provide the average daily total plant flow in gallons per day.

CWF:

Indicate if the industry uses the combined wastestream formula to determine compliance with categorical standards. "Y" = yes; "N" = no.

COMPLIANCE STATUS FOR THE SIX MONTH PERIOD ENDING:

For the six month periods listed, indicate the industry's compliance status. Use the following abbreviations:

“C”	In compliance with all standards (e.g., no violations).
“I”	Infrequent noncompliance with discharge standards. The facility had some violations but not severe enough to be considered in SNC.
“SNC,S”	In SNC with discharge standards.
“SNC,R”	In SNC with reporting requirements. The industry failed by greater than 30 days to submit reports as required.
“SNC,M”	In SNC with self-monitoring requirements. The industry did not properly report its compliance status on its self-monitoring reports.
“SNC,C”	Failure to meet a compliance schedule milestone by 90 days.

LAST INSPECTION:

Date of the last inspection performed by the city.

Significant Industrial Users

Johnson County, KS

2024

Industry Name	Cat Stnd	Regulated Process	TMT?	Treatment Type	Regulated Flow, 1000 gpd	Batch?	Total Flow, 1000 gpd	CWF?	Compliance Status for the Six Month Period Ending:				Last Inspection
									Jun 2023	Dec 2023	Jun 2024	Dec 2024	CY2024
Argenta US Manufacturing, LLC***	439NS	PHARM	Y	pH ADJ/FLT/CAS/UV/ELCHOXI	45.7	N	71.9	N	C	C	C	C	4/23/2024
Biomune Company	439ES, 439NS	PHARM	N	NA	92.6	N	106.9	N	C	C	C	C	10/17/2024
Central Biomedia, Inc.	439ES	PHARM	Y	pH ADJ	0.2	Y	0.3	N	C	C	C	C	10/3/2024
Deffenbaugh Industries, Inc.	NA	LANDFILL	N	NA	8.6	N	8.6	NA	C	C	C	C	9/17/2024
Disposable Instrument Company, Inc.	433ES	ELECPOLSH	Y	PRCP/FLT/pH ADJ	0.1	N	0.3	N	C	C	C	C	6/27/2024
ELC Distribution Center LLC****	NA	PAINTMANU	N	NA	0.4	N	3	NA	C	C	I-Reporting	C	3/12/2024
Flora Food Sourcing US, Inc.**	NA	EDIBL OIL	Y	DAF/pH ADJ	80.2	N	102.4	NA	SNC-Reporting	SNC-Reporting, I-O&G	I-O&G	C	5/9/2024
Flowers Baking Co. of Lenexa, LLC	NA	Bakery	Y	FLT/ph ADJ	3.2	N	5.5	NA	SNC-Reporting	I-O&G, I-pH	SNC-Reporting, I-pH	C	7/16/2024
Gill Studios, Inc.*****	NA	PRINTING	Y	FLT	0	N	0	NA	I-Reporting	C	Permit cancelled	N/A	2/8/2024
Heartland Precision Fastners, Inc.	433NS	NiZnCrPL	Y	PRCP/FLT/pH ADJ	6.9	N	8	N	SNC-Cd, I-Cu, I-Ni	C	I-pH, I-Cd, I-Cu	C	7/30/2024
Hennessy Research Associates, LLC (II)	439NS	PHARM	N	NA	4.1	N	4.6	N	C	C	C	C	5/2/2024
Inficon EDC, Inc. (II)	469ES	QTZCRYST	Y	FLT/pH ADJ	1.8	Y	2.3	N	C	C	C	C	1/18/2024
International Flavors and Fragrances, Inc.	NA	FOODEMUL	Y	DAF/pH ADJ	153.1	N	156.1	NA	I-pH	C	SNC-Reporting, I-O&G	C	6/25/2024
IRCA New Century*	NA	CHOCFOOD	Y	DAF/pH ADJ	0.0	Y	0.0	NA	C	C	C	Permit cancelled	1/18/2024
Ivy Animal Health, Inc.	439ES	PHARM	Y	pH ADJ	0.001	Y	0.09	N	C	C	C	C	11/5/2024
Kocher + Beck USA LP	433NS	CHEMTECH	y	PRCP/FLT/pH ADJ	2.2	Y	3.4	N	C	I- Reporting	C	C	4/11/2024
Lenexa WWTP, LLC	NA	IPTPLANT	Y	ANBIOFLT	109.2	N	110.3	NA	C	C	SNC-BOD	I-BOD	1/9/2024
SAFC Biosciences, Inc.	439ES	PHARM	Y	pH ADJ	15.1	N	19.3	N	C	I- Reporting	C	C	8/27/2024
Sauer Brands, Inc.	NA	EDIBL OIL	Y	DAF/pH ADJ	55.3	N	59.2	NA	I- Reporting	C	C	I-pH	2/6/2024
Sparhawk Laboratories, Inc.	439ES	PHARM	Y	Activated Carbon	26.3	N	28.5	N	C	C	C	C	11/14/2024
Tapco Products Company	NA	COMLAUND	Y	FLT/pH ADJ	21.2	N	21.5	NA	C	SNC-Reporting, I-pH	I-pH	I-pH	9/26/2024
TED Manufacturing Corporation	433ES	AgAuCuNiPL	Y	PRCP/FLT/pH ADJ	1	Y	2.1	N	C	SNC-CN, I-pH, SNC-Reporting, I-Reporting	C	I-pH	2/29/2024
Universal Engraving, Inc.	433NS	CHEMETCH	Y	PRCP/FLT/pH ADJ	0.6	Y	2.1	N	C	C	C	C	8/6/2024

*****Gill Studios, Incorporated's permit was cancelled, due to no reasonable potential for adversely affecting POTW's operation or for violating any Pretreatment Standards.

**** Excelligence Learning Corp. has changed it's name to ELC Distribution Center LLC

***TriRx Shawnee, LLC. was purchased and is now known as Argenta US Manufacturing, LLC.

**Upfield Sourcing US, Inc. has changed it's name to Flora Food Sourcing US, Inc.

*IRCA New Century's permit was cancelled due to the facility shuting down.

Number of SIUs:	21
Number of CategoriCal SIUs:	13
Number of Non-CategoriCal SIUs:	8

69. Were all enforcement actions taken by the CA within 30 days of knowledge of a violation? **{RNC/SNC}**
☒ Yes ☐ No

70. Did all industries in SNC either return to compliance within 90 days, receive escalated enforcement action by the CA within 90 days, or become placed on an enforceable compliance schedule within 90 days (of knowledge by the CA) of the violation? **{RNC/SNC}** ☐ Yes ☐ No ☒ N/A If no, please explain:

III.C. Control Mechanism Evaluation

71. Do the CA's control mechanisms contain the following? Y = yes; N = no; N/A = not applicable

Permit Evaluated:

REQUIRED [DSS: 403.8(f)(1)(iii)]		SUGGESTED PROVISIONS	
Specify duration (not > 5 years):	Y	Cite the CA's legal authority:	Y
Contain the correct discharge limits:	Y	Identify TTO alternatives, if applicable:	NA
Specify sample type for IU self-monitoring:	Y	Require notification within 24 hours of a violation:	Y
Adequately identify sampling location:	Y	Require resample/report in 30 days of violation:	Y
Specify sampling frequency:	Y	Specify right of entry:	Y
State applicability of civil or criminal penalties:	Y	Reserve right to revoke permit:	Y
Stipulate reporting frequency:	Y	Specify immediate slug load notification:	Y
Properly require records retention:	Y	Require submission of all sampling results:	Y
Specify limited transferability:	Y	Other?	

Are the current control mechanisms adequate? ☒ Yes ☐ No If no, please explain:

III.D. Industrial Inspection Evaluation

72. Do the industrial inspection reports contain? Y = yes; N = no; N/A = not applicable

Name of company contact:	Y	Evaluation of IU's monitoring procedures:	Y
Date of inspection:	Y	Verification of wastewater flow rates:	N
Time of inspection:	Y	Determination of applicability of the CWF:	Y
Description of manufacturing process:	Y	Description of the chemical storage area:	Y
Description of treatment process, if any:	Y	Identification of potential spill conditions:	Y
Evaluation of IU's monitoring methods:	Y		
Verification of production rates that would affect production based standard:			NA

Is the inspection report form complete? ☒ Yes ☐ No If no, please explain:

III.E. Slug/Spill Control Plans

73. If the CA has required the submittal of a slug/spill control plan, does it contain the following: [DSS: 403.8(f)(2)(v)] (Note: All the items below must be checked for the plan to be considered complete.) ☐ N/A

___Y___ A description of discharge practices including non-routine batch discharges to city sewer.

___Y___ A description of stored liquids/chemicals onsite.

___Y___ Procedures for immediate notification of slug or accidental discharges with written follow-up notification to the CA.

___Y___ Procedures necessary to prevent adverse effects at the CA's treatment plant or collection system.

___Y___ Procedures for inspection and maintenance of chemical storage areas:

- ___Y___ Proper handling and transferring of materials and liquids.
- ___Y___ Adequately loading and unloading liquids and materials.
- ___Y___ Adequately controlling pollutants from leaving the plant site.
- ___Y___ Providing training on spill response for employees.
- ___Y___ Inspecting containment structures.
- ___Y___ Providing measures for the control of toxic pollutants.
- ___Y___ Implementing procedures for emergency response to spills.
- ___Y___ Providing adequate spill response equipment onsite.

PART IV: ADDITIONAL INFORMATION

IV.A. Fats, Oil and Grease Program

74. Is there an established FOG program? ■ Yes ☐ No ☐ N/A If yes, describe the program:

a. How many sanitary sewer overflow occur on average each year?

b. Are any SSOs caused by FOG or by any other type of industrial discharge? ☐ Yes ☐ No If yes, please explain:

IV.B. Dental Amalgam Rule, Part 441 Requirements

75. How many dental dischargers have been identified by the CA? Have all dental dischargers that are served by the POTW submitted a one-time compliance report to the CA? ■ Yes ☐ No

a. If no, please explain:

b. Have treatment devices been installed when applicable? ■ Yes ☐ No If no, please explain:

c. Is the CA continuing to identify and monitor new dental dischargers or changes in ownership? ■ Yes ☐ No

III.H. IU File Review Checklists

Following are worksheets to aid in the assessment of the nature of the oversight activities and compliance status of the CA's SIUs. When reviewing SIU files, priority should be placed on categorical industries that either have a history of violations or that appear to be in compliance but have not installed that prescribed best available treatment technology to consistently meet discharge limits. While only three pages are provided, the reviewer is encouraged to copy and add additional review pages for larger CAs.

Industry Name: Flowers Baking Company
Principal Pollutants of Concern: Oil and Grease
No. of Employees: 239
Products: Bread

A. Does the file system for the industrial user contain the following items (Mark "Y" for Yes, "N" for No or "N/A" for not applicable:

Y	Completed permit application	Y	CA compliance sampling results
Y	Current (active) permit	Y	Self-monitoring reports
Y	Correct limits in permit	Y	Enforcement documentation, if applicable
Y	Correspondence/meeting notes/phone log	NA	Solvent management plan, if applicable
Y	Most recent inspection report	NA	Correct application of the CWF
Y	Evaluation for need for slug/spill control plan	Y	Copy of slug/spill control plan, if required
Y	Compliance status determination (e.g., SNC, I, C)		

B. Did the industry discharge any slug loads or spills to the CA in the past 12 months [403.12(f)]? ☐ Yes ☒ No If yes:

NA	Was there immediate notification by the IU?	NA	Follow-up written notification by IU?
NA	Did the CA respond?	NA	Adverse effect on treatment plant?

C. In the last complete calendar year, how many times did the CA do the following [403.8(f)(2)(v)]:

Sample the IU 1 Inspect the IU 1

D. Were all regulated pollutants in the IU's permit analyzed by the CA at least once in the most recent calendar year [403.8(f)(2)(v)]? ☒ Yes ☐ No

E. If the industry is subject to categorical standards, did their self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year [403.12(e)(1)]? ☐ Yes ☐ No If no, please explain:

F. Frequency in the IU's control mechanism for: Self-monitoring 1X/2WKS/DLY Reporting Semi-annual

G. Did the industry comply with the sampling and reporting frequency requirements of its control mechanism?
☐ Yes ☒ No If no, please explain: 2 reporting periods of SNC-R (JUN23&JUN24)

H. Did the CA identify all IU violations from:

IU Self-monitoring Y CA compliance monitoring Y

I. Was the IU's compliance status (e.g., SNC, Infrequent noncompliance, Consistent compliance) determined properly?
☒Yes ☐ No If no, please explain:

J. Complete the following table for all violations in the last 12 months: (If this information has already been provided above, please indicate.)

Type of Violation	Date of Violation	Date CA Knew of Violation	Date of CA's Response	ERP Required Response	Actual CA Response Type