

TARGETING FOR PRETREATMENT INSPECTIONS



APRIL 18, 2018

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AL GARCIA



STRAIGHT FORWARD APPROACH TO TARGETING CMS

- JULY 21 2014 COMPLIANCE MONITORING STRATEGY RECOMMENDED MINIMUM FREQUENCY:
 - PRETREATMENT COMPLIANCE AUDITS (PCA): 1 EVERY 5 YEARS
 - PRETREATMENT COMPLIANCE INSPECTIONS (PCI): 2 EVERY 5 YEARS
 - SIU AT NON APPROVED PRETREATMENT PROGRAMS: REVIEW REPORTS AND ANNUAL SAMPLING AND INSPECTIONS





TARGETING IN REGION 8

- APPROVAL AUTHORITY
 - TARGETING FOR APPROVED PRETREATMENT PROGRAMS (PCAS AND PCIS)
 - 38 POTWS IN REGION 8 WHERE EPA IS THE APPROVAL AUTHORITY (26 CO, 6 WY AND 6 MT)
- 

Review of Pretreatment annual reports (to identify pass through or interference)

Attachment C: Description of Each Incidence of Pass Through or Interference

Provide a description of each incidence of Pass Through or Interference at the wastewater treatment plant or collection system during the year, the cause if determined, and any actions taken by the POTW in response to the Pass Through or Interference.

Description of Pass Through/Interference

01	May 17, 2016 our influent composite sample ammonia was 80.6 mg/l . This caused us to violate our
02	permit for ammonia and TIN. On May 17, 2017
03	May 18, 2017 our Influent composite sample ammonia was 61.2 mg/l, This caused us to violate our
04	permit for ammonia and TIN. On May 18, 2017
05	City wastewater staff investigated this abnormal ammonia discharge, by the use of portable samples
06	We were unable to locate the source of this discharge. We have had no other abnormal ammonia
07	readings,
08	The City of Fort Morgan published a statement in the Fort Morgan Times.
09	
10	
11	

Review of QNCR to determine which POTWs are having metal effluent violations

Environmental Protection Agency

Integrated Compliance Information System

Coordinator's Quarterly Noncompliance Report ***QNCR***

Page 4 of 51

Data Run Date: 09/11/17

Report Date: 09/11/17

MONTANA

FACILITY: CITY OF GREAT FALLS WWTP -- NPDES ID: MT0021920 -- FRS ID: 110064645460

MAJ/MIN	FACILITY TYPE	FEDERAL GRANT	COMPLIANCE STATUS	State Region	PERMIT RNC STATUS							
					FY	FY16	FY16	FY16	FY16	FY17	FY17	FY17
					Q	Q1	Q2	Q3	Q4	Q1	Q2	Q3
Major	POTW	\$	Noncompliant		-/-	N/-	E/-	E/-	E/-	R/-	E/-	E/-

RMP VIOLATION(S) SUMMARY

VIOLATION DATE	LIMIT SET	PARAMETER	MON LOC	ENFORCEMENT ACTION IDENTIFIER	CHANGE OF LIMITS STATUS	VIOLATION	RNC DETECTION CODE/DATE/TYPE	RNC RESOLUTION CODE/DATE/DESCRIPTION
5/31/17	003-M	00978-Arsenic, total recoverable	1			E90	T 5/31/17 TRC 1	5/31/17 NC - Unresolved RNC
4/30/17	003-M	00978-Arsenic, total recoverable	1			E90	T 4/30/17 TRC 1	4/30/17 NC - Unresolved RNC
3/31/17	003-M	00978-Arsenic, total recoverable	1			E90	T 3/31/17 TRC 1	3/31/17 NC - Unresolved RNC
2/28/17	003-M	00978-Arsenic, total recoverable	1			E90	T 2/28/17 TRC 1	2/28/17 NC - Unresolved RNC
1/31/17	003-M	00978-Arsenic, total recoverable	1			E90	T 2/28/17 TRC 1	2/28/17 NC - Unresolved RNC

ENFORCEMENT ACTION(S) SUMMARY

DATE	FINAL ORDER IDENTIFIER	PARTY/ACTION	STATUS	STATUS DATE	FORMAL/ INFORMAL	C.S.?
7/14/17		ST Letter of Violation/ Warning Letter Linked to: 05/31/2017 003-M 00978 1 0 Arsenic, total recoverable			Informal	NO

TARGETING IN REGION 8

- TARGETING FOR UNAPPROVED PRETREATMENT PROGRAMS (CONTROL AUTHORITY)
 - TARGETING APPROACH FROM REGION 7 HIGH BOD IN THE INFLUENT FROM INDUSTRIAL SOURCES



INFLUENT DATA FROM ICIS

Monitoring Period End Date	Parameter	Sample Type	Monitoring Location Description	Limit Type	DMR Value	Units
09/30/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	1875	mg/L
09/30/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	3300	mg/L
10/31/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	270	mg/L
10/31/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	280	mg/L
11/30/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	1690	mg/L
11/30/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	3100	mg/L
12/31/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	1105	mg/L
12/31/2013	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	1300	mg/L
01/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	775	mg/L
01/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	1300	mg/L
02/28/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	610	mg/L
02/28/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	970	mg/L
03/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	170	mg/L
03/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	19	mg/L
04/30/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	118	mg/L
04/30/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	150	mg/L
05/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	775	mg/L
05/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	890	mg/L
06/30/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	825	mg/L
06/30/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	1200	mg/L
07/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MO AVG	325	mg/L
07/31/2014	BOD, 5-day, 20 deg. C	G	Raw Sewage Influent	MX WK AV	490	mg/L

DMR EXCEEDANCES FROM ICIS

Monitoring Period End Date	Parameter	Type	Limit	Result
4/30/2011	BOD Removal	Monthly Average Minimum	85%	83%
5/31/2011	BOD	Monthly Average	30 mg/L	34 mg/L
5/31/2011	BOD Removal	Monthly Average Minimum	85%	79%
6/30/2011	TSS	Monthly Average	30 mg/L	33 mg/L
6/30/2011	TSS	Weekly Average	45 mg/L	50 mg/L

Monitoring Period End Date	Parameter	Type	Limit	Result
1/31/2012	TSS Removal	Monthly Average Minimum	85%	83%
2/29/2012	TSS	Monthly Average	30 mg/L	32 mg/L
3/31/2012	BOD Removal	Monthly Average Minimum	85%	84%
4/30/2012	BOD	Monthly Average	30 mg/L	62.5 mg/L
4/30/2012	BOD	Weekly Average	45 mg/L	86 mg/L
4/30/2012	TSS	Monthly Average	30 mg/L	41 mg/L
4/30/2012	BOD Removal	Monthly Average Minimum	85%	52%
4/30/2012	TSS Removal	Monthly Average Minimum	85%	62%
5/31/2012	BOD	Monthly Average	30 mg/L	30.5 mg/L
5/31/2012	TSS	Monthly Average	30 mg/L	33.5 mg/L
12/31/2012	BOD Removal	Monthly Average Minimum	85%	79%
12/31/2012	TSS Removal	Monthly Average Minimum	85%	69%

Monitoring Period End Date	Parameter	Type	Limit	Result
1/31/2013	Fecal Coliform	Maximum Weekly Average	200 cfu/100 mL	1,100 cfu/100 mL
4/30/2013	BOD	Monthly Average	30 mg/L	46.5 mg/L
4/30/2013	BOD	Maximum Weekly Average	45 mg/L	47 mg/L
5/31/2013	BOD	Monthly Average	30 mg/L	63 mg/L
5/31/2013	BOD	Maximum Weekly Average	45 mg/L	91 mg/L
4/30/2014	BOD	Monthly Average	30 mg/L	67.5 mg/L
4/30/2014	BOD	Maximum Weekly Average	45 mg/L	83 mg/L
4/30/2014	BOD Removal	Monthly Average Minimum	85%	43%
4/30/2014	TSS Removal	Monthly Average Minimum	85%	35%
1/31/2015	Fecal Coliform	Maximum Weekly Average	200 cfu/100 mL	2,400 cfu/100 mL

POTENTIAL INDUSTRIAL USERS

- POPULATION OF BIG TIMBER 1,641
- REFERENCE USA NARROWED DOWN LIST

Company Name	Address	City	IU Notes
Big Timber Meats	209 E 1st Ave	Big Timber	domestic & wild game
GNLD International	915 Hart St	Big Timber	vitamin supplement distribution
Pioneer Meats	31 Pioneer Trl	Big Timber	wild game

Unapproved Pretreatment POTW Targeting

Priority	City	POTW Name	Permit Number	Industries	High Influent Data	Conventional Violations	Toxic Violations	Notes	Geographic location	Industrial User Info from State File
1	Big Timber	Big Timber	MT0020753	Y	Y	Y		Consistently very high BOD in influent.	South, between Bozeman and Billings	Big Timber Meats, Pioneer Meats. Unsure what GNLD International is.
2	Livingston	Livingston	MT0020435	Y	Y	Y		Slightly high BOD in the influent.	South, between Bozeman and Billings	Wilcoxson's Ice Cream Co, Neptunes Brewery, Katabatic Brewing Co. Sheep Mountain Meat Processing appears out of town.
1	Jordan	Jordan	MT0021385	Y	Y	Y		Consistently very high BOD in influent.	East, central	Ryan Processing Plant
1	Belt	Belt	MT0021571	Y	Y	Y		Consistently very high BOD in influent.	Central, <30 min east of Great Falls	Harvest Moon Brewing Co, L&M Lockers (meat)
1	Denton	Denton	MT0022462	Y	Y	Y		Very high BOD in influent, limited data.	Central, 1:45 east of Great Falls	Denton Meats


PHONE CALLS WITH POTW

- INTRODUCTION AND PURPOSE OF PRETREATMENT INSPECTION
- EXPLANATION OF PRETREATMENT PROGRAM
- INDUSTRIAL USERS IN SERVICE AREA
- CONCERNS FROM POTW
- ANSWERED QUESTIONS

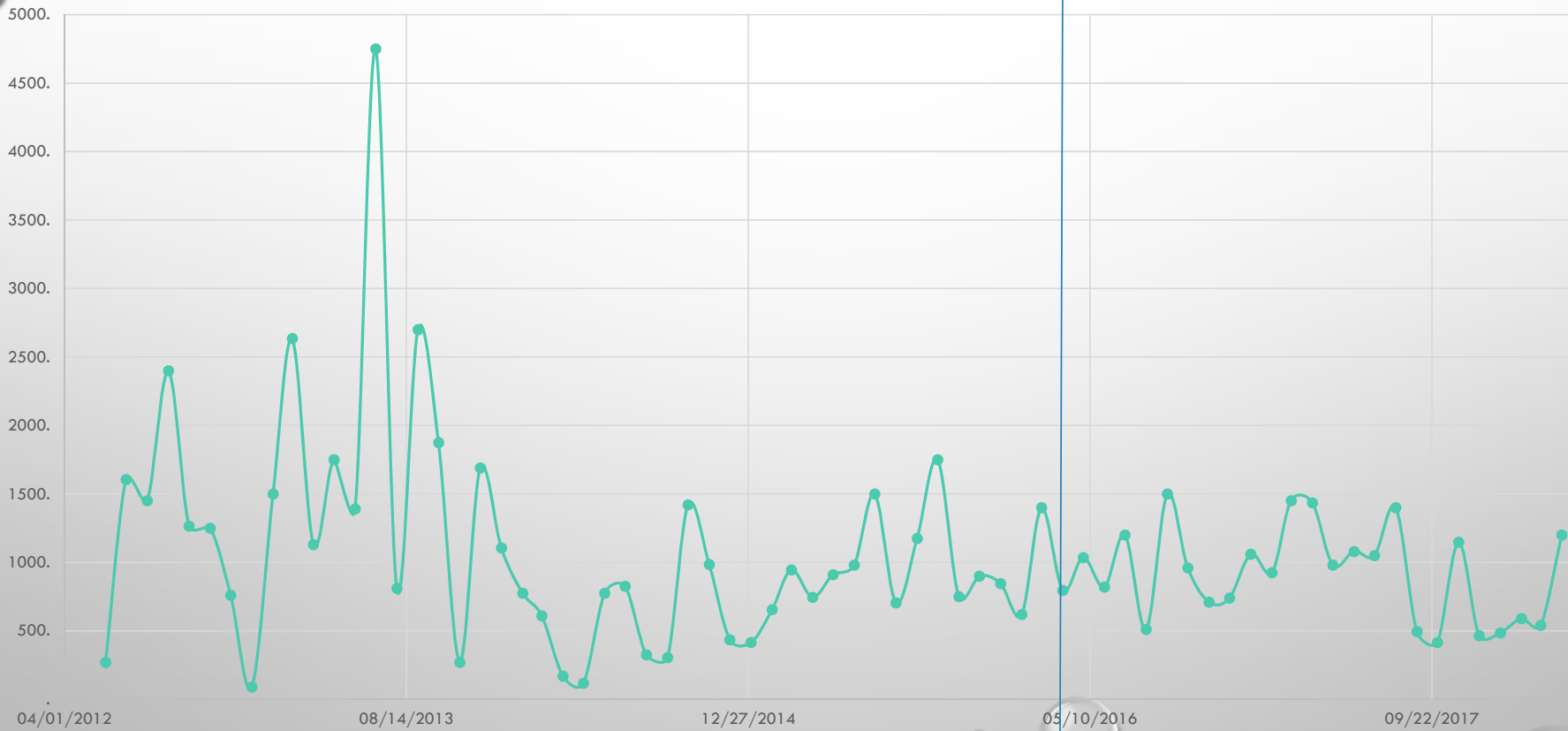




BIG TIMBER MEATS

- THE FACILITY USED TO BE A SLAUGHTERHOUSE
 - IN JANUARY 2016, THE FACILITY SWITCH OPERATIONS AND WAS MAKING DOG TREATS USING BEEF, LAMB, AND PORK.
 - IN ADDITION, THE FACILITY PROCESSES WILD GAME FROM SEPTEMBER TO FEBRUARY.
 - THE FACILITY CEASED OPERATIONS IN MARCH 2016 SHORTLY AFTER THE INSPECTION.
- 

Big Timber Influent BOD






PIONEER MEATS

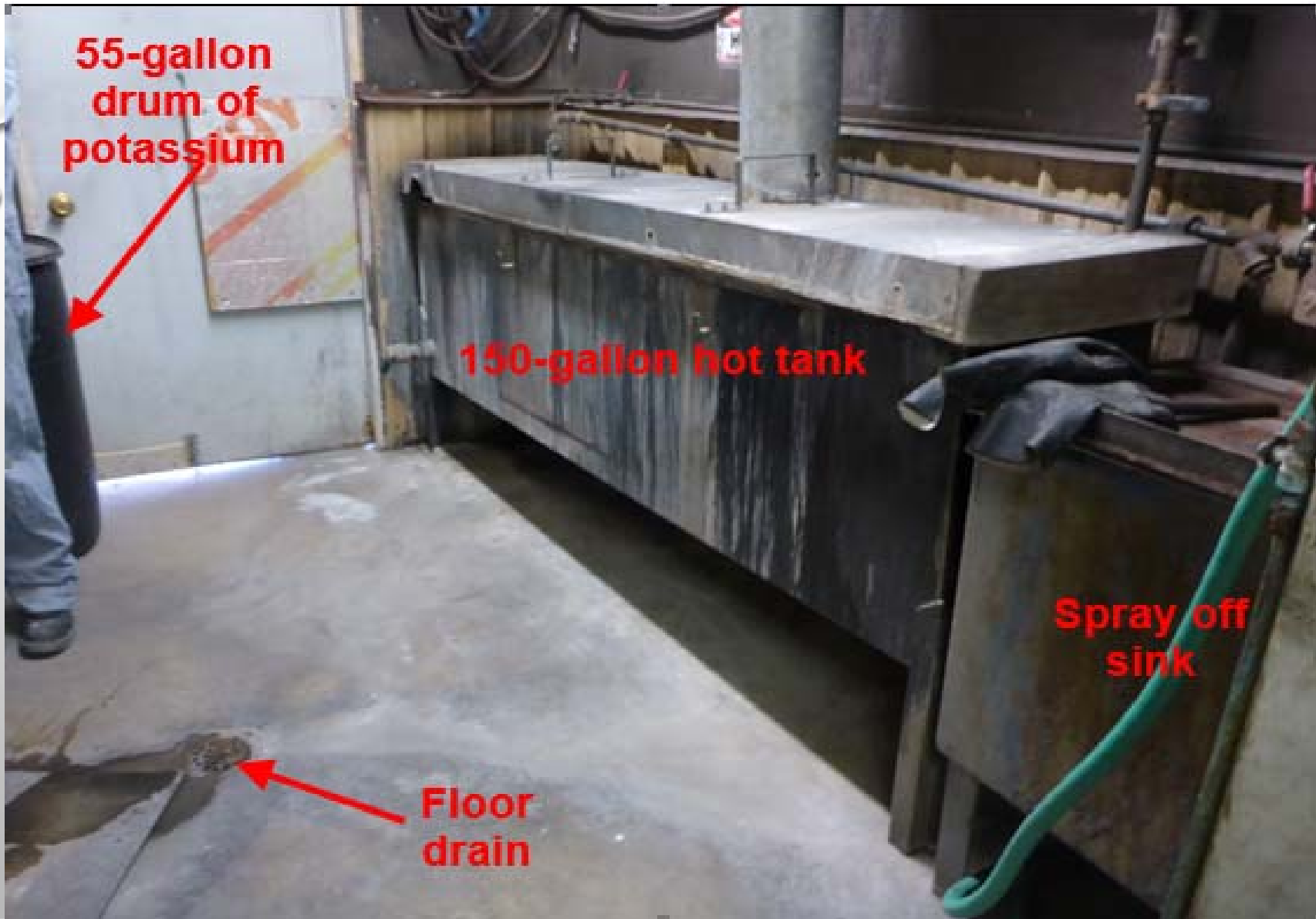
- THE FACILITY IS LOCATED OUTSIDE OF THE CITY'S SERVICE AREA AND DOES NOT DISCHARGE WASTEWATER TO THE CITY'S POTW.

GNL INTERNATIONAL

- THE FACILITY WAS A VITAMIN SUPPLEMENT DISTRIBUTION COMPANY OPERATED OUT OF A PRIVATE RESIDENCE.
 - THE FACILITY DID NOT GENERATE OR DISCHARGE NONDOMESTIC WASTEWATER TO THE POTW. THE BUSINESS WAS LOCATED WITHIN A RESIDENTIAL NEIGHBORHOOD.
- 

The background features a light gray gradient with several realistic water droplets of various sizes scattered in the corners. The droplets have highlights and shadows, giving them a three-dimensional appearance. The text is centered in the upper half of the page.

BOULDER RIVER FOUNDRY



**55-gallon
drum of
potassium**

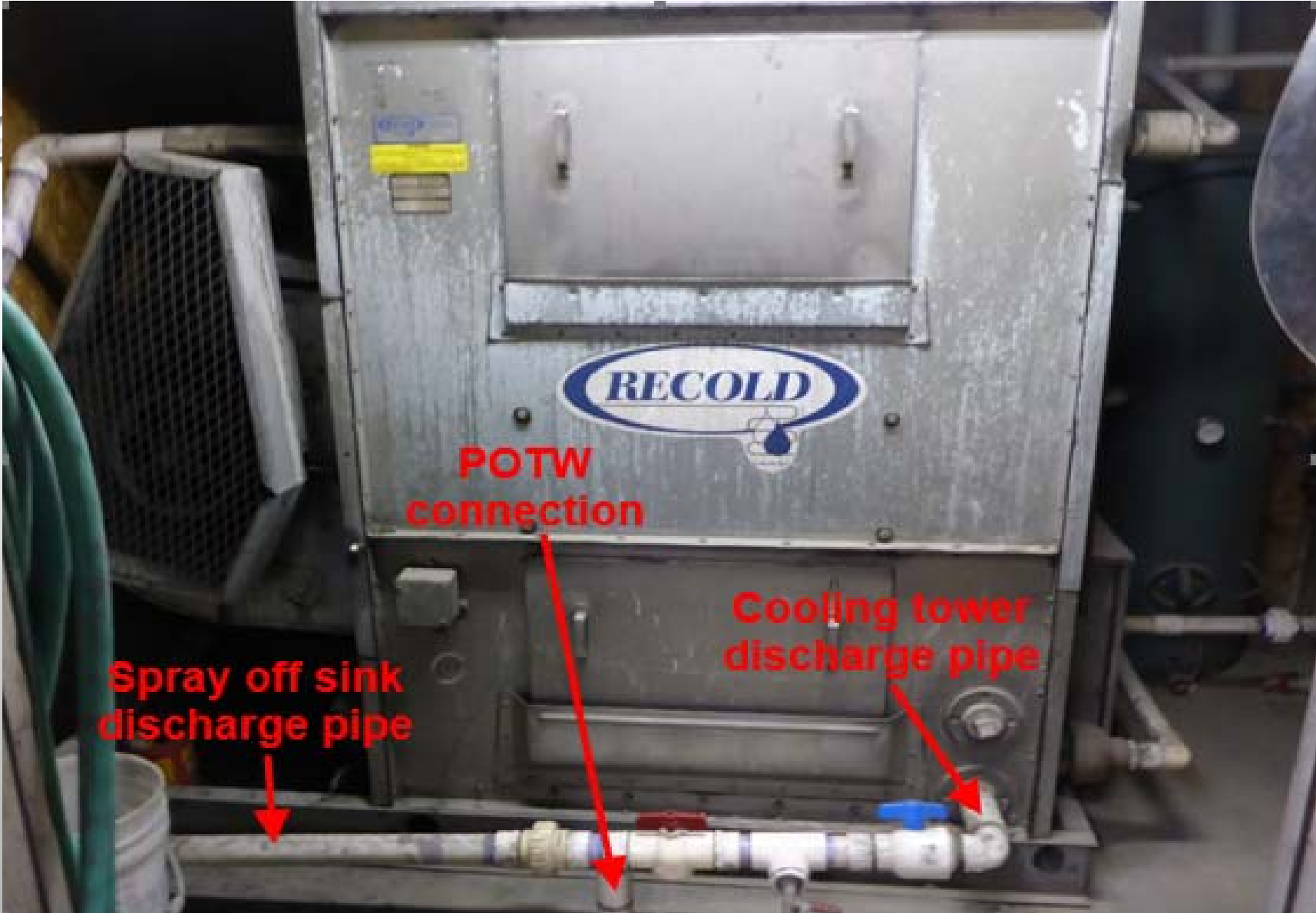


150-gallon hot tank

**Spray off
sink**

**Floor
drain**





**POTW
connection**

**Spray off sink
discharge pipe**

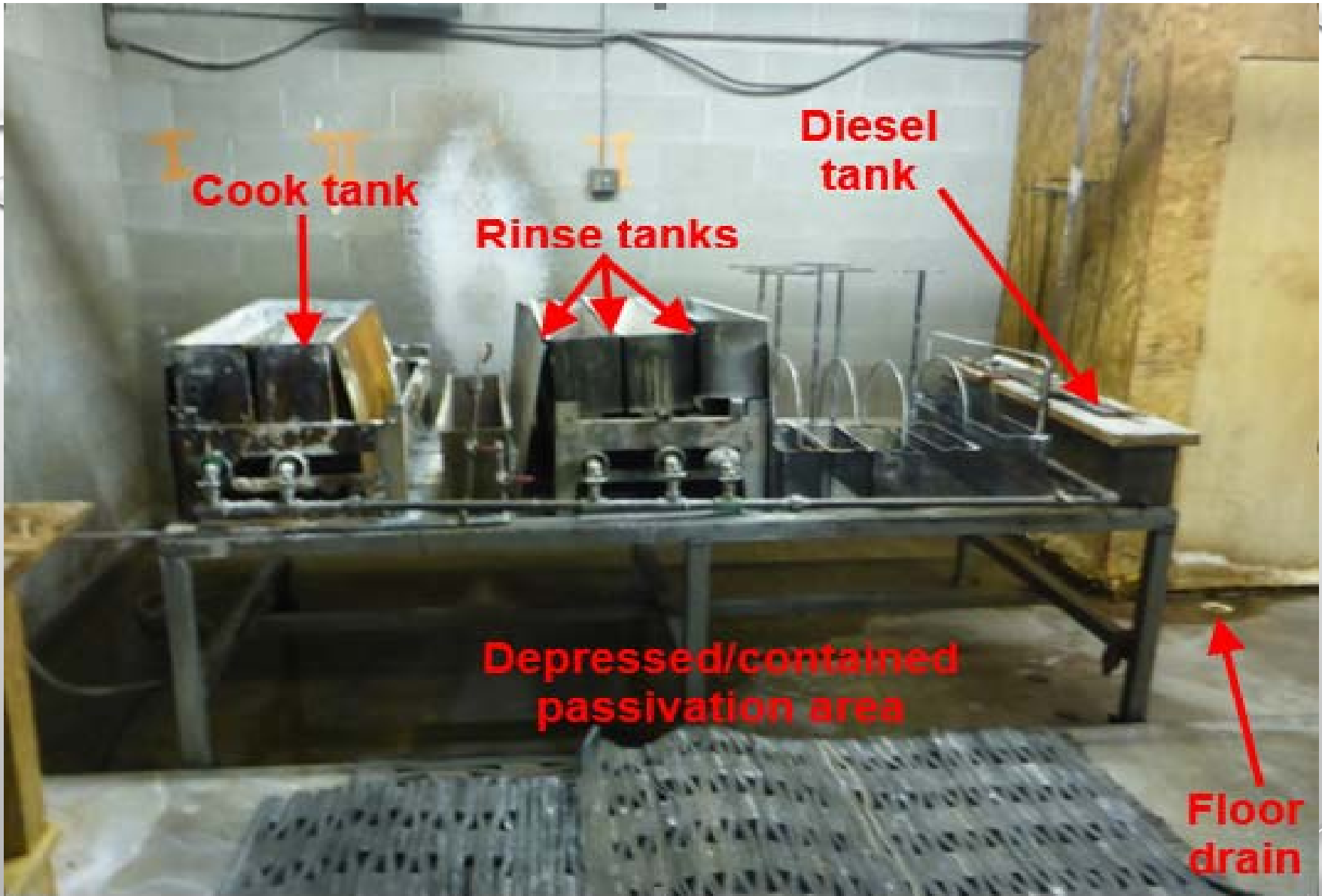
**Cooling tower
discharge pipe**

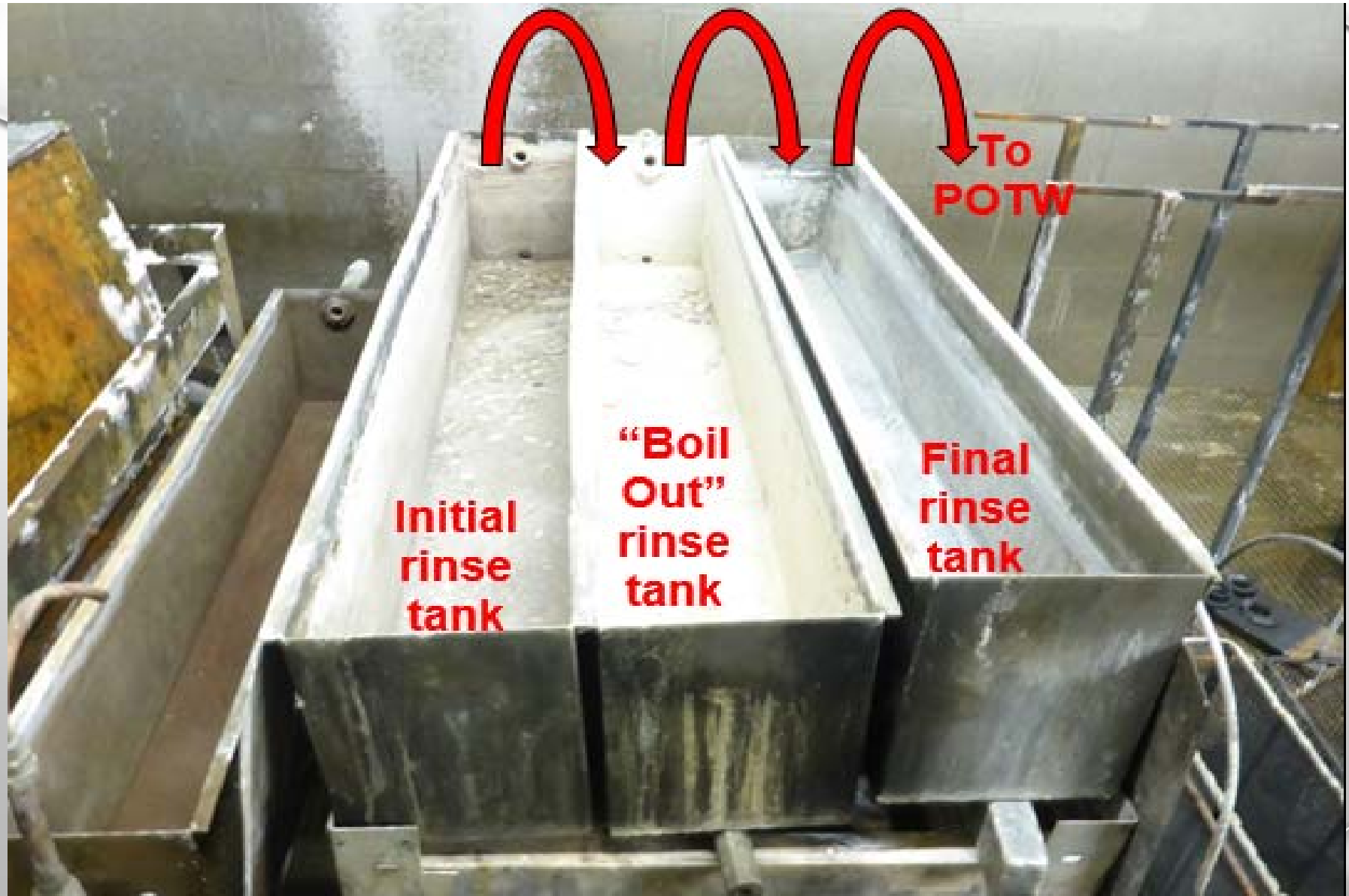
1874 SHARPS RIFLE



The image features a light gray gradient background with several realistic water droplets of various sizes scattered in the corners. The droplets have highlights and shadows, giving them a three-dimensional appearance. The text is centered in the upper half of the image.

C. SHARPS ARMS COMPANY, INC.





**Initial
rinse
tank**

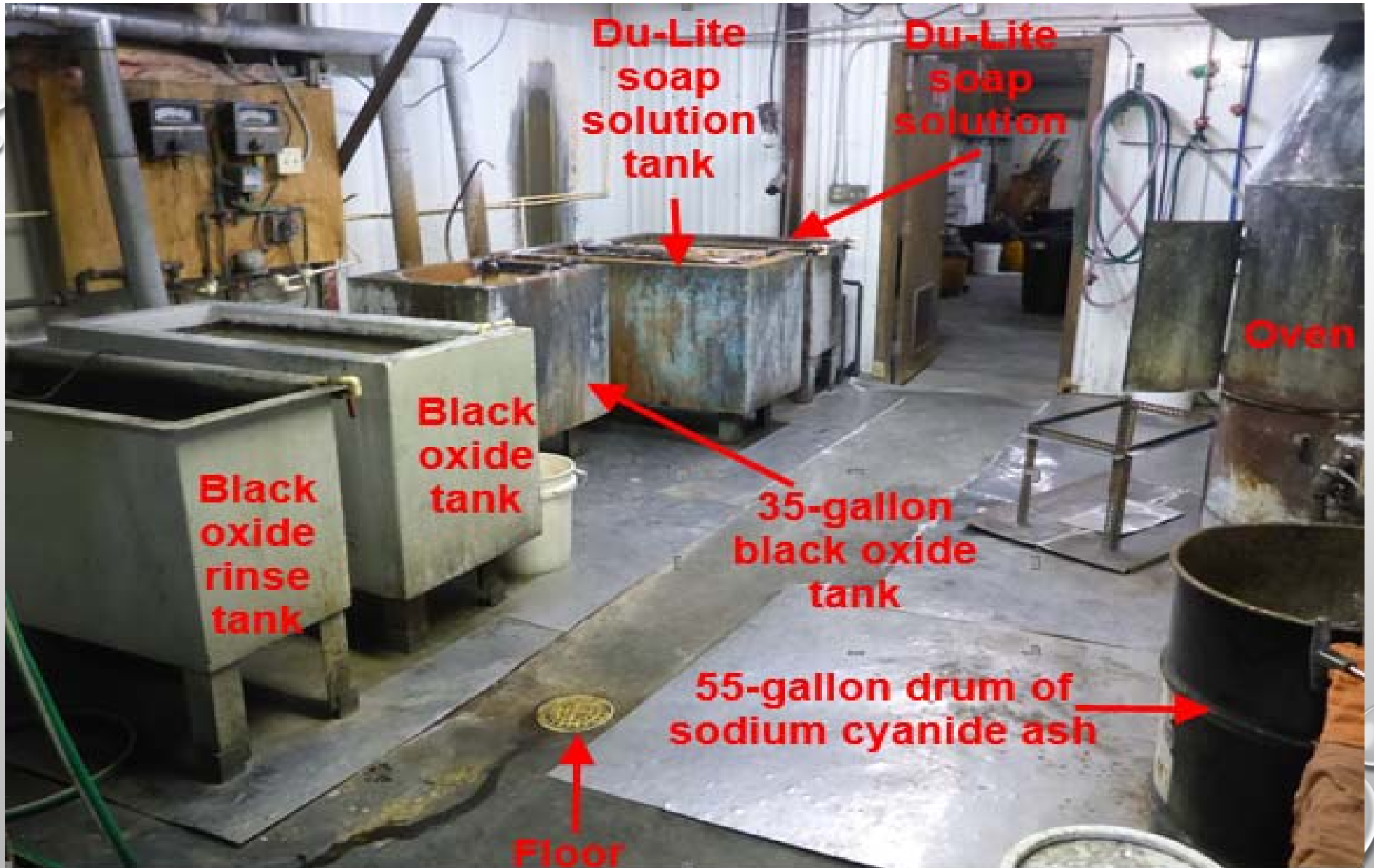
**"Boil
Out"
rinse
tank**

**Final
rinse
tank**

**To
POTW**

The image features a light gray gradient background with several realistic water droplets of various sizes scattered in the corners. The droplets have highlights and shadows, giving them a three-dimensional appearance. The text 'SHILOH SHARPS, INC.' is centered in the upper half of the image.

SHILOH SHARPS, INC.



Du-Lite
soap
solution
tank

Du-Lite
soap
solution

Oven

Black
oxide
tank

Black
oxide
rinse
tank

35-gallon
black oxide
tank

55-gallon drum of
sodium cyanide ash

Floor

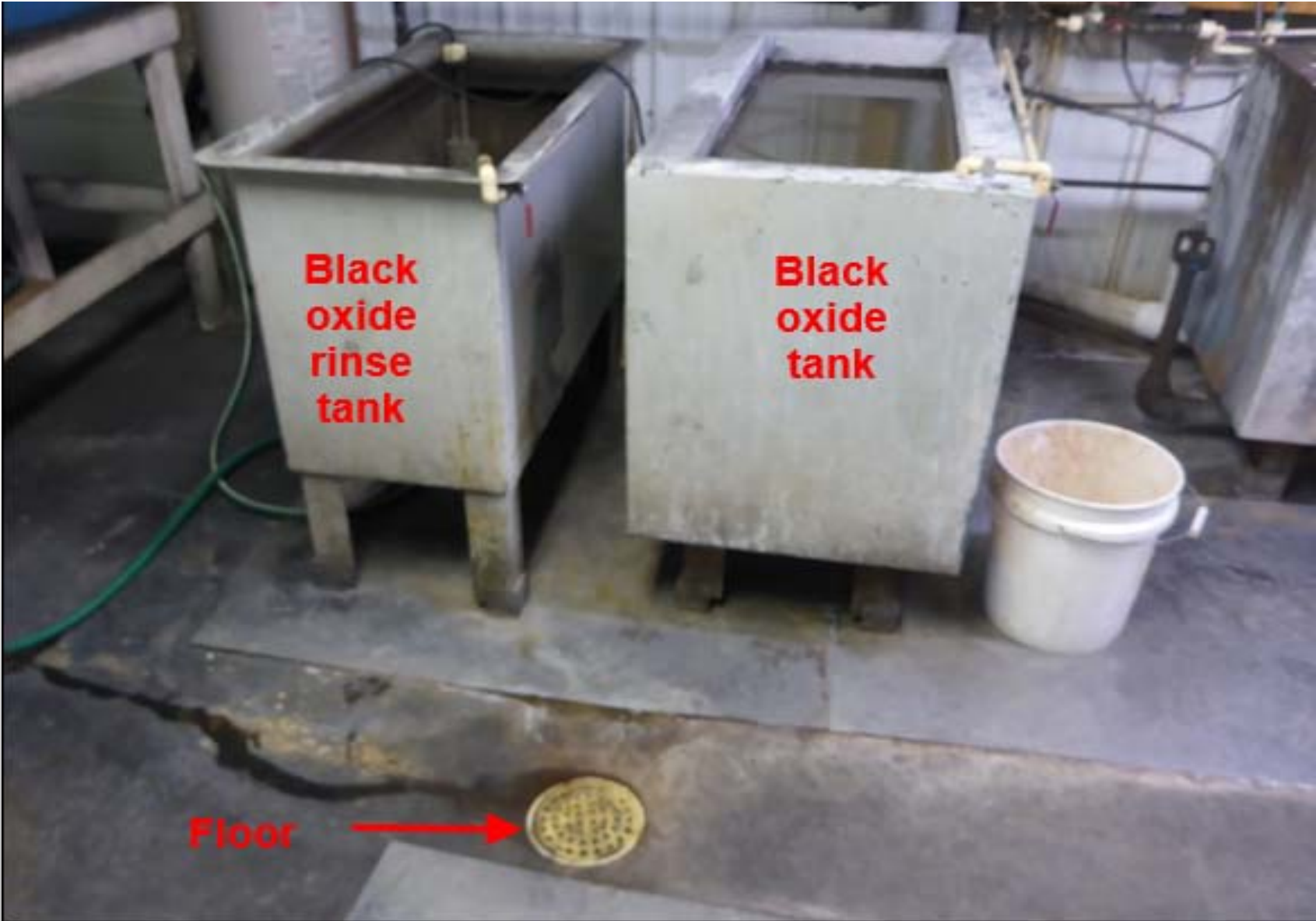


**35-gallon
black
oxide
tank**

**Du-Lite
soap
solution
tank**

**Du-Lite
soap
solution**





**Black
oxide
rinse
tank**


**Black
oxide
tank**

Floor





CONCLUSION

- THE TARGETING TOOL HELPS IDENTIFY INDUSTRIAL USERS THAT ARE SUBJECT TO THE PRETREATMENT REGULATIONS
 - THE TARGETING TOOL HELPS IDENTIFY CITIES THAT MIGHT NEED A PRETREATMENT PROGRAM.
 - INSPECTIONS AT UNAPPROVED PRETREATMENT PROGRAMS HELP CITIES BETTER UNDERSTAND THE PRETREATMENT PROGRAM.
 - INSPECTIONS AT UNAPPROVED PRETREATMENT PROGRAMS HELP CITIES IDENTIFY PRETREATMENT ISSUES THAT MIGHT BE AFFECTING THEIR NPDES PERMIT COMPLIANCE.
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QUESTIONS

- CONTACT INFORMATION
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