



ARKANSAS
Department of Environmental Quality

July 13, 2006

C.E. Dugan, Chairman
Van Buren Municipal Utilities Commission
P.O. Drawer 1269
2806 Bryan Road
Van Buren, Arkansas 72956

Re: City of Van Buren (NPDES #AR0021482) Pretreatment Program Audit/Municipal
Pollution Prevention Assessment

Dear Mr. Dugan:

Please find enclosed the finished report for the audit/assessment conducted February 21st through the 23rd, 2006. The report should be made available for review by appropriate officials. Discussions and an evaluation should be made concerning the findings. Please respond to required actions and recommendations in writing within thirty (30) days from the date on this correspondence. Your response should outline the steps and schedule in which the City can reasonably address/correct deficiencies and/or required actions.

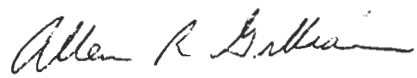
Many of the audit/assessment recommendations are meant to aide your Program further achieve the Clean Water Act's objectives to eliminate discharge of pollutants to the environment. The National Pretreatment Program is the Act's compliment to help protect publicly owned utilities with value added by implementing a Pollution Prevention program.

The City's overall, but basic implementation of its Program is being run in an adequate manner by Ms. Redo but "back-up" and/or additional support did not seem to exist to further your Program for outreach to all non-domestic dischargers. This issue may be one the City is overlooking in protecting its wastewater treatment plants and their longevity. Securing a "back-up" employee is one of the strongest recommendations this office can offer, not only for the City's benefit but, for the future of the City's Pretreatment Program.

It was a pleasure working with Ms. Redo during the audit and once again, becoming more familiar with the City of Van Buren, its industries, and its Pretreatment Program.

Feel free to contact this office with any questions at (501) 682-0625.

Sincerely,

A handwritten signature in black ink that reads "Allen R. Gilliam". The signature is written in a cursive style with a prominent initial "A".

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist
cc: Lee Bohme/EPA 6WQ-PM
Frank Esry/ADEQ Inspector Supervisor
Dennis Benson/NPDES Enforcement Branch Manager

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF VAN BUREN, ARKANSAS

NPDES PERMIT #AR0021482

JULY 11th, 2006

PREPARED BY: ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ADEQ

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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

A) INTRODUCTION

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

An audit/assessment was performed February 21 - 23, 2006, of the Pretreatment Program implemented by City of Van Buren, Arkansas. Participants included:

Allen Gilliam ADEQ / State Pretreatment Coordinator

Kim Redo City / Pretreatment Coordinator

The goals of the audit/assessment were:

- * To determine the implementation and compliance status of the City of Van Buren's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403
- * To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial/non-domestic discharges
- * To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements
- * To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof

Van Buren's Pretreatment Program was originally approved 10/1/81. Subsequent modifications were submitted, approved and incorporated into the City's NPDES permit on 3/21/90 and once again on 3/6/97. These modifications included changes in the City's Pretreatment Ordinance, headworks loading evaluation and minor program narrative revisions.

The City has three (3) wastewater treatment plants with no major modifications nor upgrades since the last (7/00) audit.

The main (South) POTW consists of a multi-cell aerated lagoon. The treated wastewater is injected with chlorine and sent through a contact chamber prior to discharge into the Arkansas River. The effluent has exhibited no toxicity to aquatic life. Sludge is being stored in the lagoon with occasional (approx. every 4 years) land application on nearby City-owned property.

The South plant's design flow is 3.1 MGD and averages about 2.2 MGD with approximately 0.58 MGD being contributed by eight (8) significant users, three (3) of which are categorical.

The Lee Creek POTW is a simple activated sludge package treatment plant operating under extended aeration conditions. It's design flow is 0.04 MGD, averages about 6,800 gal/day, has no significant industrial user contributions and accepts only sanitary wastewater from Bekaert Steel. Its treated effluent is chlorine disinfected prior to discharge to the Arkansas River. Accumulated sludge is wasted to an aerated holding digester and periodically transported to the North POTW.

The North POTW is a closed loop reactor, 2 channel orbal design, oxidation ditch with 2 stage clarification with chlorine disinfection prior to discharge to Lee Creek. It's design flow is 1.0 MGD averaging 0.97 MGD with approximately 0.01 MGD contributed by a non-categorical SIU. Biosolids are periodically dredged and land applied on City property.

The audit/assessment consisted of informal discussions with the City's Pretreatment Coordinator, examination of industrial user files, pretreatment records and site visits to four (4) industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachment(s) A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Van Buren's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under **40 CFR 403.8(f)(2)(vi)** "...Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions..."

a) The City's lab must be provided with adequate "standards" to calibrate their equipment and run analyticals for valid test results. It was discovered during the audit interview that adequate lab QA/QC standards were not available possibly undermining the validity of its own lab results. The City must make these available to its lab technicians.

b) During the file review it was found that some chain of custody forms were not complete. "Relinquished by" and "received by" signatures or initials were not found on all chains of custody. The City must review these more closely for them to be legally defensible in a court of law.

2a) Per **40 CFR 433.12(a)** a certification statement must be included in lieu of monitoring for the list of toxic organics for metal finishers. Not all the City's metal finishers who had submitted a Toxic Organic Management Plan (TOMP) were submitting this complete statement.

2b) Permits need to be more clear on this TOMP allowance. Present metal finishers' permits still include a limit for the TTOs. A footnote needs to be included stating something to the affect that, "This facility has submitted a City approved TOMP and is not required to monitor for TTOs nor meet the limit". Possibly further clarify this situation in the facility's permit section regarding "Reporting Requirements".

3) Per **40 CFR 403.8(f)(2)(iii)** "...[The City] shall notify Industrial Users...of any applicable Pretreatment Standards and any other applicable requirements...."

The City must inform its industrial users of the most recent revisions to the General Pretreatment Regulations in **40 CFR 403**. This can be accomplished with a simple cover letter with a copy of the newly promulgated "Streamlining Revisions" to **CFR 403** and/or with the EPA link for more information.

4) Per current **40 CFR 403.8(f)(2)(vi)** "...[the City shall] Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006.

While the City's current inspection form does include some general questions regarding "non-customary" discharges and "slugloads", a specific evaluation must be conducted at each significant user prior to the above deadline. This evaluation should include questions specifically asked of the industry representative such as, "Is there any possibility that any by-passes of pretreatment can be accidentally made; employee error can be made; is there any possible way you can see where any of your toxic pollutants can be purposefully be discharged into the City's collection system, etc". See EPA's 1991 "Control of Slug Loadings to POTWs" for further discussion.

5) Under **40 CFR 403.8(f)(2)(iv)** [The City shall] "Receive and analyze self-monitoring reports...by Industrial Users...to require [**403.8(f)(1)(ii)**] compliance with applicable Pretreatment Standards...

Some of River City Coatings' self monitoring reports did not include required flow monitoring nor pH measurements.

C) RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE PRETREATMENT AND POLLUTION PREVENTION PROGRAMS

- 1) Recommend Pretreatment personnel comprehensively re-familiarizing themselves with the City's Program and store it electronically in a standard ("Microsoft Word®", for example) software format.
- 2) Recommend clarifying permits' limit page to specify frequency of monitoring. See Attachment A-3p for example. "1/30" should more clearly state "once/month" and "2/365" should more clearly read "twice/year" or "once/6 month period". It's realized "1/30, 2/365, etc", are further described in the reporting requirements section of the permit but, this office would recommend it actually being delineated on the limits/frequency page.
- 3) Recommend sending a copy of 40 CFR 403.12(p) to the hazardous waste generators (ADEQ list provided during the audit) located in the City's service area. This notification should also be sent to the City's dental office/clinics, chiropractors, veterinarians, printers and hospitals. This notification will at least let the businesses realize the City is knowledgeable of their presence and allow the facilities knowledge of their RCRA and Pretreatment Regulation reporting requirements.
- 4) Recommend including questions about pollution prevention (P2), best management practices (BMP), employee training, etc. ongoing or planned on future industry survey/questionnaires.
- 5) Consider adjusting/adding to staffing levels dedicated to the City's Pretreatment Program. The City coordinator's present responsibilities seem to be hindering the Program from advancing beyond the basic requirements. A back-up "pretreatment coordinator" should be training with current personnel.
- 6) Consider adding Pollution Prevention and Best Management Practices to the general requirements in your industries' permits. Request annual reporting requirements for their current activities and program successes.
- 7) Recommend including more outreach ("Annual Industry Day"?) attempts to all the City's non-domestic dischargers, not just the permitted ones. The more knowledge your non-domestic contributors know about their general and specific Pretreatment prohibitions and reporting requirements, the easier it should be for the implementation of the City's Program.
- 8) Recommend revising all SIU permits' temperature limits to reflect what's in **40 CFR 403.5(b)(5)** where the 40°C is applicable AT the headworks of the POTW, not at the discharge point of the industry.

**D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED
PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO
COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY
REQUIREMENTS**

The City's Pretreatment Program must be modified to be current with the newly revised *40 CFR 403*. This would include any revisions to the City's Pretreatment Ordinance.

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.

PRETREATMENT AUDIT CHECKLIST

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information Pages 1- 8
 Section II: Pretreatment Program Analysis Pages 9-21
 Section III: Industrial User File Evaluation Pages 22-31

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Van Buren NPDES #: AR0021482
 Mailing address: 2806 Bryan Rd., P.O. Drawer 1269, 72956

Permit Signatory: Gary Smith Title: Superintendent

Telephone: 479.474.5067 FAX NUMBER: 479.471.8969

Pretreatment Contact: Kim Redo Title: Environmental Coord.
 Address: Same
 Telephone: 479.474.0941
 e-mail kimredo@aol.com

Pretreatment program approval date: 10/1/81

Dates of approval of any substantial modifications: 3/21/90 & 3/6/97

Month Annual Pretreatment Report Due: October

Pretreatment Year Dates: 10/1 - 9/30 Date(s) of Audit: 2/21-2/23/06
 (ASSESSMENT)

Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Allen Gilliam</u>	<u>Pret. Coord/ADEQ</u>	<u>501.682.0625</u>

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Kim Redo</u>	<u>Same</u>	<u>Same</u>
<u>Steve Difresme</u>	<u>Operations Supt.</u>	

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>12/03/03</u>	<u>None</u>
<u>PCI</u>	<u>3/16/05</u>	<u>Discharge location should be included on inspection reports and field notes should be contained in files.</u>

YES NO

 Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action: _____

Is the Control Authority currently in SNC or RNC?

.....

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with an asterisk or footnote that tells that there is more explanatory information and where it can be found.

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0021482	South	12/01/03	11/30/08
AR0040967	North	11/01/02	10/31/07
AR0037567	Lee Creek	6/01/03	5/31/08

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: South
 Location Address: 1401 Port Rd.

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 3.1 MGD; Actual (Average)- 2.2 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs _____

Industrial Contribution to this Treatment Plant

of SIUs : 8 # of CIUs : 3
 Industrial Flow (mgd): 0.58 Industrial Flow (%) : 26 %

Level of Treatment Type of Process(es):

Primary _____

Secondary Multi-cell aerated lagoon

Tertiary _____

Method of Disinfection: Chlorination

Dechlorination YES NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3H, Ark. River Basin

Receiving Stream Use: Primary Contact/Fishable/Swimmable

If effluent is disposed of to any location other than the receiving stream, please note: N/a

Method of Sludge Disposal:

Quantity of Sludge:

<input checked="" type="checkbox"/> Land Application	<u>~690*</u> dry metric tons/yr.
<input type="checkbox"/> Incineration	_____ dry tons/yr.
<input type="checkbox"/> Monofill	_____ dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	_____ dry tons/yr.
<input type="checkbox"/> Public Distribution	_____ dry tons/yr.
<input checked="" type="checkbox"/> Lagoon Storage	<u>~922</u> dry tons/yr.
<input type="checkbox"/> Other (specify)	_____ dry tons/yr.

*Applied in 2002

List of toxic pollutant limits in NPDES permit: conventional; NH3-N, TRC

a. (continuation of individual treatment plant information for South Treatment Plant.)

YES NO

Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ
 Issuance Date: Same
 Expiration Date: same

List pollutants that are specified in current sludge permit:
Reference 40 CFR 503

YES NO N/A

Has the Control Authority submitted results of whole effluent biological toxicity testing.

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) _____

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>0</u>	<u> </u>
Priority **	<u>1</u>	<u>1</u>	<u>0</u>	<u> </u>
Biomonitoring	<u> </u>	<u>4</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u>0</u>	<u> </u>
Other: **	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* As identified at 40 CFR 122, Appendix D, Table III: ** As identified 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

"Remains about the same"

YES NO N/A

Has the POTW begun tracking the trends in the above samples?

Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated

Cause(s)

N/A

YES NO

Has the treatment plant sludge violated the TCLP Test?

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

<u>NPDES Permit No.</u>	<u>Name of Treatment Plant</u>	<u>Effective Date</u>	<u>Expiration Date</u>
<u>*AR0021482</u>	<u>South</u>	<u>12/01/03</u>	<u>11/30/08</u>
<u>AR0040967</u>	<u>North</u>	<u>11/01/02</u>	<u>10/31/07</u>
<u>AR0037567</u>	<u>Lee Creek</u>	<u>6/01/03</u>	<u>5/31/08</u>

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Lee Creek
Location Address: 1200 Block of Lee Creek Rd.

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 0.04 MGD; Actual (Average) - .00682 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs 0

Industrial Contribution to this Treatment Plant

of SIUs : 0 # of CIUs : 0
Industrial Flow (mgd): 0 Industrial Flow (%) : 0%

Level of Treatment

Type of Process(es):

Primary _____

Secondary Activated sludge package treatment

Tertiary _____ plant - aerated conditions

Method of Disinfection: Chlorination

Dechlorination _____ YES NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3H, Ark. River Basin

Receiving Stream Use: Primary Contact/Fishable/Swimmable

If effluent is disposed of to any location other than the receiving stream, please note: N/a

Method of Sludge Disposal:

Quantity of Sludge:

_____ Land Application	_____ dry tons/yr. (estimated)
_____ Incineration	_____ dry tons/yr.
_____ Monofill	_____ dry tons/yr.
_____ Mun. Solid Waste Landfill	_____ dry tons/yr.
_____ Public Distribution	_____ dry tons/yr.
<input checked="" type="checkbox"/> * Lagoon Storage	<u>1.4</u> dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.

*No land app. or any sludge removal this year

List of toxic pollutant limits in NPDES permit: conventionals

a. (continuation of individual treatment plant information for Lee Creek Treatment Plant.)

YES NO

Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ
 Issuance Date: Same
 Expiration Date: same

List pollutants that are specified in current sludge permit:
Reference 40 CFR 503

YES NO N/A

Has the Control Authority submitted results of whole effluent biological toxicity testing.

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) _____

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>0</u>	<u>0</u>	<u>_____</u>	<u>_____</u>
Priority **	<u>0</u>	<u>0</u>	<u>_____</u>	<u>_____</u>
Biomonitoring (acute)	<u>_____</u>	<u>0</u>	<u>_____</u>	<u>_____</u>
TCLP	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Other: _____	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

Remains the same

YES NO N/A

Has the POTW begun tracking the trends in the above samples?

Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated

Cause(s)

YES NO

N/A Has the treatment plant sludge violated the TCLP Test?

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

<u>NPDES Permit No.</u>	<u>Name of Treatment Plant</u>	<u>Effective Date</u>	<u>Expiration Date</u>
<u>*AR0021482</u>	<u>South</u>	<u>12/01/03</u>	<u>11/30/08</u>
<u>AR0040967</u>	<u>North</u>	<u>11/01/02</u>	<u>10/31/07</u>
<u>AR0037567</u>	<u>Lee Creek</u>	<u>6/01/03</u>	<u>5/31/08</u>

* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

2. Individual Treatment Plant Information

a. Name of Treatment Plant: North
Location Address: 1945 Welnitz Dr.

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design-1.0 MGD; Actual (Average)-.97 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs 0

Industrial Contribution to this Treatment Plant (Truck Wash)

of SIUs : 1 (truck wash) # of CIUs : 0
Industrial Flow (mgd): 0.01 Industrial Flow (%) : 1 %

Level of Treatment Type of Process(es):

Primary _____
Secondary Aerated equalization basin, 2 channel
Tertiary _____ oxidation ditches, 2 stage clarification
Method of Disinfection: Chlorine contact chamber
Dechlorination _____ YES NO

Effluent Discharge

Receiving Stream Name: Lee Creek

Receiving Stream Classification: Segment 3H, Ark. River Basin

Receiving Stream Use: Secondary Contact/Fishable/Swimmable

If effluent is disposed of to any location other than the receiving stream, please note: N/a

Method of Sludge Disposal:	Quantity of Sludge:
<input checked="" type="checkbox"/> Land Application	<u>368*</u> dry tons/yr.
_____ Incineration	_____ dry tons/yr.
_____ Monofill	_____ dry tons/yr.
_____ Mun. Solid Waste Landfill	_____ dry tons/yr.
_____ Public Distribution	_____ dry tons/yr.
_____ Lagoon Storage	_____ dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.
*last applied 12/04	

List of toxic pollutant limits in NPDES permit: conventionals, NH3-N & D.O.

a. (continuation of individual treatment plant information for
North Treatment Plant.)

YES NO

Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ
 Issuance Date: Same
 Expiration Date: same

List pollutants that are specified in current sludge permit:
Reference 40 CFR 503

YES NO N/A

Has the Control Authority submitted results of whole effluent biological toxicity testing.

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) _____

How many times were the following monitored during the past pretreatment year?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>1</u>	<u>1</u>	_____	_____
Priority **	<u>1</u>	<u>1</u>	_____	_____
Biomonitoring	_____	<u>4</u>	_____	_____
TCLP	_____	_____	_____	_____
Other: _____	_____	_____	_____	_____

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

Remains the same

YES NO N/A

Has the POTW begun tracking the trends in the above samples?

Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated

Cause(s)

YES NO

N/A Has the treatment plant sludge violated the TCLP Test?
 C. Control Authority Pretreatment Program Modification [403.18]

YES NO

N/A Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]

Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.

SECTION II: PROGRAM ANALYSIS AND PROFILE

1. Modifications:

Date Approved by DEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
N/A		

2. Modifications in Progress: N/A

Date Requested	Nature of Modification
--	

YES NO

- Have any changes been made to any pretreatment program components excluding any listed above)? If yes:
- Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

D. Legal Authority [403.8(f)(1)]

Date of original Pretreatment Program approval: 10/1/81 [WENDB-PTIM]
 Date of most recent Ordinance approved by the Control authority: 1/27/97
 Date of most recent Pretreatment Program modification approval: 3/6/97

Does the Control Authority's legal authority enable it to:
 [403.8(f)(1)(i-vii)]

YES NO

- Deny or condition pollutant discharges
- Require compliance with standards
- Control discharges through permit or similar means
- Require compliance schedules and IU reports
- Carry out inspection and monitoring activities
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

YES NO

- Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:
 - No oversight authority
 - No inspection authority
 - No remedies for noncompliance
 - No "equivalent" standard
 - No clear delineation of responsibility for program implementation
 - Interjurisdictional agreements not entered into
 - Other, Specify: _____

YES NO

- Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:
- N/A Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?
- N/A Have provisions been made for the incorporation of Pollution Prevention (P2) policies by contributing jurisdictions?

SECTION II: PROGRAM ANALYSIS AND PROFILE

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1. <u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
2. <u> </u>	<u> </u>	<u> </u>	<u> </u>
3. <u> </u>	<u> </u>	<u> </u>	<u> </u>

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation.
N/A

Problems

<u>Updating industrial waste survey</u>	<u>N/A</u>
<u>Notification of IUs</u>	<u> </u>
<u>Permit issuance</u>	<u> </u>
<u>Receipt and review of IU reports</u>	<u> </u>
<u>Inspection and sampling of IUs</u>	<u> </u>
<u>Assessment of IUs for P² activity</u>	<u> </u>
<u>Analysis of samples</u>	<u> </u>
<u>Enforcement</u>	<u> </u>
<u>Other:</u>	<u> </u>

Briefly describe other problems:

Identify any IUs that have caused problems of interference, upset, pass through, sludge contamination, problems in the collection system, or worker health and safety in the past 12 months:

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>

E. Industrial User Characterization [403.8(f)(2)(i)]

YES NO

- Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] (Last one done in 2005. See Attch A-1)
- If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² activity?
- & Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
- If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P² activity and the distribution of P² reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) Business list from downtown

How often is the survey to be updated? Approx. every 2 years

Are there any problems that the Control Authority has in identifying and categorizing SIUs: None apparent

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?
N/A		

How many IUs are currently identified by the Control Authority in each of the following groups:

- a. 9 SIUs (As defined by the Control Authority) [WENDB-SIUS]
 - b. 3 Categorical Industrial Users (CIUs) [WENDB-CIUS]
 - c. 6 Noncategorical SIUs
 - d. 0 Other regulated nonsignificant IUs (Describe) _____
- 9 TOTAL of a. + d.

YES NO

✓ Has the POTW identified any IUs with Pollution Prevention opportunities? Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

If not, the Control Authority has defined "significant industrial user" to mean: N/A

F. Control Mechanism Evaluation [403.8(f)(1)(iii)]

YES NO

✓ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 3 years

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT EXPIRATION DATE

YES NO

- ✓ Does the Control Authority accept trucked septage wastes?
- ✓ Does the Control Authority accept other trucked wastes?
- ✓ Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

- YES NO
- N/A Does Control Mechanism designate a discharge point? [403.5(b)(8)]
- N/A Are all applicable categorical standards and local limits applied to trucked wastes ?

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to waste haulers:

Pollutant	Limit
N/A	

Describe the discharge point(s) (including security procedures):

N/A

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?
- Does the Control Authority have a control mechanism for regulating wastes from UST sites?

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to UST cleanup sites:

Pollutant	Limit
N/A	

G. Application of Pretreatment Standards and Requirements

YES NO

- Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

8/00 Date Notified Letter Method of Notification

How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

Federal Register Journals, Newsletters
 Meetings, Training Other Internet
 Government Agencies Other _____

YES NO

- Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit or Annual Report?

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
N/A			

YES NO

- Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)	
	Yes	No	Yes	No	Yes	No		
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>There's only a narrative in the Ordinance stating the Commission may establish local limits such that the MAHLs shall not be exceeded.</u>	
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
BOD & TSS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		See next page

* - If necessary for the sludge disposal option chosen.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

 Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

POLLUTANT	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____

YES NO

 N/A Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

What method of allocation was used for local limits for each pollutant that has a local limit in-place? N/A

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)	_____	_____	_____
Cadmium (Cd)	_____	_____	_____
Chromium-Total	_____	_____	_____
Copper (Cu)	_____	_____	_____
Cyanide (CN)	_____	_____	_____
Lead (Pb)	_____	_____	_____
Mercury (Hg)	_____	_____	_____
Molybdenum (Mo)	_____	_____	_____
Nickel (Ni)	_____	_____	_____
Selenium (Se)	_____	_____	_____
Silver (Ag)	_____	_____	_____
Zinc (Zn)	_____	_____	_____
BOD	_____	<input checked="" type="checkbox"/>	flow % applied to MAHL
TSS	_____	<input checked="" type="checkbox"/>	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? Uniformly to both south and north plants.

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	<u> 1 </u>	1/year	_____
Other SIUs	<u> 1 </u>	1/year	_____
Sampling:			
CIUs	<u> 2 </u>	1/year	_____
Other SIUs	<u> 2 </u>	1/year	_____
Reporting:			
CIUs	<u>(This varies from IU to IU with the city)</u>	2/year	_____
Other SIUs	<u> 2 </u>	2/year	_____
Self-Monitoring:			
CIUs	<u> 2 </u>	doing some of it at least 2/year	_____
Other SIUs	<u> 2 </u>	2/year	_____

SECTION II: PROGRAM ANALYSIS AND PROFILE

% How many and what percentage of SIUs were:
(refer to p.1 for Pretreatment year)

0 0 Not sampled at least once in the past reporting year?

0 0 Not inspected at least once in the past Pretreatment reporting year?

0 0 Not inspected and not sampled at least once in the past reporting year ?
[WENDB-NOIN]-[403.8(f)(2)(v)]

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected. N/A

Does the Control Authority routinely split samples with industrial personnel:

YES NO
 If requested?
 To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

Analytical Method *	Name of Laboratory
Metals 200.8	American Interplex
Cyanide 335.2	"
Organics GC/MS	"
Other Phenolics - 420.1	"
NH3-N at the North POTW	Data testing

Were all wastewater samples analyzed by 40 CFR 136 methods? Yes

* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.)

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe:
Annual EPA performance kits; blind samples for metals done independently for their lab quarterly put in request for more QA/QC standards

How much time normally elapses between sample collection and obtaining analytical results for:

5days Conventionals
>2wks Metals
" Organics

& Is there an established protocol clearly detailing sampling location and procedures?

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

Does the Control Authority use the following methods for compliance monitoring?

YES NO

Scheduled compliance monitoring
 Unscheduled compliance monitoring
 Demand monitoring for IU compliance
 IU self-monitoring
 Other: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)]

Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the plan:

YES NO

Describe how the Control Authority will investigate instances of noncompliance

Describe the Control Authority's types of escalating enforcement responses and the periods for each response

Identify by Title the Official(s) responsible for implementing each type of enforcement response

Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

<input checked="" type="checkbox"/> Notice or letter of violation	<input checked="" type="checkbox"/> Administrative Order
<input checked="" type="checkbox"/> Setting of compliance schedule	<input checked="" type="checkbox"/> Revocation of permit
<input checked="" type="checkbox"/> Injunctive relief	<input checked="" type="checkbox"/> Fines (maximum amount):

civil	\$ <u>1000</u> /day/violation
criminal	\$ <u>1000</u> /day/violation
administrative	\$ <u>1000</u> /day/violation

Imprisonment
 Termination of Service
 Other: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: _____

YES NO

When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]

Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].

Comment: _____

& If no, does the Control Authority conduct all of the monitoring? (City does monitoring for some but, not for others. Depends on permit requirements.)

YES NO N/A

Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action		Return to Compliance?	
		Type	Date	Yes (Date)	No
N/A					

SECTION II: PROGRAM ANALYSIS AND PROFILE

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period:

#	%	
0	0	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES NO

Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. _____

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

- Interference [WENDB]. _____
- Pass through [WENDB]. _____
- Fire or explosions? _____
(incl. flash point viol.)
- Corrosive structural damage? _____
(incl. pH <5.0).
- Flow obstructions? _____
- Excessive flow or pollutant concentrations? _____
- Heat problems? _____
- Interference due to oil or grease? _____
- Toxic fumes? _____
- Illicit dumping of hauled wastes? _____

YES NO

Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

0 How many SIUs are currently on compliance schedules?

Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

	Civil	Number	Amount
Administrative		3	\$ 1,800
Total		3	\$ 15,160
			\$ 16,960 [WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

- YES NO computerized
- YES NO hard copy
- OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

- | | | |
|-------------------------------------|-------------------------------------|---|
| <u>YES</u> | <u>NO</u> | |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Control Mechanism Issuance |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Inspection and Sampling schedule |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Monitoring Data *POTW inf/eff, yes, IU data,no. |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | IU Compliance Status Tracking |
| <input type="checkbox"/> | <input type="checkbox"/> | Other: _____ |

Can IU monitoring data can be retrieved by:

- | | | |
|-------------------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Industry name |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pollutant type |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | Industrial category or type |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | SIC Code |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | IU discharge volume |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Geographic location |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Receiving treatment plant (i.e.if > one plant in the system) |
| <input type="checkbox"/> | <input type="checkbox"/> | Other (specify) _____ |

Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]

Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?

Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: _____

Are all records maintained for at least 3 years?

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] * - FTE = Full Time Equivalent Employee

One FTE

YES NO
 Have any problems in program implementation been observed which appear to be related to inadequate funding?
If yes, describe and show below the source(s) of funding for the program:

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general operating fund	<u>100</u>
<input type="checkbox"/> IU permit fees	<u>These go to back</u>
<input type="checkbox"/> monitoring charges	<u>to the general</u>
<input type="checkbox"/> industry surcharges	<u>operating fund</u>
<input type="checkbox"/> other (describe) _____	
	Total <u>100%</u>

Is funding expected to continue near the current level? If no, will it:
Increase _____ or Decrease _____
If no, describe the nature of the changes:

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are an adequate number of personnel available for the following program areas:

<u>YES</u>	<u>NO</u>		<u>If no, explain</u>
✓	—	Legal assistance	_____
✓	—	Permitting	_____
✓	—	IU inspections	_____
✓	—	Sample collection	_____
✓	—	Sample analyses	_____
✓	—	Data analysis, review and response	_____
✓	—	Enforcement	_____
✓	—	Administration (inc. record keeping /data management)	_____

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
✓	—	Sampling equipment	6 automatic samplers
✓	—	Safety equipment	Standard equip
✓	—	Vehicles	City pick-up
✓	—	Analytical equipment	conventional parameter equip.

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
They've put more p2 questions in permit apps/surveys/etc

2. Has the source of any toxic pollutants been identified? No
If yes, what was found?

3. Has the POTW implemented any kind of public education program? If yes, describe:
No

4. Does the POTW have any pollution prevention success stories for industrial users documented? No. If yes, please attach.

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No
If yes, which of the "Guides to Pollution Prevention" were used? _____

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name River City Coatings File/ID No. VB 1721-22
 Industry Address 306 Sycamore St., 72956
 Industry Description Powder coat paint metal lamp bases
 Industrial Category Metal Finishing 40 CFR 433 SIC Code: 1721
 Ave. Total Flow (gpd) 3,800 Ave. Process Flow (gpd) 3,500
479-471-7675

Industry visited during audit: YES

Comments: Phosphatizing and powder coating Began ops in 9/97
Cold rolled steel, Zn, Al

FILE #: 2 Industry Name Fab Tech File/ID No. VB 3400-26
 Industry Address 12th North 25th Street
 Industry Description Fabrication of precision metal (from sheet) parts
 Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3400
 Ave. Total Flow (gpd) S.S. separate Ave. Process Flow (gpd) 225

Industry visited during audit: YES 479-474-1788

Comments: Began ops in 1992 steel, Al S.S.

FILE #: 3 Industry Name Simmons Foods, Inc. File/ID No. VB 2015-24
 Industry Address 2101 Twin Circle Dr., 72956
 Industry Description Chicken cooking facility (poultry processing)
 Industrial Category N/A 40 CFR N/A SIC Code: 2015
 Ave. Total Flow (gpd) ? Ave. Process Flow (gpd) 149,000

Industry visited during audit: YES Joe Earney 479-524-8151 X-415

Comments: raw chicken parts are either fried, par-fried/oven cooked, just oven cooked or steam cooked, then individually frozen, packaged and transported. 343 employees

FILE #: 4 Industry Name Simmons Poultry Farms File/ID No. VB 2017-18
 Industry Address 5 Main St., 72956
 Industry Description Poultry Processing
 Industrial Category N/A 40 CFR N/A SIC Code: 2017
 Ave. Total Flow (gpd) ? Ave. Process Flow (gpd) 350,000

Industry visited during audit: NO

Comments: Charles Van Pelt III/Wastwater Mgr.

FILE #: 5 Industry Name Arkansas Lamp File/ID No. VB 1721-29
 Industry Address 1701 South 28th Street
 Industry Description Phosphatize and power paint
 Industrial Category Metal finish 40 CFR 433 SIC Code: 3641
 Ave. Total Flow (gpd) Ave. Process Flow (gpd) 700 (batch)

Industry visited during audit: YES Bob Null 479-474-0876

Comments: 3 stage phosphating unit 11/02 went into ops

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Is the user subject to categorical pretreatment standards?	<u>✓</u>	<u>✓</u>	<u>No</u>	<u>No</u>	<u>✓</u>
a. New source or existing source (NS or ES)?	<u>NS</u>	<u>NS</u>	<u>--</u>	<u>--</u>	<u>NS</u>
b. Is this IU one identified as having P ² potential?	<u>1</u>	<u>1</u>	<u>no</u>	<u>no</u>	<u>1</u>

B. Control Mechanism

1. Does the file contain an application for a control mechanism? (See Attachment A-2 for example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
If yes, what is the application date?	<u>10/04</u>	<u>4/04</u>	<u>2/05</u>	<u>12/05</u>	<u>11/05</u>
Does it ask for Pollution Prevention information?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Does the file contain a Permit? (See Att A-3 for example)	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>
Permit Expiration Date?	<u>9/07</u>	<u>2/07</u>	<u>4/08</u>	<u>11/08</u>	<u>10/08</u>
Is a fact sheet included?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Appropriate discharge limitations?	<u>✓</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
e. Appropriate self-monitoring requirements?	<u>2</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Sampling frequency?	<u>3</u>	<u>3</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) fairly small & not very complex operations; 2) See Att A-3 for example. Need to correct temperature "limit" to reflect CFR 403.5(b)(5) language; 3) Recommend 1/6 months instead "1/30" or "2/365"; 4) See Att. A-3y for example (needs more info); 5) Permits should all be signed and dated.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
g. Sampling locations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Civil and Criminal Penalty provisions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Revocation of permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
l. Compliance schedules/progress reports	<u>N/A</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>Na</u>
m. General/Specific Prohibitions?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
C. Application of Standards					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>Na</u>

Comments: 1) Should notify them about the Streamlining rule or at least provide them with copy of the federal register notice.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>N/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>na</u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>na</u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
D. <u>Compliance Monitoring</u>					
<u>Sampling</u>					
1. Does the file contain Control Authority sampling results for the industry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Chain-of-custody records?	<u>✓</u>	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) Need to take more care getting signatures from all persons involved involved on one Chain of Custody form. One file reviewed had two C of C's for one sample with "relinquished by" on one form while the "received by" was on another.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>1</u>	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u>1</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
<u>Inspections (See Attachment A-4 for example)</u>					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Date of last Inspection	<u>8/05</u>	<u>5/05</u>	<u>11/05</u>	<u>6/05</u>	<u>2/06</u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Verification of production rates?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>N/a</u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Evaluation of pretreatment facilities?	<u>N/a</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>N/a</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>

Comments: 1. TTO monitoring/certification needs to be corrected/clarified (see Attachment A-3p); 2) There are questions about it on inspection report but, could be more comprehensive (See Attachment A-4 for example).

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>✓</u>
i. Manufacturing facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
j. Chemical handling and storage procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
l. Hazardous waste storage areas and handling procedures?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>
m. Sampling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
n. Laboratory procedures?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
p. Evaluation of Pollution Prevention opportunities?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
11. Does the file include:					
a. BMR?	<u>Arch</u>	<u>Arch</u>	<u>N/a</u>	<u>n/a</u>	<u>✓</u>
b. 90-Day Report?	<u>Arch</u>	<u>Arch</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Compliance schedule reports?	<u>N/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>N/a</u>
12. Did the IU report on all required parameters?	<u>5</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1) Question about SPCC & slugload but "evaluation" for potential, not there; 2) IUs use outside labs; 3) Inspection forms now ask about P2; 4) Needs to have specific questions; 5) Facility didn't report flow nor pH on every monthly report. Lab does it but #'s are not clear for flows.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
14. Did the IU report flow?	<u>No</u>	<u>Batch</u>	<u>✓</u>	<u>✓</u>	<u>batch</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>n/a</u>	<u>N/a</u>	<u>N/a</u>	<u>n/a</u>	<u>n/a</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>spcc</u>	<u>spcc</u>	<u>Spcc</u>	<u>spcc</u>	<u>spcc</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>No</u>	<u>no</u>	<u>no</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>
b. Did POTW respond to the spill?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. IU self-monitoring results?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>✓</u>	<u>✓</u>	<u>n/a</u>	<u>N/a</u>	<u>✓</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>3</u> temp	<u>0</u>	<u>2</u> BOD	<u>1</u> Report	<u>3</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>
6. Was the IU notified of all violations?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/n</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
10. Is there a compliance schedule? If yes:	<u>no</u>	<u>no</u>	<u>No</u>	<u>No</u>	<u>No</u>
11. Were there any compliance schedule violations?	<u>No</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. TRC	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Pass through/Interference	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Spill/slug loads	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
e. Reporting	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Compliance schedule	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. others (specify)	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
13. Was the SIU published for SNC? Date of publication.	<u>n/a</u> <u>--</u>	<u>n/a</u> <u>--</u>	<u>N/a</u> <u>--</u>	<u>n/a</u> <u>--</u>	<u>N/a</u> <u>--</u>

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Van Buren NPDES #: AR0021482
 Date of Audit: 2/21 - 23/06 Date entered into QNCR: 7/12/06
 (ASSESSMENT)

Level

NO	Failure to enforce against pass through and/or interference	I
NO	Failure to submit required reports within 30 days	I
NO	Failure to meet compliance schedule milestone date within 90 days	I
NO	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
NO	Failure to inspect or sample 80% of SIUs within the last reporting year	II
NO	Failure to enforce pretreatment standards and reporting requirements	II
YES*	Other violations of concern that need attention	II

*Minor administrative violations, not impactful on program

SIGNIFICANT NONCOMPLIANCE (SNC)

- NO Is the Control Authority in SNC for violation of any Level I criterion.
- NO Is the Control Authority in SNC for violation of 2 or more Level II criterion.

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Van Buren NPDES #: AR0021482

Name, address and phone number of industry:
 Simmons, 2101 Twin Circle Dr., 479.524.8151 X-415

Type of industry: Poultry Processor Date/Time of visit:
 2/22/06 / 10:15 a.m.

Industry contacts: Joe Earney-Dir. of Env. Quality / Charlie Van Pelt-Pretreatment Operator

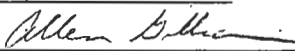
	Yes	No	N/A
1. Significant industrial user?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Classified correctly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Pretreatment equipment or procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Pretreatment equipment maintained and operational?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Hazardous waste generated or stored?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Proper solid waste disposal?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Solvent management/TTO control?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Suitable sampling location?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Appropriate self-monitoring procedures/equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Adequate spill prevention and control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Industrial familiar with limits and requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Pollution Prevention activity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Limited opportunities for this facility with USDA constraints

Additional comments:

Facility site visit was restricted to the separate pretreatment building and conversations with their representatives.

Visit conducted by: Gilliam/Redo Date: 2/22/06



(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Van Buren NPDES #: AR0021482

Industry name: Simmons

Additional comments:

Facility is a poultry further processing plant. Frozen chicken is brought in and prepared for sale to outside clients. Various marinades specific for the different food chain restaurants have caused some problems when they're switched out. Communication between production and pretreatment has improved. Pretreatment is typical DAF units (2) with various polymers added at various stages to help remove the oils/greases and solids. Adequate sampling site.

Visit conducted by: Gilliam/Redo Date: 2/22/06



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Van Buren NPDES #: AR0021482

Name, address and phone number of industry:
River City Coatings, 306 Sycamore Street, 72956 (479.471.7675)

Type of industry: Phosphatizing - Metal Finisher CFR 433 Date/Time of visit: 2/23/06 / 9:20 a.m.

Industry contacts: Frank Rogers / Sales Manager

	Yes	No	N/A
1. Significant industrial user?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Classified correctly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Pretreatment equipment or procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Pretreatment equipment maintained and operational?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Hazardous waste generated or stored?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Proper solid waste disposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Solvent management/TTO control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Suitable sampling location?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Appropriate self-monitoring procedures/equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Adequate spill prevention and control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Industrial familiar with limits and requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Pollution Prevention activity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional comments:

Facility has not changed ops significantly since the last audit about 5 years ago.

Facility uses a simple 2 stage phosphatizing (3% iron phosphate) operation prior to electrostatic powder coat painting. The phosphatizing stage includes ethylene glycol, monobutyl ether, fluorides. The two rinses after phosphatizing are countercurrent flowed. Raw material is either cast aluminum, cold rolled steel and occasionally zinc.

Visit conducted by: Gilliam/Redo Date: 2/23/06



(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Van Buren NPDES #: AR0021482

Industry name: River City Coatings

Additional comments:

Nature of the operation and process wastewater would typically not require anything other than pH neutralization to meet categorical metal finish standards in CFR 433.

Pollution prevention included air knives and reduction of the diameter of the spray nozzles for water conservation.

Suitable sampling location.

Visit conducted by: Gilliam/Redo Date: 2/23/06



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Van Buren NPDES #: AR0021482

Name, address and phone number of industry:
Fab Tech, Inc., 12 N. 25th Street, 479.474.1788

Type of industry: Phosphatizing/Metal Finisher CFR 433 Date/Time of visit: 2/22/06 / 1:05 p.m.

Industry contacts: Myron Kirksey / Kevin Treece / DeMarion Zacarias

	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>	<u> </u>	<u> </u>
2. Classified correctly?	<u>✓</u>	<u> </u>	<u> </u>
3. Pretreatment equipment or procedures?	<u> </u>	<u> </u>	<u>✓</u>
4. Pretreatment equipment maintained and operational?	<u> </u>	<u> </u>	<u>✓</u>
5. Hazardous waste generated or stored?	<u>✓</u>	<u> </u>	<u> </u>
6. Proper solid waste disposal?	<u>✓</u>	<u> </u>	<u> </u>
7. Solvent management/TTO control?	<u>✓</u>	<u> </u>	<u> </u>
8. Suitable sampling location?	<u>✓</u>	<u> </u>	<u> </u>
9. Appropriate self-monitoring procedures/equipment?	<u> </u>	<u> </u>	<u>✓</u>
10. Adequate spill prevention and control?	<u>✓</u>	<u> </u>	<u> </u>
11. Industrial familiar with limits and requirements?	<u>✓</u>	<u> </u>	<u> </u>
12. Pollution Prevention activity	<u>✓</u>	<u> </u>	<u> </u>

Additional comments:

IU brings in steel and aluminum sheet material. After stamping operations (end products include electronic and computer enclosures/chassis) material is sent through a standard 5 stage phosphatizing operation.

Visit conducted by: Gilliam/Redo Date: 2/22/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Van Buren NPDES #: AR0021482

Industry name: Fab-Tech, Inc.

Additional comments:

Typical alkaline bath followed by a fresh water rinse followed by the iron phosphate bath. Then there's another fresh water rinse after which there is a polymeric sealant rinse. Only rinses are continuously discharged to the POTW. The working tanks are periodically pumped into an empty tank while the sludge is barreled up and shipped off-site.

Painting operations include both electrostatic powder coat and some hand (solvent based) spot painting.

IU is ISO 9000 certified.

Other non-wastewater generating operations included punching, forming ("benching") and various other self contained machining stations.

Suitable sampling point.

Visit conducted by: Gilliam/Redo Date: 2/22/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Van Buren NPDES #: AR0021482

Name, address and phone number of industry:
Arkansas Lamp Manufacturing Co. 1701 South 28th P.O. Box 452
(479.474.0876)

Type of industry: Mfg. of lamp bases / CFR 433 Date/Time of visit: 2/22/06 / 2:20 p.m.

Industry contacts: Bob Null - President

	Yes	No	N/A
1. Significant industrial user?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Classified correctly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Pretreatment equipment or procedures?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Pretreatment equipment maintained and operational?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Hazardous waste generated or stored?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Proper solid waste disposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Solvent management/TTO control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Suitable sampling location?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Appropriate self-monitoring procedures/equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Adequate spill prevention and control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Industrial familiar with limits and requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Pollution Prevention activity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Additional comments:

Facility manufactures lamps and shades for hospitality and residential use. Wastewater generating operations come from a standard three (3) stage phosphatizing series of "baths" prior to powder coating.

Visit conducted by: Gilliam/Redo Date: 2/22/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Van Buren NPDES #: AR0021482

Industry name: Arkansas Lamp Manufacturing Co.

Additional comments:

Raw material includes cold rolled steel some of it being galvanized.

Pretreatment includes a coagulant to drop out what little zinc that may be present.

Suitable sampling site.

Visit conducted by: Gilliam/Redo Date: 2/22/06



(signature of auditor conducting visit)

Attachment A-1

_____ COMMERCIAL/INDUSTRIAL SURVEY
(date)
CITY OF VAN BUREN

Company Name _____

Address _____

Representative _____ Title _____ Phone _____

Days of Operation _____ Hours of operation/day _____

Number of Employees/shift: _____ ; _____ ; _____

Type of Business: _____

S.I.C. code(if applicable): _____

If manufacturer, type and amounts of product manufactured: _____

Raw materials used in production(list types and amounts): _____

For non-manufacturers, List services offered: _____

WATER USAGE

Source of water: City water _____ Well water _____ Other _____

Water used for (example-process water, cooling water, sanitary, etc.):

_____ gallons per day

_____ gallons per day

_____ gallons per day

_____ gallons per day

Is any of this water recirculated? _____

During what part of the day do you estimate your highest water usage to be? _____

Other than to sewer where are used water(s) disposed? _____

Have you ever had your waste water analyzed? _____

(If any wastewater analyses have been performed on the wastewater discharges 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 the sample(s) were taken – attach sketches, plans, etc. as necessary)

WASTE WATER(S):

What waste products are disposed to:

sewer _____

other _____

Is discharge to sewer: Intermittent _____ Steady flow _____

Quantity discharged per day: _____ gallons (Measured ___ Estimated ___)

Are Wastes pretreated? _____ If so, how? (e.g. air flotation, chlorination, grease or oil separation, etc.) _____

I _____ (print name) certify that I have personally examined and am familiar with the information submitted herein. I believe the information is accurate and true.

Signed _____ Received _____

Date _____

Environmental Coordinator

Comments: _____

APPLICATION FOR PERMIT/BASELINE MONITORING REPORT
TO DISCHARGE INDUSTRIAL TYPE LIQUID WASTE
TO VAN BUREN MUNICIPAL SEWER SYSTEM

Please complete the attached form and return it by _____

to the following address: Van Buren Municipal Utilities
409 Main
Van Buren, Arkansas 72956
Attn: Kim Redo, Environmental Coordinator

If you have any questions please contact Kim Redo at 501-474-0941

SPECIFIC INSTRUCTIONS

Item 1. A.-H. Provide all requested information about the facility producing the discharge of wastewaters.

Item 2. Self-explanatory

Item 3. A.-B. Provide a listing of all primary raw materials and chemicals used in the facility's operations. Avoid use of trade names of chemicals. If trade names are used, provide information regarding the active ingredients. C. Self-explanatory. D. List each regulated process, the production rate (i.e., 10,000 lbs. of (product name)/year), the category and subpart of the applicable Categorical Pretreatment Standard as well as the SIC code for each process. E. In order to provide the reviewing agency a complete understanding of the facility's processes, location the pretreatment facilities and sampling points, the discharger is required to submit a schematic of each process and a schematic of wastewater flows. Flow rates may be estimated. Refer to Figures 1 and 2 for example schematics. Be sure to indicate on the flow or process schematic where samples are taken.

Item 4. A. Provide the total plant flow rate (average and maximum) to the sanitary sewer in gallons per day (gpd). If accurate flow measurements are unavailable, provide the best estimate. B. Provide a breakdown of the sources of the total plant flow to the sanitary sewer including regulated and unregulated flows, sanitary wastewater, cooling water, etc. Also indicate the flow rate (gpd) and the type of discharge (batch, continuous, or none).

Item 5. A. Self-explanatory. B. The facility must sample, analyze and report the concentration of all regulated pollutants for the regulated processes. The User shall take a minimum of one representative sample to compile those data necessary to comply with the requirements of this paragraph. All samples must be representative of normal operations and be of sufficient number to allow comparison with the applicable Categorical Pretreatment Standard. Samples should be collected immediately after the regulated

process (after treatment, if applicable) before being combined with other wastestreams. Type of sample (i.e., grab, composite) sample location, number of samples and methods of analysis should be adequately described. The report should indicate the time, date and place of sampling, and methods of analysis, and shall certify that such sampling and analysis is representative of normal work cycles and expected pollutant discharges to the POTW. All sampling and analyses should conform with 40 CFR Part 136, as well as, the requirements of 40 CFR 403.12(b)(5)(iii-vi). If analytical data are provided for more than one sampling point, identify the location of all sampling points in the schematic diagram required in question 3.E. above. C. If the facility is unable to sample the wastewater from the regulated processes before mixing with other wastewater flows, the facility may sample the total plant flow and calculate an equivalent concentration limit using the combined wastestream formula. These results may be shown in Part 5C. Figure 3 provides information on the use of the combined wastestream formula.

Item 6. Self-explanatory.

Item 7. Self-explanatory.

Item 8. A. Self-explanatory. B. This report must be signed by an authorized representative as defined by 40 CFR 403.12(1).

(2) Permits:

Describe all environmental control permits held by or for the facility:

<u>Title of the Permit</u>	<u>Permit No.</u>	<u>Issuing Office</u>	<u>Expiration Date</u>

(3) Description of Operations:

A. List raw Materials Used: _____

B. List Chemicals Used: _____

C. Describe Manufacturing of Service Activities Conducted and the Final Products: _____

D. Summarize each Regulated Process: _____

<u>Process Description</u>	<u>Production Rate</u>	<u>Pretreatment Standard Category</u>	<u>Subpart</u>	<u>SIC Code</u>

A-2d

E. Provide on a separate sheet:

- 1) a schematic drawing of flow chart of each regulated process that generates wastewater.
- 2) a schematic drawing showing all wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations and estimated flows for each individual wastestream.
- 3) a schematic process diagram which indicates points of discharge to the POTW from regulated processes.

(4) Flow Measurement:

A. Total Plant Flow in Gallons Per Day (gpd):

Average _____ Maximum _____

Disclosure of time and duration of discharges: _____

B. Individual Process Flows in Gallons Per Day (gpd)

Regulated Process	Average Flow	Maximum Flow	Type of Discharge
	Rate (gpd)	Rate (gpd)	(Batch, etc.)

Unregulated Process	Average Flow	Maximum Flow	Type of Discharge
	Rate (gpd)	Rate (gpd)	(Batch, etc.)
Cooling water			
Sanitary wastewater			

A-2e

(5) Measurement of Pollutants:

A. Provide on a Separate Sheet:

- 1) The user shall identify the Pretreatment Standards applicable to each regulated process.
- 2) A description of any and all wastewater treatment utilized (show treatment system location in relation to process flows and sampling points on schematic drawing required by Question 3.E.).

B. Analysis of Regulated Flows:

The industrial user must perform sampling and analysis of the effluent from all regulated processes (after treatment, if applicable). Provide the analytical data for the regulated processes in the space provided below. Attach additional sheets if necessary. **(Only those pollutants specifically regulated by the applicable category need be reported.)**

Regulated Process: _____

Pollutant (mg/L)									
Maximum									
Average									

Sample Location: _____

Sample Type (composite samples are required except where not feasible or where grab samples are specifically required – see 40 CFR Part 403.12 (b)(5)(iii)): _____

Number of samples and Frequency Collected: _____

Analytical Methods Used: _____

C. Analysis of Total Plant Flow (if appropriate)

An industrial user may sample and analyze the total plant flow and calculate an equivalent concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

Pollutant (mg/L)									
MEC*									
AEC*									
AMMC*									
AAAC*									

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Sample Location: _____
 Sample Type (composite samples are required except where not feasible or where grab samples are specifically required (see 40 CFR 403.12(b)(5)(iii)): _____
 Number of Samples and Frequency Collected: _____
 Analytical Methods Used: _____

- *MEC - Maximum Equivalent Concentration (derived through the combined wastestream formula)
- *AEC - Average Equivalent Concentration (derived through the combined wastestream formula)
- *AMMC - Actual Measured Maximum Concentration
- *AAAC - Actual Measured Average Concentration

(6) Certification:

A. Is the facility meeting applicable categorical pretreatment standards on a consistent basis? YES _____ NO _____

B. If no, do you require:

1) additional operation and maintenance (O & M) to achieve compliance?
 YES _____ NO _____

2) new or additional pretreatment facilities to achieve compliance?
 YES _____ NO _____

3) Name of Qualified Professional that reviewed this certification:

Name & Title _____

Signature _____ Date _____

(7) Pollution Prevention: List any pollution prevention measures taken to reduce pollutant discharge(s) into the environment (add additional pages if needed):

(a) What steps or programs have you incorporated for pollution prevention?:

(b) Do you offer employee training about pollution prevention? If so, what kinds of opportunities do you offer?

(c) What type of Environmental Management do you practice?

(d) List your Best Management Practices (BMPs):

(8) Compliance Schedule:

A. If additional O & M or additional pretreatment will be required to meet categorical pretreatment standards or local ordinances (#6-1990, 3-1991, or 3-1997) on a consistent basis, attach a schedule on a separate sheet projecting increments of progress indicating dates for the commencement and completion of major events leading to compliance with the standard/ordinances. Note: the final compliance date in this schedule shall not be later than the compliance date for the applicable pretreatment standard. Written progress reports are required within 14 days of each of the compliance dates specified in the compliance schedule.

B. Signatory Requirement:

I certify under penalty of law that I have personally examined and am familiar with the information in this Baseline Monitoring Report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name - Authorized Representative

Signature

Official Title

Date

A-2 h

Attachment A-3

WATER, SEWER AND SOLID WASTE COMMISSION

C. E. Dougan
Chairman

MEMBERS

William McBrayer

John Barnwell

Jim Williamson

J.W. Floyd

Larry Weir, Engineer

Paul Gant, Attorney

Harry Short
Superintendent

Kim Redo
Environmental Coordinator

CITY OF VAN BUREN, ARKANSAS

WATER, SEWER AND SOLID WASTE COMMISSION

INDUSTRIAL WASTE PRETREATMENT DIVISION

INDUSTRIAL PERMIT

(Pursuant to all conditions and provisions listed in Van Buren Ordinance #s 3-1997, 3-1991 & 6-1990)

CITY OF VAN BUREN
WATER, SEWER AND SOLID WASTE COMMISSION
INDUSTRIAL WASTE PRETREATMENT DIVISION

ACKNOWLEDGEMENT OF PERMIT LIMITATIONS

The undersigned acknowledges the receipt of the permit authorizing discharge of wastewater to the Van Buren Sewer System being Permit #VB1721-22; the permittee also acknowledges that this permit is issued at its request based upon the application for the permit and the information provided and acknowledges the conditions and limitations set forth in said permit. All information and data contained in this document pursuant to the General Pretreatment Requirements, Part 40 CFR 403.14 identifying the nature and frequency of a discharge shall be available to the public without restriction.

River City Coatings, Inc.
(Company Name)

By: _____

Date: _____

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PAGE 4
PERMIT #VB 1721-22

City of Van Buren
Water, Sewer and Solid Waste Commission
Industrial Waste Pretreatment Division

Company Name: River City Coatings, Inc.

Address: 306 Sycamore

Van Buren, Arkansas 72956

Telephone Number: (479)471-7675

Name of Applicant: Mr. James Morland

Authorization to discharge to the
Van Buren Wastewater Treatment Facility

River City Coatings, Inc. is authorized by the Water, Sewer and Solid Waste Commission to
(Company Name)

discharge wastewater from 306 Sycamore, Van Buren, Arkansas 72956
(address of company)

to the Van Buren Wastewater Treatment Facilities in accordance with the following conditions.

Reference all correspondence regarding this Permit by "Permit Number". The maximum duration of permits shall not exceed 36 months from the date of issuance. The duration of this permit shall be as follows:

This Permit shall become effective September 19, 2004
(Date)

This Permit and Authorization to discharge shall expire at Midnight, September 18, 2007
(Date)

Signed this _____ of _____, _____
(Date) (Month) (Year)

Chairman

The permittee is obligated to reapply for reissuance of this permit no later than 90 calendar days prior to the date of expiration.

A-3d

I. DEFINITIONS

Unless the context clearly indicates otherwise, the meaning of terms or abbreviations used in this discharge permit shall be defined in Exhibit "A".

II. GENERAL CONDITIONS

a. All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant more frequently than, or a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such a violation may result in the imposition of civil and/or criminal penalties as provided for in the Sewer Use Ordinance, and/or public Law 92-500. Modifications, additions and/or expansions that increase or decrease the quality and/or quantity of wastewater discharged to the Van Buren Wastewater Facilities must be reported to the Commission in WRITING, and this permit may be modified or reissued to reflect such changes. No change in the permittee's discharge may be made unless reported to and approved by the Superintendent. In no case shall new connection, increased flows, or significant changes in effluent quantity and/or quality be permitted if such will cause violation of the effluent limitations specified herein, unless permitted by Commission.

b. After notice and opportunity for a hearing as provided by Section 10.08.06 (Part 4) of the Pretreatment Ordinance, this permit may be modified, or revoked in whole or in part during its term for causes including the following:

1. Violation of any term or condition of this permit;

2. Obtaining a permit by misrepresentation or failure to disclose fully all relevant facts;
 3. A change in conditions or the existence of a condition which requires either a temporary or permanent reduction or elimination of the authorized discharge.
 4. Promulgation of a more stringent pretreatment standard by State or Federal agencies having jurisdiction over receiving water. Permits modified under this section may include implementation schedules, self-monitoring requirements, revised effluent limitations and other provisions necessary to assure compliance.
- c. The permittee shall permit the Superintendent and other duly authorized Municipal

Utilities personnel upon the presentation of proper credentials:

1. To enter upon permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit during business hours;
 2. To have access to and copy and records required to be kept under the terms and conditions of this permit; or
 3. To inspect any monitoring equipment or monitoring method required in this permit; or
 4. To sample at any intake, wastewater facility, or outfall.
- d. In the event that the User undergoes a major change in ownership of either its

corporate voting stock or control of its corporate stock or of the building to which this contract relates, then and in any of said events, the User shall notify the Superintendent of such change.

Permits may not be assigned or transferred without the written permission of the Commission.

The failure to request such permission through the Superintendent within 30 days of change in ownership or corporate control shall void the permit to discharge. Permits may not be transferred to another site or discharge point under any circumstances.

e. If applicable, all pretreatment facilities shall be operated in a manner consistent with the Pretreatment Ordinance and any applicable Federal, State, or local requirements and guidelines. The permittee shall at all times maintain in good working order and operate as efficiently as possible any facilities or systems of controls installed or utilized to achieve compliance with the terms and conditions of this permit.

f. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize or relieve the permittee of any liability for any injury to private property or any invasion of personal rights; nor any infringement of Federal, State, or local laws or regulations; nor does it waive the necessity of obtaining any State or Federal assent required by law for the discharge authorized herein.

g. The provisions of this permit are severable, and the invalidity of any condition or subdivision thereof shall not make void any other condition or subdivision thereof.

h. Operating Upsets - Any Discharger which experiences an upset in operations which places the Discharger in a temporary state of non-compliance with the Pretreatment Ordinance or a

Wastewater Discharge Permit issued pursuant hereto shall inform the Authority thereof within 24 hours of first awareness of the commencement of the upset.

Where such information is given orally, a written follow-up report thereof shall be filed by the Discharger with the Department within five days. The report shall specify:

1. Description of the upset, the cause thereof and the upset's impact on a Discharger's compliance status.
2. Duration of non-compliance, including exact dates and times of non-compliance, and if the non-compliance continues, the time by which compliance is reasonably expected to occur.
3. All steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset or other conditions of non-compliance. A reported, bonafide operating upset shall be an affirmative defense to any enforcement action brought by the Department against a Discharger for any non-compliance with the Ordinance or any wastewater Discharge Permit issued pursuant hereto, which arises out of violations alleged to have occurred during the period of the upset.
 - i. Emergency Action - Electrical Power Failure - The permittee shall provide an alternative source of power for the operation of its pretreatment facilities or shut down its industrial operation during a power failure. The alternative power supply, whether from a generating unit

located at the plant site or purchased from an independent source of electricity, must be separate from the existing power source used to operate the pretreatment facilities.

j. Bypasses - The diversion or bypass of any discharge from pretreatment facilities utilized by the permittee to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life.

The permittee shall immediately notify the Superintendent in writing, of each such diversion or bypass in accordance with the procedure specified above for reporting non-compliance.

k. Revisions - The Department reserves the right to make appropriate revisions to this permit in order to establish any appropriate effluent limitations, schedule or compliance, or other provisions which may be authorized under Federal, State or City acts in order to bring all such discharges into compliance with these acts. Changes or new conditions in this permit shall include a reasonable schedule for compliance.

l. Reapplication - If the permittee desires to continue to discharge after the expiration of this permit, it shall apply on the application forms then in use at least ninety (90) days before this permit expires. Under no circumstances shall the permittee continue to discharge after the expiration of the permit.

III. SPECIAL CONDITIONS

a. Accidental Discharge or "Slug Load";

Permittee shall provide to the Department under Section 10.08.02 (Part 3.0), an Accidental Discharge Plan showing facilities and operating procedures in which provides protection against spills or accidental discharges of prohibited or regulated substances if determined to be necessary by the Department through the IU Slug Control Plan checklist. This checklist will be completed a minimum of once every two years.

1. Any time an accidental discharge occurs, the Permittee should sample the wastewater, call the Department as soon as possible, and send a copy of the analysis to the Van Buren Municipal Utilities within five (5) days.

b. Emergency Notification Procedures

Notice shall be furnished and permanently posted advising designated employees to call the Van Buren Waste Water plant in case of accidental discharge slug load in violation of this Permit and Ordinance. (Call 474-5068 or 474-0941)

c. Solids Disposal

Proper disposal of solids, sludges, spent chemicals, collected screenings, and other solids removed from liquid wastes shall be done in accordance with section 405 of the Clean Water Act and subtitles C & D of the Resource Conservation and Recovery Act. These shall not be allowed entry into the City's sewer collection system.

IV. COSTS AND CHARGES

Cost and charges shall consist of Annual Monitoring Fees to be determined at the end of each calendar year.

V. REPORTING AND MONITORING

a. At each connection between the permittee's sewer system and the City's collection system, the permittee shall install a sampling station or other approved structure equipped to handle an automatic composite sampler(s) or other device(s) that shall measure, sample, and record the quantity/quality of wastewater flow from the industry. The average daily flow rate, determined and accepted by both the Department and River City Coatings, Inc., will be the equivalent of the estimated employee water usage subtracted from the water meter daily usage. All monitoring devices and sampling stations must be approved by the Superintendent. The permittee shall maintain records of all information resulting from any monitoring activities required herein. If self-monitoring by SIUs indicates a violation, the SIU shall notify the Superintendent or Environmental Coordinator within 24 hours of being aware of the violation.

The user shall repeat the sampling or monitoring within 30 days of being aware of the violation. The permittee shall accept the estimates of quantities of wastewater flow, as established by the Superintendent during all periods of usage. All pH adjustment facilities shall include a continuous pH Recorder with Strip Chart.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at regular intervals to ensure accuracy of measurements.

c. The permittee shall provide the above records and shall demonstrate the accuracy of the monitoring devices upon request of the Superintendent.

d. The permittee shall analyze any samples as may be required by the Superintendent to ensure effluent quality control.

e. If the permittee monitors any wastewater characteristics more frequently than is required by this permit, he shall also provide the results of such monitoring to the Superintendent.

f. Sampling and Analysis - The sampling, preservation, handling, and analytical methods shall be performed in accordance with 40 CFR Part 136 methods.

g. All limitations as given in Section VII of this permit are conditional, and may be revised, should the conditions prove detrimental to the proper operation and maintenance of the Treatment Facilities, which are a result of excessive concentrations of pollutants.

h. Permittee self-monitoring reports shall be submitted on a monthly basis no later than seven (7) working days following any monthly reporting period.

VI IMPLEMENTATION SCHEDULE

a) Monitoring Facilities

1. All samples shall be drawn from the clean out between the building and the entrance to the municipal sewer. (This clean out is on the line discharging directly from the process line wash and rinse tanks.)
2. All process wastewaters will be generated by the overflow or drag off water from the rinse tank or maintenance draining of the rinse and wash tanks.

b) Pretreatment

The permittee shall achieve compliance with the final effluent limitations (as specified in Tables I & II) specified for discharge in accordance with the following schedule:

1. Perform sampling and analysis for parameters listed in Tables I & II according to "Measuring Frequencies" listed under "Monitoring Requirements" and forward analysis results to the Van Buren Municipal Utilities.
2. For each measurement or sample taken pursuant to the requirements of this permit, the user shall record the following information:
 - (a) The exact place, date, and time of sampling;
 - (b) The precise nature and concentrations of regulated pollutants in the discharge to the POTW;
 - (c) The dates the analyses were performed;
 - (d) The name of the person(s) who performed the analyses;
 - (e) The analytical techniques or methods used; and
 - (f) A certification that these methods conformed to those methods outlined in the regulations listed above.
3. All other terms and conditions of the permit are effective as issued and require full compliance upon initial discharge.

A-3m

VII. PENALTIES

Ordinance # 3-1997 & 3-1991 Section 10.08.07 establishes the procedure for establishing Civil, Administrative, and Criminal Penalties for violation of the Pretreatment Ordinance. Civil penalties shall consist of the assessment of monetary penalties set by the Ordinance for each parameter exceeded. In addition, additional civil penalties may be assessed for the cost to the City for any expense, loss, or damage caused by a non-complying discharge or violation. Administrative fines shall be included with monthly sewer use fees and may not exceed \$1,000 per day per offense. In addition, Criminal Penalties of up to \$1,000 per day per offense may be assessed in accordance with provisions set forth in Ordinance # VB3-1997 Section 10.08.07(3).

VIII. APPEAL

Ordinance #3-1997 Section 10.08.06(7) provides that any discharger or interested party shall have the right to request in writing an interpretation or ruling by the Commission and shall be entitled to a prompt written reply. Any enforcement actions pertaining to a violation shall be stayed pending receipt of aforementioned written reply. The appeal of any final judicial order pursuant to the enabling ordinance may be taken in accordance with local and state laws.

IX. PERMIT MODIFICATIONS

In accordance with Ordinance #VB3-1997 Section 10.08.05(2.3) the City may amend any Wastewater Discharge Permit if necessary for the City to comply with applicable laws and regulations. This permit may be reopened and modified to incorporate any new or revised requirements resulting

from the Van Buren Municipal Utilities reevaluation of its local limits. Changes or new conditions in the permit shall include a reasonable time schedule for compliance.

X. TRANSFER

Wastewater Discharge Permits may not be transferred to another site or discharge and may not be assigned to another discharger without the written permission of the Commission. Written notification to the Superintendent must be given for any change in actual or majority change or corporate ownership.

XI. REVOCAATION

A discharge permit may be revoked under a procedure outlined in a written enforcement response plan adopted by the Commission for causes set forth in Ordinance # VB 3-1997 Section 10.08.06(2).

XII. REISSUE OF PERMIT

Permits shall expire upon being revoked for cause or upon the expiration date shown on the permit. Permittees should reapply for permits no later than 90 days prior to their expiration.

XIII. PUBLICATION

A list of all significant dischargers which were the subject of enforcement proceedings pursuant to Ordinance # VB 3-1997 Section 10.08.06 during a preceding 12 month period shall be published annually in the local newspaper by the Commission summarizing the enforcement action taken against the Dischargers during the same 12 months whose violations remained uncorrected 45 or more days

PAGE 16
PERMIT #VB 1721-22

after notification of non-compliance; or which have exhibited a pattern of non-compliance over that 12 month period; or which involved failure to accurately report non-compliance.

TABLE I
 PERMIT NO. YB 1721-22

XIV. SELF MONITORING REQUIREMENTS

Dischargee shall be limited and monitored by permittee as specified below:

<u>Parameter</u>	<u>Maximum Discharge Limitations*</u>	<u>Monitoring Requirements Measuring Frequency**</u>	<u>Sample Type</u>
Flow	<u>.005 MGD</u>	<u>continuous</u>	<u>water meter</u>
pH	<u>5.0 - 11.0 S.U.</u>	<u>1/30</u>	<u>Grab samples (4/24 hrs)</u>
Temperature	<u>40 C</u>	<u>1/30</u>	<u>Grab Samples (4/24 hrs)</u>
BOD	<u>12.51 lbs/day</u>	<u>2/365</u>	<u>24 hr. Composite</u>
Total Suspended Solids	<u>12.51 lbs/day</u>	<u>2/365</u>	<u>24 hr. Composite</u>
Oil and Grease	<u>100 mg/L</u>	<u>2/365</u>	<u>4Grabs/24hrs</u>
Cadium	<u>0.003 lbs/day</u>	<u>2/365</u>	<u>24hr. Composite</u>
Chromium	<u>0.071 lbs/day</u>	<u>2/365</u>	<u>24hr. Composite</u>
Copper	<u>0.086 lbs/day</u>	<u>2/365</u>	<u>24hr. Composite</u>
Lead	<u>0.018 lbs/day</u>	<u>2/365</u>	<u>24hr. Composite</u>
Nickel	<u>0.099 lbs/day</u>	<u>2/365</u>	<u>24hr. Composite</u>
Silver	<u>0.010 lbs/day</u>	<u>2/365</u>	<u>24hr. Composite</u>
Zinc	<u>0.062 lbs/day</u>	<u>2/365</u>	<u>24hr. Composite</u>
Cyanide, total	<u>0.65 mg/L</u>	<u>2/365</u>	<u>4Grabs/24hrs.</u>
Total Toxic Organics	<u>2.13 mg/L</u>	<u>2/365</u>	<u>4Grabs/24hrs.</u>

*Permittee shall be required to meet discharge limits upon issuance of this permit. Monitoring Data shall be submitted monthly on Reporting Forms provided by the Department. (attached)

** Self-monitoring reports shall be submitted semi-annually in June and December or as batch discharge occurs. Minimum Data Reported shall include the Lowest; Highest; and Average of all Samples analyzed for the month.

EXHIBIT A
DEFINITIONS

1. BOD, denotes BIOCHEMICAL OXYGEN DEMAND, which means the quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures in five (5) days at twenty (20) degrees Centigrade expressed in terms of weight and concentration (milligrams per liter), as determined by Standard Methods.
2. City shall mean the City of Van Buren, Arkansas.
3. SUPERINTENDENT shall mean the Superintendent of the Van Buren Municipal Utilities, operating under the immediate direction of the Van Buren Municipal Utilities Commission.
4. DISCHARGE MEASUREMENT - The determination of the quantity of wastewater flowing per unit of time in the sewer system at a given point by means of a current meter, rod float, weir, Pitot tube, or other measuring device or method.
5. FLOW RECORDER shall mean a weir, meter or flume or other device, which will measure and record the volume of wastewater discharged.
6. MGD - Wastewater flow in million gallons per day.
7. AVERAGE MONITORING VALUES shall mean the arithmetic average of all Samples analyzed during a reporting period.
8. MAXIMUM DAILY FLOW shall mean the highest daily rate of wastewater flow occurring within a single day.
9. MEASURING DEVICE - Instrument determining concentration, flow, etc.

10. METER - An instrument for measuring the amount and rate of flow of liquids.
11. MINIMUM DAILY FLOW shall mean the smallest rate of wastewater flow occurring over a normal day.
12. MONITORING DEVICE shall mean any equipment which specifically measures and/or samples wastewater.
13. PRETREATMENT FACILITIES shall mean the structures, equipment, and processes required to collect, treat, and transport.
14. QUANTITY AND QUALITY OF WASTEWATER is an expression which determines the amount and composition of the wastewater. Composition, in this case, refers to the chemical and physical characteristics of the solid and liquid constituents of the wastewater. These characteristics are usually measured in terms of gallons per day, BOD₅, TSS, fats, oils, and greases, regulated heavy metals and other contaminants, and for the departure of pH values from excepted limits.
15. SAMPLE shall mean a portion of the wastewater obtained for analytical purposes. This portion may be a single sample (grab), composite sample, continuous sample or periodic sample.
 - a. SAMPLER - A device used with or without flow measurement to obtain an aliquot portion of water or wastewater for analytical purposes. May be designed for taking single sample (grab), composite sample, continuous sample, periodic sample.
 - b. COMPOSITE WASTEWATER SAMPLE - A combination of individual samples of water or wastewater taken at selected intervals, generally hourly for some specified

- c. period, to minimize the effect of the variability of the individual sample. Individual samples shall be proportional to the flow at time of sampling.
- c. SAMPLING STATION - A specified site where monitoring takes place on a regular basis.
- 16. SHALL is mandatory; MAY is permissive.
- 17. SUSPENDED SOLIDS shall mean the solids that either float on the surface of, or are in suspension in wastewater and which are largely removable by laboratory filtering, as determined by Standard Methods.
- 18. WASTEWATER TREATMENT FACILITIES - The structures, equipment, and processes required to collect, transport, treat and dispose of wastewater and dispose of the effluent including but not limited to collection system, interceptors, and wastewater treatment plant.
- 19. TREATMENT (TREAT) shall mean a process to which wastewater is subjected in order to remove or alter its objectionable constituents and thus render it less offensive or dangerous.
- 20. WASTEWATER - The spent water of industry. Spent water may be a combination of the liquid wastes from industrial establishments, together with any ground water, surface water and storm water that may be present.
- 21. WASTEWATER DISPOSAL - The act of disposing of wastewater by discharging to the City's Wastewater Treatment Facilities

EXHIBIT B

SAMPLING STATION SPECIFICATION

1. Clean out(s) between building and alley, along which manholes #611 and 611A are located, shall be called and utilized as the sample station for River City Coatings, Inc. This alley is located between Sycamore and Wood Streets.
2. Must be accessible by Van Buren Municipal Utilities Dept. personnel at all times.
3. Influent and effluent of station should extend twelve (12) inches or more to insure against infiltration.
4. Pits in the system should be cleaned out periodically to prevent false test results from sludge accumulations in lines.

VAN BUREN INDUSTRIAL WASTE PRE-TREATMENT SYSTEM
DISCHARGE MONITORING REPORT

NAME _____
ADDRESS _____

(2)
PERMIT NUMBER _____

NOTE: Read instructions
before filling out
form.

FACILITY _____
LOCATION _____

(3)

MONITORING PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY

(1) FROM

TO

PARAMETER (4)	QUALITY OR CONCENTRATION			(6) UNITS	FREQUENCY OF ANALYSIS (7)	SAMPLE TYPE (8)
	(5) MINIMUM	(5) AVERAGE	(5) MAXIMUM			

TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED (9)

I certify under penalty of law that I have personally examined and am familiar with the information submitted herein. I believe the information submitted is accurate and true and I am aware that there are criminal penalties for submitting false information

A-3u

Signature of Principal Executive Officer

Telephone	Date
Number	MM/DD

(Comment & Explanation of any Violations) Reference all attachments

EFFLUENT WASTE WATER MONITORING REPORT

NAME:

MONTH:

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----

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SIGNATURE:

GENERAL INSTRUCTIONS
FOR
DISCHARGE MONITORING REPORTING

- (1) Enter Permittee Name/Mailing Address (and Facility if different.)
- (2) Enter "Permit Number" where indicated.
- (3) Enter Dates beginning and ending "Monitoring Period".
- (4) Enter each "Parameter" specified in Monitoring Requirements of Permit.
- (5) Enter Sample Measurement Data for each parameter under Minimum, Maximum and Average in units specified in Permit. "Average" is arithmetic average of all Sample Measurements for each parameter during Monitoring Period. "Maximum" and "Minimum" are extreme high and low measurements during Monitoring Period.
- (6) Specify units used in each Parameter Measurements as specified in Permit (Such as mg/L, etc.)
- (7) Enter "Frequency of Analysis" as required by Permit. "1/7" for one day/week, "1/30" for one day/month, "30/30" for daily sample measurements. Enter "Cont" for Continuous Monitoring. If Permittee measures Parameter more often than required by Permit then actual Frequency shall be reported.
- (8) Enter "Grab" for individual Sample, "Comp" for composite, "NA" for Continuous Monitoring.
- (9) Enter Name and Title of Principal Executive Officer or Authorized Agent.
- (10) Enter Signature with date of when Report is mailed. Keep one copy for your records and mail original copy to the Van Buren Municipal Utilities, 2806 Bryan Road, P.O. Drawer 1269, Van Buren, Arkansas 72956.
- (11) Where violations of Permit Requirements are reported, attach a brief explanation to describe cause and corrective actions being taken. Reference each violation by date.
- (12) If no discharge occurs during Monitoring Period, enter "No Discharge" across form in place of date entry.

EXHIBIT D

LEGAL NOTICE

Pursuant to Ordinance, Section 10.08.08 (records retention), all Dischargers subject to this Ordinance shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence and any and all summaries thereof, relating to monitoring, sampling and chemical analysis made by or in behalf of a Discharger in connection with its discharge. All records which pertain to matters which are the subject of Administrative Adjustment or any other enforcement or litigation activities brought by the Department pursuant hereto shall be retained and preserved by the Discharger until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

FACT SHEET

Flow 5,000 gallons per day based on highest flow over previous year times 1.25 safety factor for growth: 2.9 Thousand gallons/day * 1.25 = 3,625 gpd. Permit for 5,000 based on plant headworks flow at 2/3 total capacity.

pH limits: 5.0 – 11.0 s.u. as per Van Buren Pretreatment Ordinance #VB3-1997

Temperature: 5 – 40 C as per Van Buren Pretreatment Ordinance #VB3-1997

Oil & Grease: maximum of 100 mg/L as per Van Buren Pretreatment Ordinance #VB3-1997;
52 mg/L Daily maximum and 26 mg/L Maximum Monthly Average as per 40 CFR Part 433

BOD & TSS: 300 mg/L * 8.34 lbs/day * 0.005 MGD = 12.51 lbs/day

Metals: all mass limits based on Maximum Monthly Discharge concentration limits as set forth in 40 CFR Part 433 times the maximum allowable flow of 5,000 gallons per day times the weight per gallon of 8.34 lbs/gallon. Examples below:

Cadium: 0.07 mg/L * 8.34 lbs/gal. * 0.005 MGD = 0.003 lbs/day

Chromium: 1.71 mg/L * 8.34 lbs/gal. * 0.005MGD = 0.071 lbs/day

Copper: 2.07 mg/L * 8.34lbs/gal. * 0.005 MGD = 0.086 lbs/day

Lead: 0.43 mg/L * 8.34 lbs/gal. * 0.005 MGD = 0.018 lbs/day

Nickel: 2.38 mg/L * 8.34 lbs/gal. .005 MGD = 0.099 lbs/day

Silver: 0.24 mg/L * 8.34 lbs/gal. * 0.005 MGD = 0.010 lbs/day

Zinc: 1.48 mg/L * 8.34 lbs/gal. * 0.005 MGD = 0.062 lbs/day

Cyanide: 0.65 mg/L as per Section 40 CFR Part 433

Total Toxic Organics: 2.13 mg/L as per Section 40 CFR Part 433

Attachment A-4

PRETREATMENT COMPLIANCE INSPECTION IU SITE VISIT FORM

Name of Industry: Fab Tech Permit Number: VB3400-26

Address: 12 North 25th Street

POTW Name: South Plant Date of last inspection: April 9, 2004

Industry Contact(s), Position: Myron Kirksey

Date & Time of Visit: May 31, 2005 @ 10:00 A.M.

Description of Manufacturing Process: sheet metal components. (very little galvanized)

Make parts out of cold rolled steel

Sources of Process Wastewater: clean and rinse tanks for metal parts

Categorical Industry? yes

Basis for Permit Discharge Limits: 40 CFR Part 433

Description of pretreatment equipment and procedures: n/a

Spill prevention & Solvent Management Procedures: is on computer and copy on

clipboard

Sampling location & equipment: Northwest corner of the building. Sample at

cleanout after meter.

INSPECTION OF LABORATORY/RECORDS (continued)

17. Has permittee submitted progress reports, self-monitoring reports, and other reporting on time pursuant to Administrative Order and/or permit issued? yes

18. Records of Notification for slugload, accidental or operation discharge upset? n/a

19. Description of above non-customary discharge n/a

20. Has discharge loading (organic, hydraulic) changed since last inspection? Less than last year

21. If discharge loading has changed list causative factor: less painting

22. Has discharge loading impacted P.O.T.W.? (Interference, Pass-Through, Collection system blockage, Safety, etc.) no

23. Has permittee exceeded effluent limits (BOD, TSS, pH, Oil & Grease, metals, etc.) since last inspection? List cause(s) 1X - zinc - July '04 (Zn=2.56mg/L) Retest in same month but date is wrong on report. Chem Lab was retesting on a discharge date.

24. Has permittee followed due procedure in responding to exceeding permit limits? (i.e. notification by phone, letter detailing excursion & follow-up plan, etc.) yes for documentation and resampling event

A-4c

INSPECTION OF PRETREATMENT or SAMPLING FACILITY (continued)

25. Has permittee complied with sampling procedures and techniques as defined in 40 Code of Federal Regulations, Part 136? yes
 Chain of Custody in effect? Chem Lab handles all paperwork and sample collection
 Type(s) of sample(s) yes
 Samples refrigerated during compositing? yes
 Sample preservation & time held prior to shipping/analysis yes

26. Is Permittee operating under a compliance schedule and/or Administrative Order? no

27. Has permittee complied with all aspects of the Industrial Discharge Permit under which it operates? yes

INSPECTION OF PRETREATMENT or SAMPLING FACILITY

1. Are all treatment units in service? n/a

2. Qualified operating staff provided? n/a

3. Treatment/Sampling facility properly operated and maintained? n/a

4. Is monitoring equipment operated & maintained in good working order? n/a

5. Is there a consulting engineer available for operational and maintenance problems? n/a

6. Describe procedural plan to prevent accidental discharges from entering municipal sewer system:

No floor drains. Block spill with chemical bags. Contact management ASAP. Also, emergency contact phone numbers posted and MSDS sheets.

7. Does the sampling structure meet the specifications required as set forth in the discharge permit? (Sampling structure may be functionally adaptive, but sampling protocol must be adhered to as per 40 CFR 136.) yes

A-4d

INSPECTION OF PRETREATMENT or SAMPLING FACILITY (continued)

8. Any bypasses occurring since last inspection? Please list: no

9. How are sludge and solids disposed of? Who hauls this waste and where does it go?

Will get a contract hauler the next time the tanks need to be cleaned.

They have a treatment system on site. No sludge hauled since last inspection.

10. Sludge hauling documented by manifest? Will be documented.

11. Type of flow measuring device? Sensus Water 2" meter

12. Flow measuring device properly installed? yes

13. Flow measuring device adequate to handle flow rates? yes

14. Has permittee maintained adequate spare parts inventory for PT operations and/or sampling equipment? n/a

15. Does permittee have an Operations & Maintenance Manual on site? n/a

INSPECTION OF "CHEMICAL STORAGE & PRODUCTION AREA"

1. Are there any chemicals stored near floor drains? If yes, list details below: no

They have no floor drains

A-4e

INSPECTION OF "CHEMICAL STORAGE & PRODUCTION AREA"(continued)

2. Are signs posted in designated areas giving information on who to contact and the phone number in case of an emergency such as a spill, accidental discharge, etc.? Where? _____

3. Does the production area and plumbing agree with the Baseline Monitoring Report or Permit Application (type of process, kinds of chemicals, effluent discharge points, etc.?) _____

POLLUTION PREVENTION

1. Is the discharger aware of Pollution Prevention? _____

2. What measures, if any, have been taken to reduce the pollutants discharged into the municipal sewer? _____

MISCELLANEOUS

1. Does the permittee have any questions regarding current or past actions of the VBMU in the pretreatment program? _____

2. Does the permittee have any questions regarding the local pretreatment program, rules, regulations, etc.? _____

Inspector _____ Date & Time 3/25/03 @ 10:00 AM

Industry Representative _____ Date/Time _____

Comment Area:

A-4f



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3 AR 00 02 14 82 11 12 06 02 21 17			18 G	19 S	20 1
Remarks pretreatment program Audit for Van Buren					
Reserved	Facility Evaluation Rating	BI	OA	Reserved	
67 <input type="checkbox"/> 69 <input type="checkbox"/>	70 <input type="checkbox"/>	71 <input type="checkbox"/>	72 <input type="checkbox"/>	73 <input type="checkbox"/>	74 <input type="checkbox"/> 75 <input type="checkbox"/> 80 <input type="checkbox"/>

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3 AR 00 02 14 82 11 12 06 02 22 17			18 U	19 S	20 2
Remarks 04 SIU site visits					
Reserved	Facility Evaluation Rating	BI	OA	Reserved	
67 <input type="checkbox"/> 69 <input type="checkbox"/>	70 <input type="checkbox"/>	71 <input type="checkbox"/>	72 <input type="checkbox"/>	73 <input type="checkbox"/>	74 <input type="checkbox"/> 75 <input type="checkbox"/> 80 <input type="checkbox"/>

Section B: Facility Data

Name and Location of Facility Inspected City of Van Buren Pretreatment Program PO Drawer 1269 2806 Bryan Rd Van Buren, AR 72956	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 7:00	Permit Effective Date 12/1/03
	Exit Time/Date 2:00 pm 2/23/06	Permit Expiration Date 11/30/08

CODE SHEET

Pretreatment Audit

Auditor's Name	<u>G. Lillian</u>	CODE
Permit Number	<u>AR 0021482</u>	
Audit Date	<u>2/21-23/06</u>	DTIA
Date Permit Modified to require pretreatment	<u>10/1/81</u>	PTIM

PPETS WENDR DATA ELEMENTS

Significant IUs without Control Mechanisms	<u>0</u>	NOCM
Number of Significant IUs	<u>9</u>	SIUS
Number of Categorical IUs	<u>3</u>	CIUS
Technical Evaluation for Local Limits	<u>Y</u>	EVLL
Adoption of Technically-Based Local Limits	<u>Y</u>	ADLL
Significant IUs not inspected or sampled	<u>0</u>	NOIN*
Significant IUs in significant noncompliance with standards or reporting	<u>0</u>	PSNC*
Significant IUs in significant noncompliance with self-monitoring	<u>0</u>	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	<u>0</u>	SNIN*