ADEQ

ARKANSAS
Department of Environmental Quality

July 10, 2012

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

Re: City of Van Buren (AFIN: 17-00062 NPDES Permit Number: AR0021482)
Pretreatment Program Audit & Municipal Pollution Prevention (P2) Assessment

Dear Mr. Smith:

Please find enclosed the finished report for the audit/assessment conducted by the Department from June 19th through 21st, 2012. The report should be made available for review by appropriate industrial and City officials. The Van Buren staff should discuss and evaluate the findings in this report. Please respond to the required actions and recommendations in writing within thirty (30) days.

The Department appreciates the staff's assistance. The staff 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's pretreatment program with achieving the objectives of the Clean Water Act.

If the City has questions or concerns, please do not hesitate to contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us .

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: Audit Report/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)
Eric Fleming / Mgr-Field Services (w/o attmt)

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF VAN BUREN, ARKANSAS

NPDES PERMIT #AR0021482

July 10, 2012

PREPARED BY: Rufus Torrence

ADEQ Water Division Engineer and Auditor

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 Northshore Drive

NORTH LITTLE ROCK, ARKANSAS 72118-5317

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, on 3/6/97 and recently on 3/18/2011. These modifications included changes in the City's Pretreatment Ordinance, headworks loading evaluation and minor program narrative revisions. The City recently updated the pretreatment program to comply with the 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. The main (South) POTW design flow was increased to 4.0 MGD. The South Plant has a screening unit, two 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). Eight (8) significant (four are categorical) industrial users (SIUs) contribute about 0.70 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 2.0 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.

Effective on 3-1-11, the North Plant has permit limits for Copper (9.2 µg/l) and Zinc (85.5 µg/l). Monitoring results submitted to ADEQ indicate a pattern of violations for both metals. Since the North plant has only one significant industrial user (Arkansas Valley Truck Wash), the source of the metals appear to be from domestic users. The City should be aware that the pretreatment program will probably not be placed in SNC (significant noncompliance) for pass through ("pass through" is limited to non-domestic sources) if the North plant continues to violate the effluent metal limits. However, ADEQ enforcement has expressed concerns for violating the NPDES permit limits (See Attachment I-1/3 for more details).

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.

1) Under ***40 CFR Part 408.5(f)(4)*** find "*The POTW shall develop local limits as required in §403.5(c)(1), or demonstrate that they are not necessary.*

The City's North plant has permit limits for Copper (9.2 ug/l) and Zinc (85.5 ug/l) which became effective on March 1, 2011. The permit limits are included to prevent pass through to the receiving stream (Lee Creek). The Copper and Zinc in the North plant effluent are consistently higher than WQS for the receiving stream and, hence, the plant is consistently in violation of the NPDES permit limits for Copper and Zinc. The North plant is not designed to remove Copper or Zinc.

The North plant has only one significant industrial user. The metals in the influent appear to originate from domestic sources (see Attachment L-6/14) as the metal levels in the influent are typical for domestic wastewater. Local limits apply to non-domestic sources only. ADEQ has provided the City with guidance (see Attachment K-1/6) which indicates that local limits for toxic and conventional pollutants are not necessary for the City's two main POTWs. Nonetheless, the City has a Duty to Comply with the NPDES permit limits and must take steps to remedy the violations. In a letter dated March 13, 2012, the Department required the City to work toward compliance (see Attachment I-1/3). Finally, the City must either develop local limits for all pollutants of concern or confirm that local limits are not necessary (see Recommendation #1 & #4 below for more details).

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

1) The Department will not require the City to develop local limits at this time. Based on the influent loading data shown in Attachment K-3/6, the conventional pollutant loadings to the South average only about half of the design capacity. Since the metals enter the South and North plant at domestic levels, local limits for metals at both plants appear unnecessary. However, the Department recommends that the City develop local limits for at least $CBOD_5$ and TSS for the South Plant. Referring to Attachments L-6/14 and L-9/14, the City has demonstrated that local limits are not necessary for Arsenic, Cadmium, Chromium, Copper, Cyanide, Lead, Mercury, Nickel, Selenium, Silver and Zinc as these pollutants enter the POTW below EPA Typical Domestic Levels. The City has no point source for Ammonia.

2) River City Coating permit has a fact sheet which shows the derivation of mass limits. The previous permit had mass limits. Since the present permit does not have mass limits, the City should remove the derivation from the fact sheet. See Attachment F-3/3 for details.

3) The City should consider developing a Water Effect Ratio (WER) for Copper and Zinc for the North Plant. The North Plant is consistently violating the permit limits for Copper and Zinc. A WER greater than 1 will increase the permit limits for Copper and Zinc. The Department has provided the City with guidance and contact information.

4) The South Plant occasionally violates the NPDES permit limits for ammonia. Since the City does not have a point source for ammonia, a local limit for ammonia will not remedy the violations. However, the City can request assistance from point sources of CBOD.

The City influent flow varies considerably over the course of a week. The variation in flow appears to follow the pattern of discharger from the three main hydraulic dischargers (Simmons Poultry, Simmons Food and Tyson Food). The City should consider coordinating the discharges from these three SIUs to level the influent flow and CBOD loading. A steady organic loading may assist the plant with nitrification and dinitrification.

5) Since the Metal Finishers are not significant sources of organic loading, the City should consider removing the BOD and TSS limits from these permits.

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

Referring to the requirement in Section B above, the City must submit a letter to ADEQ within 30 days of receiving this report and declare that the North and South POTWs will either develop local limits (list the pollutants-of-concern for development) or demonstrate that local limits are not necessary. At a minimum the City should consider the following pollutants:

Toxic:

- Arsenic
- Cadmium
- Chromium
- Copper
- Cyanide
- Lead
- Mercury
- Molydenum
- Nickel
- Selenium
- Silver
- Zinc

Conventional:

- Ammonia
- $CBOD_5$
- Total Suspended Solids

In the letter please list the City's decision (development or demonstration) for each pollutant shown above.

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/local limits 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

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: *Director*

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: *6/19 - 6/21/12* (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Rufus Torrence	*Engineer / ADEQ*	*501.682.0626*

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* *Kim Redo*	*Environmental Coord.*	*479-474-0941*
Gary Smith	*Director*	*479-474-5067*
Steve Dufresne	*Operations Superintendent*	*Same*
Darel Manus	*Operations Superintendent*	*Same*
Jeff Testerman	*Plant Operator*	*479-474-0941*
Larry Weir	*Professional Engineer*	*479-883-1317*

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*May 2011*	*None (Recommend submitting DMR for "Non-Discharge" months)*

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's pretreatment program is currently not in SNC or RNC. However, the City should be aware that metal violations have placed the City in SNC for violating limits in its NPDES permit (AR0040967). After March 1, 2011 the North WWTP NPDES permit had limits for copper and zinc. If the City continues to violate the copper and zinc limits, the violations could be consider as a Level II violation (Other Violations of Concern…); see the "REPORTABLE NONCOMPLIANCE (RNC)" criterion below. Based on the VBMU TBLL Development Document (Jan 2010, rev Feb, Apr & Sep 2011), the metals appear to be in the domestic wastewater. Nonetheless, the City must comply with the permit limits. The Pretreatment Program may not go into SNC (the pretreatment program applies to non-domestic sources only) 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)- 2.22 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 8 # of CIUs : 4
Industrial Flow (mgd): 0.70 Industrial Flow (%) : 31.7 %

Level of Treatment	Type of Process(es):
Primary _____	_____
Secondary ✓	Activated Sludge Unit (Two Aerated basins)
Tertiary _____	_____
Method of Disinfection:	Ultraviolent
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:
✓ Land Application	~915* dry metric tons/yr.
_____ Incineration	_____ dry tons/yr.
_____ Monofill	_____ dry tons/yr.
_____ Mun. Solid Waste Landfill	_____ dry tons/yr.
_____ Public Distribution	_____ dry tons/yr.
✓ Lagoon Storage	~661**dry tons/yr.
_____ 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?

	Influent	Effluent	Sludge	Ambient
Metals *	*4*	*4*	*1*	
Priority **	*1*	*1*	*0*	
Biomonitoring		*4*		
TCLP			*1*	
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)
NH3-N	***Large variations in flow & loading***

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
*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: 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)- 0.0055 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.
✓*	Lagoon Storage	1.4	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:

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?

	Influent	Effluent	Sludge	Ambient
Metals *	*0*	*0*		
Priority **	*0*	*0*		
Biomonitoring (acute)		*0*		
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?

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- 2.0 MGD; Actual (Average)- 1.094 MGD

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

Industrial Contribution to this Treatment Plant

# 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:
✓*	Land Application	368* 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?

	Influent	Effluent	Sludge	Ambient
Metals *	*1*	*1*		
Priority **	*1*	*1*		
Biomonitoring		*4*		
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)
Copper and Zinc	*Entering POTW from Domestic Sources*

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	
___	✓	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:

Date Approved by DEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
3-18-2011	***Streamlining" update to ordinance and program***	*3-18-2011*

2. Modifications in Progress: ***None***

Date Requested	Nature of Modification

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

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

Date of original Pretreatment Program approval: ***10/1/1981*** [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: ***10/19/2009*** Date of most recent Pretreatment Program modification approval: ***3/18/2011***

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:

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	***N/A***			
2.				

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 P^2 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:

IU Name	Problem	NPDES Permit Violation Yes	No
N/A		___	___

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)] ***Currently conducting IWS; letters dated April 2012.***

___ ✓ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 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 P^2 activity and the distribution of P^2 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. ***9*** SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. ***4*** Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. ***5*** Noncategorical SIUs
d. ***0*** Other regulated nonsignificant IUs (Describe) _____
9 TOTAL of a. + d.

YES NO

✓ _____ Has the POTW identified any IUs with Pollution Prevention opportunities?
Simmon and Tyson plants using ammonia free products

✓ ___ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)(i-ii)]

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

_____

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:

IU NAME	PERMIT EXPIRATION DATE

YES NO

___ ✓ Does the Control Authority accept trucked septage wastes?

___ ✓ Does the Control Authority accept other trucked wastes?

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

YES NO

___***N/A*** Does Control Mechanism designate a discharge point? [403.5(b)(8)]

___***N/A*** Are all applicable categorical standards and local limits applied to trucked wastes ?

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

Pollutant	Limit
N/A	

Describe the discharge point(s) (including security procedures):
N/A

YES NO

___ ✓ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

___ ✓ Does the Control Authority have a control mechanism for regulating wastes from UST sites?

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

Pollutant	Limit
N/A	

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?

4/2009 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
The CA is attempting to develop local limits. Local limits appear unnecessary at this time but the CA desires to develop limits for CBOD and TSS.			

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)	✓			✓			
Cadmium (Cd)	✓			✓			
Chromium-Total	✓			✓			
Copper (Cu)	✓			✓[1]			
Cyanide (CN)	✓			✓			
Lead (Pb)	✓			✓			
Mercury (Hg)	✓			✓			
Molybdenum (Mo) *	✓			✓			
Nickel (Ni)	✓			✓			
Selenium (Se) *	✓			✓			
Silver (Ag)	✓			✓			
Zinc (Zn)	✓			✓[1]			
BOD & TSS	✓			✓			

* - *If necessary for the sludge disposal option chosen.*

[1]***The North Plant is violating NPDES permit limits for copper and zinc; these metals appear to be entering the plant from domestic sources.***

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? Yes	No	Local Limits Needed? Yes	No	Local Limits Adopted? Yes	No	Numerical Limit Adopted (mg/l)

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		✓	
TSS		✓	

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? ***The CA is currently applying uniform local limits for BOD and TSS to both the south and north plants.***

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Reference
Inspections:			
CIUs	>=1	1/year	Page 4of9 nar & page 26 ord
Other SIUs	>=1	1/year	Page 4of9 nar & page 26 ord
Sampling:			
CIUs	>=1	1/year	Page 4of9 nar & page 26 ord
Other SIUs	>=1	1/year	Page 4of9 nar & page 26 ord
Reporting:			
CIUs	>=2	2/year	Page 23 ord
Other SIUs	>=2	2/year	Page 23 ord
Self-Monitoring:			
CIUs	>=2	2/year	Page 5of9 nar & page 22 ord
Other SIUs	>=2	2/year	Page 5of9 nar & page 22 ord

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
0	0	Not sampled at least once in the past reporting year?
0	0	Not inspected at least once in the past Pretreatment reporting year?
0	0	Not inspected and not sampled at least once in the past reporting year ? [NPDES-ICIS]-[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

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

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

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

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:

_____

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)(viii)]

✓ ___ 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)]

✓ Notice or letter of violation
✓ Setting of compliance schedule
✓ Injunctive relief
✓ Administrative Order
✓ Revocation of permit
✓ Fines (maximum amount):

civil $ 1000 /day/violation
criminal $ 1000 /day/violation
administrative $ 1000 /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 problematic users.)

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 Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? 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 [ICIS].	_____
___	✓	Pass through [ICIS].	_____
___	✓	Fire or explosions? (incl. flash point viol.)	_____
___	✓	Corrosive structural damage? (incl. pH <5.0).	_____
___	✓	Flow obstructions?	_____
___	✓	Excessive flow or pollutant concentrations?	_____
___	✓	Heat problems?	_____
___	✓	Interference due to oil or grease?	_____
___	✓	Toxic fumes?	_____
___	✓	Illicit dumping of hauled wastes?	_____

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount
Civil	_____	$_____
Administrative	_____	$_____
Total	_____	$_____ [NPDES-ICIS]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

YES	NO	
✓	___	computerized
✓	___	hard copy
___	___	OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
	✓	Inspection and Sampling schedule
✓*	✓	Monitoring Data ***POTW inf/eff, yes, IU data is flow only.***
	✓	IU Compliance Status Tracking
		Other: _____

Can IU monitoring data can be retrieved by:

	✓	Industry name
	✓	Pollutant type
	✓	Industrial category or type
✓&	✓	SIC Code
✓		IU discharge volume
N/A		Geographic location
✓		Receiving treatment plant (i.e.if > one plant in the system)
		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?
Describe and show below the source(s) of funding for the program:

		Percent of Total Funding
✓	POTW general operating fund	***100***
*	IU permit fees	****These go to back to the general operating fund***
*	monitoring charges	
*	industry surcharges	
	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:

YES	NO		If no, explain
✓		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:

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

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
   The City has included P2 questions in each permit applications, in surveys, in inspection forms, 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 II: PROGRAM ANALYSIS AND PROFILE

FILE #: 1 Industry Name *River City Coatings* File/ID No. *VBC 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) *4508*
Tony Jester, Asst Plant Manager 479-471-7675
Industry visited during audit: *YES*

Comments: *Phosphatizing and powder coating*

FILE #: 2 Industry Name *Fab Tech* File/ID No. *VBC 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: *3444*
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) *275*
Kevin Treece, Pres & Owner *Myron Kirksey, VP and Owner*
Industry visited during audit: *YES* *479-474-1788* *kevin@fab-tech.net*

Comments: *Adjusting pH only*

FILE #: 3 Industry Name *Tyson* File/ID No. *VB-2017-01*
Industry Address *802 South 28th Street*
Industry Description *Poultry Processing*
Industrial Category *Not Applicable* 40 CFR *N/A* SIC Code: *2015*
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) *228,875*

Industry visited during audit: **YES**

Comments: *Discharging wastewater at intervals to POTW and causing slug loads*

FILE #: 4 Industry Name *B & W Plating* File/ID No. *VBC 1721-04*
Industry Address *11 N 27th Street*
Industry Description *Electroplater*
Industrial Category *Metal Finishing* 40 CFR *433* SIC Code: *3471*
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) *No recent disc*

Industry visited during audit: *YES*

Comments: *Under new management (same owners)*

FILE #: 5 Industry Name *Arkansas Lamp* File/ID No. *VBC 1721-29*
Industry Address *1701 South 28th Street*
Industry Description *Phosphatize and power paint*
Industrial Category *Metal Finishing* 40 CFR *433* SIC Code: *3646*
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) *19 (700 gal batch)*

Industry visited during audit: *YES*

Comments: *Production is low due to slow economy*

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

	RCC	Fab	Tyson	B & W	Ar Lamp
1. Is the IU considered "significant" by the Control Authority?	Y	Y	Y	Y	Y
2. Is the user subject to categorical pretreatment standards?	Y	Y	N	Y	Y
a. New source or existing source (NS or ES)?	NS	NS	N/A	NS	NS
b. Is this IU one identified as having P^2 potential?	N	Y[1]	Y[1]	Y[2]	Y

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	Y	Y	Y	Y	Y
If yes, what is the application date?	10-21-10	01-25-10	06-25-09	09-12-09	06-09-11
Does it ask for Pollution Prevention information?	Y	Y	Y	Y	Y
2. Does the file contain a Permit?	Y	Y	Y	Y	Y
Permit Expiration Date?	09-18-13	02-28-13	11-30-12	11-16-12	10-12-11
Is a fact sheet included?	Y	Y	Y	Y[3]	Y

Comments:

1. Fab-Tech and Tyson are minimizing wastewater.
2. B & W has eliminated all products with TTOs.
3. See B & W Fact Sheet (Attachment B-25/26)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	RCC	Fab	Tyson	B & W	Ar Lamp
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	Y	Y	Y	CP[4]	Y
b. Expiration date?	Y	Y	Y	P4[5]	Y
c. Statement of nontransferability?	Y	Y	Y	p14	Y
d. Appropriate discharge limitations?	N[6]	N[6]	Y	N[6]	N[6]
e. Appropriate self-monitoring requirements?	Y	Y	Y	p15A	Y
f. Sampling frequency?	Y	Y	Y	p15A	Y
g. Sampling locations?	Y	Y	Y	p19	Y
h. Requirement for flow monitoring?	Y	Y	Y	p10	Y
i. Types of samples (grab or composite) for self-monitoring?	Y	Y	Y	p15A	Y
j. Applicable IU reporting requirements?	Y	Y	Y	p12	Y
k. Standard conditions for:					
Right of Entry?	Y	Y	Y	p6	Y
Records retention?	Y	Y	Y	p23	Y
Civil and Criminal Penalty provisions?	Y	Y	Y	p13	Y
Revocation of permit?	Y	Y	Y	p15	Y
l. Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	N/A
m. General/Specific Prohibitions?	N	N	N	N	N
n. Where technologically and economically achievable, are P^2 aspect included?	Y	Y	Y	Y	Y

Comments:

4. CP => Cover Page: See Attachment B-1/26
5. Expiration date of B & W permit is on page 4; see attachment B-4/26.
6. The Metal Finishers have BOD and TSS limits but are not major sources of organic loading. See page 15A of B & W permit (Attachment B-16/26)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards	RCC	Fab	Tyson	B & W	Ar Lamp
1. Has the IU been properly categorized?	Y	Y	Y	Y	Y
2. Were both Categorical Standards and Local Limits properly applied?	N[7]	N[7]	Y	N[7]	N[7]
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	Y	Y	Y	Y	Y
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
7. Is the Control Authority applying a bypass provision to this IU?	N	N	N	N	N

Comments:

7. The Metal Finishers (40CFR433 CIUs) have inappropriate BOD and TSS local limits.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	RCC	Fab	Tyson	B & W	Ar Lamp
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	Y	Y	Y	Y[8]	Y
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	Y	Y	Y	Y	Y
b. Sample date and time?	Y	Y	Y	Y	Y
c. Sample type?	Y	Y	Y	Y	Y
d. Wastewater flow at the time of sampling?	Y	Y	Y	Y	Y
e. Sample preservation procedures?	Y	Y	Y	Y	Y
f. Chain-of-custody records?	Y	Y	Y	Y	Y
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	Y	Y	Y	Y	Y
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	Y	Y	N/A	Y	Y
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Y	Y	Y	Y	Y
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	Y	Y	Y	Y	Y

Comments:

8. See attachment H-1/2 for B & W Discharge Monitoring Report

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Inspections	RCC	Fab	Tyson	B & W	Ar Lamp
7. Does the IU file contain inspection reports?	Y	Y	Y	Y	Y
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y
b. Date of last Inspection	05-17-11	05-03-12	04-26-12	09-27-11	04-05-12

SECTION III: INDUSTRIAL USER FILE REVIEW

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

9. Does the inspection report(s) include: [403.8(f)(2)(vi)]	RCC	Fab	Tyson	B & W	Ar Lamp
a. Inspector Name(s)	Y	Y	Y	p5[9]	Y
Inspection date and time?	Y	Y	Y	p5	Y
c. Name and title of IU official contacted?	p4	Y	Y	CP	Y
d. Verification of production rates?	N/A	N/A	N/A	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	Y	Y	Y	CP	Y
f. Evaluation of pretreatment facilities?	N/A	N/A	Y[10]	CP	Y
g. Evaluation of self-monitoring equipment and techniques?	Y	Y	Y	p1	Y
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	Y	Y[19]	Y	CP & p3	Y
i. Manufacturing facilities?	Y	Y	Y	CP	Y
j. Chemical handling and storage procedures?	Y	Y	Y	p4	Y
k. Chemical spill prevention areas?	Y	Y	Y	CP	Y
l. Hazardous waste storage areas and handling procedures?	Y	Y	Y	p4	Y
m. Sampling procedures?	Y	Y	Y	p1	Y
n. Laboratory procedures?	Y	Y	Y	p1	Y
o. Monitoring records?	Y	Y	Y	p1	Y
p. Evaluation of Pollution Prevention opportunities?	Y	Y	Y	p5	Y
q. Control Authority inspector signature?	Y	Y	Y	p5	Y

Comments:

9. Page 5 in B & W Inspection Report. See Attachment G-6/6.
10. Tyson has a DAF and biological treatment basin ("Racetrack").

SECTION III: INDUSTRIAL USER FILE REVIEW

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

IU Self-Monitoring and Reporting	RCC	Fab	Tyson	B & W	Ar Lamp
10. Does the file contain self-monitoring reports?	Y	Y	Y	Y	Y
11. Does the file include: a. BMR?	Y	Y	N/A	Y	Y
b. 90-Day Report?	Y	Y	N/A	Y	Y
c. All periodic reports?	Y	Y	N/A	Y	Y
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	N/A
12. Did the IU report on all required parameters?	Y	Y	Y	Y	Y
13. Did the IU comply with the required sampling frequency(s)?	Y	Y	Y	Y	Y
14. Did the IU report flow?	Y[11]	Y	Y	Y	Y[12]
15. Did the IU comply with the required reporting frequency(s)?	Y	Y	Y	Y	Y
16. For all SIUs, are self-monitoring reports signed and certified?	Y	Y	Y	Y	Y
17. Did the IU report all changes in its discharge? [403.12(j)]	N/A	N/A	N/A	N/A	N/A
18. Has the IU developed a Slug Control and Prevention Plan?	Y[13]	Y	Y	Y	No open floor drains
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	N	N	N	N	N
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	N/A	N/A	N/A	N/A	N/A
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	N/A

Comments:

11. City checks RCC city water meter to determine flow.
12. AR Lamp has batch discharge
13. RCC has a block valve in a pit to stop spills; in the previous audit report the ADEQ auditor recommended an inherent control system or procedure.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	RCC	Fab	Tyson	B & W	Ar Lamp
E. Enforcement					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	N/A	N/A	N/A	N/A	N/A
b. IU self-monitoring results?	N/A	N/A	N/A	Y	N/A
c. If NS CIU was it compliant within 90 days from commencement of discharge?	N/A	N/A	N/A	N/A	N/A
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	0	1	0
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	N/A	N/A	N/A	Y	N/A
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	N/A	N/A	N/A	Y[14]	N/A
5. Were all nondischarge violations identified in the file?	N/A	N/A	N/A	N/A	N/A
6. Was the IU notified of all violations?	N/A	N/A	N/A	N/A	N/A
7. Was follow-up enforcement action taken by the Control Authority?	N/A	N/A	N/A	Y[15]	N/A
8. Did the Control Authority follow its approved ERP?	N/A	N/A	N/A	Y[15]	N/A

Comments:

14. B & W conducted the additional monitoring.
15. The City collected $18,754 in penalties in the last pretreatment year.

SECTION Iii: INDUSTRIAL USER FILE REVIEW

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

	RCC	Fab	Tyson	B & W	Ar Lamp
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	N/A	N/A	N/A	N/A	N/A
10. Is there a compliance schedule?	N	N	N	N	N
If yes:					
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					
b. TRC	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
c. Pass through/Interference	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
d. Spill/slug loads	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
e. Reporting	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
f. Compliance schedule	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
g. others (specify)					
13. Was the SIU published for SNC?					
Date of publication.	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**

SECTION III: INDUSTRIAL USER FILE REVIEW

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

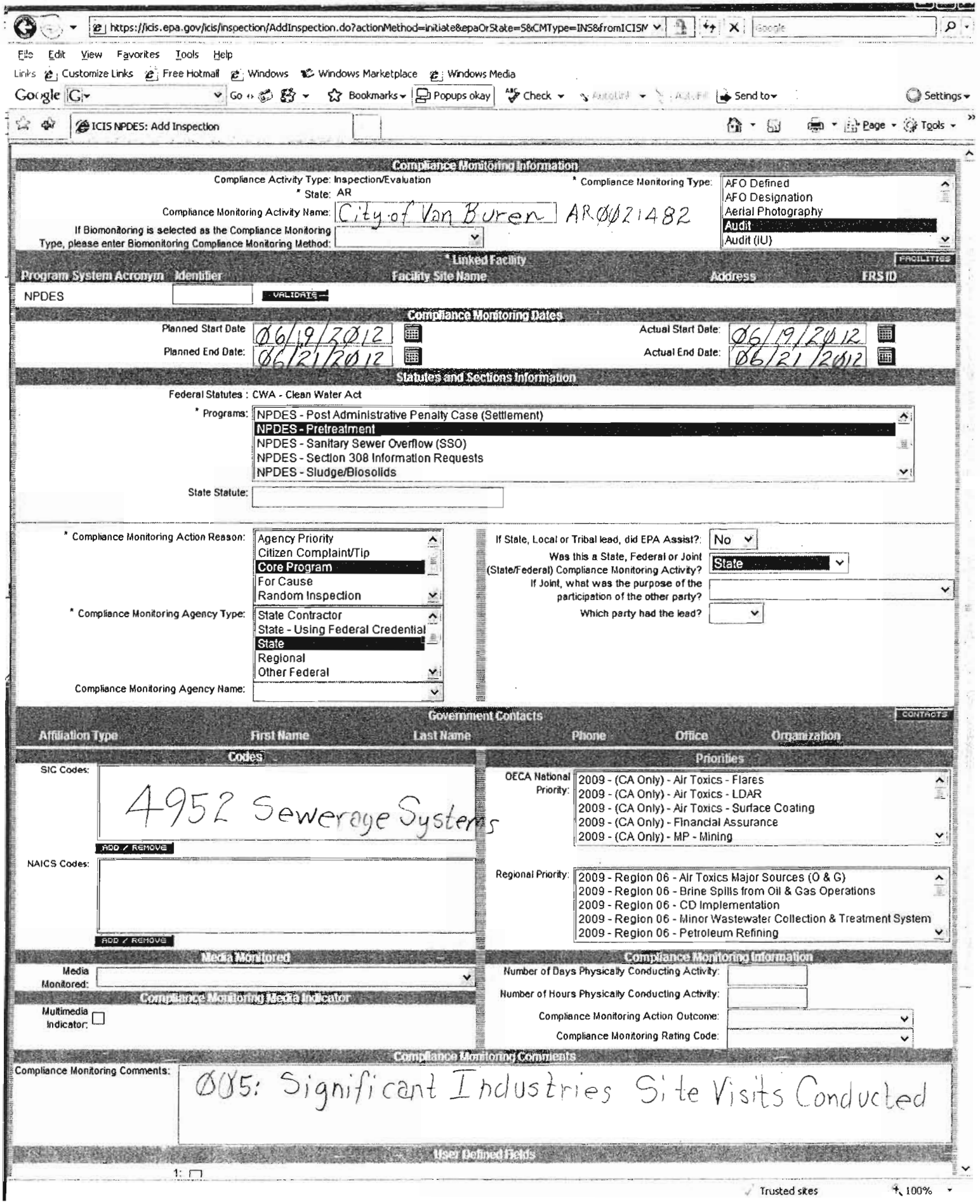
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: ***City of Van Buren*** NPDES #: ***AR0021482***
Date of Audit: ***06/19 - 21/2012*** Date entered into QNCR: ***06-26-2012***
(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.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Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

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ICIS NPDES: Add Inspection

Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: City of Van Buren ARØØ21482

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

* Compliance Monitoring Type: AFO Defined; AFO Designation; Aerial Photography; **Audit**; Audit (IU)

Linked Facility FACILITIES

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES		VALIDATE		

Compliance Monitoring Dates

Planned Start Date: Ø6/19/2Ø12 Actual Start Date: Ø6/19/2Ø12

Planned End Date: Ø6/21/2Ø12 Actual End Date: Ø6/21/2Ø12

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 CONTACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes: 4952 Sewerage Systems

ADD / REMOVE

NAICS Codes:

ADD / REMOVE

Priorities

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:

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

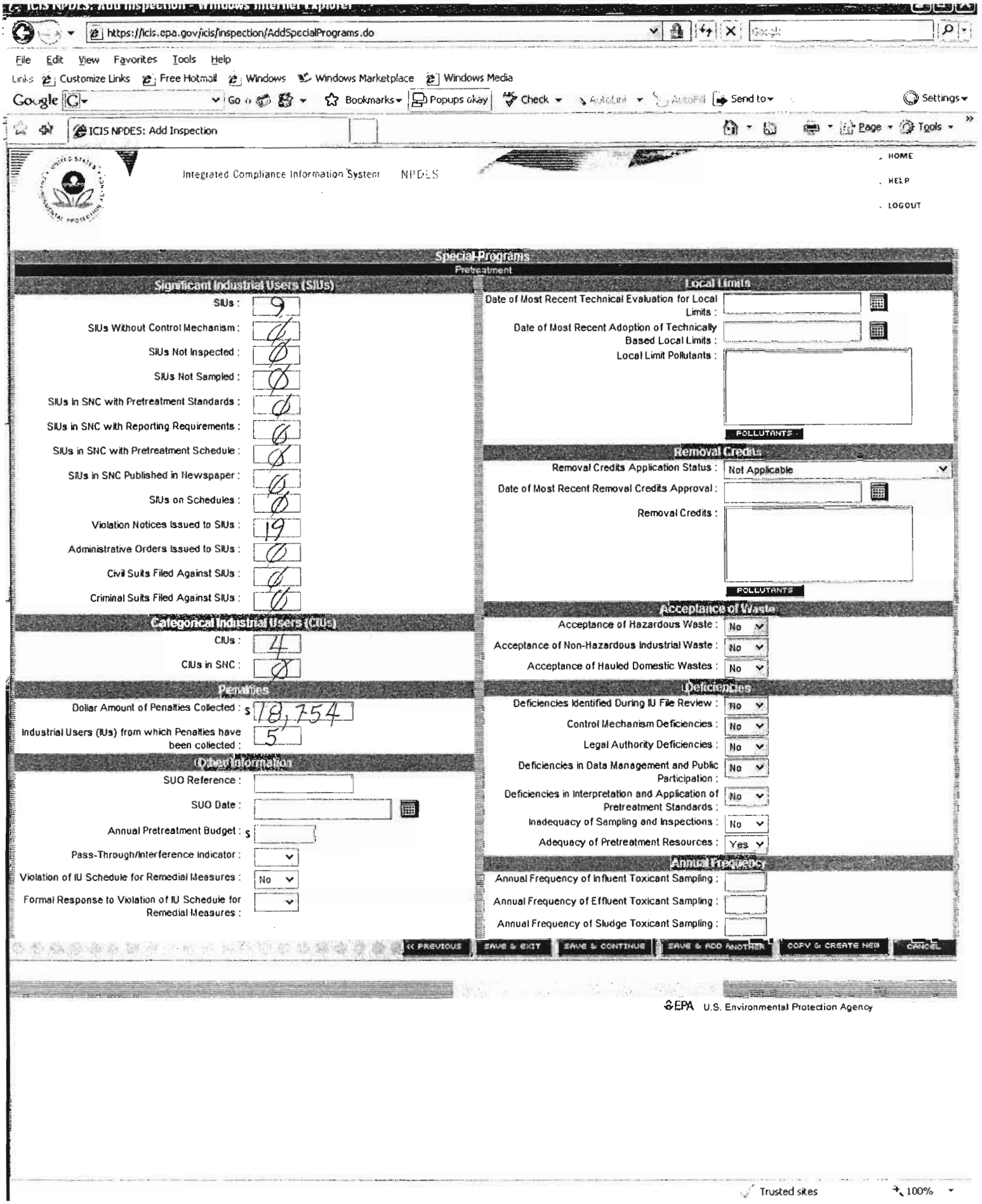
Compliance Monitoring Comments

Compliance Monitoring Comments: ØØ5: Significant Industries Site Visits Conducted

User Defined Fields

1:

Trusted sites 100%


ICIS NPDES: Add Inspection - Windows Internet Explorer
https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do
File Edit View Favorites Tools Help
Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media
Google Go Bookmarks Popups okay Check AutoFill Send to Settings
ICIS NPDES: Add Inspection
Page Tools
Integrated Compliance Information System NPDES
HOME
HELP
LOGOUT
Special Programs
Pretreatment
Significant Industrial Users (SIUs)
SIUs : 9
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 : 6
SIUs in SNC with Pretreatment Schedule : 0
SIUs in SNC Published in Newspaper : 0
SIUs on Schedules : 0
Violation Notices Issued to SIUs : 19
Administrative Orders Issued to SIUs : 0
Civil Suits Filed Against SIUs : 0
Criminal Suits Filed Against SIUs : 0
Categorical Industrial Users (CIUs)
CIUs : 4
CIUs in SNC : 0
Penalties
Dollar Amount of Penalties Collected : $ 18,754
Industrial Users (IUs) from which Penalties have been collected : 5
Other Information
SUO Reference :
SUO Date :
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 :
Local Limits
Date of Most Recent Technical Evaluation for Local Limits :
Date of Most Recent Adoption of Technically Based Local Limits :
Local Limit Pollutants :
POLLUTANTS
Removal Credits
Removal Credits Application Status : Not Applicable
Date of Most Recent Removal Credits Approval :
Removal Credits :
POLLUTANTS
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 :
Annual Frequency of Effluent Toxicant Sampling :
Annual Frequency of Sludge Toxicant Sampling :
« PREVIOUS
SAVE & EXIT
SAVE & CONTINUE
SAVE & ADD ANOTHER
COPY & CREATE NEW
CANCEL
EPA U.S. Environmental Protection Agency
Trusted sites
100%

SECTION III: INDUSTRIAL USER FILE REVIEW

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
1701 South 28th Street 72956
(479) 424-0876

Type of industry: ***Electroplater / CFR 433***

Date/Time of visit: ***June 20, 21012 @ 8:30am***

Industry contacts: ***Archie Arman, Maintenance Supervisor***

		Yes	No	N/A
1.	Significant industrial user?	✓		
2.	Classified correctly?	✓		
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:

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT

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

Control Authority: ***City of Van Buren*** NPDES #: ***AR0021482***

Industry name: ***Arkansas Lamp***

Additional comments:

Arkansas Lamp is presently experiencing a slow down in production. The facility buys lamp parts and assembles them to make the final product. No parts are casted or machined on-site.

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of person conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: ***City of Van Buren*** NPDES #: ***AR0021482***
Name, address and phone number of industry:

Tyson Foods, Inc.
802 South 28th Street 72956
(479) 474-7041

Type of industry: ***Poultry Processor***

Date/Time of visit: ***June 20, 2012 @ 10:00 to 11:45 am***

Industry contacts: ***Kenneth Flanary, Maintenance Manager***
David Lewis, WW Operator

		Yes	No	N/A
1.	Significant industrial user?	✓		
2.	Classified correctly?	✓		
3.	Pretreatment equipment or procedures?	1		
4.	Pretreatment equipment maintained and operational?	1		
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. During the exit meeting (Attendees: Bruce Ellison, Plant Manager, Oather Hamblin, Gen Production Manager, Connie Martin, Safety Manager, Kenneth Flanary, Maintenance Manager, Rufus Torrence, ADEQ and Kim Redo, VBMU), Tyson agreed to work with VBMU to minimize slug loads.

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT

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

Control Authority: ***City of Van Buren*** NPDES #: ***AR0021482***

Industry name: ***Tyson Foods***

Additional comments:

1. (Con'd) Tyson has reduced its water usage significantly but the pretreatment equipment (pumps, etc.) have not been changed. Presently, Tyson is holding the wastewater until the volume is at design capacity (to match the pumps performance). Therefore, the flow rate remains unchanged during discharge. The main difference is "intermittent" discharge. Tyson has agreed to coordinate its discharge with the two Simmons plants to provide a steady flow (organic loading) to the POTW.

The POTW is presently violating limits for NH3-N. A steady organic loading may enhance nitrification and denitrification.

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: ***City of Van Buren*** NPDES #: ***AR0021482***

Name, address and phone number of industry:

B & W Plating
11 north 27th Street 72956
(479) 474-6855

Type of industry: ***Electroplater / CFR 433***

Date/Time of visit: ***June 20, 2012 1:00 to 2:00 pm***

Industry contact: ***Casey Crase, Lab Tech***

		Yes	No	N/A
1.	Significant industrial user?	✓		
2.	Classified correctly?	✓		
3.	Pretreatment equipment or procedures?	1		
4.	Pretreatment equipment maintained and operational?	✓		
5.	Hazardous waste generated or stored?	✓		
6.	Proper solid waste disposal?	✓		
7.	Solvent management/TTO control?	2		
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. Has a batch treatment tank for metal removal

2. B & W has removed from its plant all products containing any of the 110 toxic organic listed in 40 CFR 433.11(e). See Attachment J-2/2.

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT

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

Control Authority: ***City of Van Buren*** NPDES #: ***AR0021482***

Industry name: ***B & W Plating***

Additional comments:

B & W coats nickel, tin and lead onto copper strips.

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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 72956
(479)474.1788

Type of industry: ***Phosphatizing/Metal Finisher CFR 433***
Date/Time of visit: ***June 20, 2012 2:00 to 3:00 pm***

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

		Yes	No	N/A
1.	Significant industrial user?	✓		
2.	Classified correctly?	✓		
3.	Pretreatment equipment or procedures?			1
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. Fab-Tech adjusts only the pH of the wastewater before discharging it to the City.

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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:

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: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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: ***June 20, 2012 @ 3:15 to 4:15 pm***

Industry contacts: ***Tony Jester, Assistant Plant Mgr***

		Yes	No	N/A
1.	Significant industrial user?	✓		
2.	Classified correctly?	✓		
3.	Pretreatment equipment or procedures?			1
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. No chemical treatment; settling only.

Visit conducted by: ***Torrence/Redo*** Date: 6-26-12

(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

River City Coatings (RCC) spill prevention plan centers around closing a ball valve in the event of a spill.

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: 6-26-12

(signature of auditor conducting visit)

VAN BUREN MUNICIPAL UTILITIES

PROVIDING WATER, SEWER AND SOLID WASTE SERVICES
2806 BRYAN ROAD
PO DRAWER 1269
VAN BUREN AR 72956

GARY SMITH, DIRECTOR
(479) 474-5067
FAX (479) 471-8969

July 21, 2009

B & W Plating
11 North 27th Street
Van Buren, Arkansas 72956

Re: Industrial Discharge Permit Application

Dear Mr. Capetillo:

Enclosed please find an application for permit to discharge industrial waste waters to the municipal sewer system. As we discussed during out phone conversation, no process waste waters may be discharged until a permit has been approved.

Please complete the enclosed application and return it to our main office at the above address. We will review the application as soon as possible.

If you have any further comments or questions please feel free to contact me any time.

Sincerely,

Kim Redo
Environmental Coordinator

A-1/10

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: Solder Plating
Mailing Address: 11 N. 27th St.
Van Buren, AR 72956 Zip: 72956
Corporate Address: _____

B. Facility Name: B & W Plating
Location: _____
Zip: _____

C. Name of Owner(s): Lisa Toth

D. Facility Contact (provide the name, title & phone number of a designated person to contact if additional information is necessary.) Lisa Toth
479-806-5517
479-646-7815

E. Number of Full-Time Employees: 8 Number of Part-Time Employees ____
Number of Shifts 1

F. Number of Months/Year in Operation 12
Number of days/week in operation 5

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.)
Van Buren Municipal Sewer System

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

CITY OF VAN BUREN - RAW MATERIAL AND CHEMICALS USED

RAW MATERIAL - PREFABRICATED COPPER PARTS

LINE	CHEMICALS
Strip Tank	Fluoboric Acid
	Hydrogen Peroxide
Line 1	Sodium Hydroxide
	Sulfuric Acid
	Methane Sulfonic Acid
	Lead Methane Sulfonate
	Tin Methane Sulfonate
	Hydroquinone
Line 2 & 4	Sodium Hydroxide
	Sulfuric Acid
	Stannous Sulfate
Line 3	Sodium Hydroxide
	Sulfuric Acid
	Nickel Chloride
	Nickel Sulfate
	Boric Acid
Barrel Plater	Sodium Hydroxide
	Sulfuric Acid
	Stannous Sulfate

(2) Permits:
Describe all environmental control permits held by or for the facility:

Title of the Permit	Permit No.	Issuing Office	Expiration Date
N/A			

(3) Description of Operations:

A. List raw Materials Used: Pre fabricated Copper Parts

B. List Chemicals Used: See Attatchment 3-B

C. Describe Manufacturing of Service Activities Conducted and the Final Products:
Plating Tin, Tin/Lead, Nickel on copper parts
Final products ~~are~~ are plated copper parts.

D. Summarize each Regulated Process:
Electroplating of ~~Cu~~, ~~Fe~~ nickel, lead, tin/lead products.

Process Description	Production Rate (~~Parts~~/)	Pretreatment Standard Category	Subpart	SIC Code
Nickel Electroplating	156,000/yr.			
Lead Electroplating	624,000 (Parts/yr)			

E. Provide on a separate sheet:

1) a schematic drawing of flow chart of each regulated process that generates wastewater. Included

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 622 Maximum 820
Disclosure of time and duration of discharges:
Between 6:00 Am - 1430

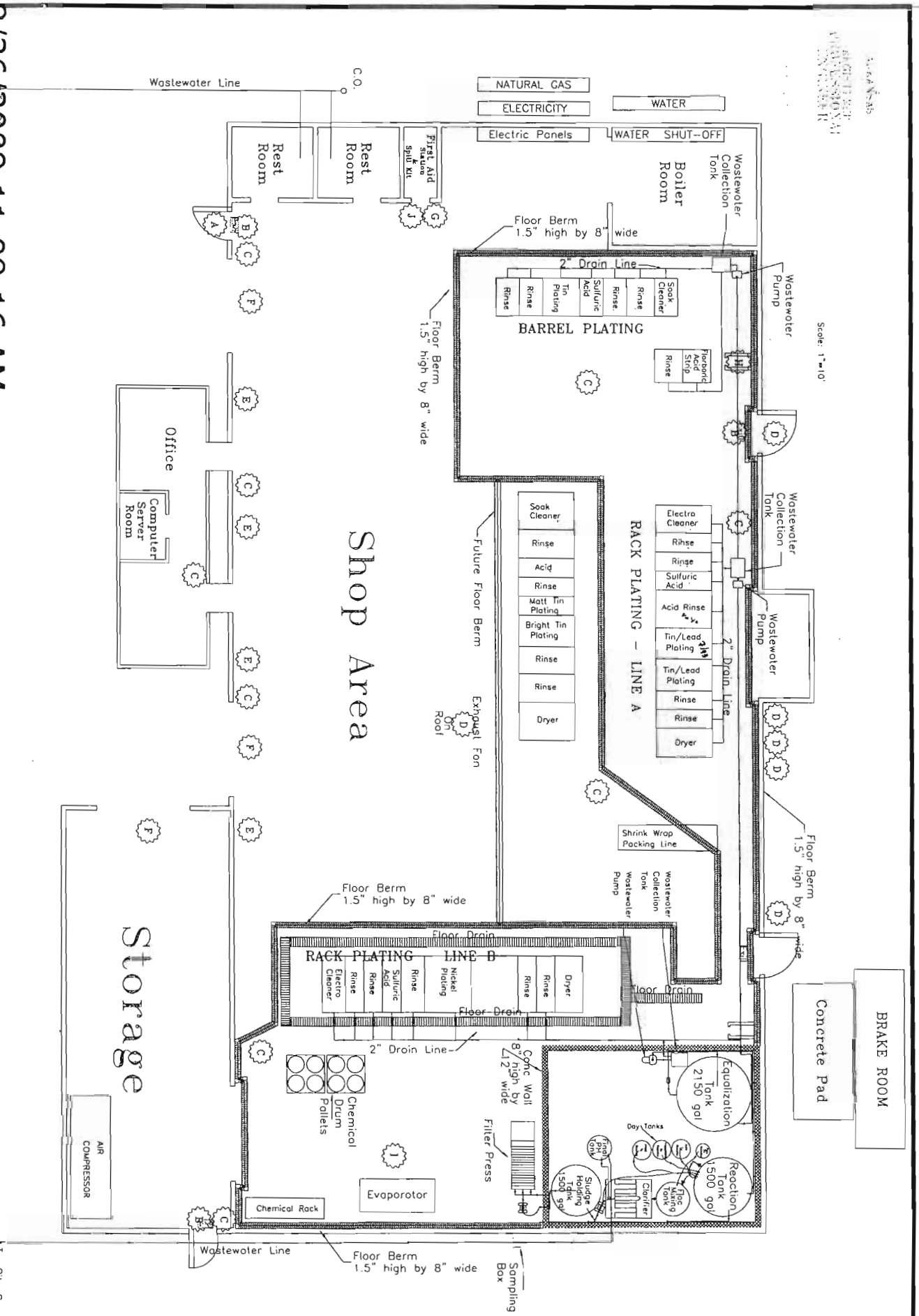
B. Individual Process Flows in Gallons Per Day (gpd)

Regulated Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Batch, etc.)
Nickel Plating line	250	350	Batch
Lead Plating Line	200	240	Batch

Unregulated Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Batch, etc.)
Tin Plating Line	50	75	Batch
Cooling water Boiler	2	5	✓ Batch
Sanitary wastewater	120	150	Batch

* Discharge from toilet waste on separate line all sinks go to Batch treatment.

8/26/2009 11:08:16 AM



COMPREHENSIVE DIAGRAM
PLATING PROCESS AND WASTEWATER TREATMENT
B & W PLATING VAN BUREN, ARKANSAS

(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: Nickel, Lead, Copper

Pollutant (mg/L)	Nickel	Lead	Copper						
Maximum									
Average									

Sample Location: Treatment tank /

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)): grab sample

Number of samples and Frequency Collected: minimum of (1) one sample prior to discharge to city sewer

Analytical Methods Used: DR 2800 Spectrophotometer PH analysis

C. Analysis of Total Plant Flow (if appropriate)

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

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

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_____

jpopma@peoplepc.com

2) new or additional pretreatment facilities to achieve compliance?
YES ✓ NO_____ New Wastewater production line placed by John Pmpa Plating & Waste Water Specialist.

3) Name of Qualified Professional that reviewed this certification: Effluent Technolo

Name & Title Carl Nixon Waste Water Specialist

Signature 972-679-0840 Date_____

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

(a) What steps or programs have you incorporated for pollution prevention?:
RCRA 2009 OCCUSAFE - air quality Sampling

(b) Do you offer employee training about pollution prevention? If so, what kinds of opportunities do you offer?
RCRA 2009 Sea. inc (501)568-3111

(c) What type of Environmental Management do you practice?
Daily waste water analysis

(d) List your Best Management Practices (BMPs):
· ISO Certified 2009
· ADEQ inspected : Compliant (2009) Follow 29 CFR Regs.
· ongoing consultant with Shawn Billings ; environmental Specialist RCRA Trained Staff.

(8) Compliance Schedule: Daily Chemical analysis.

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

B. Signatory Requirement:

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

Name - Authorized Representative	Signature
Lisa A. Toth	Lisa A. Toth
Official Title	Date
President	9-12-2009

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VAN BUREN MUNICIPAL UTILITIES COMMISSION

C. E. Dougan
Chairman

MEMBERS

Todd Young

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
VAN BUREN MUNICIPAL UTILITIES COMMMISSION
INDUSTRIAL WASTE PRETREATMENT DIVISION
INDUSTRIAL PERMIT

(Pursuant to all conditions and provisions listed in Van Buren Ordinance #26-2009)

B-1/26

CITY OF VAN BUREN
VAN BUREN MUNICIPAL UTILITIES COMMISSION
INDUSTRIAL WASTE PRETREATMENT DIVISION

ACKNOWLEDGMENT OF PERMIT LIMITATIONS

The undersigned acknowledges the receipt of the permit authorizing discharge of wastewater to the Van Buren Sewer System being Permit #VBC1721-04; 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.

Solder Plating, Inc.
(Company Name)

By: _____

Dated: _____

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City of Van Buren
Van Buren Municipal Utilities Commission
Industrial Waste Pretreatment Division

Company Name: B & W Plating, Inc.

Address: 11 North 27th Street
Van Buren, Arkansas 72956

Telephone Number: (Local Contact) Rich Capetillo, 474-6855

Name of Applicant: Lisa Toth, Owner (479) 646-7815

Authorization to discharge to the
Van Buren Wastewater Treatment Facility

B & W Plating, Inc. is authorized by the Municipal Utilities Commission to discharge
(Company Name)
wastewater from 11th North 27th Street, Van Buren, Arkansas to the Van Buren Wastewater
(address of company)
Treatment Facilities in accordance with the following conditions:

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

This Permit shall become effective November 17, 2009
(Date)
This Permit and Authorization to discharge shall expire at Midnight, November 16, 2012.
(Date)

Signed this _____ of _____, _____.
(Day) (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.

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I. DEFINITIONS

Unless the contest 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 #26-2009 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;

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. T o have access to and copy any 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. 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. Such event shall void the permit to discharge

e. If applicable, all pretreatment facilities shall be operated in a manner consistent with the Pretreatment Ordinance and any applicable Federal, State, or local regulations 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. Upset An exceptional incident in which a user unintentionally and temporarily is in a state of noncompliance with the standards set forth in this Ordinance due to factors beyond the reasonable control of the user, and excluding noncompliance to the extent caused by operational error, improperly designed treatment facilities, lack of preventative maintenance, or careless or improper operation thereof.

Where such information is given orally, a written follow-up report thereof shall be filed by the user 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 user'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 user 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 - Electric Power Failure - The permittee shall provide an alternative source of power for the operation of its pretreatment facilities or shut down its industrial operation during a power failure. The alternative power supply, whether

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

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

The permittee shall immediately notify the 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.

1. 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 which provides protection

against spills or accidental discharges of prohibited or regulated substances if determined to be necessary by the Department through the IU Slug Control Plan Checklist. This checklist was completed and a spill prevention/TOMP (Toxic Organic Management Plan) is on file.

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 Municipal Utilities Department 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/or the Pretreatment Ordinance. (Call 474-5068 or 474-0941)

c. Solids Disposal - Collected screenings, sludge's, and other solids removed from liquid wastes shall be done in accordance with Section 405 of The Clean Water Act and subtitles C & D of the Resource Conservation and Recovery Act. These shall not be allowed entry into the City's sewer collection system.

IV. COSTS AND CHARGES

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

V. REPORTING & MONITORING

a. At each connection between the permittee's sewer system and the City's

collection system, the permittee shall install a flow meter(s), composite sampler(s), sampling stations, or other device(s) that shall measure, sample, and record the quantity/quality of wastewater flow from the industry. 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 permittee shall accept the estimates of quantities of wastewater flow, as established by the Director during all periods in which the meters fail to measure the wastewater flow correctly. 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.

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, the results of such monitoring shall also be forwarded 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 the result of excessive concentrations of pollutants.

1. 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 collected from the sample box station located between the 2 clean outs on the north side of the building, labeled as "sample station", prior to discharging into the municipal sewer;

2. Discharge flow shall be determined as equivalent to the water usage;

3. Floor plan schematic & photographs of sampling station and flow schematic shall be attached to this permit and kept on file at the Van Buren Municipal Utilities laboratory.

b) Pretreatment Requirements

The permittee shall achieve compliance with the final effluent limitations (as specified in Table 1) specified for discharge in accordance with the following schedule:

For each measurement or sample taken pursuant to the requirements of this permit, the user shall record the following information:

1. The exact place, time, and date of sampling;
2. The type of sample collected (i.e. "Grab" or "Composite");
3. The dates the analyses were performed;
4. The name of the person(s) who performed the analyses;
5. The analytical techniques or methods used; and
6. The results of all required analyses.

VII. PENALTIES - Ordinances #26-2009 & 27-2009 establishes the procedure for establishing Administrative, Surcharge, Criminal and Civil Penalties for violation of the Pretreatment Ordinance. Administrative penalties shall consist of the assessment of monetary penalties set by the Ordinance for each parameter exceeded. In addition, additional 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.

The penalties shall be as follows:

Administrative Penalties, Section 10.08.16 of Ordinance #27-2009 shall be applied for discharges that exceed the limits as stated on page 15A of this permit. Penalties will be calculated on a sample basis using the actual flow (if available) or the average daily flow for the month in which the non-compliance occurs. Penalty = [(Total BOD or TSS lbs/day)-(Permitted Allotment in lbs/day)] x $2.00/lb of excess.

SURCHARGES - Ordinance #27-2009, Section 10.08.17. In addition to the normal sewer service charge and Administrative Penalties there can be assessed a separate surcharge to cover the additional cost of treatment.

The surcharge shall be as follows:

Surcharge section 10.08.17 of Ordinance #27-2009 shall be applied for discharges of BOD5 and TSS in excess of 250 mg/L. The surcharge will be calculated on a sample to sample basis using the actual flow (if available) or the average daily flow for the month in which the non-

compliance occurs.

1. $0.50 per pound of BOD5 discharged for waste strength concentration greater than 250 mg/L. i.e. (0.50) x (BOD-250) x (0.00834) x (flow in thousand gallons)

2. $0.50 per pound of TSS discharged for waste strength concentration greater than 250 mg/L. i.e. (0.50) x (TSS-250) x (0.00834) x (flow in thousand gallons)

VIII. APPEAL

Ordinance #26-2009 Section 10.08.06(8) 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 26-2009 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 Department reevaluation of its local limits. Changes or new conditions in the permit shall include a reasonable time schedule for compliance (see addendum to permit).

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 of 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 #26-2009 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 #26-2009 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 days or more after notification of non-compliance; or which have exhibited a pattern of non-compliance over that 12 month period; or which involved failure to accurately report non-compliance.

TABLE II

XIV. SELF MONITORING REQUIREMENTS PERMIT NO. VBC1721-04

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

Parameter	Maximum Discharge Limitations	Monitoring Requirements Measuring Frequency**	Sample Type
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	1X/month	24 hr. Composite
Chromium	2.77/1.71	1X/month	24hr.Composite
Copper	3.38/2.07	1X/month	24hr.Composite
Lead	0.69/0.43	1X/month	24hr.Composite
Nickel	3.98/2.38	1X/month	24hr.Composite
Silver	0.43/0.24	1X/month	24hr.Composite
Zinc	2.61/1.48	1X/month	24hr.Composite
Cyanide, total	1.20/0.65	1X/month	4 Grabs/24 hours*
Total Toxic Organics	2.13	1X/year++	4 Grabs/24 hours*
BOD_5	250 mg/L	1X/month	24 hr. Composite
TSS	250 mg/L	1X/month	24 hr. Composite
Oil & Grease	52/26 mg/L	1X/month	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 may substitute for 4 grabs/24 hrs. when due to batch type discharge.

** Self-monitoring reports shall be within 7 working days of the end of the month.

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

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

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EXHIBIT A
DEFINITIONS

1. BOD_5, 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 currently approved edition of "*Standard Methods for the Examination of Water & Wastewater*".

2. CITY all mean the City of Van Buren, Arkansas.

3. DEPARTMENT shall mean the Van Buren Municipal Utilities department.

4. DIRECTOR shall mean the Director of the Van Buren Municipal Utilities, operating under the immediate direction of the Van Buren Municipal Utilities Commission.

5. 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.

6. FLOW RECORDER shall mean a weir, meter or flume or other device, which will measure and record the volume of wastewater discharged.

7. MGD - Wastewater flow in million gallons per day.

8. AVERAGE MONITORING VALUES shall mean the arithmetic average of all Samples analyzed during a reporting period.

9. MAXIMUM DAILY FLOW shall mean the highest daily rate of wastewater flow occurring within a single day.

10. MEASURING DEVICE - Instrument determining concentration, flow, etc.

11. METER - An instrument for measuring the amount and rate of flow of liquids.

12. MINIMUM DAILY FLOW shall mean the smallest rate of wastewater flow occurring over a normal day.

13. MONITORING DEVICE shall mean any equipment which specifically measures and/or samples wastewater.

14. PRETREATMENT FACILITIES shall mean the structures, equipment, and processes required to collect, treat, and transport.

15. 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, BOD_5, TSS, fats, oils, and greases, regulated heavy metals and other contaminants, and for the departure of pH values from excepted limits.

16. 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 of water or wastewater for analytical purposes. May be designed for taking single sample (grab), composite sample, continuous sample, periodic sample.

b. COMPOSITE WASTEWATER SAMPLE - A combination of individual samples of water or wastewater taken at selected intervals, generally hourly for some specified 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.

17. SHALL is mandatory; MAY is permissive.

18. 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 currently approved edition of *Standard Methods*.

19. 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.

20. 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.

21. 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.

22. WASTEWATER DISPOSAL - The act of disposing of wastewater by discharging to the municipal sewer system.

EXHIBIT B

SAMPLING STATION SPECIFICATIONS

1. Must be accessible by Van Buren Municipal Utilities personnel at all times.

2. On the north end of the building there is a sampling station consisting of a rectangular structure large enough to insert a sample collection vessel. This structure is flanked by a cleanout on each end. To prevent discharges from entering the municipal sewer system the line can be physically blocked. (photo attached)

3. All electrical fixtures must be 110V AC.

4. Meter readings on the influent water meter will be accepted as equivalent to the sewage discharge flow.

5. Influent and effluent of sample station shall extend twelve (12) inches or more to insure against infiltration.

6. Automatic Sampler must be utilized at the designated sample station to be able to fulfill your permit requirements for parameters requiring composite sampling.

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. "1X/7" for one day/week, "1X/30" for one day/month, "30X/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, "24HC" for 24 hour 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 Rd., 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.

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EXHIBIT D

LEGAL NOTICE

Pursuant to Ordinance #26-2009, 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.

Exhibit E

Certification Statement *(due in June & December)*

Based on my inquiry of the person or persons directly responsible for managing compliance with the Total Toxic Organic (TTO) limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since the filing of the last report. I further certify that this facility is implementing the toxic organic pollutant management plan submitted to the Van Buren Municipal Utilities department.

_____ _____

(Date) (Officer)

If the user is unable to make the above certification statement the user should notify the Department sixty (60) days prior to the due date for filing the compliance reports. At that time, the Department should determine the appropriateness of requiring sampling and analysis for specific toxicant(s) and notify the user accordingly.

FACT SHEET

Employees: Full time-8; one shift.

Facility: In operation 12 months; 5 days/week. Owner: Lisa Toth

Process: Electroplating tin, tin/lead, nickel on copper parts. Final products: plated copper parts. (SIC Code #1721; Preatreatment Standard Category #433).

Average daily discharge: 622 gpd (as per permit application). Regulated Waste stream only (sanitary lines are separate)

Chemicals on site: Fluoboric acid, H_2O_2, NaOH, H_2SO_4, Methane Sulfonic Acid, Lead Methane Sulfonate, Tin Methane Sulfonate, Hydroquinone, Stannous Sulfate, Nickel Chloride, Nickel Sulfate, Boric Acid

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Flow **Batch Discharge: 430-820 gp/discharge. Permit for 1,000 gp/discharge.**

Temperature: Shall not exceed 5 – 40°C at the headworks of the waste water treatment plant as per Van Buren Pretreatment Ordinance #VB3-1997

BOD & TSS: 250 mg/L as per Van Buren Pretreatment Ordinance #VB3-1997

Metals: all limits based on concentration limits as set forth in 40 CFR Part 433.13:

	Daily Maximum	Monthly Average shall not exceed
Cadium:	0.69 mg/L	0.26 mg/L
Chromium:	2.77 mg/L	1.71 mg/L
Copper:	3.38 mg/L	2.07 mg/L
Lead:	0.69 mg/L	0.43 mg/L
Nickel:	3.98 mg/L	2.38 mg/L
Silver:	0.43 mg/L	0.24 mg/L
Zinc:	2.61 mg/L	1.48 mg/L
Cyanide:	1.20 mg/L	0.65 mg/L
Oil & Grease:	52 mg/L	26 mg/L
TSS:	60 mg/L	31 mg/L
pH:	6.0 s.u.	9.0 s.u.

Total Toxic Organics: 2.13 mg/L as per Section 40 CFR Part 433 (Exempt from testing due to absence in wastewater of like industries---must submit TTO certification statement twice per year)

ADDENDUM

Pretreatment system:

Overflow from rinse tanks collects in the EQ tank (2150 Gal. Capacity). Flows into the Reaction Tank (1500 gal. cap.) where chemical addition is made for pH adjustment and drop out metals. This flows into the Floc Mixing Tank then into the clarifier. The supernate from this clarifier flows into the tank labeled "pH tank" (no chemicals added in this tank); the sludges from the clarifier flow into the sludge holding tank. All sludges are run through the sludge press. Sludge cakes are removed and hauled off by contract waste hauler.

The evaporator collects the overflow from the clean and rinse tanks on the plating lines.

Chemical storage:

All 55 gallon drums are stored in the north end of the building. This room is surrounded by a 4-inch berm to prevent any potential spills from leaving the immediate area.

CITY OF VAN BUREN
VAN BUREN MUNICIPAL UTILITIES COMMISSION
INDUSTRIAL WASTE PRETREATMENT DIVISION

ACKNOWLEDGMENT OF PERMIT LIMITATIONS

The undersigned acknowledges the receipt of the permit authorizing discharge of wastewater to the Van Buren Sewer System being Permit #VB 2017-01; 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.

Tyson Foods, Inc.
(Company Name)

By: _____

Dated: _____

TABLE I

XIV. SELF MONITORING REQUIREMENTS PERMIT NO. VB 2017-01

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

Parameter	Maximum Discharge Limitations*	Monitoring Requirements Measuring Frequency	Sample Type
Flow	.575 MGD	continuous	Flow meter
pH	5.0 - 11.0 S.U.	Daily	4 grabs/24 hours
Temperature	Maximum 40 C	Daily	4 grabs/24 hours
	lbs/day		
BOD_5	1199	2/week	24 hr. Time Comp.
Total SuspendedSolids	1199	2/week	24 hr. Time Comp.
Oil & Grease	100 mg/L	1/ 2 weeks	4 grabs/24 hours

C2/2

*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.

* Parameters are set on a per user basis determined by actual predetermined pollutant presence.

CITY OF VAN BUREN

MUNICIPAL UTILITIES 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 #VBC1721-29; 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.

Arkansas Lamp Manufacturing Co.
(Company Name)

By:_____

Date:_____

D-1/2

TABLE II

XIV. SELF MONITORING REQUIREMENTS PERMIT NO. VBC1721-29

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

Parameter	Maximum Discharge Limitations	Monitoring Requirements Measuring Frequency**	Sample Type
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		
Cadmium	(mg/L)	2X/year	24 hr. Composite
Chromium	0.11/0.07	2X/year	24hr.Composite
Copper	2.77/1.71	2X/year	24hr.Composite
Lead	3.38/2.07	2X/year	24hr.Composite
Nickel	0.69/0.43	2X/year	24hr.Composite
Silver	3.98/2.38	2X/year	24hr.Composite
Zinc	0.43/0.24	2X/year	24hr.Composite
Cyanide, total	2.61/1.48	2X/year	4 Grabs/24 hours*
Total Toxic Organics	1.20/0.65	2X/year++	4 Grabs/24 hours*
BOD_5	2.13	2x/year	24 hr. Composite
TSS	250 mg/L	2x/year	24 hr. Composite
	250 mg/L		

*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)

CITY OF VAN BUREN
VAN BUREN MUNICIPAL UTILITIES COMMISSION
INDUSTRIAL WASTE PRETREATMENT DIVISION

ACKNOWLEDGMENT OF PERMIT LIMITATIONS

The undersigned acknowledges the receipt of the permit authorizing discharge of wastewater to the Van Buren Sewer System being Permit #VBC3400-26; 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.

FabTech, Inc.
(Company Name)

By: _____

Dated: _____

E-1/2

TABLE II

XIV. SELF MONITORING REQUIREMENTS PERMIT NO. VBC3400-26

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

Parameter	Maximum Discharge Limitations	Monitoring Requirements Measuring Frequency**	Sample Type
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*
BOD_5	250 mg/L	2X/year	24 hr. Composite
TSS	250 mg/L	2X/year	24 hr. Composite

E2/2

*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)

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:_____

F1/3

XIV. SELF MONITORING REQUIREMENTS PERMIT NO. VB 1721-22

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

Parameter	Maximum Discharge Limitations	Monitoring Requirements Measuring Frequency**	Sample Type
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		
Cadmium	(mg/L)	2X/year	24 hr. Composite
Chromium	0.11/0.07	2X/year	24hr.Composite
Copper	2.77/1.71	2X/year	24hr.Composite
Lead	3.38/2.07	2X/year	24hr.Composite
Nickel	0.69/0.43	2X/year	24hr.Composite
Silver	3.98/2.38	2X/year	24hr.Composite
Zinc	0.43/0.24	2X/year	24hr.Composite
Cyanide, total	2.61/1.48	2X/year	4 Grabs/24 hours*
Total Toxic Organics	1.20/0.65	2X/year++	4 Grabs/24 hours*
BOD_5	2.13	2X/year	24 hr. Composite
TSS	250 mg/L	2X/year	24 hr. Composite
	250 mg/L		

*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 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)

FACT SHEET

Flow 5,000 gallons per day based on highest flow over previous year times 1.25 safety factor for

growth: 2.9 Thousand gallons/day * 1.25 = 3,625 gpd. Permit for 5,000 based on plant headworks flow at 2/3 total capacity.

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

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

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

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

Metals: all mass limits based on Maximum Monthly Discharge concentration limits as set forth in

40 CFR Part 433 times the maximum allowable flow of 5,000 gallons per day times the weight per gallon of 8.34 lbs/gallon. Examples below:

Cadium:	0.07 mg/L * 8.34 lbs/gal. * 0.005 MGD = 0.003 lbs/day
Chromium:	1.71 mg/L * 8.34 lbs/gal. * 0.005MGD = 0.071 lbs/day
Copper:	2.07 mg/L * 8.34lbs/gal. * 0.005 MGD = 0.086 lbs/day
Lead:	0.43 mg/L * 8.34 lbs/gal. * 0.005 MGD = 0.018 lbs/day
Nickel:	2.38 mg/L * 8.34 lbs/gal..005 MGD = 0.099 ibs/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

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: B & W Plating Permit Number: VBC1721-04

Address: 11 North 27th Street

POTW Name: South Plant Date of last inspection: November 2, 2010

Industry Contact(s), Position: Casey Crase, Lab. Tech.

Date & Time of Visit: September 27, 2011 @ 10:00 A.M.

Description of Manufacturing Process: Nickle, Tin and Lead Electroplating

Sources of Process Wastewater: off rinse tanks, wash basins & tanks

Categorical Industry? Yes

Basis for Permit Discharge Limits: 40 CFR Part 433

Description of pretreatment equipment and procedures: EQ Tank where pH is adjusted to 9-9.5 s.u. Then to Reaction Tank (add metal precip. & coagulant) to Flock Mixing tank to clarifier to the final pH tank or sludge holding tank. From sludge holding WW goes to filter press or city sewer. Still using the evaporator

Spill prevention & Solvent Management Procedures: have cleanup kits on site, Waste from these goes to contract waste haulers for disposal. If acid is spilled – neutralize with caustic then to evaporator. If anything is spilled and there are any doubts as to the waste composition it all goes into the evaporator or put into a barrel and the solids hauled off.

Sampling location & equipment: sample box on north side of building

INSPECTION REPORT

INSPECTION OF LABORATORY/RECORDS

*1. Records & reports for analysis and monitoring maintained for three years? yes

2. Records of lab equipment calibration and maintenance? No. Haven't been keeping records. Send them a pH calibration bench sheet today via e-mail.

**3. Pass on-site visual inspection of lab equipment calibration? No.

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? Yes

12. Calculation of analysis satisfactory? yes

13. Are duplicate samples analyzed? yes

14. Is a private laboratory used? Using Chem Lab of Fort Smith, AR as of August 2011

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

*sewer hook-up/1st discharge in November 2009
**pH meter has a label "Serfilco, LTD" No ATC – must be adjusted manually.

G2/6

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
(200 gal. discharged with over the limit lead – recorded in file)

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

20. Has discharge loading (organic, hydraulic) changed since last inspection? no

21. If discharge loading has changed list causative factor: n/a

22. Has discharge loading impacted P.O.T.W.? (Interference, Pass-Through, Collection system blockage, Safety, etc.) unknown – doubtful due to low amounts discharged

23. Has permittee exceeded effluent limits (BOD, TSS, pH, Oil & Grease, metals, etc.) since last inspection? List cause(s) 1X – lead in November 2010

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

INSPECTION OF PRETREATMENT or SAMPLING FACILITY (continued)

*25. Has permittee complied with sampling procedures and techniques as defined in 40 Code of Federal Regulations, Part 136? yes
Chain of Custody in effect? Yes
Type(s) of sample(s) yes –batch*
Samples refrigerated during compositing? No
Sample preservation & time held prior to shipping/analysis yes

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

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

---

INSPECTION OF PRETREATMENT or SAMPLING FACILITY

1. Are all treatment units in service? yes

2. Qualified operating staff provided? yes. Elbert has had PT training from Rheem Mfg. WW Mgr. Both Elbert & Casey have had training from the PT equipment manufacturer. Also, a 13 yr. employee on site has been trained by Casey & Elbert on B & W's pretreatment equipment

3. Treatment/Sampling facility properly operated and maintained? yes

4. Is monitoring equipment operated & maintained in good working order? yes

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

Problems – call manufacturer or Troy Smith (wastewater mgr. at Rheem – Ft. Smith)

6. Describe procedural plan to prevent accidental discharges from entering municipal sewer system: System is closed until in-house testing ok's potential discharge(s). Valves must be opened prior to any discharge

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

*low quantity discharges often make composite sampling difficult to impossible. Make notes of sample collection procedures on each chain-of-custody form. Batch discharge – grab samples

INSPECTION OF PRETREATMENT or SAMPLING FACILITY (continued)

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

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

From the filter press---filter bags and evaporated sludges are hauled by EQ Oklahoma, Inc. out of Tulsa, OK (ARD # 982758997) - Acids (fluoroboric et al)

10. Sludge hauling documented by manifest? Yes (Viewed tracking #003889308)

11. Type of flow measuring device? Use average daily flow

12. Flow measuring device properly installed? n/a

13. Flow measuring device adequate to handle flow rates? n/a

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

15. Does permittee have an Operations & Maintenance Manual on site? For laboratory - yes. They also have a flow chart for equipment and a SOP for lab tests. For Water pretreatment – the system operation file is in file cabinet detailing how the system should work.

INSPECTION OF "CHEMICAL STORAGE & PRODUCTION AREA"

1. Are there any chemicals stored near floor drains? If yes, list details below: no. The sump in the building's NW corner gets any spills or leaks and this will go into the sump and then on to waste water treatment

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

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

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.?)

Yes

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? New filter System significantly reduced discharge due to water reuse & Prof-Ml (chemical) for Acid tank drops out metals which go to filter press & Acid tank; don't need to be dumped as often, working on dropping more metals out of soap (wash) tanks to enable lower water replenishment

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 [signature] Date & Time 9/27/11 10:15Am

Industry Representative Casey C Date/Time 09/27/11 10:15Am
Comment Area:

G6/6

PAGE EXHIBIT C PERMIT # VCS-1721-04

VAN BUREN INDUSTRIAL WASTE PRE-TREATMENT
DISCHARGE MONITORING REPORT

Check here for No Discharge ☐

NAME Lisa Toth
ADDRESS 11 N. 22nd Street
Van Buren, AR 72956

(2) VCS-1721-04
PERMIT NUMBER

NOTE: Read instructions before filling out form.

FACILITY B&W Plating
LOCATION

(1)

(3) MONITORING PERIOD

	YEAR	MONTH	DAY		YEAR	MONTH	DAY
FROM	2012	05	10	TO	2012	05	10

	QUALITY OR CONCENTRATION					
PARAMETER (4)	(5) MINIMUM	(5) AVERAGE	(5) MAXIMUM	(6) UNITS	FREQUENCY OF ANALYSIS (7)	SAMPLE TYPE (8)
pH			8.1	mg/L	1 x month	grab
Temperature			27.0	°C	1 x month	grab
Cadmium			<0.003	mg/L	1 x month	grab
Chromium			0.022	mg/L	1 x month	grab
Copper			<0.010	mg/L	1 x month	grab
Lead			0.027	mg/L	1 x month	grab
Nickel			0.183	mg/L	1 x month	grab
Silver			0.101	mg/L	1 x month	grab
Zinc			<0.020	mg/L	1 x month	grab
Cyanide			<0.010	mg/L	1 x month	grab
BOD			44.5	mg/L	1 x month	grab
TSS			4.67	mg/L	1 x month	grab
Oil and Grease			13.6	mg/L	1 x month	grab

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.

Casey

TITLE: PRINCIPAL EXECUTIVE OFFICER Telephone Number: 479-474-6[illegible]

2012 / 05 / 29
Date: Year/Month/Day

Signature of Principal Executive Officer Casey C

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 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.

H1/2

In Compliance

CHEM LAB INC.
ANALYTICAL SERVICES

Ark Lab I.D.# 66-0666
Okla Lab I.D.# 9601

Phone (479) 646-15
FAX (479) 646-9148
Emergency Numbers
(479) 420-9033
(918) 658-5127

Site/Facility Location
Client Sample I.D.
Date of Sample 5/10/12
Lab I.D.# 12-05-0556

Client– B&W Plating
Control Number– 12-05-0556
Date/Time Sampler on– 5/10/12 9:00
Report Issued– 5/23/12
Date/Time Sampler off– 5/10/12 10:00
PO Number–
Date/Time Received in Lab– 5/10/12 13:48
Sample ID– Effluent
Collected From– Outfall #001
Sample Phase– Liquid

Grab

Parameter	Concentration	Units	Collected By	Collected @ Date/Time	Analyzed By	Analyzed @ Date/Time	Method	Batch #	Blank Value Less than MDL	RPD Value Acceptable Range	LFB % Recovery Acceptable Range	Spike % Recovery Acceptable Range	Spike Dup % Recovery Acceptable Range	MDL MQL
pH	8.1	SU	Client-CC	5/10/12 9:00	Client-CC	5/10/12 9:10	SM 4500-H+ B	N/A	N/A	N/A	N/A	N/A	N/A	N/A SU
										N/A	N/A	N/A	N/A	N/A SU
Temperature	27.0	°C	Client-CC	5/10/12 9:00	Client-CC	5/10/12 9:15	SM 2550 B	N/A	N/A	N/A	N/A	N/A	N/A	N/A °C
										N/A	N/A	N/A	N/A	N/A °C
Cyanide	<0.010	mg/L	Client-CC	5/10/12 10:00	JC	5/13/12 9:30	SM 4500-CN E	05187	yes	4.26	99.0	96.0	92.0	0.004 mg/L
										0.081 to 12.5	87.4 to 97.7	87.4 to 97.7	87.4 to 97.7	0.010 mg/L
Oil & Grease	13.6	mg/L	Client-CC	5/10/12 9:05	DE	5/11/12 10:50	SM 4500-CN E	05184	yes	-2.960	102	92.6	95.4	0.004 mg/L
										0.081 to 12.5	87.4 to 97.7	87.4 to 97.7	87.4 to 97.7	0.010 mg/L
BOD	44.5	mg/L	Client-CC	5/10/12 9:00	DE	5/10/12 19:35	SM 5210 B	05179	yes	0.410	98.8	N/A	N/A	2.00 mg/L
										-18.1 to 19.6	87.5 to 112	N/A	N/A	5.00 mg/L
TSS	4.67	mg/L	Client-CC	5/10/12 9:00	DE	5/11/12 8:40	SM 2540 D	05180	yes	-2.53	N/A	N/A	N/A	1.00 mg/L
										-25.1 to 20.9	N/A	N/A	N/A	2.50 mg/L
Cadmium	<0.003	mg/L	Client-CC	5/10/12 9:00	JC	5/13/12 13:54	SM 3120 B	05186	yes	0.474	117	98.3	97.8	0.001 mg/L
										-23.4 to 19.0	20.0 to 145	20.0 to 145	20.0 to 145	0.003 mg/L
Chromium	0.022	mg/L	Client-CC	5/10/12 9:00	JC	5/13/12 13:54	SM 3120 B	05186	yes	5.40	108	110	105	0.003 mg/L
										-18.5 to 19.8	71.4 to 123	20.0 to 156	20.0 to 156	0.010 mg/L
Copper	<0.010	mg/L	Client-CC	5/10/12 9:00	JC	5/13/12 13:54	SM 3120 B	05186	yes	-1.13	117	96.7	97.8	0.000 mg/L
										-11.9 to 13.4	42.3 to 130	42.3 to 130	42.3 to 130	0.010 mg/L
Lead	0.027	mg/L	Client-CC	5/10/12 9:00	JC	5/13/12 13:54	SM 3113	05186	yes	-3.92	117	98.5	102	0.015 mg/L
										-39.4 to 29.0	6.57 to 147	5.43 to 158	5.43 to 158	0.038 mg/L
Nickel	0.183	mg/L	Client-CC	5/10/12 9:00	JC	5/13/12 13:54	SM 3120 B	05186	yes	0.532	119	73.4	73.0	0.024 mg/L
										-22.1 to 22.3	10.6 to 155	12.0 to 143	12.0 to 148	0.040 mg/L
Silver	0.101	mg/L	Client-CC	5/10/12 9:00	JC	5/13/12 13:54	SM 3120 B	05186	yes	0.380	57.3	57.1	81.5	0.001 mg/L
										-23.2 to 24.4	26.4 to 135	26.4 to 135	26.4 to 135	0.003 mg/L
Zinc	<0.020	mg/L	Client-CC	5/10/12 9:00	JC	5/13/12 13:54	SM 3120 B	3.75	yes	114	102	98.4	79.0	0.005 mg/L
										-18.9 to 17.7	26.7 to 131	43.3 to 152	43.3 to 152	0.020 mg/L

Approved by _____

Date 5/23/12

symbol denotes matrix interference

2/12 H

ADEQ

A R K A N S A S
Department of Environmental Quality

March 13, 2012

Darel Manus
City of Van Buren North Plant
2806 Bryan Road
Van Buren, AR 72957

RE: NPDES Permit: AR0040967, AFIN: 17-00565
Warning Letter - Effluent Violations

Dear Mr. Manus:

A recent review of the NPDES file for the City of Van Buren North Plant has revealed the enclosed effluent violations for the review period of January 1, 2009 through February 28, 2012.

You will need to determine the cause of these effluent violations and work towards compliance.

As you know, Arkansas Pollution Control and Ecology Commission regulations and your NPDES Permit require you to take all reasonable measures necessary to eliminate or prevent the occurrence of violations. Please note that any violation of your permit can lead to enforcement action by ADEQ pursuant to the Arkansas Water and Air Pollution Control Act. Also, be aware that we maintain records of violations and of non-compliance reports documenting corrective action to determine the appropriateness and level of the enforcement action.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me by phone at 501-682-0823 or e-mail at suel@adeq.state.ar.us.

Sincerely,

Kevin Suel
Enforcement Analyst
Water Division Enforcement Branch

Enclosure

DMR Effluent Violations Since 1/1/09

AR0040967 - VAN BUREN, CITY OF NORTH WWTP / Major POTW

DMR End Date	Disch-Desig	Parameter Desc	Reported DMR Value	Permit Limit	Vio %
05/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	115.5	85.5	35%
07/31/2011	001-A	Copper, total recoverable (MO AVG, ug/L)	14	9.2	52%
08/31/2011	001-A	Zinc, total recoverable (MO AVG, ug/L)	120	85.5	40%
08/31/2011	001-A	Copper, total recoverable (MO AVG, ug/L)	13	9.2	41%
09/30/2011	001-A	Nitrogen, ammonia total (as N) (7 DA AVG, mg/L)	3.15	3	5%
09/30/2011	001-A	Copper, total recoverable (MO AVG, ug/L)	15.5	9.2	68%
09/30/2011	001-A	Copper, total recoverable (7 DA AVG, ug/L)	19	18.5	3%
10/31/2011	001-A	Copper, total recoverable (MO AVG, ug/L)	18	9.2	96%

Date Submitted: 03/13/2012 | Integrated Compliance Information System-NPDES | Date Entered _____

ICIS-NPDES

EA Initials: KS | **ENFORCEMENT ACTION CODING FORM** | ICIS Staff Inintials: _____

FACILITY NAME:	**VAN BUREN, CITY OF NORTH WWTP / Major POTW**
NPDES PERMIT #:	AR0040967

Enforcement Action Type: Letter of Violation/ Warning Letter	**ACTION Tracking #:**
Issued By: State	**PENALTY: $**
Effective Date:	***SEP Contribution #1:* $**
Regional Court Docket (LIS) #:	***SEP Contribution #2:* $**
Programs Violated:	

Specify the TYPES OF VIOLATIONS addressed by this enforcement action below.

DMR VIOLATIONS — Violation Types: D80/D90/E90

DISCHARGE NUMBER	PARAMETER NUMBER	PARAMETER NAME	MONITORING PERIOD END DATE	VIOLATION CODE
001-A	01094-1-0	Zinc, total recoverable (MO AVG, ug/L)	05/31/2011	E90
001-A	01119-1-0	Copper, total recoverable (MO AVG, ug/L)	07/31/2011	E90
001-A	01094-1-0	Zinc, total recoverable (MO AVG, ug/L)	08/31/2011	E90
001-A	01119-1-0	Copper, total recoverable (MO AVG, ug/L)	08/31/2011	E90
001-A	00610-1-0	Nitrogen, ammonia total (as N) (7 DA AVG, mg/L)	09/30/2011	E90
001-A	01119-1-0	Copper, total recoverable (MO AVG, ug/L)	09/30/2011	E90
001-A	01119-1-0	Copper, total recoverable (7 DA AVG, ug/L)	09/30/2011	E90
001-A	01119-1-0	Copper, total recoverable (MO AVG, ug/L)	10/31/2011	E90

NARRATIVE CONDITION/COMPLIANCE SCHEDULE VIOLATIONS — Violation Codes: C10, C20, C30, C40

NUMBER-TYPE-EVENT	SCHEDULE EVENT	SCHEDULE DATE	VIOLATION CODE

2006

RIVER CITY COATINGS

CHEMICAL SPILL PREVENTION AND MANAGEMENT PLAN

Our pre-treatment chemical shall be contained in 330 gal. Tote containers, suspended over 375 gal. Portable secondary emergency spill containment tanks from which the chemical can be reclaimed and put back into safe containers.

Our reorder point shall be at approximately 30 gals. Therefore, we won't have more than approx. 360 gals. Contained in no more than two (2) 330 gal. Tote containers at any one time. Also, a blocking device will be installed in the drain trough in the concrete floor to prevent entry into the sewer.

J-1/2

COPPERFAB
479-646-7815
5512 S. 66TH STREET
FORT SMITH, AR. 72903

B&W PLATING
479-474-6855
11 NTH 27TH STREET
VAN BUREN, AR. 72956

To Whom It May Concern:

I, Casey Crase, certify that this facility does not contain any toxic organics

Sincerely,

Casey Crase
06/20/12

J 2/2

CALCULATIONS OF ARKANSAS WATER QUALITY-BASED EFFLUENT LIMITATIONS

For an Arkansas River/Stream

	(Reserved)	
STEP 1:	INPUT TWO LETTER CODE FOR ECOREGION (Use Code at Right)	AV
	Basin Name	AR River

FACILITY

Permittee	VNBN South
NPDES Permit No.	AR0021482
Outfall No.(s)	001
Plant Ave Flow (MGD)	2.59
SIUs Ave Flow (MGD)	0.67
Domestic Flow (MGD)	1.92
Plant Design Flow (MGD)	4.00
Plant Design Flow (cfs)	6.18

RECEIVING STREAM

Is this a large river? (see list at right)(enter "1" if yes, "0" if no; make entry as a number)	1
Name of Receiving Stream:	Ark River
Waterbody Segment Code No.	3H
Is this a lake or reservoir? (enter '1' if yes, ' 0 ' = no; make entry as a number)	0
Is seasonal critical flow applicable (1=yes, 0=no); see Reg 2 page 1-3 for details.	0
(Reserved) DO NOT INPUT DATA INTO CELL H25, H26 & H27....LEAVE BLANK=>	
(Reserved)	
(Reserved) (Reserved)	
(Reserved) (Reserved) (Reserved)	
(Reserved) (Reserved) (Reserved)	
(Reserved) (Reserved) (Reserved)	

Ecoregion TSS (mg/l) (For Large River, See List to Right)			12.00
Ecoregion Hardness (mg/l)			125.00
Enter 7Q10 (cfs)	(Reserved)		700.00 (Reserved
Long Term Ave / Harmonic Mean Flow (cfs)			1350.00 (Reserved (Reserved)
Using Diffusers (Yes/No)			No
pH (Avg)			7.45
Percent (%) of 7Q10 for Chronic Criteria			0.25
Percent (%) of 7Q10 for Acute Criteria			0.06
Water Effect Ration (WER)			1.00
EPA Statistical Factor for Data (enter 2.13 for <20; enter 1 for >20)			2.13
Ave Monthly Limit LTA Multiplier (Ref: page 103 TSD for WQ-Based Toxics Control)			1.55
Max Daily Limit LTA Multiplier (Ref: " " " ")			3.11

Codes & TSS for Ecoregions and Large Rivers

Ouachita Mts. Eco (OM) =	2.0 mg/l	Arkansas (Ft. Smith to Dardanelle Dar	12.0 mg/l
Ozark Highlands Eco (OH) =	2.5 mg/l	Arkansas (Dardanelle Dam to Terry Lé	10.5 mg/l
Boston Mts. Eco (BM) =	1.3 mg/l	Arkansas (Terry L&D to L&D No. 5)	8.3 mg/l
Ark River Valley Eco (AV) =	3.0 mg/l	Arkansas (L&D No. 5 to Mouth)	9.0 mg/l
Gulf Coastal Eco (GC) =	5.5 mg/l	White (Above Beaver Lake)	2.5 mg/l
Delta Ecoregion (DL) =	8.0 mg/l	White (Below Bull Shoals to Black Riv	3.3 mg/l
		White (From Black River to Mouth)	18.5 mg/l
		St. Francis River	18.0 mg/l
		Ouachita (Above Caddo River)	2.0 mg/l
		Ouachita (Below Caddo River)	5.5 mg/l
		Red River	33.0 mg/l

Total Hardness for:

Arkansas River = 125 mg/l	Red River = 211 mg/l
Ouachita River = 28 mg/l	St. Francis River = 103 mg/l
White River = 116 mg/l	
Gulf Coastal = 31 mg/l	Ouachita Mount = 31 mg/l
Ozark Highlands = 148 mg/l	Ark River Valley = 25 mg/l
Boston Mount = 25 mg/l	Delta = 81 mg/l

Large Rivers

Mississippi River, Arkansas River, Red River
White (Below confluence with Black River)
Ouachita (Below confluence with Little Miss. River)

For industrial and federal facility, use the highest monthly average flow for the past 24 months. For POTWs, use the design flow.

#VALUE! => No violation or Not Applicable

K-1/6

VNBN South MAHL

Pollutant	% Rem[7]	Water Quality	Water Quality[1]	Sludge	Sludge[1]	Inhibition[2]	Inhibition[4]	MAHL	MAHC	Domestic	Allocation for %SF	MAIL	Max Inf Exceeded Max Effluent	
		mg/l	lbs/day	mg/kg	lbs/day	mg/l	lbs/day	lbs/day	mg/l	lbs/day	lbs/day[5]	lbs/day	MAHC	vs WQS(mg/l)
Cadmium Total	67	0.1265	8.2818	85	1.17	1.00	21.60	1.17	0.05415	0.01	1.05	1.043	No	No
Copper Total	68	0.4316	29.1356	4300	58.30	1.00	21.60	21.60	1.00000	0.35	19.44	19.088	No	No
Lead Total	61	0.5877	32.5483	840	12.70	1.00	21.60	12.70	0.58778	0.08	11.43	11.349	No	No
Mercury Total	60	0.00039	0.0212	57	0.88	0.10	2.16	0.0212	0.00098	0.0032	0.02	0.016	No	No
Nickel Total	42	15.0719	561.3125	420	9.22	1.00	21.60	9.22	0.42684	0.10	8.30	8.202	No	No
Selenium Total	50	0.1378	5.9513	100	1.84	0.20	4.32	1.844	0.08537	0.03	1.66	1.628	No	No
Silver Total	75	0.1126	9.7273	0	0.00	0.25	5.40	5.40	0.25000	0.04	4.86	4.824	No	No
Zinc Total	69	3.4612	241.1720	7500	100.22	0.300	6.48	6.48	0.30000	2.80	5.83	3.027	No	No
Chromium Total	82	22.6802	2721.6997	3000	33.73	1.00	21.60	21.60	1.00000	0.16	19.44	19.280	No	No
Cyanide Total	99	0.1540	10.7315	0	0.00	0.10	2.16	2.16	0.10000	0.16	1.94	1.784	No	No
Arsenic	45	4.8078	188.8193	75	1.54	0.10	2.160	1.54	0.07114	0.02	1.38	1.361	No	No
Molybdenum	50	0.0000	0.0000	75	1.38	0.20	4.32	1.383	0.06403	0.01	1.24	1.237	No	No
Beryllium	50	0.173405	7.4913	0	0.00	0.10	2.16	2.16	0.10000	0.00	1.94	1.939	No	No
Phenols								?		?				
503 Table I														
Molybdenum	50	0.0000	0.00	75		0.20							0.022	0.046
PCBs								?		?				
NPDES Permit														
CBOD5							Note 8: ==>	5108.00	Note 9: ==>	3910.00	4597.20	687.200		
TSS							Note 10 ==>	6672.00	Note 9: ==>	4600.00	6004.80	1404.800		
NH3-N							Note 11 ==>	835.00	Note 11 ==>	398.70	751.50	352.800		
TP								?		?				
TK								?		?				

Dry tons/day of sludge[3] 4.61 Saftey Factor 0.10

Notes:

1. lbs/day = mg/l * 8.34 * average flow / (1-%Rem)
2. Inhibition Levels from Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l and Zinc Level from 04-19-2005 Inf analysis
3. lbs/day = (dry tons/day * 0.002 * criteria(mg/kg))/ % Rem; Dry Tons/Day taken from Audit report dated July 11, 2006, page 3
   Dry tons/day of sludge based on page 3 of checklist in Audit Report dated July 11, 2006.
4. lbs/day = mg/l * Flow * 8.34
5. lbs/day = (1 - SF) * MAHL
6. MAIL = Maximum allowable industrial loading = Allocation for % SF - Domestic
7. Rem Eff from Page 3-56 EPA 833B87202, Be & Mo est @ 50; Cu,Pb & Zn from "Rem" spreadsheet in this Workbook
8. The Department elected to use the actual current POTW's peak loading capacity for CBOD as shown on the Conventional Pollutants spreadsheet for the month of Dec 2011.
   The design loading is 4.0 MGD * 200 mg/l * 8.34 = 6672 lbs/day which is greater than the actual peak loading (5108 lbs/day) for the past twelve months is also acceptable.
   The influent effluent data on the Conventional Pollutants sheet was provided to the Department (Torrence) in an email from the City (Redo) dated 5-30-2012.
   Other options are also available if the City elects to develop limits; please refer to page 5-22 in *"EPA Local Limits Development Guidance; 833-R-04-002A"*
9. Since the City has not provided the Department with Domestic sampling for conventional pollutants, the Department elected to use the Ten States Standard BOD rate of 0.17 lb/day per capita (BOD is always equal to or greater than CBOD). The 2010 population of Van Buren was 23,000; therefore, the domestic load is 0.17 X 23,000 = 3910 lbs/day. The TSS domestic rate is 0.20 lb/day per capita (.2 X 23,000 = 4600 lbs/day).
   Reference: Recommend Standards for Wastewater Facilities 2004 Edition (Ten States Standards); Section 11.253.a
10. The actual current peak loading for TSS removal is only 3504 lbs/day for the month Nov 2011. The Department elected to use the design loading for TSS at 4.0 MGD X 200 mg/l X 8.34 = 6672 lbs/day. Refer to Hawkins-Weir Project #04251 dated 11/14/2007.
    The plant average only 266 lbs/day of TSS in the effluent; the allowable limit is 1000.8 lbs/day.
11. The Department elected to use the actual current maximum performance for NH3-N of 835 lbs/day (the design load is 4.0 MGD X 25 mg/l X 8.34 = 837 lbs/day)
    Note that during the month of Mar 2012 the effluent average 151 lbs/day of NH3-N. The South plant has no limit for March but the limit for May - Oct is 166.8 lbs/day.
    Referring to *"EPA Design of Wastewater Treatment Facilities Major Systems"*, find in Table 2-2. Typical Characteristics of Domestic Sewage the average value of NH3-N at 15 mg/l. During the month of Mar 2012 the average flow was 3.187 MGD. The average domestic loading for NH3-N is 3.187 MGD X 15 mg/l X 8.34 = 398.7 lbs/day.

K-2/6

2011-2012 Annual Averages --- South Plant

Effluent

Month	Effluent Flow	BOD(mg/L) May-Oct.	BOD(lbs/day)	CBOD (mg/L) Nov.-Apr.	CBOD (lbs/day)	TSS(mg/L)	TSS(lbs/day)	Fecal Coli.(c.f.u.)	pH(min/max)	NH3-N (mg)	NH3-N(lbs)	Max. Flow	temp(hi/low)	ave.temp	TDS (mg/L)
Oct.2011	1.758			9	131	9	133	54	7.24/7.49	0.8	12.6	2.998	21.9/16.4	20.3	466
Nov.2011	2.285	16	319			13	266	72	7.26/7.60	6.6	114.8	4.382	18.9/12.2	16.1	459
Dec.2011	2.532	15	322			11	247	25	7.34/7.70	11	219	4.312	13.6/10.2	12.1	355
Jan.2012	2.448	14	272			14	276	36	7.18/7.61	16	284	4.440	13.3/9.3	11.3	630
Feb 2012	2.711	12	270			9	237	6	7.14/7.48	18	302	4.005	15.3/9.1	12.4	303
Mar.2012	3.278	12	345			6	172	29	7.17/7.57	7	151	6.198	20.3/14.3	17.0	270
Apr.2012	2.254	13	277			11	219	70	7.24/7.67	12	246	4.196	22.7/18.5	20.1	398
May.2012															
Jun.2012															
Jul.2012															
Aug.2012															
Sept.2012															
Averages	2.467	14	301	1.5	22	10	221			10.2	190			15.6	

Influent

Month	InfluentFlow	CBOD(mg/L) May-Oct.	CBOD(lbs/day)	BOD (mg/L) Nov.-Apr.	BOD (lbs/day)	TSS(mg/L)	TSS(lbs/day)	pH(min/max)	NH3-N (mg)	NH3-N(lbs)	Max. Flow	temp(hi/low)	ave.temp	NO2 & NO3	P
Oct.2011	1.762			214	3161	94	1388	7.03/7.59	17	251	3.512	25.5/19.0	22.6	9.488	3.3
Nov.2011	2.273	226	4911			165	3504	7.10/7.63	18	397	4.368	21.7/16.0	19.0	5.486	2.8
Dec.2011	2.513	254	5108			106	2062	7.01/7.48	15	318	4.160	17.4/13.5	15.4	1.048	5.0
Jan.2012	2.498	181	3881			89	2002	7.01/8.75	16	347	6.643	17.7/10.9	13.8	11.85	9.8
Feb.2012	2.689	171	3818			101	2244	7.00/7.89	15	331	4.234	16.4/10.9	13.9	18.812	8.0
Mar.2012	3.187	112	2710			76	1859	7.00/7.55	25	835	6.869	19.8/15.2	16.9	11.36	4.3
Apr.2012	2.207	250	4071			215	3496	7.24/7.49	23	384	3.832	22.3/17.5	19.5	0.954	11.6
May.2012															
Jun.2012															
Jul.2012															
Aug.2012															
Sept.2012															
Averages	2.447	199	4083	36	527	121	2365		18	409			17.3	8.4	6.4

K-3/6

Project: Van Buren Main (South) Plant
Project Number: 04251
Date: 11/14/2007

This project is a conversion of the existing aerated lagoon in Van Buren to a complete mix aerated lagoon with separate clarification. The project also increases the design flow capacity from 3.1 MGD to 4.0 MGD consistent with the 20 year growth projections. The purpose of the project is to provide for the removal of ammonia nitrogen to comply with the NPDES discharge standards and in compliance with a Consent Administrative Order. The project also provides for UV disinfection to comply with the discharge limits for total residual chlorine. The project as designed includes a new inlet fine screen and coarse screen, the modification of the existing aerated lagoon, the construction of two secondary clarifiers with provisions for biosolids recirculation, and the construction of UV disinfection. Ancillary to the project will include new flow monitoring equipment and the providing of standby emergency power for the treatment train, including the diffused aeration, clarification, disinfection, controls and all pumping functions.

Design Parameters		
Average Design Flow	4,000,000	GPD
Average BOD	150	mg/l
Average TSS	200	mg/l
Influent Avg Inert Solids Conc	60	mg/l
Influent Ammonia Nitrogen	25	mg/l
Influent Screen (replaces existing fine drum screen)		
Design Basis (fine screen)	2	SF/MG
Peak Influent Flow	7,000	GPM
Standby Manually Cleaned Coarse Screen (channel sized for future fine screen)		
Fine Screen Opening	0.25	Inch
Estimated Screenings Production	2	CF/MG
Aerated Lagoon		
Winter Temperature minimum	12	C
θm ratio	0.07	kg/kg
Design solids yield rate	0.66	kg/kg BOD removed
Solids Waste Rate	2610	Pounds/Da
Reactor HRT	24	Hours
Reactor SRT	15	Days
Applied O2 per lb BOD	1.6	Pounds
Applied O2 per lb Ammonia N	4.6	Pounds
Design alpha	0.65	
Design Beta	0.95	
Removal Basis	100%	BOD
	100%	NH3-N
Mixing Requirement	7	SCFM/1000 CF
Requirements for mixing	3,800	SCFM/1000 CF
Requirements for Oxygenation	4,696	SCFM/1000 CF
Computed Aerated Cell Volume at 13' depth	4.0	MG

C. Larry Weir, P.E.

K-4/6

5.3.1 BOD/TSS

One of the most commonly documented industry-related causes of POTW effluent violations is the discharge of excessive conventional pollutants, particularly BOD and TSS (see Exhibit 5-5). As stated earlier in the chapter on POC development, POTWs should develop MAHLs for all NPDES-permitted conventional pollutants and understand the degree to which the plant is loaded. In fact, some EPA regions require any wastewater treatment plant that operates at 80 percent of any NPDES permitted conventional pollutant MAHL for three months of the calendar year to calculate a MAIL and establish local limits for those pollutants. To establish MAHLs for BOD and TSS, EPA recommends the following.

Exhibit 5-5: Less BOD, More Ammonia and Phosphorous

In the late 1980s, the City of Trenton Wastewater Treatment Plant (WWTP) violated NPDES permits due to excessive BOD_5 loading. Today, BOD_5 loading has been cut in half after two industries that accounted for half of the BOD_5 loading upgraded their existing treatment facilities by including nutrient addition and longer retention times. However, the industries' nutrient addition led to problems with high amounts of Ammonia-N and Phosphorous discharged to the WWTP. The ratio of BOD to Ammonia-N to Phosphorous has increased from 100:5:1 to 100:11:2.

- The POTW's rated average design capacity, along with any improvements subsequent to construction that have increased plant capacity, should be used as a "monthly average"- based MAHL. The treatment works is designed to have the capacity to consistently treat a specified amount of conventional pollutants to acceptable levels for discharge. A copy of the approved design capacity may be available from the State as part of the design or operating manual for the POTW.

- The POTW's peak loading capacity should be used as the "daily maximum"- based MAHL. Based on a peaking factor, peak loading capacity reflects the plant's ability to handle diurnal, wet weather, or seasonal peaks.

EPA recognizes that sometimes average design capacity and the corresponding peak loading factor may be too conservative when considering the industrial allocation of conventional pollutants. Therefore, the POTW can provide a technically defensible argument for establishing a MAHL for the plant. These arguments could include the following.

- Performing mass balance calculations on the entire plant for the current condition, and scale up the plant loading until loading rates for individual processes exceed design guidelines, including solids handling facilities.

- Verifying capacity of hydraulic structures.

- Performing detailed modeling of biological process capacity under current loading conditions using software (e.g., BioWin by Envirosim). Calibrate the model to current conditions and then increase loading rates to estimate failure.

- Determining maximum biological process loading compared to typical design guidelines - including aeration equipment capacity, basin sizing, mixing energy, secondary clarifier sizing, return activated sludge/waste activated sludge capacity, nutrient removal capacity, winter and peak operation.

- Evaluating current operating conditions. For example, a plant with three activated sludge trains is operating reliably at 2/3 of its design loading with only one train in service.

- Stress testing of individual processes. Increase loading through a single process train until failure is recognized.
- Benchmarking against similar plants and processes.
- Pilot or bench-scale testing of unit operations that have been determined to possibly be a bottleneck for plant capacity.

Smaller plants should incorporate a safety factor in developing the BOD/TSS MAHL for the plant using these methods.

5.3.2 Ammonia

Typical concentrations of ammonia in untreated domestic wastewater range from 10 to 50 mg/L. Therefore, significant non-domestic industrial sources of ammonia will be unusual and the result of industry-specific activities. If the POTW was designed to remove ammonia through specific processes such as nitrification and denitrification, breakpoint chlorination, or ammonia stripping, the engineering specifications that establish design loading rates should be used as the MAHL. However, for most conventional activated sludge and trickling filter plants, ammonia removal is incidental, and a study of the plant will have to be conducted to determine its removal efficiency. The AHL for ammonia can then be determined using Equation 5.5. When the AHL is determined using site-specific removal efficiencies and Equation 5.5, a safety factor of at least 20 percent should be applied. NPDES ammonia limits are often seasonal, with more stringent limits in place during warmer weather. This needs to be taken into consideration in the development of local limits. A seasonal limit for ammonia might be developed for IUs as well.

5.3.3 Oil and Grease

The term fats, oil, and grease (FOG) includes materials of vegetable, animal, and mineral origin. Mineral oils include petroleum, hydrocarbon, and or non-polar fats, oils, and grease. Petroleum-based oil and grease (non-polar concentrations) occur at businesses using oil and grease; and can usually be identified and regulated by municipalities through local limits and associated pretreatment permit conditions. Animal-based and vegetable-based oil and grease (polar concentrations) are more difficult to regulate when the major source is a large number of restaurants and fast-food outlets in the collection system. Collection system issues related to animal-based and vegetable-based oil and grease are addressed in Section 8.3 dealing with flow obstructions.

The pretreatment regulations 40 CFR 403.5(b)(6) prohibit the discharge of "petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through." Most POTWs have adopted 100 mg/L as their local limit for petroleum-based oil and grease because of its history of being protective of the treatment plant and receiving stream. Additionally, the

Van Buren Municipal Utilities
2806 BRYAN RD
P.O. DRAWER 1269
VAN BUREN, AR 72957
479-474-5067 Fax: 479-471-8969

June 28, 2011

Mr. Rufus Torrence, ADEQ Engineer
Arkansas Dept. of Environmental Quality
5301 Northshore Drive
Little Rock, Arkansas 72118-5317

Re: City of Van Buren TBLL/MAHL Development
NPDES Permit NO. AR0021482
NPDES Permit NO. AFIN 17-00062

Dear Mr. Torrence:

In Reference to your letter dated June 9, 2011, Please find enclosed the City of Van Buren development of MAHL for conventional Pollutants and Metals for the South Wastewater Plant, the North Wastewater Plant and Lee Creek Plant. It is our understanding we will recalculate the TBLL/MAHL annually and submit to ADEQ with our annual Pretreatment Report in October of each year.

If you have any questions please feel free to contact, Larry Weir, PE. or myself.

Respectfully,

Gary Smith, Director of Utilities

CC Kim Redo, Environmental Coordinator
Steve Dufresne, Operation Supt.
Darel Manns, Operation Supt.
File

C. Larry Weir, Professional Engineer

Licensed in Arkansas, Oklahoma, Georgia and Missouri

June 22, 2011

Mr. Gary Smith
Director of Utilities
Van Buren Municipal Utilities
P.O. Box 1269
Van Buren, AR 72957

Re: City of Van Buren TBLL/MAHL Development
Permit No. AR0021482
Permit No. AR0040967
Permit No. AR0037567

Dear Mr. Smith:

This is pursuant to a letter dated June 9, 2011, from Rufus Torrence, ADEQ Engineer, Arkansas Department of Environmental Quality.

It is our understanding from that letter that the information previously submitted is determined to be adequate and but incomplete in that conventional pollutants (BOD5 and TSS) must be included in the TBLL/MAHL evaluation charts. These have been computed and are included with the attached charts pertinent for the three permitted plants referenced above.

As suggested in Mr. Torrence's letter in his second paragraph we have included numbers for NH3-N and Total Phosphorus for AR0021482 and for NH3-N for AR0040967.

The development of data for AR0037567 seems to be of little consequence due to the size of the plant, the limited contributions, and the minimal monitoring data available. However, I have attempted to develop a chart for the plant with the available information.

L-2/14

The development of headworks data for total phosphorus for AR0021482 is limited by available data. Currently the plant is required to monitor and report total phosphorus but no information is available for the background concentrations. We will refine the total phosphorus monitoring information for future calculations.

We have also requested additional monitoring of background data for NH3-N for AR0040967 to better evaluate seasonal changes for the limits established for that plant.

As required by Mr. Torrence's letter, the attached charts amend the data for the Main (South) Plant, the North Plant, and we have included the Van Buren/Lee Creek Industrial Park Plant. The methodology is included in the Notes previously prepared for your use but not included in previous submittals to ADEQ. For Mr. Torrence's use, a copy of the EXCEL spreadsheet is also attached with this letter and it is suggested that it is transmitted to him for his use should he wish to review the imbedded formulae.

The computation of maximum allowable headworks loading is based on water quality limits, inhibition of treatment, and quality of biosolids. Water quality numbers were provided by ADEQ (additionally, we have assumed that the water quality data for the Main Plant for metals to be adequate for the Lee Creek Plant); inhibition limits are taken from USEPA Guidance Manual 833B87202; and Sludge ceiling concentrations are derived from 40 CFR Part 503.

Removal percentages used for the generation of the MAHL/TBLL charts were derived from those published for activated sludge treatment in USEPA Guidance Manual 833B87202 or as consistently demonstrated by the treatment plant's performance.

As a point of clarification, we have revised some of the input information to include inhibition threshold limits pertinent for nitrification.

Please review the information included with this letter and, if you concur, it is suggested that you forward it along a copy of the attached electronic file by e-mail to Mr. Torrence prior to his stated deadline of June 30.

L-3/14

Let me know if you have any questions or comments. I am forwarding a copy of this letter to Kim Redo and to Daral Manus.

Sincerely,

C. Larry Weir, P.E.
1714 Bunker Hill Drive
Van Buren, AR 72956
c.l.weir@sbcglobal.net

L-4/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS

Notes pertaining to Spread Sheet Calculations

1. Variables for this plant are the entries in RED. Evaluated the flows, sludge production, domestic contribution, and the percent removal no less frequently than once per year.

2. The domestic loading is equal to (AVERAGE DOMESTIC FLOW IN MGD) x (AVERAGE DOMESTIC CONCENTRATION OF THE PARAMETER IN MG/L) x (8.34)

3. The allowable mass loading in pounds per day based on limitations for water quality considerations is equal to (ALLOWABLE CONCENTRATION IN MG/L BASED ON THE ALLOWABLE WATER QUALITY CRITERIA) x (8.34) x (AVERAGE FLOW IN MGD) divided by (1 - % REMOVAL BY THE PLANT PROCESS)

4. An inhibition concentration criterion is based on page 3-44 of EPA publication 833B87202 (USEPA Guidance Manual on the Development and Implementation of Local Discharge Limits under the Pretreatment Program). Beryllium is estimated at 0.10 mg/l

5. The allowable mass loading in pounds per day based on criteria for sludge is equal to ((DRY TONS OF SLUDGE PRODUCED PER DAY) x (0.002) x (CONCENTRATION CRITERIA FOR SLUDGE IN MG/KG)) divided by (% REMOVAL)

6. The allowable mass loading in pound per day based on criteria for process inhibition is equal to (THE INHIBITION CONCENTRATION CRITERIA IN MG/L) x (AVERAGE DAILY FLOW IN MGD) x (8.34)

7. The Maximum Allowable Headworks Loading (MAHL) in pounds per day is the maximum allowable calculated using the minimum criteria for water quality, for sludge contamination, or for inhibition of the process.

8. The Maximum Allowable Headworks Concentration (MAHC) is equal to (MAHL in pounds per day) divided by (8.34) x (the average daily flow in MGD).

9. The allowable allocation for the assumed safety factor in pounds per day equals (1-%Safety Factor) x (MAHL in pounds per day)

10. The Maximum Allowable Industrial Loading in pounds per day equals the allocation for the available safety factor minus the domestic

L-5/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
MAIN (SOUTH) PLANT
NPDES NUMBER AR0021482

CALCULATION ENTRY DATE =	27-Jun-11	
AVERAGE FLOW (Q) =	2.47	MGD
SIUs AVERAGE FLOW =	0.745	MGD
DOMESTIC FLOW =	1.725	MGD
DESIGN FLOW =	4	MGD
SLUDGE PRODUCED PER DAY =	4.61	DRY TONS
SAFETY FACTOR =	25%	

Instructions: Enter values in the shaded boxes based on anual average conditions and analyses for available information. Reported values for influent contribution is in mg/l. Sludge values are in mg/kg. If in question use conservative values

	[1]	[2]	[3]	[4]
PARAMETER	AQUATIC LIFE AML, UG/L (source ADEQ)	Typical Domestic Conc EPA, P3-59, MG/L	Domestic Conc Reported, MG/L	DOMESTIC LOADING LB/DA
BOD5	30000		265	3812
CBOD5	25000		260	3740
TSS	30000		133	1913
NH3-N	5000		17	245
Phosphorus, total	1000		No Background Tests	
CADMIUM, TOTAL	126.52	0.0030	0.0006	0.00820
CHROMIUM, (HEX)	108.22			
COPPER, TOTAL	431.63	0.0607	0.0145	0.20860
LEAD, TOTAL	587.66	0.0490	0.0030	0.04316
MERCURY, TOTAL	0.39	0.0003	0.0000	0.00040
NICKEL, TOTAL	15071.86	0.0210	0.0055	0.07913
SELENIUM, TOTAL	137.76		0.0050	0.07193
SILVER, TOTAL	112.58	0.0050	0.0027	0.03856
ZINC, TOTAL	3461.17	0.1750	0.1500	2.15798
CHROMIUM, (TRI)				
CHROMIUM, TOTAL	22680.2	0.0500	0.0100	0.14387
CYANIDE, TOTAL	154.01	0.0410	0.0100	0.14387
ARSENIC	4807.76	0.0030	0.0005	0.00748
MOLYBDENUM				
BERYLLIUM	173.41		0.0003	0.00432

L-6/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
MAIN (SOUTH) PLANT
NPDES NUMBER AR0021482

	[5]	[6]	[7]	[8]	[9]	[10]
PARAMETER	% REMOVAL	WATER QUALITY, MG/L	WATER QUALITY, PPD	SLUDGE, MG/KG (Ceiling Concentrations)	SLUDGE, PPD	INHIBITION, MG/L
BOD5	90	30	6180			
CBOD5	90	25	5150			
TSS	90	30	6180			
NH3-N	72	5	367.9			
Phosphorus, total		1	20.6			
CADMIUM, TOTAL	67	0.12652	7.9	85	1.1697	1.0000
CHROMIUM, (HEX)		0.10822	2.2			
COPPER, TOTAL	87	0.43163	68.4	4300	45.5701	0.4800
LEAD, TOTAL	77	0.58766	52.6	840	10.0582	0.5000
MERCURY, TOTAL	60	0.00039	0.0201	57	0.8759	0.1000
NICKEL, TOTAL	44	15.07186	554.4	420	8.8009	1.0000
SELENIUM, TOTAL		0.13776	2.8	100		0.2000
SILVER, TOTAL	81	0.11258	12.2	0		0.2500
ZINC, TOTAL	78	3.46117	324.1	7500	88.6538	0.5000
CHROMIUM, (TRI)						
CHROMIUM, TOTAL	82	22.6802	2595.6	3000	33.7317	1.0000
CYANIDE, TOTAL		0.15401	3.2			0.2300
ARSENIC		4.80776	99.0	75		0.1000
MOLYBDENUM	50			75	1.3830	0.2000
BERYLLIUM	50	0.17341	7.1			0.1000

L-7/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
MAIN (SOUTH) PLANT
NPDES NUMBER AR0021482

	[11]	[12]	[13]	[14]	[15]	[16]
PARAMETER	INHIBITION, PPD	MAHL, PPD	MAHC, MG/L	DOMESTIC LOADING LB/DA	ALLOCATION FOR SF, PPD	MAIL, PPD
BOD5		6180	300.0	3812	4635	823
CBOD5		5150	250.0	3740	3862	122
TSS		6180	300.0	1913	4635	2722
NH3-N		368	17.9	245	276	31
Phosphorus, total		20.5998	1.00000	0.0000	15.4499	15.4499
CADMIUM, TOTAL	20.5998	1.1697	0.05678	0.0082	0.8773	0.8691
CHROMIUM, (HEX)						
COPPER, TOTAL	9.8879	9.8879	0.48000	0.2086	7.4159	7.2073
LEAD, TOTAL	10.2999	10.0582	0.48827	0.0432	7.5436	7.5005
MERCURY, TOTAL	2.0600	0.0201	0.00098	0.0004	0.0151	0.0147
NICKEL, TOTAL	20.5998	8.8009	0.42723	0.0791	6.6007	6.5216
SELENIUM, TOTAL	4.1200			0.0719		
SILVER, TOTAL	5.1500	5.1500	0.25000	0.0386	3.8625	3.8239
ZINC, TOTAL	10.2999	10.2999	0.50000	2.1580	7.7249	5.5670
CHROMIUM, (TRI)						0.0000
CHROMIUM, TOTAL	20.5998	20.5998	1.00000	0.1439	15.4499	15.3060
CYANIDE, TOTAL	4.7380			0.1439		
ARSENIC	2.0600			0.0075		
MOLYBDENUM	4.1200	1.3830	0.06714		1.0373	1.0373
BERYLLIUM	2.0600	2.0600	0.10000		1.5450	1.5450

L-8/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
NORTH PLANT
NPDES NUMBER AR0040967

CALCULATION ENTRY DATE =	27-Jun-11	
AVERAGE FLOW (Q) =	1.199	MGD
SIUs AVERAGE FLOW =	0.008	MGD
DOMESTIC FLOW =	1.191	MGD
DESIGN FLOW =	2	MGD
SLUDGE PRODUCED PER DAY =	1.008	DRY TONS
SAFETY FACTOR =	10%	

Instructions: Enter values in the shaded boxes based on anual average conditions and analyses for available information. Reported values for influent contribution is in mg/l. Sludge values are in mg/kg. If in question use conservative values.

	[1]	[2]	[3]	[4]
PARAMETER	AQUATIC LIFE AML, UG/L (source ADEQ)	Typical Domestic Conc EPA, P3-59, MG/L	Domestic Conc Reported, MG/L	DOMESTIC LOADING LB/DA
CBOD (May - Oct)	10000		198	1966
CBOD (Nov-Apr)	20000		120	1191
Total Suspended Solids (May-Oct)	15000		150	1489
Total Suspended Solids (Nov-Apr)	20000		144	1430
NH3-N (April)	2200	17.0		169
NH3-N (May-Oct)	2000	17.0		169
NH3-N (Nov-Mar)	4000	17.0		169
CADMIUM, TOTAL	1.84	0.0030	0.0005	0.00496
CHROMIUM, (HEX)	11.81			
COPPER, TOTAL	9.24	0.0607	0.0120	0.11915
LEAD, TOTAL	2.71	0.0490	0.0011	0.01092
MERCURY, TOTAL	0.0134	0.0003	0.0000	0.00008
NICKEL, TOTAL	96.96	0.0210	0.0036	0.03574
SELENIUM, TOTAL	5.58		0.0050	0.04965
SILVER, TOTAL	0.93	0.0050	0.0005	0.00496
ZINC, TOTAL	85.53	0.1750	0.0780	0.77447
CHROMIUM, (TRI)	295.43			
CHROMIUM, TOTAL		0.0500	0.0100	0.09929
CYANIDE, TOTAL	5.8	0.0410	0.0100	0.09929
ARSENIC	348.96	0.0030	0.0005	0.00496
MOLYBDENUM				
BERYLLIUM	5.91			

L- 9/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
NORTH PLANT
NPDES NUMBER AR0040967

	[5]	[6]	[7]	[8]	[9]	[10]
PARAMETER	% REMOVAL	WATER QUALITY, MG/L	WATER QUALITY, PPD	SLUDGE, MG/KG, (Ceiling Concentrations)	SLUDGE, PPD	INHIBITION, MG/L
CBOD (May - Oct)	95	10	2000			
CBOD (Nov-Apr)	95	20	4000			
Total Suspended Solids (May-Oct)	95	15	3000			
Total Suspended Solids (Nov-Apr)	95	20	4000			
NH3-N (April)	72	2.2	79			
NH3-N (May-Oct)	72	2	71			
NH3-N (Nov-Mar)	40	4	67			
CADMIUM, TOTAL	67	0.00184	0.0558	85	0.2558	1.0000
CHROMIUM, (HEX)		0.01181	0.1181			
COPPER, TOTAL	86	0.00924	0.6600	4300	10.0820	0.4800
LEAD, TOTAL	54	0.00271	0.0589	840	3.1366	0.5000
MERCURY, TOTAL	78	0.0000134	0.0006	57	0.1474	0.1000
NICKEL, TOTAL	11	0.09696	1.0894	420	7.6990	1.0000
SELENIUM, TOTAL		0.00558	0.0558	100		0.2000
SILVER, TOTAL	75	0.00093	0.0372	0		0.2500
ZINC, TOTAL	79	0.08553	4.0727	7500	19.1430	0.5000
CHROMIUM, (TRI)						
CHROMIUM, TOTAL	82	0.2954	16.4106	3000	7.3771	1.0000
CYANIDE, TOTAL		0.0058	0.0580			0.2300
ARSENIC		0.34896	3.4895	75		0.1000
MOLYBDENUM	50			75	0.3025	0.2000
BERYLLIUM	50	0.00591	0.1182			0.1000

L-10/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
NORTH PLANT
NPDES NUMBER AR0040967

	[11]	[12]	[13]	[14]	[15]	[16]
PARAMETER	INHIBITION, PPD	MAHL, PPD	MAHC, MG/L	DOMESTIC LOADING LB/DA	ALLOCATION FOR SF, PPD	MAIL, PPD
CBOD (May - Oct)		2000	200	1966	1800	-166
CBOD (Nov-Apr)		4000	400	1191	3600	2408
Total Suspended Solids (May-Oct)		3000	300	1489	2700	1211
Total Suspended Solids (Nov-Apr)		4000	400	1430	3600	2170
NH3-N (April)		79	7.85714	169	71	-98
NH3-N (May-Oct)		71	7.14286	169	64	-105
NH3-N (Nov-Mar)		67	6.66667	169	60	-109
CADMIUM, TOTAL	9.9997	0.0558	0.00558	0.0050	0.0502	0.0452
CHROMIUM, (HEX)						
COPPER, TOTAL	4.7998	0.6600	0.06600	0.1191	0.5940	0.4748
LEAD, TOTAL	4.9998	0.0589	0.00589	0.0109	0.0530	0.0421
MERCURY, TOTAL	1.0000	0.0006	0.00006	0.0001	0.0005	0.0005
NICKEL, TOTAL	9.9997	1.0894	0.10894	0.0357	0.9805	0.9447
SELENIUM, TOTAL	1.9999			0.0496		
SILVER, TOTAL	2.4999	0.0372	0.00372	0.0050	0.0335	0.0285
ZINC, TOTAL	4.9998	4.0727	0.40729	0.7745	3.6654	2.8910
CHROMIUM, (TRI)						
CHROMIUM, TOTAL	9.9997	7.3771	0.73773	0.0993	6.6394	6.5401
CYANIDE, TOTAL	2.2999			0.0993		
ARSENIC	1.0000			0.0050		
MOLYBDENUM	1.9999	0.3025	0.03025		0.2722	0.2722
BERYLLIUM	1.0000	0.1182	0.01182		0.1064	0.1064

L-11/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
VAN BUREN LEE CREEK INDUSTRIAL PARK
NPDES NUMBER AR0037567

CALCULATION ENTRY DATE =	27-Jun-11		
AVERAGE FLOW (Q) =	0.0061	MGD	*Avg Q from DMR 06/2010:05/2011*
SIUs AVERAGE FLOW =	0	MGD	*No Industrial Contributors*
DOMESTIC FLOW =	0.0061	MGD	*Avg Q from DMR 06/2010:05/2011*
DESIGN FLOW =	0.04	MGD	*Orginal Design Capacity*
SLUDGE PRODUCED PER DAY =	0.007	DRY TONS	*Estimated*
SAFETY FACTOR =	10%		

	[1]	[2]	[3]	[4]	
PARAMETER	AQUATIC LIFE AML, UG/L (source ADEQ)	Typical Domestic Conc EPA, P3-59, MG/L	Domestic Conc Reported, MG/L	DOMESTIC LOADING LB/DA	
BOD	30000		169	8.59771	*Domestic Conc from Avg of DMR*
Total Suspended Solids	30000		159	8.08897	*Domestic Conc from Avg of DMR*
CADMIUM, TOTAL	126.52	0.0030		0.00015	
CHROMIUM, (HEX)	108.22				
COPPER, TOTAL	431.63	0.0607		0.00309	
LEAD, TOTAL	587.66	0.0490		0.00249	
MERCURY, TOTAL	0.39	0.0003		0.00002	
NICKEL, TOTAL	15071.86	0.0210		0.00107	
SELENIUM, TOTAL	137.76			0.00000	
SILVER, TOTAL	112.58	0.0050		0.00025	
ZINC, TOTAL	3461.17	0.1750		0.00890	
CHROMIUM, (TRI)					
CHROMIUM, TOTAL	22680.2	0.0500		0.00254	
CYANIDE, TOTAL	154.01	0.0410		0.00209	
ARSENIC	4807.76	0.0030		0.00015	
MOLYBDENUM					
BERYLLIUM	173.41				

Metals Sampling not routinely reported for this treatment plant

Instructions: Enter values in the shaded boxes based on anual average conditions and analyses for available information. Reported values for influent contribution is in mg/l. Sludge values are in mg/kg. If in question use conservative values.

L-12/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
VAN BUREN LEE CREEK INDUSTRIAL PARK
NPDES NUMBER AR0037567

	[5]	[6]	[7]	[8]	[9]	[10]
PARAMETER	% REMOVAL	WATER QUALITY, MG/L	WATER QUALITY, PPD	SLUDGE, MG/KG, (Ceiling Concentrations)	SLUDGE, PPD	INHIBITION, MG/L
BOD	85	30	10.1748			
Total Suspended Solids	85	30	10.1748			
CADMIUM, TOTAL	67	0.12652	0.0195	85	0.0018	1.0000
CHROMIUM, (HEX)		0.10822	0.0055			
COPPER, TOTAL	86	0.43163	0.1568	4300	0.0700	1.0000
LEAD, TOTAL	54	0.58766	0.0650	840	0.0218	1.0000
MERCURY, TOTAL	78	0.00039	0.0001	57	0.0010	0.1000
NICKEL, TOTAL	11	15.07186	0.8615	420	0.0535	1.0000
SELENIUM, TOTAL		0.13776	0.0070	100		0.2000
SILVER, TOTAL	75	0.11258	0.0229	0		0.2500
ZINC, TOTAL	79	3.46117	0.8385	7500	0.1329	4.5000
CHROMIUM, (TRI)						
CHROMIUM, TOTAL	82	0.2954	0.0835	3000	0.0512	1.0000
CYANIDE, TOTAL		0.15401	0.0078			0.2300
ARSENIC		4.80776	0.2446	75		0.1000
MOLYBDENUM	50			75	0.0021	0.2000
BERYLLIUM	50	0.17341	0.0176			0.1000

L-13/14

CITY OF VAN BUREN
CALCULATIONS OF HEADWORKS LOADINGS
VAN BUREN LEE CREEK INDUSTRIAL PARK
NPDES NUMBER AR0037567

	[11]	[12]	[13]	[14]	[15]	[16]
PARAMETER	INHIBITION, PPD	MAHL, PPD	MAHC, MG/L	DOMESTIC LOADING LB/DA	ALLOCATION FOR SF, PPD	MAIL, PPD
BOD		10	200	8.5977	9.1573	0.5596
Total Suspended Solids		10	200	8.0890	9.1573	1.0684
CADMIUM, TOTAL	0.0509	0.0018	0.03491	0.0002	0.0016	0.0014
CHROMIUM, (HEX)						
COPPER, TOTAL	0.0509	0.0509	1.00000	0.0031	0.0458	0.0427
LEAD, TOTAL	0.0509	0.0218	0.42807	0.0025	0.0196	0.0171
MERCURY, TOTAL	0.0051	0.0001	0.00177	0.0000	0.0001	0.0001
NICKEL, TOTAL	0.0509	0.0509	1.00000	0.0011	0.0458	0.0447
SELENIUM, TOTAL	0.0102			0.0000		
SILVER, TOTAL	0.0127	0.0127	0.25000	0.0003	0.0114	0.0112
ZINC, TOTAL	0.2289	0.1329	2.61256	0.0089	0.1196	0.1107
CHROMIUM, (TRI)						
CHROMIUM, TOTAL	0.0509	0.0509	1.00000	0.0025	0.0458	0.0432
CYANIDE, TOTAL	0.0117			0.0021		
ARSENIC	0.0051			0.0002		
MOLYBDENUM	0.0102	0.0021	0.04128		0.0019	0.0019
BERYLLIUM	0.0051	0.0051	0.10000		0.0046	0.0046

L - 14/14