

REPORT OF THE PRETREATMENT COMPLIANCE INSPECTION

AT

The City of Joplin
602 South Main Street
Joplin, Missouri 64801

MO-0103349 (Turkey Creek WWTP)
MO-0023256 (Shoal Creek WWTP)

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7

ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON

June 24-28, 2024

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Pretreatment Compliance Inspection of the Joplin Approved Industrial Pretreatment Program (IPP) was conducted on June 24 through 28, 2024. To direct the inspection, a checklist was used that evaluates all important elements of the Pretreatment Program. A copy of the checklist is attached to this report (Attachment 1). The inspection consisted of a discussion with the IPP personnel and file review of the IPP's program records, and visits to one of the regulated industries: Lozier Corporation. In addition, I conducted a brief file review of the city's Biosolids Management Program (Sludge). Brad Allen and Joshua Grosvenor with Missouri Department of Natural Resources were present during this inspection. This narrative report presents the findings of the inspection.

Participants

City of Joplin

- Austin Bruce, Pretreatment Inspector, ABruce@joplinmo.org

Missouri Department of Natural Resources

- Brad Allen, Pretreatment Coordinator Brad.Allen@dnr.mo.gov
- Joshua Grosvenor, Environmental Engineer joshua.grosvenor@dnr.mo.gov

U.S. Environmental Protection Agency (EPA), R7

- Naji J. Ahmad, Environmental Engineer, WB/DWIS Ahmad.naji@epa.gov

Facilities Description

The city of Joplin owns and operates two Wastewater Treatment Facilities (WWTF): Joplin Turkey Creek, MO0106649 and Joplin Shoal Creek, MO0023256.

The Turkey Creek plant (the larger of the two) is located on the northwest side of the city at 3457 West Eddy Lane and it is an advanced treatment facility utilizing an influent screen, peak flow pumping, grit removal, comminution, flow splitter, primary clarification, biotowers, intermediate clarification, oxidation ditch, final clarification, Diamond Fabric filter, ultraviolet disinfection, step aeration prior to discharge, anaerobic sludge digestion, aerobic digestion, sludge belt press, and sludge drying beds. According to the NPDES permit number MO0106649 which will expire on September 30, 2027, the facility has a design population equivalent of 100,000, design flow of 15.0 million gallons per day (mgd), an actual flow of 8.5 mgd, and an annual design sludge production of 2,340 dry tons. Sludge is land applied. The discharge from this facility flows into Turkey Creek.

The Shoal Creek WWTF is located on the southwest side of the city at 2860 Apricot Drive, and it consists of a mechanical bar screen, grit removal, comminutor, primary clarifiers, trickling filter, oxidation ditch, biological nutrient removal, final clarifiers, tertiary filtration, ultraviolet disinfection, anaerobic digesters, sludge thickening, and aerobic digesters. According to the NPDES permit number MO0023256 which will expire on March 31, 2028, the facility has a design population equivalent of 34,800, a design flow of 7.5 mgd, an actual flow of 4.9 mgd, and an annual design sludge production of 2,605 dry tons. Sludge is land applied. The discharge from this facility flows into Shoal Creek .

According to the IPP personnel, the two WWTFs have a combined design peak flow of approximately 37 mgd and an actual 2023 combined average daily flow of 11.18 mg.

Industrial Pretreatment Program Overview

The city of Joplin Industrial Pretreatment Program (IPP) was originally approved on September 28, 1983. The city's most recent local limits evaluation was approved on March 25, 2022. The authority to enforce the IPP is listed under Chapter 118, Article II of the Joplin code of ordinances.

On January 19, 2022, the IPP submitted a written technical evaluation of the need to revise local limits (Page 49-Attachment 3) to the Missouri Department of Natural Resources (MDNR) pursuant to the requirement of 40 CFR122.44(j)(2)(ii) and Special Condition # 21 of the Turkey Creek WWTF NPDES Permit (Attachment 4) (and condition #20 of the Shoal Creek WWTF NPDES (Attachment 3) which required the IPP to submit to the MDNR the evaluation under 40 CFR 403.5(c)(1).

The January 19, 2022, submittal included the IPP's June 2021 (Attachment 2) evaluation analysis of maximum daily limits for Maximum Allowable Industrial Loadings (MAIL) values for 15 pollutants of concern for both the Turkey Creek and Shoal Creek WWTFs, and modification to the sewer use ordinance (SUO) (Attachment 5) which incorporated the required 2005 Streamlining Rule revisions in the 40 CFR 403 federal rule and optional provisions such as (a) non-significant categorical industrial user classification, (b) specific monitoring waiver of pollutants not present, and (c) authority to adopt best management practices to implement local limits. The MDNR designated those changes as substantial modifications because the city modified its SUO to include updated local limits which could have a significant impact on the

operation of the program, pursuant to 40 CFR 403.18(b)(7). The city did not update the enforcement response plan (ERP). The ERP was approved on April 4, 2017.

The calculated mass limits (pounds/day) included under Section 118-184 of the SUO are listed in Table 1 below.

Table 1, Joplin's Local Limits

Pollutant	Turkey Creek WWTF	Shoal Creek WWTF
	Maximum Allowable Industrial Load (lb./day)	Maximum Allowable Industrial Load (lb./day)
Silver (Ag)	4.50	3.63
Arsenic (As)	1.13	0.60
Cadmium (Cd)	0.28	0.33
Cyanide (CN)	0.93	1.01
Chromium (Cr)	33.27	13.67
Copper (Cu)	4.89	6.73
Mercury (Hg)	0.16	0.35
Molybdenum (Mo)	1.02	0.51
Nickel (Ni)	6.62	5.81
Lead (Pb)	1.10	0.76
Selenium (Se)	0.75	0.84
Zinc (Zn)	10.71	6.71
Biochemical Oxygen Demand 5 (BOD ₅)	12,740	12,581
Total Suspended Solids (TSS)	10,013	8,758
Total Kjeldahl Nitrogen (TKN)	2,344	935

Records indicated that the city had effluent limit exceedances that occurred during the 2022 and 2023 calendar years. Table 2 summarizes such exceedances, none of which were reported to be caused by an industry.

Table 2, WWTFs effluent limit exceedances

Turkey Creek	Parameter	Period
	Ammonia as N	February 2022
	Oil & Grease	April 2023
Shoal Creek	<i>E.coli</i> (monthly Average)	April 2022
	<i>E.coli</i> (7-day Average)	April 2022
	Zinc	December 2023

Mr. Bruce was assigned the responsibility of coordinating the Joplin IPP in May 2024, and was given the title of "Pretreatment Inspector" not "IPP Coordinator." In addition, Mr. Bruce is responsible for the Sludge Management Program, the Fat, Oil and Grease Program, and investigating illicit discharges to the Joplin Municipal Separate Storm Sewer System (MS4). However, the city never provided him with the opportunity to receive formal Pretreatment training.

The Joplin IPP doesn't have a set frequency to conduct an industrial waste survey. However, the IPP is part of Joplin inter-departmental communication where they would know if a new entity were planning on connecting the sanitary sewers. Records indicated that the last formal IWS was completed in 2017. Currently there are 28 regulated industrial users (IUs) that are being regulated by the Joplin IPP. Of which, 16 are considered Significant Industrial Users (SIU) and all of which are located within the city of Joplin city limits. Eight of the regulated SIUs are classified as categorical industrial users (CIU).

Prior to the EPA PCI in 2017, the Joplin IPP reported all 28 IUs to the EPA and MDNR as SIUs. Since then, the city evaluated the list and determined that approximately half are non-SIUs. During the PCI, Mr. Bruce was unable to locate records justifying the decision of dropping those industries from the list of SIUs.

The Joplin IPP has identified and sent the one-time compliance report (OTCR) to approximately 40 dental offices between September 2020 and September 2023, under the Amalgam rule 40 CFR Part 441. Seven offices have closed, seven do not use amalgam, and 26 offices have submitted the OTCR. The last OTCR was submitted in October 2023. No new dental offices were identified since. The IPP reports the list of regulated dental offices annually to the MDNR.

Permits

All industries have current permits, and the IPP continues to issue permits with a three-year duration. But one industry (Eagle Picher) was issued a permit with a one-year duration. Soon after incorporating the Streamlining Rule and the local limits into the SUO on October 1, 2022, the IPP reissued all 28 industrial user permits to reflect the new local limits and the new streamlining rule requirements. All permits will expire on September 30, 2025 (except Eagle Picher). Overall, permits appeared to contain the necessary elements that should be included in an enforceable permit. Records indicate that industries submitted complete and adequate permit renewal applications.

Permits include numerical limits for pollutants of concerns (POC) and only monitoring requirements for other pollutants such as phosphorus, TKN, ammonia, chemical oxygen demand (COD), zinc, and flows.

Inspections

Records indicated that all SIUs were inspected in the past 12 months. However, Mr. Bruce has not independently inspected many industry on his own since he took over the responsibility of the IPP. The IPP uses a 7-page inspection checklist that includes a list of 104 pretreatment questions and five stormwater questions. Overall, the checklist addresses all requirements of the program as required.

Determining the need for a slug control plan (SCP) is done by the PC during the inspection. During my review of industrial files, I pointed out to Mr. Bruce that industries are submitting a spill prevention and countermeasures control (SPCC) plan as their SCP. I also pointed out to Mr. Bruce that although some elements of the SPCC cover what's required in the SCP, the SPCC is a federal requirement under 40 CFR Part 112, §112.3 for those industries that have at least 1,320 U.S. gallons of petroleum products (e.g., diesel fuel, gasoline, hydraulic fluid, oil, and used oil)

stored onsite in various containers such as double-wall tanks, totes, and 55-gallon drums. I added, the SCP should meet the requirement of 403.8(f)(2)(vi)(A) to (D).

Waste Haulers

Hauled waste is accepted by the city only at the septic receiving station at the Turkey Creek WWTF from septic tanks, grease traps, metal recyclers, portable or chemical toilets, gas stations, and special projects and events. The city requires contractors/haulers to obtain a license from City Hall. Currently the city has seven licensed haulers. On average, the city accepts 145 loads per month of waste, averaging 2,500 gallons per load. The WWTF personnel would conduct random sampling of the waste. But all haulers must submit a completed manifest indicating the source of the waste.

Compliance Monitoring, Self-Monitoring, and Reporting

Section 118-125 of the SUO gives the IPP the authority to sample its industries and to identify sampling frequencies of regulated pollutants, monitoring of PCs, and sampling locations. The IPP samples all industries at least quarterly. Self-monitoring is described in the industrial permits and self-monitoring requirements differ from one industry to another. The city is capable of sampling with short notices and using analytical methods that conform to 40 CFR Part 136.

Industries are required to submit quarterly self-monitoring reports no later than fifteen days after the end of the reporting period. Quarterly reports appeared to be submitted accordingly and included the certification statements.

Industries that are subject the electroplating, metal finishing, and electrical and electronic components categories submitted total toxic organics (TTO) certification indicating that they are implementing a Solvent Management Plan (SMP)/Toxic Organics Management Plan (TOMP) in lieu of TTO monitoring. Records indicated that Lozier Corporation and Mapp Technologies submitted the certification statement. Mr. Bruce believes all four industries subject to such categorical standards chose to develop and implement an SMP and submit the TTO certification statements. Records indicated that the SMP submitted are adequate.

Enforcement

The ERP was originally approved in 1992 and was revised on April 4, 2017 (Attachment 6). Overall, the current ERP includes the minimum requirements contained in 40 CFR 403.8(f)(5). It indicated that the Pretreatment Coordinator is responsible for the completion and delivery of the Notice of Violation. Analytical data is reviewed and analyzed on a “rolling” or “as-received” basis. But it does not establish time frames for initiating enforcement.

Section 118-60. - Civil penalties (Ord. No. 2022-098, § 1, 6-20-22) indicated that any “*any user who is in found to have violated an order of the city council or who willfully or negligently failed to comply with any provision of this article and the orders, rules, regulations and permits issued under this article shall be fined not less than \$100.00 and not more than \$500.00 for each offense*”. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition, fees, court costs, court reporters' fees and other expenses of litigation may be assessed by appropriate suit at law against the person found to have violated this article or the orders, rules, regulations and permits issued under this article. In the case of a

monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation.

This language does not meet the requirement of 40 CFR 403.8(f)(1)(vi)(A) which requires at least the amount of \$1,000 a day for each violation by industrial users of Pretreatment Standards and Requirements.

The Calendar Year 2022 Pretreatment Annual Report indicated that Protein Solutions was in Significant Noncompliance (SNC) during calendar year 2022 for high amounts of Oil & Grease that resulted in several blockages in the area sewer lines and runoff into Silver Creek from the truck and trailer parking area. This illicit discharge was discovered on June 2, 2022. Two Notice of Violations were issued to Protein Solutions for the illegal discharges. Since that time, the facility has made several upgrades and improvements including lift station up-grades, hiring of a Wastewater Manager, installation of wastewater screening, pump upgrades, creation of operational standards to improve the collection of fats and oils to prevent from entering the waste stream, and stormwater collection upgrades. The violation was published in the Joplin Globe on February 22, 2023. No fines were collected. Even though, the SUO and ERP allow imposing fines.

The Calendar Year 2023 Pretreatment Annual Report indicated that Gilster-Mary Lee Corp., Ajinomoto Foods, Inc., Protein Solutions/Protein, and Tamko Building Products-Rangeline were in SNC during calendar year 2023. The violations were published in the Joplin Globe on February 13, 2024. No fines were collected.

Gilster-Mary Lee exceeded the BOD and TSS monthly average limits in the first half of 2023. The city increased the BOD and TSS permit limits to a value that is a more appropriate limit that allows the industry more flexibility without compromising the industry loading rates at the WWTF. An email was sent to the industry regarding the exceedances, with recommendations to research for ways to reduce BOD and TSS loadings in their process water wastestream.

Ajinomoto Foods exceeded the BOD and TSS monthly average limits in the second half of 2023. The city increased the BOD and TSS permit limits to a value that is a more appropriate limit that allows the industry more flexibility without compromising the industry loading rates at the WWTF. An email was sent to the industry regarding the exceedances, and they have indicated that they are making the necessary changes to increase treatment and reduce loadings in their process water wastestream. This increase was approved the MDNR.

Protein Solutions exceeded the BOD and TSS monthly average limits in the first half of 2023. The city increased the daily maximum limits and monthly average limits in May of 2023 to a value that was a more appropriate limit to allow the industry more flexibility without causing harm to the WWTF. Since that modification, the industry has achieved compliance in the second half of 2023, and is continuing to improve their process water wastestream. This increase was approved the MDNR.

Tamko Building Products exceeded the TSS monthly average limits in the first half of 2023 and BOD and TSS monthly average limits in the second half of 2023. The city increased the daily

maximum limits and monthly average limits beginning in January of 2024 to a value that was a more appropriate limit to allow the industry more flexibility without compromising the industry loading rates at the WWTF. The facility is also looking at ways to reduce loadings and improve their process water wastestream. This increase was approved the MDNR.

Site visit to Lozier Corporation

I traveled to Lozier Corporation, located at 1625 South Schifferdecker Ave in Joplin, to observe the city conduct an inspection and to investigate if any of the 40 processes under §433.10 are used on site. Lozier is a categorical industrial user (CIU) subject to the Metal Finishing Standard 40 CFR, Part 433.17, that mainly manufactures self-checkout systems, and refurbishing of store shelves. Process includes machining, welding, painting, and forming. Regulated wastestreams come from the phosphate cleaning system (Coating: phosphating, and coloring) as one of the six metal finishing operations listed in §433.10, and the wastewater generated from the “Tumbling Operation” where water is collected in a 275 gallons tote.

The facility has two outfalls: Outfall 001 is located at the sump located at the end of the rinse tank of the phosphate cleaning system, and Outfall 002 is located at southeast corner of the main facility at the combined discharge point.

Outfall 001 wastestream is sampled quarterly for all parameters listed in Part §433.17 except for silver (Ag) is sampled semiannually, and total toxic organics (TTO) are not sampled because the facility chose to submit TTO certification that they are implementing an SMP in lieu of TTO monitoring. The industry submitted their TOMP on June 27, 2022, and was resigned with a new responsible official on June 26, 2024.

Outfall 002 receives water from the tumbling operation, shelf-refurbishing operation, and bathrooms. Outfall 002 is not sampled, however, wastewater generated from the tumbling operation and collected in the 275-gallon tote is tested for pH weekly before discharged to the sanitary sewers via Outfall 002. Waters from the shelf refurbishing process is not sampled. Lozier personnel explain that the refurbish process consisted of removing labels off used store shelves, cleaning, and painting the shelves to be reused in another store. I point out to Lozier personnel and Mr. Bruce that the tumbling is one of the 40 process operations listed in §433.10 and should be treated the same as the Outfall 001 wastestream. I also recommended that the washwater from the refurbish process be sampled to see what pollutants are present in it.

Mr. Bruce was the lead inspector. He started the inspection with an opening conference and completed most of the checklist. Then we toured the production areas, chemical storage, phosphate cleaning system, tumbling operation, painting line, welding area, and shelf refurbishing area, and held an exit meeting.

Sludge Quality (Attachment 10)

One function of the IPP is to protect the city’s sludge from metals contamination. As part of this inspection, the 2022 and 2023 annual biosolids reports for the Turkey Creek and Shoal Creek WWTFs were reviewed to determine the IPP’s effectiveness. Historically the city has had high concentrations of zinc in their sludge. The high zinc concentrations are not related to industrial users’ discharges, instead it is an issue of infiltration into the collection system. The city of

Joplin is in an old lead mining area and the soils in the area are rich in zinc and other metals. Due to the high zinc concentration and pH content in the sludge, the city must continuously add lime to the sludge at both plants (in the ratio of 400 pounds to every 6000 gallons of sludge at the Turkey Creek WWTF) in a mixing pit. At the Turkey Creek plant, the city utilizes one of the two filter-belt presses, then the pressed sludge is stored on site in the drying beds and land applied at the rate of 31 to 32% solids. However, city personnel surface applies liquid sludge that is 3 to 4% solids from the Shoal Creek because the filter-belt press has been down for few months.

In 2022, the city produced 1,975 dry tons (dt) and 1,156 dt in 2023. The city land applied all generated sludge as class B sludge. The city reported the volume of sludge produced and land applied in 2022 and 2023 in dry tons not dry metric tons.

Below are the 2023 tables that compares the city's peak observed metals level against the statutory ceiling and the city's average level against the exceptional quality (EQ) sludge level specified by the 40 C.F.R. Part 503 Sludge regulations. Because the city sampled the Turkey Creek at least six times a year and the Shoal Creek quarterly, the monthly average is the maximum value observed.

Table 3, 2023 Turkey Creek Sludge Metal Concentration Quality (mg/kg)

Pollutant	503 Ceiling	503 EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic, As	75	41	67.8	67.8	90.40%	165.37%
Cadmium, Cd	85	39	52	52	61.18%	133.33%
Copper, Cu	4300	1500	524	524	12.19%	34.93%
Lead, Pb	840	300	312	312	37.14%	104.00%
Mercury, Hg	57	17	1.15	1.15	2.02%	6.76%
Molybdenum , Mo	75	----	27.1	27.1	36.13%	
Nickel, Ni	420	420	85.5	85.5	20.36%	20.36%
Selenium, Se	100	36	108	108	108.00%	300.00%
Zinc, Zn	7500	2800	7210	7210	96.13%	257.50%

Table 4, 2023 Shoal Creek Sludge Metal Concentration Quality (mg/kg)

Pollutant	503 Ceiling	503 EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic, As	75	41	11	11.1	14.67%	27.07%
Cadmium, Cd	85	39	31.1	31.1	36.59%	79.74%
Copper, Cu	4300	1500	359	359	8.35%	23.93%
Lead, Pb	840	300	41.8	41.8	4.98%	13.93%
Mercury, Hg	57	17	0.98	0.98	1.72%	5.76%
Molybdenum , Mo	75	----	44.4	44.4	59.20%	
Nickel, Ni	420	420	21.8	21.8	5.19%	5.19%
Selenium, Se	100	36	17	17	17.00%	47.22%
Zinc, Zn	7500	2800	4270	4270	56.93%	152.50%

While reviewing the 2023 sludge data, I noticed that the city applied sludge generated from the Turkey Creek WWTF when the selenium (Se) concentration was 108 mg/kg dry weight on July 19, 2023, which exceeds the 503 Concentration Based Limits of 100 mg/kg dry weight.

I emailed Mr. Bruce, asking him for verification of the high selenium concentration and if the city investigated cause of the high concentration.

Mr. Bruce indicated via an email sent to me on August 8, 2024, that “for some reason, the Report Limit for selenium that day was 108 mg/kg dry (higher than the compliance limit of 100 mg/kg dry) and so the result was recorded as <108 mg/kg dry. This seems to be a lab calibration error (Attachment 11). The Report Limit for selenium is usually set at a much lower value, single digits many times. This is reflected in our other lab results, and we were always well below the limit of 100 mg/kg dry. He added that, 30.58 dry tons of sludge were applied at the Turkey Creek field and 16.25 dry tons of sludge were applied at the old Landfill field.

Table 5, 2023 Turkey Creek Sludge Metal Concentration

		24-Jan	24-Mar	Jan-1 Jan-19	24-May	Jun-15 Jun-20	Apr-5 Apr-11	Jul-11 Jul-19	24-Sep	Oct-4 Oct-17	24-Nov	MXM	AVG
		DB	DB	ANA	DB	DB	ANA	ANA	DB	ANA	DB		
Arsenic	75	2.5	2.7	11	2.76	8.87	4.5	67.8	2.5	4.35	3.68	67.8	11
Cadmium	85	30.1	28.8	52	37.6	49.2	50.2	18.3	23.1	40.9	41.9	52	37
Copper	4300	209	192	323	239	524	337	297	300	313	272	524	301
Lead	840	140	110	160	109	312	146	155	32	130	147	312	144
Mercury	57	0.32	0.292	0.41	0.461	0.371	0.95	0.523	0.653	1.15	0.453	1.15	1
Molybdenum	75	9.4	9.9	22	11	26.6	17.1	27.1	26.1	17.9	13.8	27.1	18
Nickel	420	29.4	21.5	36.1	24.8	85.5	37.1	42	16.7	32.2	34.3	85.5	36
Selenium	100	3.5	5.1	16.5	6.31	11.3	8.9	108	4.43	7.31	8.53	108	18
Zinc	7500	4180	4170	7090	5390	6970	7210	2640	3520	5580	6100	7210	5285

DB: Drying Beds ANA: Anarobic sludge

Table 5 above also shows significnat variations in the concentration of some metals such as lead, nickel, copper, and selenium in the Class B sludge generated from the Turkey Creek WWTF. The IPP did not investigate the cause of such variations in the conentration .

Data Management

Overall, industrial files have all the necessary documentation as recommended by the Agency checklist. Each file consisted of permit and permit renewal applications, inspection reports, monitoring reports, and correspondence between the IPP Inspector and the industry. Records are well kept by Mr. Bruce at the Turkey Creek WWTF and maintained at his office for more than three years and are available for public review. Records are also kept electronically.

Conclusion & Recommendations

Mr. Austin Bruce was assigned the responsibility of coordinating the Joplin IPP in May 2024, and was given the tile of “Pretreatment Inspector” not “IPP Coordinator.” In addition, Mr. Bruce is responsible for the Sludge Management Program, the Fat, Oil and Grease Program, and investigating illicit discharges to the Joplin Municipal Separate Storm Sewer System (MS4). The city should give Mr. Bruce and other staff members responsible for the implementation of the

IPP the opportunity to attend Pretreatment training courses. The city should also cross-train other qualified staff members.

The city should have justification why they reclassified almost half of the significant industrial users to non-significant industrial users.

The ERP does not establish time frames for initiating enforcement. The city should consider including language for example “the PC will review industrial user reports within five days of receipt and for minor errors may issue the formal letter notification within an additional seven days. Formal notices of violation will generally be issued within 30 days of receipt of the report.”

The city should ensure that the civil penalties amount, listed under Chapter 18-60- Article II- Division 2- Section 118-60 of the city ordinance, meets the requirement of 40 CFR 403.8(f)(1)(vi)(A) which requires that civil penalties should be at least the amount of \$1,000 a day for each violation by industrial users of Pretreatment Standards and Requirements.

Lozier Corporation and the IPP should consider the tumbling as one of the 40 process operations listed in §433.10 and should treat it in the same manner as the Outfall 001 regulated wastestream. Lozier Corporation and the IPP should also sample the washwater from the refurbish process to see what pollutants are present in it.

The city applied sludge generated from the Turkey Creek WWTF when the selenium (Se) concentration was 108 mg/kg dry weight on July 19, 2023, which exceeds the 503 Concentration Based Limits of 100 mg/kg dry weight. Mr. Bruce indicated that *“for some reason, the Report Limit for selenium that day was 108 mg/kg dry (higher than the compliance limit of 100 mg/kg dry) and so the result was recorded as <108 mg/kg dry. This seems to be a lab calibration error. The Report Limit for selenium is usually set at a much lower value, single digits many times. This is reflected in our other lab results, and we were always well below the limit of 100 mg/kg dry.* He added that, *30.58 dry tons of sludge were applied at the Turkey Creek field and 16.25 dry tons of sludge were applied at the old Landfill field.”*

The city should ensure that they report sludge volume in dry metric tons not dry tons.

The IPP should investigate any fluctuations in metal concentrations in the sludge to ensure that no industry is negatively impacting the quality of the Joplin sudge.

The IPP should evaluate all slug control plans submitted by industries to ensure they are not submitting spill prevention and countermeasures control (SPCC) plans as their SCP.

NAJI AHMAD Digitally signed by NAJI AHMAD
Date: 2024.08.13 07:17:35 -05'00'

Naji J. Ahmad
Environmental Engineer, WB/DWIS

NICOLE MORAN Digitally signed by
NICOLE MORAN
Date: 2024.08.13
08:30:39 -05'00'

Nicole Moran
Section Supervisor, WB/DWIS

Attachments

1. PCI Checklist
2. Local Limits Evaluation
3. LL and SUO submittal and Approval
4. Turkey Creek NPDES Permit
5. SOU
6. ERP
7. Industrial permits
8. Industrial questions.
9. R7 Biosolids Checklist
10. Biosolids information
11. Selenium lab report



PCI

Approved Pretreatment Program

Date(s): June 24-28, 2024

FY2024

POTW:	CITY OF JOPLIN	Date of last PCI/Audit:
Address:	602 South Main street	August 9, 2023 (MDNR)
	Joplin, Missouri 64801	NPDES Permit No.: MO0103349 (Turkey Creek) MO0023256 (Shoal Creek)
Contact:	Austin Bruce	State Permit No.:
Title:	Industrial Pretreatment Inspector	Expiration Date:
Phone:	417-624-3615 Ext 1852	MO0103349 9/30/2027
Fax:	417-624-4726	MO0023256 3/31/2028
	e-mail: ABruce@Joplinmo.org	

Participants

POTW: Austin Bruce Industrial Pretreatment Inspector	Inspectors: Naji J. Ahmad, EPA Region 7 Brad Allen, MDNR, PC Joshua Grosvenor, MDNR SWRO
Period covered by this PCI/Audit: 2022 and 2023	

POTW Information

Total for ALL Treatment Plants (MGD)			
Design Daily Ave. 21.5	Actual Daily Ave. 11.18	Design Peak: 37	% Industrial Flow: 13.9%
Number of Plants: 2	% Combined Sewers: 0	Type of Treatment at Principal Plant: Trickling Filter/Activated Sludge	
Sludge Disposal Method: Land Applied	Quantity (dry/tons/Y): 1,974.6	Receiving Stream: Turkey Creek and Shoal Creek	

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:	9/28/1983
Shoal Creek 2022 Turkey Creek 2023	Date NPDES Permit originally modified to require implementation [PTIM] :	3/24/1989

2. Approved Pretreatment Program modifications:

REQUIRED MODIFICATIONS	APPROVAL DATE	OTHER APPROVED MODIFICATIONS	APPROVAL DATE
PIRT SUO Revisions	9/19/1995		
List of SIUs [403.8(f)(6)]	3/31/1992		
Enforcement Response Plan	3/31/1992	ERP	4/4/2017
DSS SUO Revisions	9/19/1995	Streamlining Rule	3/25/2022
LOCAL LIMITS	1989	MAIL for both WWTFs	3/25/2022

3. Is the POTW presently working on any program modifications? NO

4. Does the POTW have any program modifications currently being reviewed by the Approval Authority?
NO

I.B. Approved Program Contents

5. Authority to enforce Pretreatment Standards contained in: **Chapter 118 Utilities Article II**

6. Date enacted or adopted: **1998 & 06/20/2022**

7. Approved Control Mechanism: **PERMITS**

8. What is the frequency required by the **approved program/modifications** for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	1	1
POTW inspection of:	1	1
SIU self-monitoring:	4	4
SIU reporting:	4	4

9. What types of enforcement options are available through the approved program:

Y	Notice of Violation (NOV)
Y	Administrative Order (AO)
Y	Show Cause Hearing
Y	Establishment of Compliance Schedules
Y	Revocation of Permit
Y	Injunctive Relief
NO	Fines; at least \$1000/day/violation
Y	Criminal Penalties
Y	Termination of Service

COMMENTS:

Sec. 118-60. – Civil penalties (Ord. No. 2022-098, § 1, 6-20-22)

(a) Any user who is found to have violated an order of the city council or who willfully or negligently failed to comply with any provision of this article and the orders, rules, regulations and permits issued under this article shall be fined not less than \$100.00 and not more than \$500.00 for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition, fees, court costs, court reporters' fees and other expenses of litigation may be assessed by appropriate suit at law against the person found to have violated this article or the orders, rules, regulations and permits issued under this article. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of the violation.

(b) Any user who shall fail to pay the wastewater treatment fees set forth in section 118-203 shall be deemed guilty of an infraction, and shall be punishable by **a fine not greater than \$500.00.**

(c) In addition, should a user violating provisions of this article and the orders, rules, regulations and permits issued under this article cause, by such violation, the city to violate its NPDES permit, the user shall be civilly liable to the city for the costs of penalties levied against the city by the state or the EPA.

(d) In determining the amount of civil liability, the court shall take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the user's violation, corrective actions by the user, the compliance history of the user, and any other factor as justice requires.

(e) Filing a suit for civil penalties shall not be a bar against, or a prerequisite for, taking any other action against a user.

PART II: INTERVIEW QUESTIONS

II.A. Legal Authority and Jurisdiction

11. Have any Pretreatment modifications been made to the Sewer Use Ordinance since the last PCI/Audit that have not been approved by the Approval Authority. **NO**
12. List by name and location any SIUs that discharge to the POTW from outlying jurisdictions. **NONE**
Indicate which of the above are not covered by a contract/agreement requiring them to abide by the POTW's legal authority. **NA**
13. Does the POTW have the authority to seek fines at least a \$1000 per day? [403.8(f)(1)(vi)] **NO \$500**
14. If the POTW has not yet developed an Enforcement Response Plan when does the POTW feel it will complete this requirement? **NA. ERP revised and adopted on April 4, 2017.**

II. B. Control Mechanism

16. General Information:

Type:	PERMITS	Issued to Noncategorical SIUs? [DSS: 403.8(f)(2)(i)]
Duration:	1-3	
		YES

17. Do all SIUs have current (unexpired) control mechanisms? **{NOCM} YES**
18. List by name those that do not and indicate which ones have not had a current control mechanism for 180 days or more. **{RNC/SNC} NONE. All permits were issued in October 2022 to include the new local limits.**

II.C. Hauled Wastes

19. Does the POTW accept hauled waste? (If "no," go to question 25) **YES. City accepts Septic, Grease, metal recycling, gas stations, and special projects and events. There are Seven haulers are licensed and four bring majority of the waste.**
 - a. if so describe (include approx. no. of loads per month):
2022 and 2023 Approximately 145 loads per month. Averaging 2,500 gallons per load.
 - b. How does the POTW ensure that it does not accept hazardous waste?
Random Sampling and completing manifest indicating sources of waste.
20. Does the POTW have a control mechanism for regulating waste haulers, and if so describe.
Business licenses
21. Does the POTW have a designated discharge point (or points) for waste haulers? [DSS: 403.5(b)(8)]
Describe: **YES- Septic Receiving Station at Turkey Creek.**
22. Are all applicable Categorical standards and Local Limits applied to IUs whose wastes are hauled to **YES**
23. Describe the method used to apply local limits to hauled waste. **Testing and Sampling**

24. COMMENTS: **Program is well managed**

II.D. Industrial User Characterization

25. How often does the POTW update its Industrial Waste Survey (IWS) to identify new SIUs or changes to wastewater discharges? **Not frequent**

a. When the last formal update was: **2017**

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

Current	Industrial User Type	Last Reported
8	Categorical SIUs {CIUS}	8
8	Non-Categorical SIUs	7
16	Total all SIUs {SIUS}	15

II.E. Local Limits

27. Does the POTW have numerical limits for metals in its NPDES permit? If so list the metals and the limits (or attach list). **YES**

27. Have there been any numerical NPDES permit violations in the last 12 months? **YES**

Oil & Grease exceedance in April of 2023 caused by equipment failure at the Turkey Creek and Zinc exceedance in December of 2023 at the Shoal Creek Plant. Follow up sampling and analysis on both were within permit limits.

a. Were any of the numerical NPDES violations, identified above, a result of interference or pass through? **NO**

1. Was the interference traceable to an industrial user? **NA**

2. Was action taken that led to elimination within 90 days of the interference or pass through? {SNC} **NA**

3. Was the responsible industry placed on an enforceable compliance schedule within 90 days of discovery? {SNC} If not, why? **NA**

29. How many times per year does the POTW regularly sample its PRINCIPAL plant for the following?

Parameter	Influent	Effluent	Sludge
Metals	4/4	*/**	6
Toxic Organics		2/2	2/2
Biomonitoring		2/1	
TCLP			1

For the Shoal Creek and the Turkey Creek WWTFs

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

Pollutant	Turkey Creek WWTF	Shoal Creek WWTF
	Maximum Allowable Industrial Load (lb./day)	Maximum Allowable Industrial Load (lb./day)
Silver (Ag)	4.50	3.63
Arsenic (As)	1.13	0.60
Cadmium (Cd)	0.28	0.33
Cyanide (CN)	0.93	1.01
Chromium (Cr)	33.27	13.67
Copper (Cu)	4.89	6.73
Mercury (Hg)	0.16	0.35
Molybdenum (Mo)	1.02	0.51
Nickel (Ni)	6.62	5.81
Lead (Pb)	1.10	0.76
Selenium (Se)	0.75	0.84
Zinc (Zn)	10.71	6.71
Biochemical Oxygen Demand 5 (BOD ₅)	12,740	12,581
Total Suspended Solids (TSS)	10,013	8,758
Total Kjeldahl Nitrogen (TKN)	2,344	935

Comments: Sec. 118-184. - Discharge limitations

31. Are the POTW's BOD and TSS limits technically derived (ie. based on plant capacity)? **YES**

32. Are BOD and TSS violations treated as violations of technically based local limits? **YES**

33. If there is more than one treatment plant, were the local limits established specifically for each plant?
YES

34. Has the POTW made any changes to its Local Limits which have not been approved, and if so provide details? [403.18] **NO**

35. Has the POTW granted any Net/Gross allowances under 403.15? **NO**

II.F. Standards and Requirements for Industrial Users

37. Does the POTW compare local limits against federal Categorical standards and apply the most stringent standards to Categorical IUs? [403.4] **YES**
38. Has the POTW notified its IUs of possible RCRA obligations? [40 CFR 403.8(f)(2)] **YES**
Permit application and during inspections
39. Does the POTW allow Categorical users to use Solvent Management Plans/certification or surrogate test procedures to meet TTO requirements? **YES**

II.G. POTW Compliance Monitoring and Inspections

40. What is the current frequency for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	4/yr	4/yr
POTW inspection of:	1/yr	1/yr
SIU self-monitoring:	Varies	Varies
SIU reporting:	4/yr	4/yr

42. List those SIUs that were not sampled by the POTW within the last 12 months. [DSS: 403.8(f)(2)(v)] **Autotronics - They do small and infrequent plating operations and perform the sampling themselves during that time. No plating was performed in 2023.**
43. List those SIUs that were not inspected within the last 12 months. [DSS: 403.8(f)(2)(v)] **Autotronics.**
44. How many industries were neither sampled nor inspected within the last 12 months. [DSS: 403.8(f)(2)(v)] **{NOIN}{RNC/SNC} Autotronics.**
45. Does the POTW sample its SIUs for all regulated pollutants at least once annually? [403.8(f)(2)(v)] **YES**

46. Sample/Analysis Procedures:

Chain-of-Custody always used? YES	Sampling method, metals: TC
Ability to sample on short notice? YES	Sampling method, CN: GRAB
In-house analysis of toxic pollutants: NONE	Sampling method, O&G: GRAB
Do in-house analytical methods conform to 40 CFR part 136? YES	

47. How does the POTW document its industrial user inspections? **CHECKLIST**

48. Does the POTW evaluate all SIUs at least every two years to determine the need for a slug discharge/spill control plan? [DSS: 403.8(f)(2)(v)] **YES**

a. Describe the method used by the POTW to evaluate the need for a slug control plan.
During annual inspections.

II.H. IU Self Monitoring and Reporting

49. Are all Categorical IUs required to self-monitor for all pollutants regulated by the respective Categorical standard at least twice per year? [403.12(e)] **YES**

50. Were any Baseline Monitoring Reports or 90 day Compliance Reports due within the past 12 months? If so, from whom? Were the reports submitted? **NO**

51. Are IUs required to report spills, slug discharges, etc. to the POTW? [403.12(f)] **YES**

52. Are IUs required to report violations within 24 hours of knowledge of the violation? [403.12(g)(2)] **YES**

53. Are IUs required to resample and submit results within 30 days following a violation as per 403.12(g)(2)? **YES**

II.I. Data Management

54. Are files/records computerized? **YES- LAB RECORDS MOSTLY HARD COPIES**

55. Are all records maintained for at least 3 years? [403.12(o)] **YES**

56. Are program records available to the public as required by 40 CFR 403.14(b)? **YES**

57. Does the POTW have provisions to address confidential business information? [403.14(a)] **YES**
No industry claimed CBI.

58. How is compliance status calculated? Describe the procedure used in determining Significant Noncompliance (eg. are mo. avg. violations considered as well as daily max?).
Following the EPA SNC definition

II.J. Program Resources

59. What percent of the Pretreatment Coordinator's time is spent on pretreatment?
PC 75% Chemist 75% One staff take samples 60%

PC also in charge of Biosolids Program and FOG program.

60. What computer programs does the POTW use for:

Wordprocessing:	WORD
Spreadsheet:	Excel
Database:	

61. Does the POTW believe its annual budget adequate for implementation? **YES**

However, the POTW needs more staff to implement program.

- a. If not, is the level of money available for pretreatment less than that in the approved program or approved modification?

II.K. Special Questions

62. Are there any issues that the POTW would like to discuss?

Discussed the SNC calculations.

Pretreatment Training

SSOs

PART III: FILE AND RECORDS REVIEW

Following is a table containing the POTW's Significant Industrial User 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 sought by the table and 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 "NA" 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; "precip/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 1000.

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 6 MO PERIOD ENDING:

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

CIn compliance with all standards: no violations.

IInfrequent noncompliance with discharge standards: the facility had some violations but not severe enough to be considered in significant noncompliance.

SNC,SIn significant noncompliance with discharge standards.

SNC,RIn significant noncompliance with reporting requirements: the industry failed by greater than 30 days to submit reports as required.

SNC,MIn significant noncompliance with self monitoring requirements: the industry did not properly report its compliance status on its self monitoring report.

SNC,C Failure to meet a compliance schedule milestone by 90 days.

LAST INSPECTION:

Date of the last inspection performed by the POTW

SECTION VII: SIGNIFICANT INDUSTRIAL USERS

Industry Name	Cat. Stnd	Reg. Process	T M T	Type	Reg. Flow	Total Flow	C W F	Compliance Status for Six Month Period Ending:				Last Inspection
								JUN '22	DEC '22	JUN '23	DEC '23	
AUTOTRONICS, INC	433	Electro Plating	N	NA	0.4K	0.4K	N	C	C	C	C	NA
AJINOMOTO WINDSOR	NA		Y	DAF	129K	135K	N	C	I	C	SNC,S	5/11/2023
DUCOMMUN-LABARGE	413.16	CHEMETCHNG	Y	IE, FILT, pHAdj	0.9K	9K	NA	C	C	C	C	6/29/2023
EAGLE PICHER (C STREET)	461	Ni CAD BATTS	Y	IE, FILT, pHAdj	9K	46K	N	I	I	I	I	8/9/2023
GENERAL MILLS	NA	FRZ BAKERY	N	123K	219K	46.7K	N	C	I	I	I	11/14/2023
Gilster-Mary Lee Corp.	NA	CEREAL	Y	SETL, Ph	10.7K	30.9K	N	C	C	SNC, S	C	
HEARTLAND PET PRODUCTS	NA	DOG FOOD	N	DAF	68K	131K	NA	C	C	C	C	10/17/2023
INTERNATIONAL PAPER	429	GROUND H2O	Y	OW Seprt.	9K	9K	NA	C	C	C	C	8/15/2023
JASPER PRODUCTS	NA	BVRGPRDCTS	N	Ph Adj/AER	1.09M	1.22M	NA	C	I	I	I	4/25/2023
LOZIER CORP.	433	Metal Finishing	N	NA	0.5K	1.8K	N	C	C	C	C	6/21/2023
MAPP Technologies	433	Electro Plating	Y	pH & Filtr	1K	2K	N	I	I	C	C	5/23/2023
MERCY HOSPITAL	460	HOSPITAL	N		115K	155K	NA	C	I	I	C	4/26/2023
PROTEN SOLUTIONS LLC.	NA	MEAT PROCES	Y	SCREN,DAF	144K	149K	N	SNC, S	I	SNC,S	C	5/18/2023
REFRESCO/CLIFFSTAR	NA	JUICE MFR	Y	Ph Adj	174K	174K	NA	I	I	I	I	9/19/2023
TAMKO (HIGH STREET)	443	Asphalt Roof	Y	Selling Basin	10K	56K	NA	C	C	I	C	10/26/2023
TAMKO (RANGLINE STREET)	NA	ROOFING	Y	pH	51K	51K	NA	C	I	C	SNC,S	10/26/2023

III.B. Significant Industrial User Compliance Evaluation

63. From the above list of industries, how many are in Significant Noncompliance (SNC) with either discharge standards or reporting requirements based on the most recent six-month reporting period?
{PSNC} two AJINOMOTO WINDSOR & TAMKO (RANGLINE STREET)

64. List by name, those industries currently on a compliance schedule. Complete the table below. **NONE**

Industry Name	Date Schedule Issued	Compliance Deadline	How Administered*
---------------	----------------------	---------------------	-------------------

eg. Administrative Order, Permit, etc.

65. List those industries last published in the newspaper for noncompliance and provide the date (or attach a copy of the public notice). **Ajinomoto Foods, Gilster-Mary Lee, Protein Solutions, and Tamko Building Products. See attached Joplin Globe Order Confirmation for SNC article. On 2/8/2024.**

66. If an industry has been deleted from the list of Significant Industrial Users list by name below and provide the reason. **The POTW evaluated their industries and conclude on 15 industries are classified as SIUs, eight of which are CIUs. See table above.**

AUTOTRONICS no longer does plating operation, and their flow is 500 gallons per day. Therefore, is no longer an SIUs.

67. For those industries in SNC within the last 12 months complete the following table for all written enforcement actions.

IU Name	Violation	Date of POTW knowledge	Date of Action	Enforcement Action	ERP required action
AJINOMOTO WINDSOR FOOD	BOD & TSS DMX & MAVG	July 26, 2023			
Gilster-Mary Lee Corp	BOD & TSS DMX & MAVG	July 26, 2023			
PROTEN SOLUTIONS LLC.	BOD DMX & MAVG	April 2023	5/5/2023	LOW	
TAMKO (RANGLINE)	BOD				

Gilster-Mary Lee Corp. This facility is a Non-SIUs

Violation: Gilster-Mary Lee is in Significant Noncompliance in 2023 for exceeding the BOD and TSS monthly average limits in the first half of 2023. The city is working with their Consulting Engineer on increasing the permit limits to a value that is a more appropriate limit that allows the industry more flexibility with-out compromising the industry loading rates at the WWTF. An email was sent to the industry regarding the exceedances, with recommendations to research for ways to reduce BOD and TSS loadings in their process water wastestream.

Ajinomoto Foods, Inc.

Violation: Ajinomoto Foods is in Significant Noncompliance in 2023 for exceeded the BOD and TSS monthly average limits in the second half of 2023. The city is working with their Consulting Engineer on increasing the permit limits to a value that is a more appropriate limit that allows the industry more flexibility with-out compromising the industry loading rates at the WWTF. An email was sent to the industry regarding the exceedances, and they have indi-cated that they are making the necessary changes to increase treatment and re-duce loadings in their process water wastestream.

Protein Solutions/Protein for Pets OPCO, LLC.

Violation: Protein Solutions/Protein for Pets OPCO, LLC. is in Significant Noncompliance in 2023 for exceeding the BOD and TSS monthly average limits in the first half of 2023. The city and their Consulting Engineer increased the daily maximum limits and monthly average limits in May of 2023 to a value that was a more appropriate limit to allow the industry more flexibility without compromising the industry loading rates at the WWTF. Since that modification, the industry has achieved compliance in the second half of 2023, and is continuing to improve their process water wastestream.

Tamko Building Products Rangeline and Newman Road, Joplin, MO

Violation: Tamko Building Products is in Significant Noncompliance in 2023for exceeding the TSS monthly average limits in the first half of 2023 and BOD and TSS monthly average limits in the second half of 2023. The city and their Consulting Engineer increased the daily maximum limits and monthly average limits beginning in January of 2024 to a value that was a more appropriate limit to allow the industry more flexibility without compromising the in-dustry loading rates at the Wastewater Treatment Facility. The facility is also look ing at ways to reduce loadings and improve their process water wastestream.

68. Provide the total number of NOV's, Administrative actions, Judicial referrals, and criminal prosecutions that occurred in the last twelve months. {FENF} {JUDI}

69. Were all actions taken by the POTW within 30 days of knowledge of a violation? {RNC/SNC}
YES

70. Did all industries in SNC either return to compliance within 90 days, receive escalated enforcement action by the POTW within 90 days, or become placed on an enforceable compliance schedule within 90 days (of knowledge by the POTW) of the violation? {RNC/SNC} **YES**

III.C. Control Mechanism Evaluation
--

71. Do the POTWs control mechanisms: Permittee:

REQUIRED [DSS: 403.8(f)(1)(iii)]		SUGGESTED PROVISIONS	
Specify duration (no > 5 yrs.):	Y	Cite the POTW's legal authority:	Y
Contain the correct discharge limits:	Y	Identify TTO alternatives, if applicable:	Y
Specify sample type for IU self monitoring:	Y	Require notification within 24 hrs 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:	<u>Y</u>

REQUIRED [DSS: 403.8(f)(1)(iii)]		SUGGESTED PROVISIONS	
Specify limited transferability:	Y		

Result of this review from the last PCI/audit:

III.D. Industrial Inspection Evaluation

72. Do the Industrial Inspection reports contain?

Name of Company contact:	Y	Evaluation of IU's monitoring procedures:	Y
Date of inspection:	Y	Verification of wastewater flow rates:	Y
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		Y
Verification of production rates that would affect production based standard:			Y

III.E. Slug Discharge Control Procedures

73. If the POTW has required the submittal of a Slug Control Plan does it contain: [DSS: 403.8(f)(2)(v)]

Yes- no slug plans were reviewed

- _____ A description of discharge practices including non-routine batch discharges
- _____ A description of stored chemicals
- _____ Procedures for immediate notification of slug discharges with written follow-up notification
- _____ Procedures necessary to prevent adverse effects at the POTW's treatment plant:
- _____ inspection and maintenance of storage areas
 - _____ handling and transfer of materials
 - _____ loading and unloading operations
 - _____ control of plant site runoff
 - _____ worker training
 - _____ building of containment structures
 - _____ measures for the control of toxic organics
 - _____ measures for emergency response

74. COMMENTS

III.F. Industrial User File Review Checklists

Following are worksheets to aid in the assessment of the nature of the oversight activities and compliance status of the POTW's Significant Industrial Users. 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 BAT 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 POTWs.

tech lab : city
page : 510

Industry Name: Lozier Corp.
Principal Pollutants: 433.17
Products: Store Self-checkout

40 CFR 433
No. of Employees: 87

A. Does the file system for the industrial user contain:

☐ Permit application	☒ POTW sampling results <u>4/2</u>
☒ Current Permit	☒ Self-monitoring reports
☒ Correct limits in Permit <u>✓</u>	☒ Enforcement documentation <u>(NA)</u>
<u>Elect.</u> ☒ Correspondence/meeting notes/phone log	☒ Solvent Management Plan <u>NA</u>
☒ Most recent inspection report <u>6/21/2023</u>	☒ Correct application of the CWF
☒ Evaluation for need for Slug control	☒ Slug Control Plan
☒ Compliance status determination	☒ <u>inadequate</u>
<u>separate self sheet.</u>	

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months? NO
[403.12(f)]

☐ Immediate notification by the IU	☐ Follow-up written notification
☐ POTW response	☐ Effect on the plant

C. In the last complete calendar year how many times did the POTW:

Sample the IU 4 Inspect the IU 1

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? yes

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six month period during the last full calendar year? yes - 4/2022

F. Frequency in the IU's control mechanism for: Self-monitoring 4 Reporting 4

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism? yes

H. Did the POTW identify all IU violations from:

IU Self-monitoring ✓

POTW Compliance monitoring ✓

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly? yes.

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
------------------	--------------------------	-------------------------------	------------------------------	------------------------------	----------------------

Temp Sign 6/24/2015 need update & signature.

updated in 2022

Signed 6/24/2024