

ADEQ

ARKANSAS
Department of Environmental Quality

January 11, 2011

Mr. Larry Waldrop, General Manager
El Dorado Water Utilities
P.O. Box 1587
El Dorado, AR 71731

AFIN: 70-00341

NPDES Permit No.: AR0033723

Dear Mr. Waldrop:

On December 14 and 15, 2010, I performed a pretreatment compliance inspection of the El Dorado Water Utilities in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following:

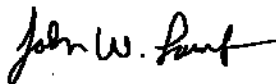
1. The facility did not have an updated industrial user survey on file.
2. The City's inspection of the Prescolite Reflector Plant performed on 22 November 2010 did not include the review or addition of Prescolite's T.O.M.P. An inspection performed on 19 September 2009 stated the T.O.M.P. was being reviewed and rewritten by Prescolite. The November 2010 inspection should have documented the completion status of the new T.O.M.P and whether or not it was being implemented.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Branch Manager, of the Water Division Enforcement Branch of this Department. This response should be mailed to the address below. This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response with all necessary detailed documentation (i.e. pictures) is due by January 21, 2011.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 870-682-0680.

Sincerely,



John W. Lamb
District 8 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type				
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="3"/> <input type="text" value="7"/> <input type="text" value="2"/> <input type="text" value="3"/> 11 <input type="text" value="1"/> 12 <input type="text" value="0"/> <input type="text" value="1"/> <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="4"/> 17 <input type="text" value="P"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>	Remarks								
Inspection Work Days		Facility Evaluation Rating		BI		QA		-----Reserved-----	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69		70 <input type="text" value="N"/>		71 <input type="text" value="N"/>		72 <input type="text" value="N"/>		73 <input type="text"/> <input type="text"/> <input type="text"/> 74 75 <input type="text"/> <input type="text"/> <input type="text"/> 80	

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) City of El Dorado El Dorado Pretreatment Program	Entry Time/Date 10:15/12/14/2010	Permit Effective Date 01 October 2008
	Exit Time/Date 11:47/12/15/2010	Permit Expiration Date 30 September 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) John Peppers/Pretreatment Coordinator/870-862-6951 Harold Baker/Treatment Superintendent/870-862-6951	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Larry Waldrop/General Manager/870-862-6951 El Dorado Water Utilities P.O. Box 1587 El Dorado, AR 71731	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	S	Sampling
S	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	M	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	S	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The program is still operating very smoothly. The staff was required to make program modifications as a result of the pretreatment audit that was preformed in September 2009. The facility has made the required changes. The City continues to do the sampling for the industries, (expect pH for Miller Transport).

An updated industrial survey could not be provided at the time of inspection.

The City's inspection of the Prescolite Reflector Plant performed on 22 November 2010 did not include the review or addition of Prescolite's T.O.M.P. An inspection performed on 19 September 2009 stated the T.O.M.P. was being reviewed and rewritten by Prescolite. The November 2010 inspection should have documented the completion status of the new T.O.M.P and whether or not it was being implemented.

Name(s) and Signature(s) of Inspector(s) John W. Lamb	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality/ El Dorado 870-862-0680, Fax 870-862-3509	Date 06 January 2011
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

+++++

Name of Municipality: City of El Dorado

AFIN Number: 70-00341

NPDES Permit Numbers: AR0033723, AR0033936, AR0049443

Program Tracked under NPDES Permit Number: AR0033723

Fact Sheet Preparation Date: Unknown

Date of Last PCI/Audit: 15-17 September 2009/Audit

Date of Last Annual Report: March 2010 for Jan-Dec 2009

Name of Inspector: John W. Lamb

Date PCI Performed: 14-15 December 2010

Name, Title, and Telephone Number of Facility Representative:
John Pepper, Pretreatment Coordinator, 870-862-6451

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Pilgrims Pride, Americable

Note: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

+++++

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. None

2. Has ADPC&E or EPA been notified of these changes? N/A
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** NO
4. What procedures are being used to update the IU Survey?
The facility did not have an updated IU survey

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 07

6. Number of Categorical Industrial Users: 3
7. How does the POTW determine the appropriate categorical standards to apply to an IU?
Code of Federal Registry as per ADEQ

8. List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
<u>Prescolite Reflector</u>	<u>Metal Finishing</u>	<u>Anodizing</u>
<u>Milbank</u>	<u>Metal Finishing</u>	<u>Phosphatizing</u>
<u>Miller Transport</u>	<u>Trans equip cleaning</u>	<u>Equip. cleaning</u>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADPC&E OR EPA? YES

2. Describe any apparent problems with the local limits.
None noted

2. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
influent	<u>4/year</u>	<u>4/year</u>	<u>yearly</u>	
effluent	<u>4/year</u>	<u>4/year</u>	<u>yearly</u>	
sludge	<u>yearly</u>	<u>yearly</u>	<u>Yearly (low level</u>	<u>quarterly)</u>
Organics:				
influent	<u>yearly</u>	<u>yearly</u>	<u>yearly</u>	
effluent	<u>yearly</u>	<u>yearly</u>	<u>Yearly</u>	
sludge	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective? _____

None noted according to Mr. Peppers.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? permit
2. How many IU permits (or other control documents) have been issued? 18
3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**
yes
4. Does the control document contain the following items?
An expiration date yes
Discharge limitations yes

If the program requires self-monitoring by the IUs, do the permits contain

- IU self-monitoring requirements yes (Miller Transport only)
- IU reporting requirements yes (Miller Transport only)
5. Indicate which of the following recommended standard conditions are contained in the control documents:
 - sample location yes
 - type of sample yes
 - monitoring frequency yes
 - bypass prohibition yes
 - right of entry yes
 - nontransferability yes
 - revocation clause yes
 - penalty provisions yes
 - slug load notification yes
 - notification of process change yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>batch-twice/year</u>	<u>twice per year</u>
other SIUs	<u>once/week-twice/year</u>	<u>yearly</u>
Inspection:		
categorical IUs	<u>yearly</u>	<u>yearly</u>
other SIUs	<u>yearly</u>	<u>yearly</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** yes

3. Are inspections announced or unannounced? both

4. Are records kept of each inspection? yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection yes

Officials present yes

Inspection of chemical storage areas yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams yes

Inspection of the pretreatment facilities yes

Review of self-monitoring records yes, Miller Transport

Observation of IU self-monitoring procedures yes, Miller

Verification that approved analytical techniques are used yes

Verification of IU flow measurement (where required) yes

6. Overall adequacy of inspection documentation: adequate, but the following was noted: The City's inspection of the Prescolite Reflector Plant performed on 22 November 2010 did not include the review or addition of Prescolite's T.O.M.P. An inspection performed on 19 September 2009 stated the T.O.M.P. was being reviewed and rewritten by Prescolite. The November 2010 inspection should have documented the status of the new T.O.M.P whether or not it was being implemented.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).
yes
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? yes
9. Are sampling and flow monitoring equipment properly maintained? yes
10. Is the POTW keeping proper field notes and chain of custody forms? yes
11. Is the sampling location representative of the discharge to the collection system? yes
12. Are sampling locations identified in POTW records? yes
13. Are sampling services available in an emergency? yes
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Mr. Peppers reviews all reports when they are received, then again when the lab bills are attached.
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes, the City does all the sampling and contracts all analysis with an outside lab, except for pH at Miller, so the facility actually sees the lab data before the permittees.
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?
yes

17. What are the POTW's procedures for following up violations? Since the City does all the sampling and analysis, (except Miller Transport, pH) Mr. Peppers knows of all the violations before the industries. Emails, letters, CAO's and revocation of permit are the enforcement actions which are used. The City also sends surcharges for BOD excursions with the water bills.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address yes

Other environmental permits held yes

Description of operations yes

Process flow diagrams yes

Flow measurements yes

Measurements of regulated pollutants yes

Certification of compliance by the IU yes

Compliance schedule (if needed) yes

19. Additional comments on the POTW's inspection and sampling procedures: Since the POTW does almost all the sampling and contracts the lab work, the facility has very good sampling data for all facilities. The industries also seem to like this arrangement because it is less paperwork for them to keep; to ensure compliance.

E. ENFORCEMENT

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS?

yes

2. How does the POTW respond to the following violations?

Effluent limitations emails, letter, surcharges

Late reports emails and letter

Unpermitted discharges suspend water and sewer usage

Slug loads or spills spills are contained at manholes and then the clean up contracted and billed back to the spiller.

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)?

yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
<u>None this</u>	<u>year</u>	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

5. Comments on the POTW's enforcement procedures:

The POTW has a very good handle on enforcement. Very little enforcement is needed due to the limited number Industrial Users. The city sends emails to the permittees when an issue comes up. The city then keeps copies of the email records. The facility was required to add criminal penalties to the IU permits. This has been done.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

- 1. Is the program structure essentially the same as that presented in the approved pretreatment program?
yes
- 2. Are staffing levels adequate? yes
- 3. Are the responsible officials familiar with the approved program?
yes

G. MULTIJURISDICTIONAL ISSUES

- 1. List any IUs which are located outside of the jurisdictional area of the POTW:
n/a
- 2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?
n/a
- 3. Does the POTW have copies of permits for IUs in user cities?
n/a
- 4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? n/a
- 5. Comments on multijurisdictional issues:
n/a

H. EVALUATION AND COMMENTS

The overall pretreatment program is running very smoothly. However, the facility has not updated the Industrial User Survey. The facility should conduct a new survey to insure that no changes or new industries are connected to the POTW.

The City's inspection of the Prescolite Reflector Plant performed on 22 November 2010 did not include the review or addition of Prescolite's T.O.M.P. An inspection performed on 19 September 2009 stated the T.O.M.P. was being reviewed and rewritten by Prescolite. The November 2010 inspection should have documented the completion status of the new T.O.M.P whether or not it was being implemented.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Pilgrim's Pride

POTW Name: City of El Dorado

Industry Contacts: Hal Davis

Date and Time of Visit: 14 December 2010/10:52

Description of Manufacturing Process: rendering plant

Sources of Process Wastewater:
wash down of equipment and floor drains

Categorical Industry? no

Basis for Limits: n/a

Point of Application: n/a

Description of Pretreatment Equipment and Procedures: DAF units, pH adjustment

Spill Prevention and Solvent Management Procedures:
n/a

Sampling Location and Equipment: parhsall flume south side of treatment plant

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Americable

POTW Name: City of El Dorado

Industry Contacts: Chad Thorton

Date and Time of Visit: 14 December 2010, 11:26

Description of Manufacturing Process: Manufacturing of wire and cable

Sources of Process Wastewater: cooling rinse

Categorical Industry? NO

Basis for Limits: N/A

Point of Application: N/A

Description of Pretreatment Equipment and Procedures:
none

Spill Prevention and Solvent Management Procedures:
hydraulic fluid disposed of offsite, small quantity solvents of 1 gallon or less per container.

Sampling Location and Equipment: Manhole east side of plant, near back entrance.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

	CODE
INSPECTOR'S NAME <u>John W. Lamb</u>	
NAME OF FACILITY <u>City of El Dorado</u>	
PERMIT NUMBER USED TO TRACK PROGRAM <u>AR0033723</u>	NPID
DATE OF PCI <u>14 and 15 December 2010</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS)	<u>07</u>	SIUS
NUMBER OF CATEGORICAL IUS	<u>3</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW	<u>0</u>	SNIN

El Dorado Water Utilities

500 NORTH WASHINGTON • P. O. BOX 1587 • EL DORADO, AR 71731 (870) 862-6451

January 27, 2011

Ms. Cindy Garner
Branch Manager
Arkansas Department of Environmental Quality
5301 North shore Drive
North Little Rock, AR 72118-5317

Certified Mail
7008 2810 0001 4205 4439

Re: AFIN 70-00341

NPDES Permit No.: AR0033723 & AR 0033936

Dear Ms. Garner:

Enclosed you will find the corrective actions taken on the deficiencies that were noted by Mr. John Lamb on his December 14, 2010 inspection.

- (1) The lab personnel have been instructed to keep a closer watch on the water bath Calibration log. Enclosed you will find the most recent completed log sheet.
- (2) The utility is now in the process of updating the industrial user surveys. Enclosed you will find a sample of the letter and survey forms that are being sent out.
- (3) The T.O.M.P. for Prescolite Reflector has been updated and has been verified that it is being implemented. Enclosed you will find a copy of the updated T.O.M.P.

If I can be of any further assistance, please contact me at 870-862-6451 or harold@eldoradowater.com.

Sincerely,



T. Harold Baker
Treatment Superintendent
El Dorado Water Utilities

CALIBRATION / MAINTENANCE LOG

WATERBATH

DATE	TIME	TEMP	ROOM TEMP	ADJUSTMENTS / NOTES	NAME
8-24-10	1430	44.5	24°		Don
8-31-10	1415	44.5	23°		Don
9-7-10	1405	44.5	24°		Don
9-14-10	1400	44.5	24°		Don
9-21-10	1350	47.3	25°	turned down	Don
9-28-10	1400	44.5	24°		Don
10-5-10	1420	44.5	24°		Don
10-12-10	1410	44.5	24°		Don
10-19-10	1340	44.5	25°		Don
10-26-10	1350	44.5	24°		Don
11-2-10	1425	44.5	25°		Don
11-9-10	1430	44.5	25°		Don
11-17-10	1415	41.9	25°	turned up	Don
11-23-10	1405	44.5	26°		Don
11-30-10	1430	44.5	25°		Don
12-7-10	1415	44.5	25°		Don
12-14-10	1405	41.2	26°	turned up	Don
12-21-10	1355	44.5	26°		Don
12-28-10	1410	44.5	25°		Don
1-4-11	1420	44.5	25°		Don
1-11-11	1410	48.2	26°	turned down	Don
1-18-11	1400	44.5	25°		Don

TOXIC ORGANIC MANAGEMENT PLAN
PRESCOLITE REFLECTOR PLANT

I. Description of Facilities and Solvent Use

A. Process Description

Prescolite manufactures incandescent, fluorescent, and HID light fixtures. The majority of these fixtures requires reflectors to control or direct the light output. The reflectors are made from aluminum that is drawn or hand spun, hand polished, bright dipped, anodized and sealed. Structural parts may also be anodized for better paint adhesion.

Waste water types are shown on the following drawing. The source of process waste water is from the anodizing line. The waste stream is treated by coagulation/flocculation with chemical and polymer additions for solids and metals reduction. The treated effluent is discharged to the city sewer system. The sludge is processed through a filter press and the aluminum hydroxide cake is hauled to an approved land fill.

B. Identification of Toxic Organic Chemicals Entering the Plant Waste Water.

1. Chemical analysis over the last 18 months by the El Dorado Water Company show the discharged wastes to be well within the specified limits.
2. Identification of toxic organic chemicals used in the anodizing lines:

Nickel Acetate is used to seal the surface of the reflectors after anodizing to prevent oxidation.
3. Identification of other potential sources of toxic organic pollutant introduction to the waste water treatment system.
 - a. Drain in receiving area for water cooler.
 - b. Clean out plug in waste treatment area.

II. Description of Control Options Explored

A. Seal Substitution

The nickel acetate seal is considered by the industry as the best seal available at the present time. The nickel fills in the pores giving the reflector's surface a seal that will hold up in damp and wet locations preventing oxidation.

B. Process Modification

None - The reflectors must be sealed.

C. Sealing Floor Drains

The water cooler drain is 4-6" off the floor and the clean-outs are sealed.

III. Toxic Organic Management Plan

As a result of the above analysis, Prescolite believes that any toxic organic pollutant discharge can be controlled by a toxic organic management plan in lieu of routine toxic organic monitoring.

A. Seal Substitution

New seals will be tried as they become available to eliminate the nickel acetate.

B. Process Change

There will be no process changes until a new seal is developed and approved.

C. Seal Storage

The seal is received in 55 gallon drums. If a drum should rupture in the receiving area or en route to storage, the fluid cannot enter the city drain. The drain at the water cooler is 4-6" above the floor.

The seal is stored in the back of the waste water treatment area. If a leak should occur, it will enter the pretreatment area and will not be discharged until it is processed through the system.

D. Sealed or Diked Drains

The anodizing line was designed to eliminate or protect all drains that go into the city sewer. The pretreatment area will not discharge into the city sewer unless it is pretreated first.

E. Spent Seal and Waste Disposal Practices

All of the tanks in the anodize line area dumped into the pretreatment system when the solution is spent, dirty, or will not pass titrations tests. All waste water is run through the waste water treatment. The nickel and aluminum particles are treated to fall out. The sludge is run through a filter press. The waste is in a cake form called aluminum hydroxide. The TCLP volatile organic compound test, EPA method 624, was run and all parameters were within EPA limits. Prescolite has a permit with waste management of North America to bury the aluminum hydroxide at the Union County Landfill. The waste water after adjustment for pH is dumped into the city sewer.

F. Training

Present employees involved in the anodizing operation have received instructions in the proper handling and disposal of all wastes in order to keep regulated toxic organics out of industrial waste water. New employees will be trained by the department foreman.

All personnel working in these activities will be familiar with this toxic organic management plan and will follow the procedure. New employees will be trained by the department foreman.

G. Inspections

Department foreman will routinely inspect the area to verify cleaning procedures and adherence to this toxic management plan.

IV. Certification

"Based on my inquiry of the person or persons directly responsible for the managing compliance with the TTO limitations, I certify that, to the best of knowledge and belief, no dumping of concentrated toxic organics into the waste waters has occurred. I further certify that this facility is adhering to and implementing the toxic organic management plan submitted to El Dorado Water Utilities on January 10, 2011.

1-10-2011

Date

Robert Humphrey

Manager of Operations

Prescolite - Reflector Plant
216 Mims Drive
El Dorado, AR. 71730
Phone : (870) 862-8181

El Dorado Water Utilities

500 NORTH WASHINGTON • P. O. BOX 1587 • EL DORADO, AR 71731 (870) 862-6451

January 26, 2011

Mr. Terry Ross
Hollywood Cleaners
202 West Grove
El Dorado, AR 71730

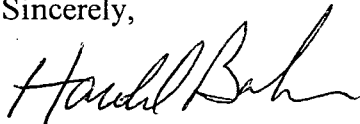
Dear Mr. Ross:

In accordance with provisions of the Air Pollution Control Act and the Clean Water Act, El Dorado Water Utilities is permitted to discharge treated wastewater into the receiving waters of the State of Arkansas. A condition of the above mentioned permit requires the utility to periodically update industrial and commercial wastewater user information to adequately ensure that all industrial and commercial users are properly characterized at all times.

Please complete the attached wastewater survey and return as soon as possible, but no later than March 15, 2011.

If I can be of any assistance, please call me at 862-6451.

Sincerely,



T. Harold Baker
Treatment Superintendent

Enclosure

El Dorado Water Utilities

500 NORTH WASHINGTON • P. O. BOX 1587 • EL DORADO, AR 71731 (870) 862-6451

January 26, 2011

Mr. Terry Ross
Hollywood Cleaners
202 West Grove
El Dorado, AR 71730

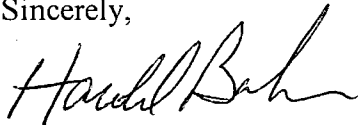
Dear Mr. Ross:

In accordance with provisions of the Air Pollution Control Act and the Clean Water Act, El Dorado Water Utilities is permitted to discharge treated wastewater into the receiving waters of the State of Arkansas. A condition of the above mentioned permit requires the utility to periodically update industrial and commercial wastewater user information to adequately ensure that all industrial and commercial users are properly characterized at all times.

Please complete the attached wastewater survey and return as soon as possible, but no later than March 15, 2011.

If I can be of any assistance, please call me at 862-6451.

Sincerely,



T. Harold Baker
Treatment Superintendent

Enclosure

WASTEWATER SURVEY FOR NONRESIDENTIAL ESTABLISHMENTS:

SECTION A - GENERAL INFORMATION

A.1. Company name, mailing address, and telephone number:

Zip Code _____ Telephone No. () _____

A.2. Address of production or manufacturing facility. (If same as above, check[.])

Zip Code _____ Telephone No. () _____

A.3. Name, title, and telephone number of person authorized to represent this firm in official dealings with the Sewer Authority and/or City:

A.4. Alternate person to contact concerning information provided herein
Name _____ Title _____ Tel. No. _____

A.5. Identify the type of business conducted (auto repair, machine shop, electroplating, warehousing, painting, printing, meat packing, food processing, etc.).

Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit be required for your facility, the information in this questionnaire will be used to issue the permit.

This is to be signed by an authorized official of your firm after adequate completion of this form and review of the information by the signing official.

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.

_____ Date

_____ Signature of Official
(Seal if applicable)

A.6. Provide a brief narrative description of the manufacturing, production, or service activities your firm conducts.

A.7. Standard Industrial Classification Number(s) (SIC Code) for your facilities:

A.8. This facility generates the following types of wastes (check all that apply):

	<u>Average gallons</u> <u>per day</u>		
1. <input type="checkbox"/> Domestic wastes (restrooms, employee showers, etc.)	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
2. <input type="checkbox"/> Cooling water, non-contact	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
3. <input type="checkbox"/> Boiler/Tower blowdown	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
4. <input type="checkbox"/> Cooling water, contact	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
5. <input type="checkbox"/> Process	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
6. <input type="checkbox"/> Equipment/Facility Washdown	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
7. <input type="checkbox"/> Air Pollution Control Unit	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
8. <input type="checkbox"/> Storm water runoff to sewer	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
9. <input type="checkbox"/> Other (describe)	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured

Total A.8.1 - A.8.9 _____

A.9. Wastes are discharged to (check all that apply):

	<u>Average Gallons</u> <u>per day</u>		
<input type="checkbox"/> Sanitary sewer	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Storm sewer	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Surface water	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Ground water	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Waste haulers	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Evaporation	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Other (describe)	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured

Provide name and address of waste hauler(s), if used.

A.10. Is a Spill Prevention Control and Countermeasure Plan prepared for the facility?

yes no

Note: If your facility did not check one or more of the items listed in A.8.4 through A.8.9 above, then you do not need to complete any further sections in this survey/application. If any items A.8.4 through A.8.9 were checked, complete the remainder of this survey/application.

SECTION B - FACILITY OPERATION CHARACTERISTICS

B.1 Number of employee shifts worked per 24-hour day is _____.
Average number of employees per shift is _____.

B.2 Starting times of each shift: 1st _____ am _____ pm 2nd _____ am _____ pm 3rd _____ am _____ pm

Note: The following information in this section must be completed for each product line.

B.3 Principal product produced: _____

B.4 Raw materials and process additives used:

B.5 Production process is:
 Batch Continuous Both _____%batch _____%continuous
Average number of batches per 24-hour day _____

B.6 Hours of operation: _____ a.m. to _____ p.m. continuous

B.7 Is production subject to seasonal variation? yes no
If yes, briefly describe seasonal production cycle.

B.8 Are any process changes or expansions planned during the next three years?
 yes no
If yes, attach a separate sheet to this form describing the nature of planned changes or expansions.

SECTION C - WASTEWATER INFORMATION

C.1 If your facility employs processes in any of the 34 industrial categories or business activities listed below and any of these processes generate wastewater or waste sludge, place a check beside the category or business activity (check all that apply).

A. 34 Industrial Categories

1. Adhesives
2. Aluminum Forming
3. Auto & Other Laundries
4. Battery Manufacturing
5. Coal Mining
6. Coil Coating
7. Copper Forming
8. Electric & Electronic Components
9. Electroplating
10. Explosives Manufacturing
11. Foundries
12. Gum & Wood Chemicals
13. Inorganic Chemicals
14. Iron & Steel
15. Leather Tanning & Finishing
16. Mechanical Products
17. Nonferrous Metals
18. Ore Mining
19. Organic Chemicals
20. Paint & Ink
21. Pesticides
22. Petroleum Refining
23. Pharmaceuticals
24. Photographic Supplies
25. Plastic & Synthetic Materials
26. Plastics Processing
27. Porcelain Enamel
28. Printing & Publishing
29. Pump & Paper
30. Rubber
31. Soaps & Detergents
32. Steam Electric
33. Textile Mills
34. Timber

B. Other Business Activity

- Dairy Products
- Slaughter/Meat Packing/Rendering
- Food/Edible Products Processor
- Beverage Bottler

C.2 Pretreatment devices or processes used for treating wastewater or sludge
(check as many as appropriate)

- Air flotation
- Centrifuge
- Chemical precipitation
- Chlorination
- Cyclone
- Filtration
- Flow Equalization
- Grease or oil separation, type _____
- Grease trap
- Grit Removal
- Ion Exchange
- Neutralization, pH correction
- Ozonation
- Reverse Osmosis
- Screen
- Sedimentation
- Septic tank
- Solvent separation
- Spill protection
- Sump
- Biological treatment, type _____
- Rainwater diversion or storage _____
- Other chemical treatment, type _____
- Other physical treatment, type _____
- Other, type _____
- No pretreatment provided

C.3 If any wastewater analyses have been performed on the wastewater discharge(s) from your facilities, attach a copy of the most recent data to this questionnaire. Be sure to include the date of the analysis, name of laboratory performing the analysis, and location(s) from which sample(s) were taken (attach sketches, plans, etc., as necessary).

C.4 Priority Pollutant Information: Please indicate by placing an "x" in the appropriate box by each listed chemical whether it is "Suspected to be Absent," "Known to be Absent," "Suspected to be Present," or "Known to be Present" in your manufacturing or service activity or generated as a by-product.

CHEMICAL COMPOUND	Known Present	Suspected Present	Known Absent	Suspected Absent	Known or Suspected Concentration/day	CHEMICAL COMPOUND	Known Present	Suspected Present	Known Absent	Suspected Absent	Known or Suspected Concentration/day
I. METALS & INORGANICS											
1. Antimony	[]	[]	[]	[]	[]	32. Benzene, 1,2,4-trichloro	[]	[]	[]	[]	[]
2. Arsenic	[]	[]	[]	[]	[]	33. Benzene, hexachloro	[]	[]	[]	[]	[]
3. Asbestos	[]	[]	[]	[]	[]	34. Benzene, ethyl	[]	[]	[]	[]	[]
4. Beryllium	[]	[]	[]	[]	[]	35. Benzene, nitro	[]	[]	[]	[]	[]
5. Cadmium	[]	[]	[]	[]	[]	36. Toluene	[]	[]	[]	[]	[]
6. Chromium	[]	[]	[]	[]	[]	37. Toluene, 2,4-dinitro	[]	[]	[]	[]	[]
7. Copper	[]	[]	[]	[]	[]	38. Toluene, 2,6-dinitro	[]	[]	[]	[]	[]
8. Cyanide	[]	[]	[]	[]	[]	IV. PCBs & RELATED COMPOUNDS					
9. Lead	[]	[]	[]	[]	[]	39. PCB-1016	[]	[]	[]	[]	[]
10. Mercury	[]	[]	[]	[]	[]	40. PCB-1221	[]	[]	[]	[]	[]
11. Nickel	[]	[]	[]	[]	[]	41. PCB-1232	[]	[]	[]	[]	[]
12. Selenium	[]	[]	[]	[]	[]	42. PCB-1242	[]	[]	[]	[]	[]
13. Silver	[]	[]	[]	[]	[]	43. PCB-1248	[]	[]	[]	[]	[]
14. Thallium	[]	[]	[]	[]	[]	44. PCB-1254	[]	[]	[]	[]	[]
15. Zinc	[]	[]	[]	[]	[]	45. PCB-1260	[]	[]	[]	[]	[]
II. PHENOLS AND CRESOLS											
16. Phenol(s)	[]	[]	[]	[]	[]	46. 2-Chloronaphthalene	[]	[]	[]	[]	[]
17. Phenol, 2-chloro	[]	[]	[]	[]	[]	V. ETHERS					
18. Phenol, 2,4-dichloro	[]	[]	[]	[]	[]	47. Ether, bis(chloromethyl)	[]	[]	[]	[]	[]
19. Phenol, 2,4,6-trichloro	[]	[]	[]	[]	[]	48. Ether, bis(2-chloroethyl)	[]	[]	[]	[]	[]
20. Phenol, pentachloro	[]	[]	[]	[]	[]	49. Ether, bis(2-chlorosopropyl)	[]	[]	[]	[]	[]
21. Phenol, 2-nitro	[]	[]	[]	[]	[]	50. Ether, 2-chloroethyl vinyl	[]	[]	[]	[]	[]
22. Phenol, 4-nitro	[]	[]	[]	[]	[]	51. Ether, 4-bromophenyl phenyl	[]	[]	[]	[]	[]
23. Phenol, 2,4-dinitro	[]	[]	[]	[]	[]	52. Ether, 4-chlorophenyl phenyl	[]	[]	[]	[]	[]
24. Phenol, 2,4-dimethyl	[]	[]	[]	[]	[]	53. Bis(2-chloroethoxy) methane	[]	[]	[]	[]	[]
25. m-Cresol, p-chloro	[]	[]	[]	[]	[]	VI. NITROSAMINES AND OTHER NITROGEN-CONTAINING COMPOUNDS					
26. o-Cresol, 4,6-dinitro	[]	[]	[]	[]	[]	54. Nitrosamine, dimethyl	[]	[]	[]	[]	[]
III. MONOCYCLIC AROMATICS (EXCLUDING PHENOLS, CRESOLS AND PHTHALATES)											
27. Benzene	[]	[]	[]	[]	[]	55. Nitrosamine, diphenyl	[]	[]	[]	[]	[]
28. Benzene, chloro	[]	[]	[]	[]	[]	56. Nitrosamine, di-n-propyl	[]	[]	[]	[]	[]
29. Benzene, 1,2-dichloro	[]	[]	[]	[]	[]	57. Benzidine	[]	[]	[]	[]	[]
30. Benzene, 1,3-dichloro	[]	[]	[]	[]	[]	58. Benzidine, 3,3'-dichloro	[]	[]	[]	[]	[]
31. Benzene, 1,4-dichloro	[]	[]	[]	[]	[]	59. Hydrazine, 1,2-diphenyl	[]	[]	[]	[]	[]
						60. Acrylonitrile	[]	[]	[]	[]	[]

CHEMICAL COMPOUND	Known Present	Suspected Present	Known Absent	Suspected Absent	Known or Suspected Concentration/day	CHEMICAL COMPOUND	Known Present	Suspected Present	Known Absent	Suspected Absent	Known or Suspected Concentration/day
VII. HALOGENATED ALIPHATICS											
61. Methane, bromo-	[]	[]	[]	[]	---	95. Benzo (a) anthracene	[]	[]	[]	[]	---
62. Methane, chloro-	[]	[]	[]	[]	---	96. Benzo (b) fluoranthene	[]	[]	[]	[]	---
63. Methane, dichloro	[]	[]	[]	[]	---	97. Benzo (k) fluoranthene	[]	[]	[]	[]	---
64. Methane, chlorodibromo	[]	[]	[]	[]	---	98. Benzo (ghi) perylene	[]	[]	[]	[]	---
65. Methane, dichlorobromo	[]	[]	[]	[]	---	99. Benzo (a) pyrene	[]	[]	[]	[]	---
66. Methane, tribromo	[]	[]	[]	[]	---	100. Chrysene	[]	[]	[]	[]	---
67. Methane, trichloro	[]	[]	[]	[]	---	101. Dibenzo (a,n,) anthracene	[]	[]	[]	[]	---
68. Methane, tetrachloro	[]	[]	[]	[]	---	102. Fluoranthene	[]	[]	[]	[]	---
69. Methane, trichlorofluoro	[]	[]	[]	[]	---	103. Fluorene	[]	[]	[]	[]	---
70. Methane, dichlorodifluoro	[]	[]	[]	[]	---	104. Indeno (1,2,3-cd) pyrene	[]	[]	[]	[]	---
71. Ethane, 1,1-dichloro	[]	[]	[]	[]	---	105. Naphthalene	[]	[]	[]	[]	---
72. Ethane, 1,2-dichloro	[]	[]	[]	[]	---	106. Phenanthrene	[]	[]	[]	[]	---
73. Ethane, 1,1,1-trichloro	[]	[]	[]	[]	---	107. Pyrene	[]	[]	[]	[]	---
74. Ethane, 1,1,2-trichloro	[]	[]	[]	[]	---	X. PESTICIDES					
75. Ethane, 1,1,2,1-tetrachloro	[]	[]	[]	[]	---	108. Acrolein	[]	[]	[]	[]	---
76. Ethane, hexachloro	[]	[]	[]	[]	---	109. Aldrin	[]	[]	[]	[]	---
77. Ethene, chloro	[]	[]	[]	[]	---	110. BHC (Alpha)	[]	[]	[]	[]	---
78. Ethene, 1,1-dichloro	[]	[]	[]	[]	---	111. BHC (Beta)	[]	[]	[]	[]	---
79. Ethene, trans-dichloro	[]	[]	[]	[]	---	112. BHC (Gamma) or Lindane	[]	[]	[]	[]	---
80. Ethene, trichloro	[]	[]	[]	[]	---	113. BHC (Delta)	[]	[]	[]	[]	---
81. Ethene, tetrachloro	[]	[]	[]	[]	---	114. Chlordane	[]	[]	[]	[]	---
82. Propane, 1,2-dichloro	[]	[]	[]	[]	---	115. DDD	[]	[]	[]	[]	---
83. Propene, 2,4-dichloro	[]	[]	[]	[]	---	116. DDE	[]	[]	[]	[]	---
84. Butadiene, hexachloro	[]	[]	[]	[]	---	117. DDT	[]	[]	[]	[]	---
85. Cyclopentadiene, hexachloro	[]	[]	[]	[]	---	118. Dieldrin	[]	[]	[]	[]	---
VIII. PHTHALATE ESTERS											
86. Phthalate, di-c-methyl	[]	[]	[]	[]	---	119. Endosulfan (Alpha)	[]	[]	[]	[]	---
87. Phthalate, di-n-ethyl	[]	[]	[]	[]	---	120. Endosulfan (Beta)	[]	[]	[]	[]	---
88. Phthalate, di-n-butyl	[]	[]	[]	[]	---	121. Endosulfan Sulfate	[]	[]	[]	[]	---
89. Phthalate, di-n-octyl	[]	[]	[]	[]	---	122. Endrin	[]	[]	[]	[]	---
90. Phthalate, bis(2-ethylhexyl)	[]	[]	[]	[]	---	123. Endrin aldehyde	[]	[]	[]	[]	---
91. Phthalate, butyl benzyl	[]	[]	[]	[]	---	124. Heptachlor	[]	[]	[]	[]	---
IX. POLYCYCLIC AROMATIC HYDROCARBONS											
92. Acenaphthene	[]	[]	[]	[]	---	125. Heptachlor epoxide	[]	[]	[]	[]	---
93. Acenaphthylene	[]	[]	[]	[]	---	126. Isophorone	[]	[]	[]	[]	---
94. Anthracene	[]	[]	[]	[]	---	127. TCDD (or Dioxin)	[]	[]	[]	[]	---
						128. Toxaphene	[]	[]	[]	[]	---

C.5 If you are unable to identify the chemical constituents of products you use that discharged in your wastewater, attach copies of the materials safety data sheets for such products.

SECTION D - OTHER WASTES

D.1 Are any liquid wastes or sludges from this firm disposed of by means other than discharge to the sewer system?

yes no

If "no," skip remainder of Section D.
If "yes," complete items 2 and 3.

D.2 These wastes may best be described as:

	Estimated Gallons or Pounds/Year
<input type="checkbox"/> Acids and Alkalies	_____
<input type="checkbox"/> Heavy Metal Sludges	_____
<input type="checkbox"/> Inks/Dyes	_____
<input type="checkbox"/> Oil and/or Grease	_____
<input type="checkbox"/> Organic Compounds	_____
<input type="checkbox"/> Paints	_____
<input type="checkbox"/> Pesticides	_____
<input type="checkbox"/> Plating Wastes	_____
<input type="checkbox"/> Pretreatment Sludges	_____
<input type="checkbox"/> Solvents/Thinners	_____
<input type="checkbox"/> Other Hazardous Wastes (specify)	_____
_____	_____
<input type="checkbox"/> Other wastes(specify)	_____
_____	_____
_____	_____

D.3 For the above checked wastes, does your company practice:

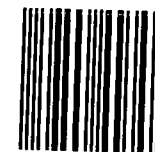
- on-site storage
- off-site storage
- on-site disposal
- off-site disposal

Briefly describe the method(s) of storage or disposal checked above.

CERTIFIED MAIL™



7008 2810 0001 4205 4439



1000

72118

U.S. POSTAGE
PAID
EL DORADO, AR
71730
JAN 27, 11
AMOUNT

\$6.32
00036978-03

Return Receipt Requested
Showing Address
Where Delivered

Return Receipt Requested
Showing Address
Where Delivered

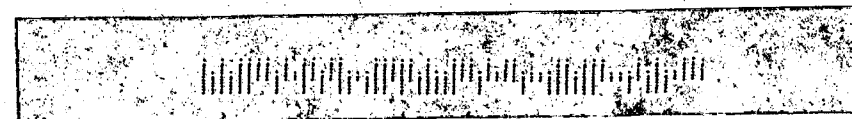
FROM

El Dorado Water Utilities

P.O. BOX 1587

EL DORADO, ARKANSAS 71731

*Ms. Cindy Garner
Branch Manager
ADEA
5301 Northshore Drive
W. Little Rock, AR 72118-5317*



ADEQ

ARKANSAS
Department of Environmental Quality

February 7, 2011

Mr. Larry Waldrop, General Manager
El Dorado Water Utilities
P.O. Box 1587
El Dorado, AR 71731

Re: NPDES Permit Nos.: AR0033936 & AR0033723 AFIN: 70-00341
Response to Inspections

Dear Mr. Waldrop:

The Department has received your response to the December 14th and 15th, 2010 compliance inspections of your facility by our District Field Inspector, John Lamb. Your letter appears to adequately address the discrepancies identified during the visits. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your site and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0635 or you may e-mail me at anderson@adeq.state.ar.us.

Sincerely,



Alan Anderson
Enforcement Analyst
Water Division Enforcement Branch