

ADEQ

ARKANSAS
Department of Environmental Quality

July 10, 2009

Gary Smith, Director
City of Van Buren
P O Drawer 1269
Van Buren, AR 72956

Re: City of Van Buren (NPDES #AR0021482) Pretreatment Program
Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Smith:

Please find enclosed the finished report for the audit/assessment conducted June 15 through June 18, 2009. The report should be made available for review to appropriate industrial officials. Your staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

The Department appreciates your staff's assistance. They appeared very interested in both the Pretreatment and Pollution Prevention Programs. Most of the recommendations in the attached audit/assessment are intended to aide the City of Van Buren pretreatment program with achieving the objectives of the Clean Water Act.

Please do not hesitate to contact my office if you or any of your staff have questions or concerns in the future.

Sincerely,



Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)
Eric Flemings / ADEQ Technical Assistant Mgr-Field Services (w/o attmt)
Cindy Garner / ADEQ Technical Assistant Mgr-Enforcement (w/o attmt)

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT**

CITY OF VAN BUREN, ARKANSAS

NPDES PERMIT #AR0021482

JULY 10, 2009

PREPARED BY: RUFUS TORRENCE, AUDITOR

WATER DIVISION ENGINEER II

Arkansas Department of Environmental Quality (ADEQ)

TABLE OF CONTENTS

A) Introduction

B) Summary of Findings with Required Actions

C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs

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

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

Attachments A, B, C, D, E, F, G, H, I, J, K, L, M & N: Supporting Documentation

A) INTRODUCTION

In accordance with ADEQ's (department) responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, the department will conduct audits of Pretreatment Programs within the state as part of its coordination and compliance monitoring strategy.

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

The auditor assessed on June 15th through 18th, 2009 the Pretreatment Program implemented by City of Van Buren, Arkansas (City). Participants included:

Rufus Torrence	ADEQ / Engineer / Auditor
Kim Redo	City / Pretreatment Coordinator
Steve Dufresne	City / Operations Superintendent
Jeff Testerman	City / South WWTP Operator
Clyde Hill	City / North WWTP Operator

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 is currently updating the pretreatment program to comply with recent revisions to 40 CFR Part 403. These revisions are commonly referred to as the "Streamlining" updates.

The City has three (3) wastewater treatment plants. Since the department performed the last audit in February 2006, the City has upgraded the main plant.

The main (South) POTW has recently been upgraded to increase the design flow from 3.1 MGD to 4.0 MGD. The upgrade includes a new screening unit, two new 60' diameter secondary clarifiers, UV disinfection unit, flow monitoring equipment, and standby power source. The old aerated lagoon was modified to an activated sludge unit consisting of two aerated basins (combined surface area of 56,292 square feet), aerobic sludge storage (surface area of 46,354 square feet), and an equalization basin (surface area 167,777 square feet). The old screening unit and the chlorine disinfection unit were taken out of service. Seven (7) significant (three are categorical) industrial users (SIUs) contribute about 0.67 millions gallons each day to the POTW. The South POTW discharges into the Arkansas River. The POTW effluent has exhibited no toxicity to aquatic life. Constructing and upgrading the plant, the City dredged the lagoon and land applied the sludge in July 2008 on nearby City-owned property. The sludge had low metal content (Copper at 13 mg/kg and Zinc at 54 mg/kg).

The Lee Creek POTW is a simple activated sludge package treatment plant operating under extended aeration conditions. This POTW design flow is 0.04 MGD. The POTW has no significant industrial user contributions and accepts only sanitary wastewater from Bekaert Steel, a nearby ball park and an I-40 rest area. The POTW treated effluent is chlorine disinfected and discharged 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, has a 2 channel orbal design, and has an oxidation ditch with 2 stage clarification. A non-categorical SIU contributes about 10,000 gallons each day to the POTW. The POTW design flow is 1.0 MGD and discharges to Lee Creek. The POTW effluent is disinfected in a UV contact chamber and discharged to the creek. The POTW effluent has exhibited no toxicity to aquatic life. Biosolids are periodically dredged and land applied on City property.

The North Plant will have permit limits for Copper (9.2 ug/l) and Zinc (85.5 ug/l) effective 3-1-2011. The City should be aware that the pretreatment program may be placed in SNC (significant noncompliance) for pass through ("pass through" is limited to non-domestic sources) if the North plant effluent metal concentrations exceed the limits.

The audit/assessment consisted of informal discussions with the City's Pretreatment Coordinator, examination of industrial user files, pretreatment records and site visits to five (5) industrial users. The auditor utilized a checklist 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 Attachments

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. The auditor has paraphrased with CFR citations the actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program. A narrative explanation of the finding will follow the citations.

The following findings were shown in the last audit and the City must address these findings.

1) (This finding addressed QA/QC procedures. The City has implemented new QA/QC procedures)

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 clearer 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".

(The City has added the footnote to the metal finishers' permits but the DMRs still do not contain this certification:

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority.)

3),4) & 5) (The City appears to have adequately addressed these findings.)

The following findings are applicable to this audit.

6) Under 40 CFR Part 403.5(c)(1) find “*Each POTW...shall develop and enforce specific limits to implement the prohibition [40 CFR Part 403.5(a)(1)]...A User may not introduce into a POTW any pollutant(s) which cause Pass Through...Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits. [40 CFR Part 403.5(c)(4)] POTWs may develop Best Management Practices (BMPs) to [prevent pass through]. Such BMPs shall be considered local limits and Pretreatment Standards...*”

The City’s North plant has permit limits for Copper (9.2 ug/l) and Zinc (85.5 ug/l) which become effective on March 1, 2011. The permit limits are included to prevent pass through to the receiving stream (Lee Creek). The North plant is not designed to remove Copper or Zinc. The City must find the source of the Copper and Zinc and control these pollutants at the source. Since there are no major industrial users connected to the North Plant, the City may implement BMPs to control commercial facilities (car washes, laundries, etc.).

7) Under 40 CFR Part 403.8(f)(1)(iii) find that the City must “*Control through Permit...the contribution to the POTW by each [Significant] Industrial User to ensure compliance with applicable Pretreatment Standards...*”

The City must remove all equivalent mass limits from each 40 CFR 433 Categorical Industrial User’s permit and apply only the applicable concentration limits. The City may reinstate mass limits in these CIUs’ permits if

- a)** the CIUs demonstrate eligibility according to the conditions in 40 CFR 403.6(c)(5)(i)(A) through (E).
- b)** and in accordance with 40 CFR 403.6(c)(5)(iii), the City “*Must calculate the equivalent mass limits by multiplying the actual average daily flow rate of the regulated process(es) of the Industrial User by the concentration-based...Standard for the applicable categorical Pretreatment Standard...*”

The City has not documented the eligibility of each CIU to receive equivalent mass limits.

The City is currently using “5000 gpd” for each conversion instead of the “actual” average daily flow rate. See attachments B-25/25, C-2/3, and D-1/2. Even though the Fact Sheet (attachment D-1/2) in permit # 1721-29 shows mass limits, the City “correctly” listed concentrations limits in Table II (attachment D-2/2).

Finally, the City has no apparent reason at this time to grant “equivalent mass limits” for these CIUs.

8) Under 40 CFR Part 403.16(a) find that “*An Upset does not include noncompliance to the extent caused by operational error...*”

The City must strike the “Operating Upsets” language from all permits. The language in permit # VB 1721-22 is located on page 7 in Section II in paragraph h (see attachment B-7/25). For more details see recommendation 14 below.

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

The following recommendations were shown in the last audit and the City should address these recommendations:

- 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.
- 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.

The following recommendations are applicable to this audit:

- 8) The City should use the department influent/effluent chart to report lab analyses. The City should follow the guidance in Allen Gilliam's email dated 1-14-09. See Attachment H-1/1. Even though the procedure is optional for the influent, the City should use the same procedure in the guidance for the influent as well.
- 9) The City should not report surcharges for BOD & TSS as penalties. The City's last annual report contained Attachment C with \$27,925 listed as "penalties".

10) The City may employ general permits with BMPs for local commercial facilities (car washes, auto repair/service shops) to control the copper and zinc entering the headworks at the North Plant. Manhole #1451 was the domestic sampling location for Sample Point 2 and this location had elevated levels of both copper and zinc. A car wash is located about 100 feet from this sample point. According to the attached article (see Attachment I-1/1), copper and zinc are constituents of “brake dust”. The City has a final permit limit (9.2 ug/l) for Copper and should take steps immediately to mitigate the source of the Copper. A number of sample BMPs for car washes are available on the internet (see attachment G-3/3).

11) The City may consider laying a two-mile long pipeline along Lee Creek to the Arkansas River. The North Plant existing permit limit for Copper is only 9.2 ug/l. If the North Plant effluent entered the Arkansas River, the limit for Copper would increase to 432 ug/l.

12) The City should apply a “negative” safety factor to “reduce” the allowable loading to the POTW. The City is currently applying a “positive” factor in permits to increase the allowable loading to the POTW. If the City is trying to allow for industrial growth, the safety factor must “reserve” capacity not “consume” capacity. For example, referring to attachment E-1/1, the safety factor should be 0.75 and not 1.25.

13) The City should show the “local” legal authority in all permits under “ACKNOWLEDGEMENT OF PERMIT LIMITATIONS” (see attachment B-2/25). Currently, the legal authority is cited under “General Conditions” in section II (see attachment B-5/25) and in a footnote on the Cover Page (see attachment B-1/25). The City should always cite both the ordinances and codes. Only the codes were cited in permit #VB 1721-22 under “General Conditions”. The City cited both the ordinances and codes under “General Conditions” in permit #VB 3400-26 (see attachment C-1/3). The City should be consistent from permit to permit.

14) The City should revise §10.08.06.9 in the proposed “Streamlining” ordinance. The City incorrectly combined “Operating” with “Upsets” in the proposed ordinance and included similar language in permits. EPA did not intend to allow operational errors as justification for “upsets”. The auditor has included suggested language in the proposed draft ordinance (submitted earlier to the City) and the City may use this language to provide for the “Upset” provision. Nonetheless, the auditor recommends that the City should not include any upset provision in permits. If a categorical industrial user (CIU) suffers a catastrophic event (tornado, earthquake, etc.), the CIU may be incapable of asking for assistance and the City should offer to advise the CIU of its options under the upset provision. Note that the upset provision applies only to CIUs.

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*. The City must comply with the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply. Some of the streamlining changes are less stringent than the previous pretreatment regulations and the City may at its option elect to include these changes in the program modification. However, thirteen (13) elements are more stringent than the previous pretreatment regulations and the City must ensure that the approved program contains all applicable more stringent streamlining changes. The City should note that some of the elements may not be applicable to the City's approved program.

The City has commenced a modification to comply with the Streamlining Rule Changes by submitting a proposed ordinance. The department has reviewed this ordinance and indicated required and recommended changes. The required changes reflect the thirteen (13) elements mentioned above. The City must proceed as soon as possible in adopting the ordinance and, subsequently, updating the narrative in the approved program.

* * * * *

E) CONCLUSIONS

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: 6/15 - 6/18/09
 (ASSESSMENT)

Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Rufus Torrence</u>	<u>Engineer / ADEQ</u>	<u>501.682.0626</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 Dufresne</u>	<u>Operations Superintendent</u>	<u>Same</u>
<u>Jeff Testerman</u>	<u>Plant Operator</u>	<u>Same</u>
<u>Clyde Hill</u>	<u>Plant Operator</u>	<u>Same</u>

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>4/16/08</u>	<u>None (Recommend updating ERP and increasing pretreatment staff)</u>
<u>PCI</u>	<u>5/10/07</u>	<u>None (Recommend updating ERP)</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 a asterisk or footnote that tells that there is more explanatory information and where it can be found.

** The Control Authority is currently not in SNC. However, the City should be aware that metal violations may place the City in SNC. After March 1, 2011 the North WWTP NPDES permit will have limits for copper and zinc. If the City violates the copper or zinc limit, the violation could be consider as a Level I violation; see the "REPORTABLE NONCOMPLIANCE (RNC)" criterion below. The City must find the source of metals and abate them at the source or demonstrate that the metals are primarily in the domestic wastewater. In either case, the City must comply with permit limits. If the latter case is true, the Pretreatment Program may not go into SNC but the permittee may still be subject to enforcement for permit violations.*

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 (Main)	03/01/09	02/28/14
AR0040967	North	03/01/08	02/28/13
AR0037567	Lee Creek	06/01/08	05/31/13

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

2. Individual Treatment Plant Information

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

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 4.0 MGD; Actual (Average)- 2.58 MGD

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

Industrial Contribution to this Treatment Plant

of SIUs : 7 # of CIUs : 3
 Industrial Flow (mgd): 0.67 Industrial Flow (%) : 26 %

Level of Treatment Type of Process(es):

Primary _____
 Secondary Activated Sludge Unit (Two Aerated basins)
 Tertiary _____

Method of Disinfection: Ultraviolet

Dechlorination _____ YES _____ NO N/A

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>-915*</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>-661**</u> dry tons/yr. |
| <input type="checkbox"/> Other (specify) | _____ dry tons/yr. |

*Applied in July 2008 **Based on TSS inf = 186 mg/l, TSS eff = 31 mg/l and flow = 2.8 MGD; therefore, (186-31) (8.34) (2.8) (365)/2000 = 661 dry tons/yr

List of toxic pollutant limits in NPDES permit: None

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>1</u>	_____
Priority **	<u>1</u>	<u>1</u>	<u>0</u>	_____
Biomonitoring	_____	<u>4</u>	_____	_____
TCLP	_____	_____	<u>1</u>	_____
Other: **	_____	_____	_____	_____

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

BOD
TRC

Heavy Rains (High Influent Flow)
O&M (Sulphur Dioxide regulator failed)

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:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
<u>*AR0021482</u>	<u>South (Main)</u>	<u>03/01/09</u>	<u>02/28/14</u>
<u>AR0040967</u>	<u>North</u>	<u>03/01/08</u>	<u>02/28/13</u>
<u>AR0037567</u>	<u>Lee Creek</u>	<u>06/01/08</u>	<u>05/31/13</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: NONE

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:

YES

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?

YES

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>	_____	_____
Priority **	<u>0</u>	<u>0</u>	_____	_____
Biomonitoring (acute)	_____	<u>0</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

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

YES 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)

None

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:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0021482	South (Main)	03/01/09	02/28/14
AR0040967	North	03/01/08	02/28/13
AR0037567	Lee Creek	06/01/08	05/31/13

* 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:

<u>✓*</u> 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 Mar 2007

List of toxic pollutant limits in NPDES permit: Copper and Zinc

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)

None

YES NO

N/A

Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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.

1. Modifications: None

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

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>02/25/2009</u>	<u>"Streamlining" update to ordinance and program</u>

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?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?

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>

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

Problems

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

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>

SECTION II: PROGRAM ANALYSIS AND PROFILE

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 3 years

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

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. 8 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 3 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 5 Noncategorical SIUs
- d. 0 Other regulated nonsignificant IUs (Describe) _____
- 8 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: Control Authority is updating SIU definition to match 40 CFR 403.3(v).

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:

	PERMIT	EXPIRATION
IU NAME		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
<u>N/A</u>	

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

N/A

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
<u>N/A</u>	

SECTION II: PROGRAM ANALYSIS AND PROFILE

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
<u>Pursuant to 40 CFR 122.44(j)(ii) and permit requirements, the CA has provided a technical evaluation on the adequacy of existing MAHLs.</u>			

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"/>	<u>There's only a narrative in the Ordinance stating the Commission may establish local limits such that the MAHLs shall not be exceeded. The City is currently updating the Ordinance may delegate the authority to the Director.</u>		
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			
BOD & TSS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<u>See next page</u>

* - If necessary for the sludge disposal option chosen.

¹The City is currently investigating sources of Copper and Zinc entering the North plant.

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"/>	_____
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.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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</u>	2/year	_____
Other SIUs	<u>from IU to IU)</u>	2/year	_____
Self-Monitoring: doing some of it at least			
CIUs	<u>2</u>	2/year	_____
Other SIUs	<u>2</u>	2/year	_____

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	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	<u>200.8</u>	<u>American Interplex</u>
Cyanide	<u>335.2</u>	<u>"</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>Phenolics - 420.1</u>	<u>"</u>
<u>NH3-N at the North POTW</u>		<u>Data testing</u>

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.)

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe:
Annual EPA performance kits; blind samples for metals done
QA/QC assistance provided by Environmental Resources Assoc (ERA)

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?
The individual permits show sampling location but there is no manual with all the sampling locations 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: _____

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's?
 [~~403.8(f)(2)(vii)~~ 403.8(f)(2)(viii)]
**CA is currently updating the ordinance to incorporate EPA's definition.*

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.)

SECTION II: PROGRAM ANALYSIS AND PROFILE

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					

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]

SECTION II: PROGRAM ANALYSIS AND PROFILE

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 _____
hailed 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:

	<u>Number</u>	<u>Amount</u>
Civil	_____	\$ _____
Administrative	_____	\$ _____
Total	_____	\$ _____ [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
- YES NO OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

- | | | |
|-------------------------------------|-------------------------------------|---|
| <u>YES</u> | <u>NO</u> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Control Mechanism Issuance |
| <input 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 is flow only. |
| <input 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 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 type="checkbox"/> | <u>N/A</u> | 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	100%

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	<u>6 automatic samplers</u>
✓	___	Safety equipment	<u>Standard equip</u>
✓	___	Vehicles	<u>City pick-up</u>
✓	___	Analytical equipment	<u>conventional parameter equip.</u>

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.):
The City has included P2 questions in each permit applications, in 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
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) _____ Ave. Process Flow (gpd) 2,000
Tony Jester, Asst Plant Manager 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 (www.fab-tech.net)
Industry Description Fabrication of precision metal (from sheet) parts
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3400
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 95
Kevin Treece, Pres & Owner Myron Kirksey, VP and Owner
Industry visited during audit: YES 479-474-1788 kevin@fab-tech.net

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

FILE #: 3 Industry Name Arkansas Valley TWA, Inc File/ID No. VB 7542-22
Industry Address 121 Access Road (Exit 5 off I-40)
Industry Description Truck Wash
Industrial Category N/A 40 CFR N/A SIC Code: 7542
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 9980
Brian Taylor, Owner (479) 474-2899
Industry visited during audit: YES

Comments: Sole proprietorship

FILE #: 4 Industry Name Tate & Lyle File/ID No. VB 2046-20
Industry Address 610 South 28th Street www.tateandlyle.com
Industry Description Wet Corn Milling
Industrial Category N/A 40 CFR N/A SIC Code: 2046
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) _____
Randall Cook, Plant Manager (479) 410-6019
Industry visited during audit: YES

Comments: _____

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

Y => Yes N => No N/A => Not Applicable

	<u>RCC</u>	<u>Fab</u>	<u>AR TW</u>	<u>T & L</u>	<u>Ar Lamp</u>
1. Is the IU considered "significant" by the Control Authority?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Is the user subject to categorical pretreatment standards?	<u>Y</u>	<u>Y</u>	<u>N</u>	<u>N</u>	<u>Y</u>
a. New source or existing source (NS or ES)?	<u>NS</u>	<u>NS</u>	<u>N/A</u>	<u>N/A</u>	<u>NS</u>
b. Is this IU one identified as having P ² potential?	<u>N</u>	<u>Y¹</u>	<u>Y²</u>	<u>Y³</u>	<u>Y</u>

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	<u>Y</u>	<u>Y</u>	<u>N⁴</u>	<u>Y</u>	<u>Y</u>
If yes, what is the application date?	<u>10-17-07</u>	<u>01-08-07</u>	<u>N/A</u>	<u>03-23-07</u>	<u>10-30-08</u>
Does it ask for Pollution Prevention information?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Does the file contain a Permit?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Permit Expiration Date?	<u>09-18-10</u>	<u>02-28-10</u>	<u>12-31-11</u>	<u>05-31-10</u>	<u>10-08-11</u>
Is a fact sheet included?	<u>Y⁵</u>	<u>Y⁵</u>	<u>Y⁶</u>	<u>Y⁶</u>	<u>Y⁵</u>

Comments:

1. Fab-Tech is minimizing wastewater.
2. AV Truck Wash is practicing "Good HouseKeeping".
3. Tate & Lyle is considering a micro-filtration system to reduce BOD & TSS (Trade Name "Xenon").
4. The City renewed AV Truck Wash permit without an application. This is a small facility with no processes, 40 CFR 403 contains no requirement for permit applications and the City ordinance does not contain language for "permit reissuance" and section XII in all permits say "should reapply for permit" (see attachment B-15/25). This facility may be permitted with car washes under a "General Permit".
5. The City is applying inappropriate "mass limits"; see paragraph 7 in section B (Required Actions) in the audit report.
6. The City is applying inappropriate safety factors; see paragraph 12 in section C (Recommendations) in the audit report.

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

	<u>RCC</u>	<u>Fab</u>	<u>AV TW</u>	<u>T & L</u>	<u>Ar Lamp</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f) (1) (iii) (A) - (E)]					
a. Legal Authority Cite?	<u>Y⁷</u>	<u>Y⁷</u>	<u>Y⁷</u>	<u>Y⁷</u>	<u>Y⁷</u>
b. Expiration date?	<u>p4*</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
*page 4 in permit #VB 1721-22, attachment B					
c. Statement of nontransferability?	<u>p15</u>	<u>p15</u>	<u>p15</u>	<u>p15</u>	<u>p15</u>
d. Appropriate discharge limitations?	<u>N⁸</u>	<u>N⁸</u>	<u>N⁸</u>	<u>N⁸</u>	<u>N⁹</u>
e. Appropriate self-monitoring requirements?	<u>N⁵</u>	<u>N⁵</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
f. Sampling frequency?	<u>p12</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
g. Sampling locations?	<u>p12</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
h. Requirement for flow monitoring?	<u>p11</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>p15A</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
j. Applicable IU reporting requirements?	<u>p11</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
k. Standard conditions for:					
Right of Entry?	<u>p6</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Records retention?	<u>p24</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Civil and Criminal Penalty provisions?	<u>p14</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Revocation of permit?	<u>p15</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
l. Compliance schedules/ progress reports	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
m. General/Specific Prohibitions?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>

Comments:

7. The cite is in section II under "General Conditions"; see paragraph 13 under Recommendations in audit report for more details.

8. The City is applying inappropriate mass limits and "incorrect" safety factors. See paragraph 7 in Section B and paragraph 12 in Section C of the audit report for more details.

9. Arkansas Lamp permit fact sheet shows "mass limits" but the effluent limitations are "concentration-based".

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

	<u>RCC</u>	<u>Fab</u>	<u>AV TW</u>	<u>T & L</u>	<u>Ar Lamp</u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>N⁵</u>	<u>N⁵</u>	<u>N/A</u>	<u>N⁸</u>	<u>N⁵</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</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>N/A</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>N/A</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>N/A</u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

RCC Fab AV TW T & L Ar Lamp

D. Compliance Monitoring

Sampling

1. Does the file contain Control Authority sampling results for the industry?	<u>Y¹⁰</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
b. Sample date and time?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
c. Sample type?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
d. Wastewater flow at the time of sampling?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
e. Sample preservation procedures?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
f. Chain-of-custody records?	<u>Y¹¹</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
4. Has the Control Authority appropriately implemented all applicable TMO monitoring/management requirements?	<u>N¹²</u>	<u>N¹²</u>	<u>N/A</u>	<u>N/A</u>	<u>N¹²</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>

Comments:

10. See attachment J-1/3 for River City Discharge Monitoring Report

11. See attachment K-1/1 for City Chain of-Custody

12. RCC has submitted a TOMP (see attachment N-1/1) but 40 CFR 433.12(a) certification missing from DMRS

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

Inspections

	<u>RCC</u>	<u>Fab</u>	<u>AV TW</u>	<u>T & L</u>	<u>Ar Lamp</u>
7. Does the IU file contain inspection reports?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</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>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
b. Date of last Inspection	<u>07/21/08</u>	<u>07/22/08</u>	<u>09/04/08</u>	<u>07/16/08</u>	<u>02/19/08</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

RCC Fab AV TW T & L Ar Lamp

9. Does the inspection report(s) include:
[403.8(f)(2)(vi)]

a.	Inspector Name(s)	<u>p4*</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
	*page 4 in inspection report for River City Coating; attachment F-1/6.					
	Inspection date and time?	<u>p4</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
c.	Name and title of IU official contacted?	<u>p4</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</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>CP**</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
		**Cover Page				
f.	Evaluation of pretreatment facilities?	<u>N/A</u>	<u>N/A</u>	<u>Y¹³</u>	<u>Y</u>	<u>Y</u>
g.	Evaluation of self-monitoring equipment and techniques?	<u>p1&3</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
h.	(Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>p3</u>	<u>Y¹⁹</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
i.	Manufacturing facilities?	<u>CP</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
j.	Chemical handling and storage procedures?	<u>p4</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
k.	Chemical spill prevention areas?	<u>CP</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
l.	Hazardous waste storage areas and handling procedures?	<u>p4</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
m.	Sampling procedures?	<u>CP</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
n.	Laboratory procedures?	<u>p1</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
o.	Monitoring records?	<u>p1</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
p.	Evaluation of Pollution Prevention opportunities?	<u>p4</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
q.	Control Authority inspector signature?	<u>p4</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>

Comments:

13. AV TW has a settling pit in the wash bay with 3 baffled sections connecting by a 4" PVC pipe. The flow exits the pit to a 1500 gallon settling tank with "S-shaped" baffles to slow the flow.

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

RCC Fab AV TW T & L Ar Lamp

IU Self-Monitoring and Reporting

10. Does the file contain self-monitoring reports?	<u>Y¹⁴</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
11. Does the file include:					
a. BMR?	<u>Y</u>	<u>Y</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>
b. 90-Day Report?	<u>Y</u>	<u>Y</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>
c. All periodic reports?	<u>Y</u>	<u>Y</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</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>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
14. Did the IU report flow?	<u>Y¹⁵</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y¹⁶</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>Y</u>	<u>Y</u>	<u>Y¹⁷</u>	<u>Y</u>	<u>Y</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>Y¹⁸</u>	<u>Y¹⁹</u>	<u>Y</u>	<u>Y</u>	<u>No open floor drains</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. Did POTW respond to the spill?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

Comments:

14. RCC's DMR needs 40CFR433.12(a) certification.
15. City checks RCC city water meter to determine flow.
16. AR Lamp has batch discharge
17. Some SIUs (AV TW) are submitting faxes
18. RCC plans to plug line when a spill occurs (see attm't N-1/2); auditor recommends an inherent plan if possible.
19. Fab Tech spill plan is attached (attm't L-1/1) and city's annual evaluation (attm't M-1/7).

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

	<u>RCC</u>	<u>Fab</u>	<u>AV TW</u>	<u>T & L</u>	<u>Ar Lamp</u>
E. Enforcement					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>
b. IU self-monitoring results?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>N/A</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>0</u>	<u>2-BOD 23-TSS</u>	<u>1-Zinc</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>N/A²⁰</u>
5. Were all nondischarge violations identified in the file?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>
6. Was the IU notified of all violations?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>
8. Did the Control Authority follow its approved ERP?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>

Comments:

20. Ar Lamp batch discharges preclude the 30 day limit.

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

RCC Fab AV TW T & L Ar Lamp

9. Did the Control Authority's enforcement action result in the IU achieving compliance? N/A N/A N/A Y²¹ Y²²
10. Is there a compliance schedule?
If yes: N N N N N
- Were there any compliance schedule violations? N/A N/A N/A N/A N/A
11. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)] N/A N/A N/A N/A N/A

During such evaluation for SNC, did the CA consider each of the following criteria?

- | | | | | | |
|------------------------------|----------|----------|----------|----------|----------|
| a. Chronic violations | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| b. TRC | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| c. Pass through/Interference | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| d. Spill/slug loads | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| e. Reporting | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| f. Compliance schedule | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| g. others (specify) | | | | | |

13. Was the SIU published for SNC?
Date of publication. N/A N/A N/A N/A N/A

Comments:

21. Tate & Lyle had personnel problems with their wastewater treatment operators; they have resolved the problems.
22. Arkansas Lamp made O&M changes to achieve compliance.

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Van Buren NPDES #: AR0021482
 Date of Audit: 06/15 - 18/09 Date entered into QNCR: 6-26-09

(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
NO	Other violations of concern that need attention	II

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.

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

Compliance Monitoring Type:

State: AR

- AFO Defined
- AFO Designation
- Aerial Photography
- Audit
- Audit (IU)

Compliance Monitoring Activity Name: City of Van Buren

If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:

Program System Acronym	Identifier	Linked Facility	Address	FRS ID
NPDES	AR00421482			

Compliance Monitoring Dates

Planned Start Date: 06/15/2009
Planned End Date: 06/18/2009

Actual Start Date: 06/15/2009
Actual End Date: 06/18/2009

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

- Programs:
- NPDES - Post Administrative Penalty Case (Settlement)
 - NPDES - Pretreatment
 - NPDES - Sanitary Sewer Overflow (SSO)
 - NPDES - Section 308 Information Requests
 - NPDES - Sludge/Biosolids

State Statute:

- Compliance Monitoring Action Reason:
- Agency Priority
 - Citizen Complaint/Tip
 - Core Program
 - For Cause
 - Random Inspection
- Compliance Monitoring Agency Type:
- State Contractor
 - State - Using Federal Credential
 - State
 - Regional
 - Other Federal
- Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: No

Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State

If Joint, what was the purpose of the participation of the other party?

Which party had the lead?

Government Contacts

Affiliation Type	First Name	Last Name	Phone	Office	Organization
------------------	------------	-----------	-------	--------	--------------

SIC Codes: 4952 Sewerage Systems

NAICS Codes:

- OECA National Priority:
- 2009 - (CA Only) - Air Toxics - Flares
 - 2009 - (CA Only) - Air Toxics - LDAR
 - 2009 - (CA Only) - Air Toxics - Surface Coating
 - 2009 - (CA Only) - Financial Assurance
 - 2009 - (CA Only) - MP - Mining

- Regional Priority:
- 2009 - Region 06 - Air Toxics Major Sources (O & G)
 - 2009 - Region 06 - Brine Spills from Oil & Gas Operations
 - 2009 - Region 06 - CD Implementation
 - 2009 - Region 06 - Minor Wastewater Collection & Treatment System
 - 2009 - Region 06 - Petroleum Refining

Media Monitored

Media Monitored:

Compliance Monitoring Media Indicator

Multimedia Indicator:

Compliance Monitoring Information

Number of Days Physically Conducting Activity: 4

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome: No Violations

Compliance Monitoring Rating Code: Satisfactory

Compliance Monitoring Comments

Compliance Monitoring Comments: 001: Non-Significant Industry Site Visit Conducted
006: Significant Industries Site Visits Conducted

User Defined Fields

1:



Special Programs
Pretreatment

Significant Industrial Users (SIUs)

SIUs : 8
 SIUs Without Control Mechanism : 0
 SIUs Not Inspected : 0
 SIUs Not Sampled : 0
 SIUs in SNC with Pretreatment Standards : 0
 SIUs in SNC with Reporting Requirements : 0
 SIUs in SNC with Pretreatment Schedule : 0
 SIUs in SNC Published in Newspaper : 0
 SIUs on Schedules : 0
 Violation Notices Issued to SIUs : 11
 Administrative Orders Issued to SIUs : 0
 Civil Suits Filed Against SIUs : 0
 Criminal Suits Filed Against SIUs : 0

Local Limits

Date of Most Recent Technical Evaluation for Local Limits : 02/25/2009
 Date of Most Recent Adoption of Technically Based Local Limits : 01/27/1997
 Local Limit Pollutants : BOD & TSS

Removal Credits

Removal Credits Application Status : Not Applicable
 Date of Most Recent Removal Credits Approval :
 Removal Credits :

Categorical Industrial Users (CIUs)

CIUs : 3
 CIUs in SNC : 0

Penalties

Dollar Amount of Penalties Collected : \$ 0
 Industrial Users (IUs) from which Penalties have been collected : 0

Other Information

SUO Reference : 6-1990
 SUO Date : 01/27/1992
 Annual Pretreatment Budget : \$
 Pass-Through/Interference Indicator :
 Violation of IU Schedule for Remedial Measures : No
 Formal Response to Violation of IU Schedule for Remedial Measures :

Acceptance of Waste

Acceptance of Hazardous Waste : No
 Acceptance of Non-Hazardous Industrial Waste : No
 Acceptance of Hauled Domestic Wastes : No

Deficiencies

Deficiencies Identified During IU File Review : No
 Control Mechanism Deficiencies : No
 Legal Authority Deficiencies : No
 Deficiencies in Data Management and Public Participation : No
 Deficiencies in Interpretation and Application of Pretreatment Standards : No
 Inadequacy of Sampling and Inspections : No
 Adequacy of Pretreatment Resources : Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling : 4
 Annual Frequency of Effluent Toxicant Sampling : 4
 Annual Frequency of Sludge Toxicant Sampling : 1

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Van Buren NPDES #: AR0021482

Name, address and phone number of industry:

Car Wash near 2220 Fayetteville Road across from Wal-Mart

Type of industry: Car Wash

Date/Time of visit: June 15, 2009 @ 3:15 pm

Industry contacts: (Not Applicable)

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

Additional comments:

1. The City is currently investigating this facility as a point source for copper and zinc. The City may designate this facility as a Non-Significant Industrial User. This facility may be covered under a General Permit with a BMP to control metals (copper and zinc).

Visit conducted by: Torrence/Hill Date: 6-25-09


 (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: Car Wash

Additional comments:

The auditor did not do a file review on this "IU" because the city currently do not permit car washes.

If the City finds that Car Washes are "point sources", the City may wish to require additional pretreatment equipment to implement BMPs as a requirement for coverage under a "general permit". The City may elect to monitor the car washes for copper and zinc for the first permit cycle before allowing BMPs only. The monitoring during the first permit cycle can establish a baseline for the North plant headworks concentrations for copper and zinc. If the headworks concentrations start to increase after the City switches to BMPs only, the City may elect to monitor for copper and zinc again.

Visit conducted by: Torrence/Hill Date: 6-25-09


(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: *6-17-09 @ 10:30 am*

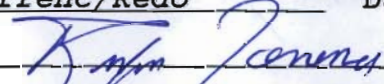
Industry contacts: *James Moreland, Owner & Mgr*
Tony Jester, Assistant Plant Mgr

	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:

River City Coating has a 2 stage iron phosphatizing operation. They perform electrostatic powder coat painting.

Visit conducted by: Torrenc/Redo Date: 6-25-09



(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:

River City Coatings (RCC) spill prevention plan centers around plugging a drain in the event of a spill. RCC inadvertently installed a piece of equipment over the access to the plug. RCC plans to install a valve instead.

RCC should consider an inherent spill plan that does not require manual intervention. For example, pumping all wastewater to holding tanks then purposely emptying the tanks to the POTW.

Visit conducted by: Torrence/Redo Date: 6-25-09



(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: *6/17/09 @ 9:05 am*

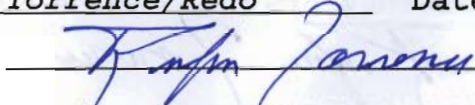
Industry contacts: *Myron Kirksey, V-P & Owner*
Kevin Treece, President & Owner

	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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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:

FabTech buys steel and aluminum sheet material. The facility has a 5 stage phosphatizing operation with electrostatic powder coating.

Visit conducted by: Torrence/Redo Date: 6-25-09



 (signature of auditor conducting visit)

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

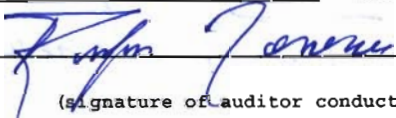
Control Authority: City of Van Buren NPDES #: AR0021482

Industry name: Fab-Tech, Inc.

Additional comments:

Due to the slow down in the economy FabTech is currently operating with a "skeleton" crew (18 employees) and production is significantly down.

Visit conducted by: Torrence/Redo Date: 6-25-09



(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: *6/17/09 @ 8:10 am*

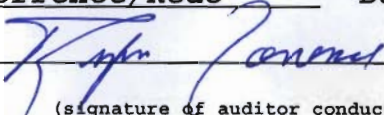
Industry contacts: *Bob Null - President & Kim Merechka*

	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:

Ark Lamp manufactures lamps and shades for hospitality and residential use. The facility has a three stage phosphatizing operation with powder coating.

Visit conducted by: Torrence/Redo Date: 6-25-09



(signature of auditor conducting visit)

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

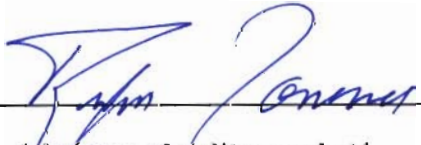
Control Authority: City of Van Buren NPDES #: AR0021482

Industry name: Arkansas Lamp Manufacturing Co.

Additional comments:

Arkansas Lamp currently has 63 employees.

Visit conducted by: Torrence/Redo Date: 6-25-09



(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 Valley TWA, Inc. 121 Access Road at Exit 5 off I-40

Type of industry: Truck Wash

Date/Time of visit: 6/17/09 @ 9:45 am

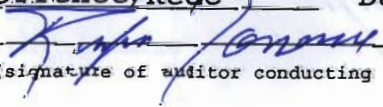
Industry contacts: Brian Taylor, Owner and Manager

	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?	<u>1</u>	<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 type="checkbox"/>	<input checked="" 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"/>

Additional comments:

1. Treatment consists of gravity separation in a baffled bay pit and an S-shaped 1500 gallon pit outside.

Visit conducted by: Torrence/Redc Date: 6-25-09


(signature of auditor conducting visit)

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

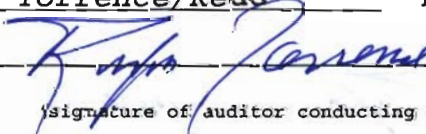
Control Authority: City of Van Buren NPDES #: AR0021482

Industry name: Arkansas Valley TWA, Inc

Additional comments:

The City may elect to include this IU under a General Permit with Car Washes.

Visit conducted by: Torrence/Redo Date: 6-25-09


(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:

Tate & Lyle / 610 S 28th Street / (479) 474-5241

Type of industry: Wet Corn Mill

Date/Time of visit: 6/17/09 @ 8:30 am

Industry contacts: Randall Cook, Plant Manager

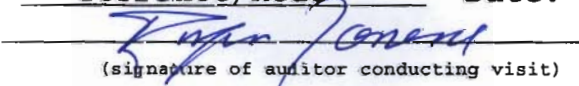
	Yes	No	N/A
1. Significant industrial user?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Classified correctly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Pretreatment equipment or procedures?	<input checked="" type="checkbox"/>	<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 type="checkbox"/>	<input checked="" type="checkbox"/>
6. Proper solid waste disposal?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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"/>

Additional comments:

T & L modifies starch by removing the fats and proteins; the process uses propylene oxide and alcohol.

This facility has an extensive treatment system which consists of stills, equalization tank (160,000 gal cap), aeration basin (216,000 gal cap) and a clarifier (23,000 gal cap). The plant discharges about 45,000 gallons each day.

Visit conducted by: Torrence/Redo Date: 6-25-09


(signature of auditor conducting visit)

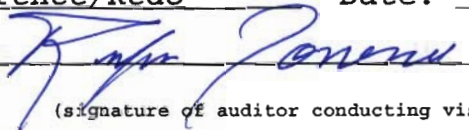
PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: _____ NPDES #: _____

Industry name: _____

Additional comments:

Visit conducted by: Torrence/Redo Date: 6-25-09


(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:

Simmons Food, Inc / 810 South 28th St / (479) 471-5511

Type of industry: *Food Processor*

Date/Time of visit: *6-17-2009 @ 12:40*

Industry contacts: *Tony Holderfield, Maint Manager*

	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>1</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:

Simmons receives chicken parts for cooking and packaging.

1. Simmons has one DAF and two 250,000 gallon equalization tanks (with aeration).

Visit conducted by: Torrence/Redo Date: 6-25-09


(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 Food, Inc.

Additional comments:

The auditor did not do a file review on Simmons. This audit focuses on "toxic" discharges since the City has pending limits for metals (copper and zinc). Since time was available, the auditor elected to visit Simmons after visiting six other facilities with potential toxic discharge.

Visit conducted by: Torrence/Redo

Date: 6-25-09


(signature of auditor conducting visit)

1
RCC

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
2806 Bryan Road
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

A-1/8

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).

INDUSTRIAL DISCHARGE PERMIT APPLICATION/
INDUSTRIAL BASELINE MONITORING REPORT

Instructions: Please complete this form in as much detail as possible. Include additional information on attached sheets as necessary. Refer to the supplemental instruction and return this report to the address shown in the instructions.

(1) Identifying information:

A. Legal name of Industry: River City Coatings
Mailing Address: 306 Sycamore St.
Van Buren Ar. Zip: 72956
Corporate Address: _____

B. Facility Name: _____
Location: _____
Zip: _____

C. Name of Owner(s): JAMES B. MORLAND

D. Facility Contact (provide the name, title & phone number of a designated person to contact if additional information is necessary.) JAMES B. MORLAND
President

E. Number of Full-Time Employees: 32 Number of Part-Time Employees _____
Number of Shifts 2

F. Number of Months/Year in Operation 10 yrs.
Number of days/week in operation 5 days

G. Provide the name of the publicly owned treatment works that receives the wastewater discharges from this facility (if this facility is not connected to a sewerage system describe where the wastewater is discharged.)
South Plant

H. Provide the date the facility began/will begin discharging to the publicly owned treatment works (sewage authority, municipality, etc.)
Date facility began operation Sept. 10, 1997

A-3/8

(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>
Industrial Permit	VB 721-22	Van Buren	9-18-2007

(3) Description of Operations: Powder Coating

A. List raw Materials Used: cold roll steel, zinc, aluminum

B. List Chemicals Used: liquid low temperature cleaner / Iron-Phosphate - used at 2-3% concentration with water.
 Phosphoric Acid, Sodium Hydroxide 2-Butoxyethanol
 Hydrogen Fluoride - See attached.

C. Describe Manufacturing of Service Activities Conducted and the Final Products: Substrate parts are placed or hung on a moving line that moves through a spray washer that ~~applies~~ the above chemicals make up the part Deger. The part then moves to a paint booth where powdered paint is applied. It moves on to a bake oven where the paint is cured. the part is then removed from the line and is packed as a completed Service.

D. Summarize each Regulated Process: See above

<u>Process Description</u>	<u>Production Rate</u>	<u>Pretreatment Standard</u>		<u>SIC Code</u>
		<u>Category</u>	<u>Subpart</u>	
Electrostatic Powder Coating	Fluctuates	Electrostatic	433	1721
		Powder Coating		
		Steel, Aluminum, Zinc		

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 1776 Maximum _____
 Disclosure of time and duration of discharges: Steady flow on Rinse

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

	Average Flow	Maximum Flow	Type of Discharge
Regulated Process	Rate (gpd)	Rate (gpd)	(Batch, etc.)
<i>Wash System</i>	<i>UNKNOWN</i>		

	Average Flow	Maximum Flow	Type of Discharge
Unregulated Process	Rate (gpd)	Rate (gpd)	(Batch, etc.)
<i>Sanitation</i>	<i>UNKNOWN</i>		

Cooling water			
Sanitary wastewater			

(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: Electrostatic Wash

Pollutant (mg/L)	Cadmium	Chromium	Copper	Lead	Nickel	Silver	Zinc	Cyanide	Total Organic
Maximum	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Average									

Sample

Location: 366 Sycamore St. Van Buren, AR.

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)									
------------------	--	--	--	--	--	--	--	--	--

eff finishing
 CFR 433
 Uses Contract
 Lab for
 Analysis

0.1 +
 Gross
 50

MEC*									
AEC*									
AMMC*									
AAAC*									

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 James Morland, President
 Signature James B. Morland Date 10-19-07

(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?:
All chemicals barrels surrounded by holding vat type tanks

(b) Do you offer employee training about pollution prevention? If so, what kinds of opportunities do you offer? If for some reason there should be a spill, the chemicals will be contained by sand & the employees

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

Have been instructed to call - Signs have been posted giving information with telephone numbers and who to contact.

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

See Attached

(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.

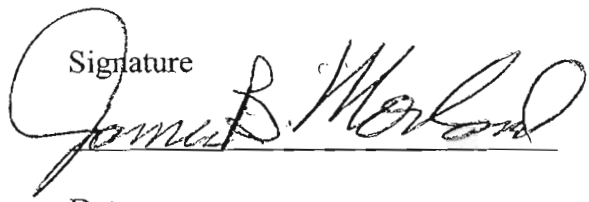
B. Signatory Requirement:

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

James Morland

Signature



Official Title

President

Date

10-17-07

RCC

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

Gary Smith
Director

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)

B-1/25

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: 12-3-07

B-2/25

TABLE OF CONTENTS

		<u>Page</u>
Article I	Definitions	5
Article II	General Conditions	5
Article III	Special Conditions	9
Article IV	Costs & Charges	10
Article V	Reporting & Monitoring	11
Article VI	Implementation Schedule	12
Article VII	Penalties	14
Article VIII	Appeal	14
Article IX	Permit Modification	14
Article X	Transfer	15
Article XI	Revocation	15
Article XII	Reissue of Permits	15
Article XIII	Publication	15
Article XIV	Self Monitoring Requirements	15A,B
Exhibit A	Definitions	17
Exhibit B	Sampling Station Specifications	20
Exhibit C	Reporting Form & Instructions	21-23
Exhibit D	Legal Notice	24
Exhibit E	Fact Sheet	25

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)

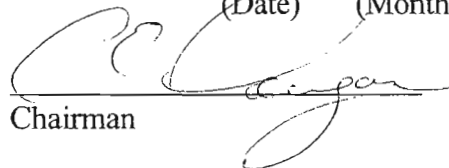
to the Van Buren Wastewater Treatment Facilities in accordance with the following conditions.

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, 2007
(Date)

This Permit and Authorization to discharge shall expire at Midnight, September 18, 2010
(Date)

Signed this 13th of November, 2007.
(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.

B-4/25

PAGE 5

PERMIT #VB 1721-22

I. DEFINITIONS

Unless the contest clearly indicates otherwise, the meaning of terms of 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 Director. 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;

B-5/25

PAGE 6

PERMIT #VB 1721-22

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 Director 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 Director of such change.

B-6/25

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

The failure to request such permission through the Director 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.

B-7/25

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.

B-8/25

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 Director 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

B-9/25

the Department through the IU Slug Control Plan checklist. **This plan was submitted August 2, 2006 and is on file with the VBMU.**

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.

B-10/25

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 Director. 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 Director 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 Director 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 Director.

B- 11/25

d. The permittee shall analyze any samples as may be required by the Director 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 Director.

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-12/25

b) Pretreatment

The permittee shall achieve compliance with the final effluent limitations (as specified in Tables 1 & 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.

B-13/25

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 Director must be given for any change in actual or majority change or corporate ownership.

XI. REVOCATION

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.

B-17/25

XIV. SELF MONITORING REQUIREMENTS
 Dischargee shall be limited and monitored by permittee as specified below:

Parameter	Maximum	Monitoring Requirements		Sample Type
	Discharge Limitations*	Measuring Frequency**	In conjunction with self-monitoring	
Flow	.005 MGD			water meter
pH	<u>5.0 - 11.0 S.U.</u>	<u>1/30 days</u>	<u>1/30 days</u>	Grab samples (4/24 hrs)
Temperature	<u>40 C</u>	<u>1/30 days</u>	<u>1/30 days</u>	Grab Samples (4/24 hrs)
BOD	<u>12.51 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24 hr. Composite
Total Suspended Solids	<u>12.51 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24 hr. Composite
Oil and Grease	<u>100 mg/L</u>	<u>1/180 days</u>	<u>1/180 days</u>	4Grabs/24hrs
Cadmium	<u>0.003 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24hr. Composite
Chromium	<u>0.071 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24hr. Composite
Copper	<u>0.086 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24hr. Composite
Lead	<u>0.018 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24hr. Composite
Nickel	<u>0.099 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24hr. Composite
Silver	<u>0.010 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24hr. Composite
Zinc	<u>0.062 lbs/day</u>	<u>1/180 days</u>	<u>1/180 days</u>	24hr. Composite
Cyanide, total	<u>0.65 mg/L</u>	<u>1/180 days</u>	<u>1/180 days</u>	4Grabs/24hrs.
Total Toxic Organics+	<u>2.13 mg/L</u>	<u>1/180days+</u>	<u>1/180days+</u>	4Grabs/24hrs

*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.
 +TTO exemption possible if: (1) Solvent Management Plan submitted & approved by authority and (2) TTO Certification Statement submitted 1/180 days

B-18/25

EXHIBIT A
DEFINITIONS

1. BOD₅, 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. DIRECTOR shall mean the Director 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.

B-19/25

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-20/25

- 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 shall be cleaned out periodically to prevent false test results from sludge accumulations in lines.

B-22/25

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.

B-23/25

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:	$0.07 \text{ mg/L} * 8.34 \text{ lbs/gal.} * 0.005 \text{ MGD} = 0.003 \text{ lbs/day}$
Chromium:	$1.71 \text{ mg/L} * 8.34 \text{ lbs/gal.} * 0.005 \text{ MGD} = 0.071 \text{ lbs/day}$
Copper:	$2.07 \text{ mg/L} * 8.34 \text{ lbs/gal.} * 0.005 \text{ MGD} = 0.086 \text{ lbs/day}$
Lead:	$0.43 \text{ mg/L} * 8.34 \text{ lbs/gal.} * 0.005 \text{ MGD} = 0.018 \text{ lbs/day}$
Nickel:	$2.38 \text{ mg/L} * 8.34 \text{ lbs/gal.} * 0.005 \text{ MGD} = 0.099 \text{ lbs/day}$
Silver:	$0.24 \text{ mg/L} * 8.34 \text{ lbs/gal.} * 0.005 \text{ MGD} = 0.010 \text{ lbs/day}$
Zinc:	$1.48 \text{ mg/L} * 8.34 \text{ lbs/gal.} * 0.005 \text{ MGD} = 0.062 \text{ lbs/day}$
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

R-25/25

I. DEFINITIONS

Unless the context clearly indicates otherwise, the meaning of terms of abbreviations used in this discharge permit shall be as 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 #3-1997, #6-1990, and #3-1991, 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 Director. In no case shall new connections, 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;

C-1/3

FACT SHEET

Employees: Full time-29; one shift.

Facility: In operation 12 months; 5 days/week. Began operation 1992. Owner: Tim Wise

Process: Pre-(electrostatic) paint wash of sheet metal (steel, aluminum, stainless steel) parts (SIC Code #3400; Pretreatment Standard Category #433) & fabrication.

Average daily discharge: **216 gpd** (as per permit application). Regulated waste stream only (sanitary lines are separate)

Chemicals on site: Paints & paint additives; Oakite dynadet, oakite Crysoat 747, Oakite Ultrasol MSDS sheets on file

Flow 5,000 gpd based on similar categorical industry with electrostatic painting of metal parts (mostly carbon steel). 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: Shall not exceed 5 – 40°C at the headworks of the waste water treatment plant as per Van Buren Pretreatment Ordinance #VB3-1997

Oil & Grease: maximum of 100 mg/L as per Van Buren Pretreatment Ordinance #VB3-1997;

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 (no testing necessary due to absence in wastewater of like industries---submit TTO certification statement twice per year)

C-2/3

XIV. SELF MONITORING REQUIREMENTS

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

TABLE I
PERMIT NO. VB 3400-26

Parameter	Monitoring Requirements		
	Maximum Discharge Limitations*	Measuring Frequency	Sample Type
Flow	0.003 MGD	continuous	Flow Measurement
pH	5.0 - 11.0 S.U.	Daily	4 grabs/24 hours
Temperature	Max. 40°C (at WWTP headworks)	Daily	4 grabs/24 hours
	Daily/Maximum/Maximum Monthly (mg/L)		
BOD ₅	12.51 lbs/day	1X/6 months	24 hr. Time Comp.
Total Suspended Solids	12.51 lbs/day	1X/6 months	24 hr. Time Comp.
Oil & Grease	100 mg/L	1X/6 months	4 Grabs/24 hours
Cadmium	0.003 lbs/day	1X/6 months	24 hr. Time Comp.
Chromium	0.071 lbs/day	1X/6 months	24 hr. Time Comp.
Copper	0.086 lbs/day	1X/6 months	24 hr. Time Comp.
Lead	0.018 lbs/day	1X/6 months	24 hr. Time Comp.
Nickel	0.099 lbs/day	1X/6 months	24 hr. Time Comp.
Silver	0.010 lbs/day	1X/6 months	24 hr. Time Comp.
Zinc	0.062 lbs/day	1X/6 months	4 Grab/24 hours
Cyanide, Total	0.65 mg/L	1X/6 months	4 Grabs / 24 hours
Total Toxic Organics	2.13	certification statement++	submit in June & December

*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)

Minimum Data Reported shall include the Lowest; Highest; and Average of all Samples analyzed for the month.

*Self-monitoring reports & Certification Statements shall be submitted semi-annually in June and December.

++ TTO Monitoring waived upon receipt of Toxic Organic Management Plan (TOMP)

C-3/3

FACT SHEET

Flow 5,000 gallons per day based on similar categorical industry with electrostatic painting of metal parts (mostly carbon steel; some zinc and aluminum). Mass permit parameters based on 5,000 gpd discharge and 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

(Previous year discharge total = 15,000 gallons)

D-1/2

TABLE II

XIV. SELF MONITORING REQUIREMENTS

PERMIT NO. VB 1721-29

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	.005 MGD	batch	As measured and logged
pH	5.0 - 11.0 S.U.	1/month	Grab samples (4/24 hrs)*
Temperature	40°C	1/month	Grab Samples (4/24 hrs)*
	Daily Maximum/Maximum Monthly (mg/L)		
Cadmium	0.11/0.07	2X/year	24 hr. Composite
Chromium	2.77/1.71	2X/year	24hr. Composite
Copper	3.38/2.07	2X/year	24hr. Composite
Lead	0.69/0.43	2X/year	24hr. Composite
Nickel	3.98/2.38	2X/year	24hr. Composite
Silver	0.43/0.24	2X/year	24hr. Composite
Zinc	2.61/1.48	2X/year	24hr. Composite
Cyanide, total	1.20/0.65	2X/year	4 Grabs/24 hours*
Total Toxic Organics	2.13	2X/year++	4 Grabs/24 hours*

*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) One grab sample shall substitute for 4 grabs/24 hrs. due to batch type discharge.

** Self-monitoring reports shall be submitted twice per year.

Minimum Data Reported shall include the Lowest; Highest; and Average of all Samples analyzed for the month.

++ TTO Monitoring waived upon receipt of Toxic Organic Management Plan (TOMP)

D-2/2

Fact Sheet* (data based on Jan.-Dec. 2006)

Average BOD.....299 mg/L; Maximum (monthly)BOD.....803 mg/L
(299 mg/L)(8.34 lbs/gallon)(.053 MGD[max.ave.flow])(1.25**) = 165 lbs/day

Average TSS.....322 mg/L; Maximum TSS.....902 mg/L
(322 mg/L)(8.34 lbs/gallon)(.051 MGD)(1.25**) = 178 lbs/day

Average Daily Flow = 0.047 mgd; Safety factor 1.25 X 0.047 = 0.059 MGD

(Continuous discharge, 24 hrs/day, 365 days/year except during scheduled maintenance. 28 full-time employees; 2 shifts. Average daily flow = 47,000gpd)

*The data used for average numbers reflects the maximum of the monthly averages submitted by **Tate & Lyle** in the permit application.

**1.25 is the factor used to represent a 25% safety factor for industrial growth, etc.

Waste water discharge consists of approximately 45% process waste (equalized & treated); 9% seal water; 2% Boiler blow down; 42 % cooling tower water; and 2% sanitary waste water

FINDINGS

Current discharge parameters are set as follows:

Flow.....0.080 MGD.....measured continuously
pH5.0-11.0 s.u.....checked once every 7 days
Temperature.....maximum of 40° Centigrade...once/7 days
BOD₅.....200 lbs/day.....tested once every 7 days
TSS.....200 lbs/day.....tested daily

Due to the leniency of the current maximum allowable discharge loadings all parameters and measuring frequencies will remain the same.

E-1/1

VAN BUREN MUNICIPAL UTILITIES

PROVIDING WATER, SEWER AND SOLID WASTE SERVICES

2806 BRYAN ROAD
PO DRAWER 1269

GARY SMITH, MANAGER

(479) 474-5067
FAX (479) 471-8969

July 29, 2008

River City Coatings
306 Sycamore
Van Buren, Arkansas 72956

Re: Permit #VB1721-22

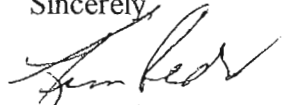
Dear Mr. Morland:

Enclosed please find a copy of the annual Pretreatment Compliance Inspection report. This inspection was conducted July 21, 2008. The following points were noted.

1. A new clean/rinse tank system was installed late in 2007. Higher capacity. This has stainless steel tanks (no rusting--no leaks). The 1st tank is a clean tank. 2nd tank-rinse tank. 3rd tank-Iron phosphate bath--etcher--gives coating protection--rust inhibitors & some cleaner. 4th tank-rinse tank. 5th tank--rinse and/or can change contents to make it a sealer. All tanks are piped to the city sewer but not all are discharged.
2. Chemical drum (55 gallons) is stored inside a larger drum.
3. No other changes to plumbing schematic have occurred since the last inspection.

We find River City Coatings to be in compliance with all applicable pretreatment rules and regulations at this time.

Sincerely,



Kim Redo
Environmental Coordinator

F-1/6

Vehicle and Equipment Washwater Discharges

Best Management Practices Manual

Washington State Department of Ecology
Water Quality Program
Program Development Services Section
P.O. Box 47600
Olympia, WA 98504-7600

G-2/3

PRETREATMENT COMPLIANCE INSPECTION IU SITE VISIT FORM

Name of Industry: River City Coatings Permit Number: VB1721-22

Address: 306 Sycamore Street POTW Name: South Plant

Date & Time of Visit: July 21, 2008 @ 2:00 P.M.

Last inspection: August 22, 2007

Industry Contact(s), Position: Tony Jester, Assistant Plant Manager

Description of Manufacturing Process: washing of metal (steel, aluminum, and some Cu) parts in liquid phosphatizer for spray wash system and powder coating & assembly

Sources of Process Wastewater: rinse tank only.

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: Alkali cleaner, phosphate, FePO₄, SpectraLink & Duraseal. Plug-if a spill, they cap the main line to contain then sandbag to keep spill in plant. Call Safety Kleen to clean up the rest. (Not happened to date.)

Sampling location & equipment: clean out behind shop on southwest corner of building

* TOMP submitted & received Oct. 6, 2006

SLUDGE: on June 19, 2007 Safety Kleen pumped this out completely. In house personnel used a power washer to wash down the sides of the tanks.

4 chemical used: Duraseal (fluorozirconic & hydrofluoric acids); Spectralink-proprietary (alcohol); Secure 2111 – Iron phosphatizer (PO₄, Ammonium Soln.); Alkali cleaner in stage 1 – Na₄Pyrophosphate, Ethanol

INSPECTION REPORT

INSPECTION OF LABORATORY/RECORDS

1. Records & reports for analysis and monitoring maintained for three (3) years? YES
2. Records of lab equipment calibration and maintenance? n/a
3. Pass on-site visual inspection of lab equipment calibration? n/a
4. Records of Analytical Methods & Techniques used? yes*
5. Approved Analytical Testing procedures used? yes*
6. Records of analysis date & time performed? yes*
7. Records of individual performing analysis? yes*
8. Record of sampling date, time, & location? yes*
9. Parameters and sampling frequency agree with permit? yes*

10. Parameters other than those required by permit analyzed? No
11. Monitoring and analysis being performed more frequently than required by permit? no
12. Calculation of analysis satisfactory? Yes
13. Are duplicate samples analyzed? yes
14. Is a private laboratory used? yes*
15. Are analytical results consistent with self-monitoring reports? yes*
16. If a private lab is used, do the monthly reports agree with the laboratory reports?
If no, list details: yes

*ChemLab of Fort Smith used for permit testing requirements

*Using pH strips for in-house operations control

F-3/8

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? yes
21. If discharge loading has changed list causative factor: increased production
there are 2 rinse tanks on this new system...to rinse alkali & phosphates from metals
22. Has discharge loading impacted P.O.T.W.? (Interference, Pass-Through, Collection system blockage, Safety, etc.) unknown
23. Has permittee exceeded effluent limits (BOD, TSS, pH, Oil & Grease, metals, etc.) since last inspection? List cause(s) no
-
24. Has permittee followed due procedure in responding to exceeding permit limits? (i.e. notification by phone, letter detailing excursion & follow-up plan, etc.) n/a
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? yes
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

F-4/6

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:
They have a plug for the drain line. They would immediately pull drain cover off & plug the hole to keep any spill in the building. If necessary they can call Safety Kleen to clean up a spill.
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
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?
Safety Clean. Clean out varies—at least once per year. They are getting close to having this done.
10. Sludge hauling documented by manifest? Invoices
11. Type of flow measuring device? City meter (usage only)
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

F-5/6

INSPECTION OF "CHEMICAL STORAGE & PRODUCTION AREA"

1. Are there any chemicals stored near floor drains? If yes, list details below: _____

all clean/air tanks located above drain troughs that go to sewer.

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.? yes

one in office, on wall by paint booth, & in plant opposite office (by 7 line clock)

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.?)

went to 5 stage process with chemicals for that system
plumbing is same; discharge is same

POLLUTION PREVENTION

1. Is the discharger aware of Pollution Prevention? yes

2. What measures, if any, have been taken to reduce the pollutants discharged into the municipal sewer? no

MISCELLANEOUS

1. Does the permittee have any questions regarding current or past actions of the VBMU in the pretreatment program? no

2. Does the permittee have any questions regarding the local pretreatment program, rules, regulations, etc.? no

Inspector Kim Bede Date & Time 7/21/08 2:30PM

Industry Representative [Signature] Date/Time 7/21/08

Comment Area:




Vehicle and Equipment Washwater Discharges

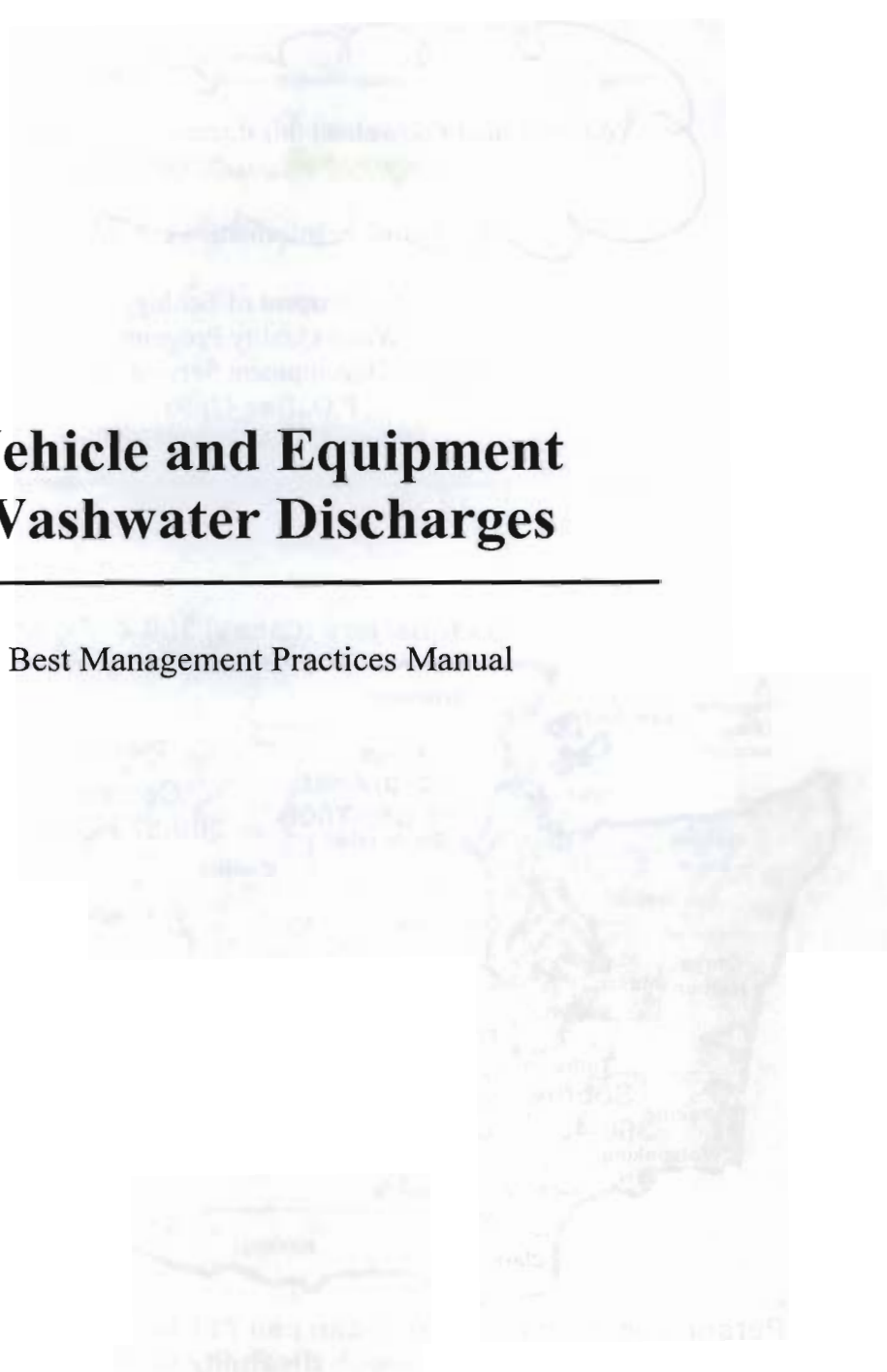
Best Management Practices Manual



June 1995 (Revised 9/2007)
Publication WQ-R-95-56

 Please recycle

G-1/3



Vehicle and Equipment Washwater Discharges

Best Management Practices Manual

Washington State Department of Ecology
Water Quality Program
Program Development Services Section
P.O. Box 47600
Olympia, WA 98504-7600

G-2/3

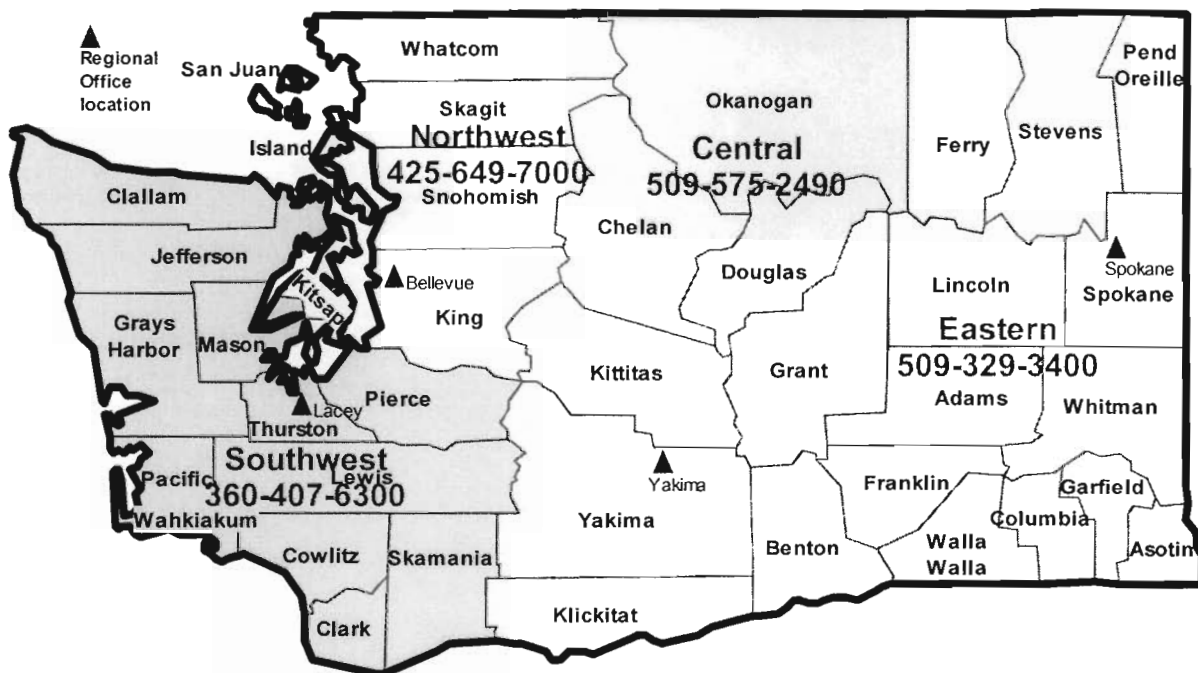
You can print or download this document from our website at:

<http://www.ecy.wa.gov/biblio/95056.html>

For more information contact:

Department of Ecology
Water Quality Program
Program Development Services Section
P.O. Box 47696
Olympia, WA 98504-7696

Headquarters (Lacey) 360-407-6000



Persons with a hearing loss can call 711 for Washington Relay Service.
Persons with a speech disability can call 877-833-6341.

If you need this publication in an alternate format, please call the Water Quality Program at 360.407.6401. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

G-3/3

Torrence, Rufus

From: Gilliam, Allen
Sent: Wednesday, January 14, 2009 1:44 PM
To: Fuller, Kim; Torrence, Rufus; Bailey, John
Subject: inf/eff "ND" reporting

Does the below parallel with what's in our CPP and what our permit writers may be expected to do? Comments PLEASE before I send this out.

Thx, Allen g

Dear Pretreatment Professionals:

As previously mentioned, this guidance is submitted with some explanation and examples (see attached) of reporting your effluent results (for your influent values, you may place whatever numbers or "ND" your lab may supply you. Hopefully you are also using the same methods as the used for the effluent samples for more accurate removal efficiencies.).

Our NPDES permit writers have the option to use your effluent values in calculating your "reasonable potential to exceed WQ criteria".

The below footnoted #s are denoted in red with the examples on the attached:

- 1) If you have a detectable level of an analyte, obviously report that number (in ug/l)
- 2) If you have a non-detect value AT or BELOW the EPA required MQL, you may report "0".
- 3) If you have a non-detect value ABOVE the EPA required MQL, please report "ND*" with that asterisk denoting at what MQL the analyte was not detected at.

Keep in mind if your lab cannot achieve the required MQL and you report "ND*", an NPDES permit writer may take this "ND*" at its numeric value in calculating your reasonable potential for exceeding a WQ criteria. It is in your best interest to achieve these MQLs especially if you are discharging into an intermittent stream as the WQ criteria will be applicable at the "end of pipe" of your outfall (the most stringent case).

See attachment for examples. Questions? Please feel free to contact this office with any questions or comments,

Thank you for your cooperation,

Allen Gilliam
State Pretreatment Coordinator
501.682.0625

H- 1/1

Brake linings and tires source of major toxic emissions

28.08.2007 - (idw) Schwedischer Forschungsrat - The Swedish Research Council

Particles from the wear of brake linings and tires are still a major source of emissions of toxic metals. Researchers at the University of Kalmar in Sweden have studied city traffic in Stockholm and found that the emission of toxic metals has not decreased appreciably despite major environmental efforts by automakers. Considering the ban on lead in vehicle fuel and the debate about the climate impact of carbon dioxide emissions from transportation, it is easy to imagine that fuel is one of the major sources of pollution from vehicle traffic.

"What you seldom think about is the huge amounts of brake linings and tires that are worn out in traffic and the fact that these products contain considerable amounts metals," says David Hjortenkrans, one of the scientists at the University of Kalmar in Sweden who performed the study.

Despite the fact that authorities have regulated the metal content of auto parts and the fact that the auto industry has tried to make improvements, brake linings and tires are still among the major sources of metals in urban environments.

The study compares estimated metal emissions from brake linings and tires for the years 1995/1998 and 2005. **The release of copper and zinc from brake linings has remained unchanged over this period.**

"It is gratifying to see that efforts to remove cadmium and lead from auto products have yielded results, with decreased emissions as a result," says Professor Bo Bergbäck.

It was also shown that there are now large quantities of the metal antimony in brake linings, which is among the newer metals whose use has increased in society in the last few years (cf. the element platinum in catalytic converters). It was also revealed that, despite their lower metal content, tires are one of the major sources of zinc and cadmium in cities.

The study, published in one of the journals of the American Chemical Society, Environmental Science & Technology, has created quite a stir, above all in the United States.

"The study presents findings that are not entirely favorable for a nation that has the highest number of vehicles registered per inhabitant in the world," says David Hjortenkrans. More stringent control of emissions might substantially hamper the mobility of many people.

David Hjortenkrans, phone: +46-480 446 227, or Bo Bergbäck, phone: +46-480 446 245; cell phone: +46-70 653 01 78.

I-1/1

VAN BUREN INDUSTRIAL WASTE PRE-TREATMENT SYSTEM
DISCHARGE MONITORING REPORT

NAME River City Castings
ADDRESS 326 Squanville

(2)

NOTE: Read instructions before filling out form.

PERMIT NUMBER

(3)

FACILITY
LOCATION Van Buren

MONITORING PERIOD						
YEAR	MO	DAY	TO	YEAR	MO	DAY
09	02	16		09	02	17

(1) FROM

PARAMETER (4)	QUALITY OR CONCENTRATION				FREQUENCY OF ANALYSIS (7)	SAMPLE TYPE (8)
	(5) MINIMUM	(5) AVERAGE	(5) MAXIMUM	(6) UNITS		
Cadmium		<0.002				
Chromium		<0.017				
Copper		0.029				
Lead		<0.023				
Nickel		0.093				
Silver		0.004				
Zinc		0.106				
TSS		11.7				
Bod		15.6				
Cyanide		<0.020				
pH		38.6				
Temp		34.1				

TITLE PRINCIPAL EXECUTIVE OFFICER
Tony L. JESTER

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.

Tony L. Jester
Signature of Principal Executive Officer

Telephone Number 471-7675

TYPED OR PRINTED (9)

EFFLUENT WASTE WATER MONITORING REPORT

NAME: River City Coating

MONTH: April

Date	Cadmium	Chromium	Copper	Lead	Nickel	Silver	Zinc	TSS	Bod 5-day
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13	0.002	0.017	0.029	0.023	0.093	0.004	0.106	11.8	15.6
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									

Joey J. [Signature]

SIGNATURE:

Client-- River City

Date of Sample-- 02/16

Report Issued--

Date Received-- 02/17

PO Number--

Time Received-- 11:00 AM

Sample ID--

Collected From-- Outfall #001

Sample Phase--

Parameter	Concentration	Units	Collected By	Collected @ Date/Time	Analyzed By
Grab					
pH	7.13	SU	TD	02/16	TD
Temperature	31.8	deg Celcius	TD	02/16	TD
pH	7.45	SU	TD	02/16	TD
Temperature	33.4	deg Celcius	TD	02/16	TD
pH	8.12	SU	TD	02/17	TD
Temperature	28.6	deg Celcius	TD	02/17	TD
pH	7.76	SU	TD	02/17	TD
Temperature	31.9	deg Celcius	TD	02/17	TD
Oil & Grease	36.7	mg/L	TD	02/16	SG
Oil & Grease	37.5	mg/L	TD	02/16	SG
Oil & Grease	43.0	mg/L	TD	02/17	SG
Oil & Grease	37.1	mg/L	TD	02/17	SG
Cyanide	<0.020	mg/L	TD	02/16	JC
Cyanide	<0.020	mg/L	TD	02/16	JC
Cyanide	<0.020	mg/L	TD	02/17	JC
Cyanide	<0.020	mg/L	TD	02/17	JC
24 Hour Comp.					
BOD	15.6	mg/L	TD	02/17	DE
Total Suspended Solids	11.8	mg/L	TD	02/17	DE
Cadmium	<0.002	mg/L	TD	02/17	DE
Chromium	<0.017	mg/L	TD	02/17	DE
Copper	0.029	mg/L	TD	02/17	DE
Lead	<0.023	mg/L	TD	02/17	DE
Nickel	0.093	mg/L	TD	02/17	DE
Silver	0.004	mg/L	TD	02/17	DE
Zinc	0.106	mg/L	TD	02/17	DE

Handwritten signature and stamp:
 Compliance
 02/17

VAN BUREN WATER & SEWER CHAIN OF-CUSTODY RECORD

Industry Identification: River City Cooling
 Sample Number: RCC022008
 Sampler(s) Signature: [Signature]
 Set-Up Collection Date and Time: 2/20/08 @ 8:40 AM
 Take-Off Collection Date and Time: 2/21/08 @ 8:40 AM a.m./p.m.
 Grab Sample Collection Date and Time: see below @ _____ a.m./p.m.
 Location Sample Collected: Sample Cleanout behind building

Type of Sample: Grab Time Composite Flow Proportional Composite
 Composite Frequency: 15 min / 100 ml Draw
 Sample Iced During Composite: Yes No N/A
 Type of Event: Scheduled Non-Scheduled Demand
 Set-Up Flow Reading: 527724
 Take-Off Flow Reading: 528140 / 416 gallons

Sample Type	Preservative	Bottle Type	Parameters	Receiver	Relinquished By Signature Date-Time	Received By Signature	Destroyed Date-Time
<u>24 hr. Comp</u>	<u>Ice</u>	<u>P</u>	<u>BOD, TSS</u>	<u>WBMV Lab</u>			
<u>24 hr. Comp</u>	<u>HNO3</u>	<u>P</u>	<u>Cd, Cr, Cu, Pb, Ni, Zn, Ag</u>				
<u>* Grabs</u>	<u>NaOH</u>	<u>P</u>	<u>CN-</u>	<u>Amusement</u>	<u>2/20/08</u>		
<u>* Grabs</u>	<u>H2SO4</u>	<u>G</u>	<u>Oil & Grease</u>	<u>Intercept</u>	<u>2/20/08</u>		

Comments:

Grab #	Time (hrs)	pH (s.u.)	Temp (°C)
<u>RCC1</u>	<u>0845</u>	<u>8.76</u>	<u>21.2</u>
<u>RCC2</u>	<u>1450</u>	<u>9.37</u>	<u>30.3</u>
<u>RCC3</u>	<u>0900</u>	<u>9.29</u>	<u>27.6</u>

* Grabs
 To be composited
 prior to
 testing for
 CN- & Oil & Grease

Comp 9.27 s.u. @ 3.5°C

Spill Prevention and Solvent Management

Purpose

This document outlines methods of control to be exercised by Fab Tech personnel in order to prevent the accidental discharge of solvents into the municipal wastewater treatment system. It is part of an overall management plan to comply with municipal regulations and discharge permit.

Guidelines and Procedures

1. No solvents, paints, catalysts, oils, and/or mixtures thereof shall be disposed of through any drain.
2. All containers of chemicals shall be clearly identified with the name of the chemical or mixture.
3. Containers shall be visually inspected periodically to detect any leaking or seeping.

In case of accidental spill:

1. Contain the spill using a chemical absorption boom or similar material.
2. Locate the source of the spill and isolate if possible (i.e. close valve, right a knocked over drum, etc.).
3. If the spill has poured into the municipal waste system, notify the appropriate authority.
4. Clean up the spill for disposal or neutralize according to the manufacturer's instructions.
5. Evaluate the accident to prevent recurrence.

IU SLUG CONTROL PLAN REVIEW CHECKLIST FOR POTWS

The IU Slug Control Plan should be evaluated using the following requirements criteria and checking the appropriate column. A check in the "S" Column means the Plan satisfactorily meets the requirements; "U" means the Plan unsatisfactorily meets the requirements; "A" means that additional information is needed to determine if the requirement is being met; and "N/A" means the requirement is not applicable to the facility. The reviewer should use best engineering judgment in determining the adequateness of the Plan in meeting each requirement. Comments should be provided as appropriate.

	S	U	A	N/A
I. General Information				
Facility Name, Address, Contacts and Phone Numbers	✓			
Type of Business, Operating Schedule, Number of Employees	✓			
Daily Wastewater Discharge Flow Rates(s)	✓			
Applicable Categorical Standards	✓			
Previous Slugs				✓
Security and Warning Signs	✓			
Comments:				

II. Facility Layout and Flow Diagrams

General Layout of Facility Showing:

	S	U	A	N/A
Property Boundaries				✓
Entrance and Exit Routes				✓
Manufacturing Areas				✓
① Hazardous Materials Process & Storage Areas			✓	✓
② Waste Handling, Storage and Treatment Facilities	✓		✓	
Loading and Unloading Areas	✓			
Drainage Direction	✓			
Floor Drains, Pipes, and Channels and Drainage Destinations	✓			
Flow Diagram(s) Showing:				
Piping and Instrumentation	✓			
Flow Rates				✓
② Tanks and Capacities			✓	
Treatment Systems	✓			
Final Destinations of Flows	✓			
Comments:				

① only have acid for Acid wash tank
 ② small quantity

III. Hazardous Materials Data

	S	U	A	N/A
Hazardous Materials			✓	
Location			✓	/
Maximum Volume			✓	
Container Volume			✓	
Type of Container			✓	
Comments:				

N/A

IV. Slug Prevention Equipment and Procedures

Adequate Equipment in the Following Areas:

	S	U	A	N/A
Storage	✓		✓	
Loading/Unloading	✓		✓	
Process	✓		✓	
Treatment			✓	✓
Other Areas:				
Comments:				

	S	U	A	N/A
Adequate Procedures Including the Following:				
Inspections and Maintenance of Containers and Tanks	✓			
Inspections and Maintenance of Slug Prevention and Response Equipment	✓			
Inspections of Storage, Process, Loading and Unloading Areas	✓			
Proper Labeling	✓			
Other Procedures Needed:				
Comments:				

	S	U	A	N/A
V. Emergency Response Equipment and Procedures				
Availability of the Following Equipment:				
Communication Equipment and Alarms				✓
Spill Containment and Control Equipment and Tools	✓			
Spilled Material Storage Containers	✓			
Protective Clothing	✓			
Respirators	✓			
First Aid Kits	✓			
Decontamination Equipment				✓ water?
Ventilation Equipment <i>large garage open doors, fans, etc.</i>	✓			

M-4/7

	S	U	A	N/A
Other Equipment Needed:				
Comments:				
Adequate Response Procedures Including the Following:				
Notification of Responsible Facility Personnel	✓			
Chain of Command	✓			
Safety and First Aid Procedures	✓			
Evacuation Procedures	✓			
Notification of Outside Assistance	✓			
Spill and Slug Assessment Procedures	✓			
Spill and Slug Cleanup Procedures	✓			
Decontamination Procedures				✓
Procedures for Preventing Contact Between Incompatible Materials	✓			✓
Procedures for Disposing or Treating Spilled Materials	✓			
Other Procedures Needed:				
Comments:				

Small quantity + no floor drains. All compatible with water. Washdown/dilution possible. Have absorpt. materials on site.
 Also, ^{can} block discharge to city easily.

M-5/7

	S	U	A	N/A
VI. Slug Reporting and Control Plan Modification Procedures				
Slug Reporting Procedures	✓			
Slug Plan Modification Procedures				✓
Comments:				

	S	U	A	N/A
VII. Training Program				
Detailed Outline of Training Program	✓			
Training Appropriate to Job Description	✓			
Hazards of Chemicals Used at the Facility	✓			✗
Emergency Response Training				✓
Comments: No untrained employees handle chemicals				

Have spill prevention + solvent mgmt.

	S	U	A	N/A
VIII. Certifications				
Facility Representative Certification				✓
Professional Engineer Certification				✓
Comments:				

M-6/7

General Comments and Follow-up Actions Needed:

IX. Approval Status

Approved _____
Not Approved _____

Reviewed by:

Kim Redd
(POTW Reviewer)

Date:

8/16/06

M-7/7



Coatings, Inc.

Rec'd
10/06
KBC

306 Sycamore • Van Buren, Arkansas 72956
Telephone (501) 471-7675 • Fax (501) 410-1226

TOXIC ORGANIC MANAGEMENT PLAN

/SPCC

OUR PRE-TREATMENT CHEMICAL SHALL BE CONTAINED IN 55 GAL. CONTAINERS. CONTAINERS WILL BE SUSPENDED OVER A 375 GAL. PORTABLE SECONDARY EMERGENCY SPILL CONTAINMENT TANK FROM WHICH THE CHEMICAL CAN BE RECLAIMED AND PUT BACK INTO SAFE CONTAINERS.

OUR REORDER POINT SHALL BE AT APPROXIMATELY 30 GAL. THEREFORE, WE WON'T HAVE MORE THAN APPROXIMATELY 165 GAL. CONTAINED IN NO MORE THAN (2) 55 GAL. CONTAINERS AT ANY ONE TIME.

A BLOCKING DEVICE WILL BE INSTALLED IN THE DRAIN THROUGH THE CONCRETE FLOOR TO PREVENT ENTRY INTO SEWER. THERE WILL ALSO BE SAND AVAILABLE TO BUILD A TEMPORARY BARRICADE SO THAT CLEAN-UP OF ANY SPILLS CAN BE HANDLED IN AN ENVIRONMENTALLY SAFE MANNER.

OUR PLAN OF ACTION IS AS FOLLOWS:

OUR CHEMICAL SPILL TEAM CONSISTS OF SIX INDIVIDUALS THAT ARE TRAINED TO REACT IN CASE OF AN EMERGENCY.

1. DRAIN WILL BE BLOCKED AS SOON AS SPILL IS NOTICED.
2. A SAND BARRICADE WILL BE BUILT AROUND CHEMICAL TO CONTAIN IT.
3. IF SPILL IS TOO LARGE FOR IN HOUSE CLEAN-UP, SAFETY KLEEN WILL BE CALLED.

N-1/2



Coatings, Inc.

306 Sycamore • Van Buren, Arkansas 72956
Telephone (501) 471-7675 • Fax (501) 410-1226

THE FOLLOWING ARE POSTED NUMBERS WE CALL IN CASE OF A SPILL:

- 474-5067..... V.B. WASTE WATER DEPT.
- 474-0941..... KIM REDO, VB. MUNICIPAL UTILITIES
- 471-3260..... CRAWFORD CO. OFFICE OF EMERGENCY
- 501-682-0841..... ARKANSAS DEPT. OF ENVIRONMENTAL QUALITY
- 501-424-8802..... NATIONAL EMERGENCY RESPONSE

ALSO, OUR PRETREATMENT WASH TANK IS PUMPED OUT AND DISPOSED OF BY SAFETY KLEEN VACUUM SERVICE ONCE EVERY 6 MONTHS.

N-2/2