PRETREATMENT PROGRAM AUDIT

Van Buren Municipal Utilities - City of Van Buren

NPDES Permit Number AR0021482

February 15, 2018

Prepared by:

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Engineer / State Pretreatment Coordinator

Office of Water Quality

Arkansas Department of Environmental Quality

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Attachments

A. INTRODUCTION

Under the Arkansas Department of Environmental Quality (ADEQ or Department) responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the State of Arkansas will be part of its coordination and compliance monitoring strategy.

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

An audit/assessment of the Pretreatment Program implemented by Van Buren Municipal Utilities - City of Van Buren (City) was performed November 15, 2016 through November 17, 2016. Participants in the audit include the following:

Name	Organization	Title
Adam Yates	ADEQ	Engineer, NPDES Permits Section
Allen Gilliam	ADEQ	State Pretreatment Coordinator
Kim Redo	Van Buren Municipal Utilities	Pretreatment/Environmental Coordinator
James Dunn	Van Buren Municipal Utilities	Chief Plant Operator

The goals of the audit/assessment were:

- To determine the implementation and compliance status of the City's Pretreatment Program with the requirements of 40 CFR Part 403 – General Pretreatment Regulations for Existing and New Sources of Pollution;
- To determine the effectiveness of the City's Pretreatment and P2 Programs in controlling industrial discharges;
- To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements; and
- To assess the level of additional P2 activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

The City's Pretreatment Program was originally approved on October 1, 1981. Modifications to the Program were approved March 21, 1990, March 6, 1997, and March 18, 2011 in order to comply with revisions to the Pretreatment Regulations. The City operates three wastewater treatment plants or publicly owned treatment works (POTWs), which include, the Main (South) Plant with NPDES Permit Number AR0021482, Lee Creek Industrial Park with NPDES Permit Number AR0037567, and the North Treatment Plant with NPDES Permit Number AR0040967.

The permit for the Main Plant is used for tracking purposes of the State's Pretreatment Program. The treatment system consists of a screening unit, activated sludge system, final clarifiers, and UV disinfection, as described in the Fact Sheet of the permit. The discharge is made into the Arkansas River in Segment 3H of the Arkansas River Basin. There are nine (9) Significant Industrial Users (SIUs) that are permitted for discharge into the Main Plant POTW, four (4) of which are classified as Categorical Industrial Users (CIUs). Industrial

contributions from these IUs constitute approximately 34% of the POTW's average flow of 2.55 MGD. Additionally, there has been no evidence of lethality or sub-lethality in the effluent within the past three (3) years, based on submitted results for whole effluent toxicity (WET) testing.

The treatment system for Lee Creek consists of an extended aeration activated sludge package plant and chlorine disinfection, as described in the Statement of Basis of the permit. The discharge is made into the Arkansas River in Segment 3H of the Arkansas River Basin. Currently, there are no SIUs discharging to the Lee Creek POTW. This permit does not have any WET testing requirements.

The treatment system for the North Plant consists of bar screens, three (3) individual systems of oxidation ditches with final clarifiers operated in parallel, equalization pond during wet weather conditions, and UV disinfection, as described in the Fact Sheet of the permit. The discharge is made into Lee Creek, thence to the Arkansas River in Segment 3H of the Arkansas River Basin. There is one (1) SIU that is permitted to discharge into the North Plant POTW, constituting approximately 1% of the POTW's average flow 1.28 MGD. Additionally, there were two (2) test failures each for lethality and sub-lethality for *Ceriodaphnia dubia* (water flea) within the past three (3) years, based on submitted results for WET testing. The test failures occurred in November 2013 and January 2014. The POTW conducted a Toxicity Reduction Evaluation (TRE) beginning in April 2015 with the final report received in June 2016. No failures were noted during the TRE, therefore, no cause or corrective actions were determined. The POTW continues to conduct Toxicity Identification Evaluation (TIE) screening tests even though toxicity has not been noted since January 2014.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files and pretreatment records, and site visits at three (3) of the permitted IUs. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the complete checklist is included with this report as Attachment A. Additional information obtained during the audit is included with this report as Attachment B.

B. SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

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

1. 40 CFR §403.5(c)(1) states, "Each POTW developing a POTW Pretreatment Program pursuant to §403.8 shall develop and enforce specific limits to implement the prohibitions listed in paragraphs (a)(1) and (b) of this section. Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits."

During the file review, it was discovered that the City did not include a reevaluation of the maximum allowable industrial loading for the North Plant. This reevaluation is required so that the City may have a complete and approvable Pretreatment Program.

2. 40 CFR §403.8(f)(2)(i) states, "The POTW shall…identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index, or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request."

   It was noted during the file review that the City, when surveying various IUs to determine whether those users would be subject to the Pretreatment Program, did not compile an index of IUs that had been surveyed. This index would be beneficial for tracking purposes so that the City can readily know which IUs have or have not been surveyed.

3. During the file review, it was not clear how often the City will sample/inspect its permitted industries. Therefore, a review of the City's Pretreatment Program is required to clarify, and possibly modify language, which IUs need to be sampled once per year or once every six months.

4. 40 CFR §403.8(f)(2)(viii) states, "…a Significant Industrial User (or any Industrial User which violates paragraphs (f)(2)(viii)(C), (D), or (H) of this section) is in significant noncompliance if its violation meets one or more of the following criteria." In the effort to keep this report concise, the criteria for significant noncompliance will not be listed here, but can be found at 40 CFR §403.8(f)(2)(viii)(A) – (H).

   In order to implement an effective pretreatment program, the City's Enforcement Response Plan (ERP) must include the current definition (instantaneous limits are not included) of significant noncompliance (SNC) so as to accurately determine if an IU is in violation of any provisions of the Program.

5. 40 CFR §433.12(a) states, "In lieu of requiring monitoring for [total toxic organics] TTO, the permitting authority (or, in the case of indirect dischargers, the control authority) may allow dischargers to make the following certification statement…for indirect dischargers, the statement is to be included as a comment to the periodic reports required by 40 CFR 403.12(e)." Additionally, 40 CFR §433.12(b) specifies that "In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies…the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater."

   The files of certain metal finishing IUs did not contain their submitted Toxic Organic Management Plans (TOMPs) or the City's approvals of those TOMPs. According to the above regulations, as well as the record-keeping requirements of 40 CFR §403.12(o), this information should be included in the IUs' files and retained for a minimum of three years. Although, retaining these TOMPs should be indefinite since they should be a part of the IUs' fact sheet sections.

6. 40 CFR §403.12(b)(3) states, "The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes."

   It was revealed during the file review that the City's permitted IUs, when applying for coverage under the City's Pretreatment Program, were not required to submit a description of the User's operations or schematic process diagrams. The schematic should detail the processes where wastewater is generated, direction of flow through the treatment system, and the final sampling point. This information is required by the aforementioned regulation, but is also essential to understanding exactly what all goes on at a particular industry. With this information in mind, the City can prepare a more comprehensive permit that accurately covers the IU's operations.

7. 40 CFR §403.8(f)(2)(vi) states, "The POTW shall…evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges…"

   It was discovered that the City had not evaluated its SIUs for their potential to cause a Slug Discharge. This is a necessary aspect of the Program as it determines which SIUs need to implement procedures and practices to prevent Interference or Pass Through and, at the least, mitigate any adverse effects of a Slug Discharge.

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

1. Recommend including a standard operating procedure (SOP) for conducting IU surveys in the City's Pretreatment Program. Developing a SOP for IU surveys would be beneficial for the future of the Program as it would provide instructions to any new employees that are involved with pretreatment. Additionally, it is recommended to include a timeframe for IUs to submit an application and subsequent reports.

2. Recommend including more information pertinent to the IU's background in the fact sheets of permits. Some of the information to include is as follows:
   a. Date of fact sheets;
   b. contact information (contact name, phone number, e-mail, *etc.*);
   c. start-up date (used to determine whether IU is an Existing Source or a New Source);
   d. brief compliance history; and
   e. average flow

3. Recommend including the basis for limitations in the fact sheet of the IUs' permits. Providing explanation and justification for limitations and other requirements is an important facet of the permitting process.

4. Recommend implementing monitoring requirements for flow as "Report" only, rather than an actual limitation.

5. Strongly recommend developing a better illustration of compliance verification for mass limits at the permitted truck wash. Additionally, remove any reference to total toxic organics (TTO).

6. Recommend revising the sampling frequency of twice per year to be specified as once per six (6) months. This could preclude the possibility of taking two samples back-to-back in a small timeframe that may not be representative of the full year.

7. Strongly recommend sending notification to all hazardous waste generators that they may be subject to certain regulatory requirements. A list of generators within the local area was provided to the City during the audit. Also, consider sending notification to all healthcare-related facilities as they may be hazardous waste generators as well.

8. Recommend improving inspections by including more narrative descriptions of evaluations of all manufacturing processes (rust, leaking fittings, pooling of fluids on floor, scaling, and preventative maintenance, etc.)

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

Per Section B, requirement 1, the City's current "approved" Pretreatment Program must be completed by submitting an approvable Technically Based Local Limits/Maximum Allowable Industrial Loadings (TBLL/MAIL) evaluation per 40 CFR 403.5(c) or demonstrate they are not necessary per 40 CFR 403.8(f)(4).

[If the attached is the TBLL/MAIL Evaluation section missing from the City's Program, please confirm in a written statement to this office.]

PRETREATMENT AUDIT CHECKLIST

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. Personnel and Program Information

Control Authority: City of Van Buren NPDES Permit No. (Tracking): AR0021482
Mailing Address: 2806 Bryan Road, P.O. Drawer 1269, Van Buren, AR 72956
Responsible Official: Steve Dufresne Title: Director of Utilities

Telephone Number: (479) 474-5067 Fax Number: (479) 471-8969

Pretreatment Contact: Kim Redo Title: Pretreatment/Environmental Coordinator
Address: Same as above mailing address.
Telephone Number: (479) 474-0941
E-mail Address: kim@vbmu.arcoxmail.com
Pretreatment Program Approval Date: October 1, 1981
Dates of Approval of any Substantial Modifications: March 21, 1990, March 6, 1997 & March 18, 2011

Annual Pretreatment Report Due (Month): October

Pretreatment Year Date: October 1st – September 30th Date(s) of Audit: November 15-17, 2016

Approval Authority Representative(s)

Name	Title	Telephone Number
Allen Gilliam	State Pretreatment Coordinator	(501) 682-0625
Adam Yates	Engineer, NPDES Permits Section	(501) 682-0617

Control Authority Representative(s)

Name	Title	Telephone Number
Kim Redo	Pretreatment/Environmental Coordinator	(479) 474-0941
James Dunn	Chief Plant Operator	(479) 651-4449

Date(s) of Previous PCIs/Audits

Type	Date	Deficiencies Noted
No PCIs found during previous four years		

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?

SECTION I: GENERAL INFORMATION

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

SECTION I: GENERAL INFORMATION

B. Wastewater Treatment Plant Information

1. This Pretreatment Program covers the following POTWs:

NPDES Permit No.	Facility Name	Permit Effective Date	Permit Expiration Date
AR0021482	Main Plant (South)	January 1, 2015	December 31, 2019
AR0040967	North Plant	May 1, 2013	April 30, 2018
AR0037567	Lee Creek Industrial Park	June 1, 2013	May 31, 2018

2. Individual POTW Information

Facility Name: Main Plant (South)
Facility Address: 1401 Port Road, Van Buren, AR 72956

Design flow: 4.0 MGD Average flow: 2.55 MGD

Sewer system: 100 % Separate 0 % Combined Number of SSOs (due to grease blockages): 0

Industrial Contribution

Number of SIUs: 9 Number of CIUs: 4
Industrial flow: 0.87 MGD Percent of average flow: 34.1 %

Level of Treatment		Type of Process(es)
Primary		Activated sludge (two aeration basins) and final clarifiers
Secondary	✓	
Tertiary		

Method of Disinfection: UV
Dechlorination: YES NO ✓ N/A

Effluent Discharge

Receiving Stream Name: Arkansas River in Segment 3H of the Arkansas River Basin
Receiving Stream Classification: H.U.C. 11110104 and Reach #001
Receiving Stream Use(s): primary and secondary contact recreation; raw water source for domestic, industrial, and agricultural water supplies; and propagation of desirable species of fish and other aquatic life
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 metric tons/year
	Incineration		dry tons/year
	Monofill		dry tons/year
	Municipal Solid Waste Landfill		dry tons/year
	Public Distribution		dry tons/year
	Lagoon Storage		dry tons/year
	Other (specifiy)		dry tons/year

* Facility has not land applied sludge since July 2008.

List of toxic pollutant(s) limited in NPDES Permit: None [conventional pollutants and ammonia-nitrogen (NH_3-N)]

SECTION I: GENERAL INFORMATION

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: _____
Issuance Date: _____
Expiration Date: _____
List pollutants that are specified in current sludge permit: _____

✓		Has the Control Authority submitted results of whole effluent toxicity (WET) testing?
	✓	Has there been a pattern of toxicity demonstrated by WET testing?

If yes, explain what has been or is being done to resolve it. (*e.g.*, Is there an ongoing TRE?)

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

	Influent	Effluent	Sludge	Ambient
Metals[1]	4	4	0	
Priority[2]	1	1		
Biomonitoring		4		
TCLP		1		
Other				

[1] As identified at 40 CFR 122, Appendix D, Table III.
[2] As identified at 40 CFR122, Appendix D, Table II.

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

YES	NO	
✓		Has the POTW begun tracking the trends in the above samples?
✓		Has the POTW violated its 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)
NH_3-N (May, July, Aug 2016)	

	✓	Has the sludge from the POTW violated the TCLP Test?

SECTION I: GENERAL INFORMATION

3. Individual POTW Information

Facility Name: North Plant
Facility Address: 1945 Wellnitz Drive, Van Buren, AR 72956

Design flow: 2.0 MGD Average flow: 1.28 MGD

Sewer system: 100 % Separate 0 % Combined Number of SSOs (due to grease blockages): 0

Industrial Contribution

Number of SIUs: 1 (truck wash) Number of CIUs: 0
Industrial flow: 0.013 MGD Percent of average flow: 1.03%

Level of Treatment		Type of Process(es)
Primary		Three individual systems of oxidation ditches with final clarifiers operated in parallel.
Secondary	✓	Equalization pond is used during wet weather conditions.
Tertiary		

Method of Disinfection: UV
Dechlorination: YES NO ✓ N/A

Effluent Discharge

Receiving Stream Name: Lee Creek, thence into the Arkansas River in Segment 3H of the Arkansas River Basin
Receiving Stream Classification: H.U.C. 11110104 and Reach #002
Receiving Stream Use(s): primary and secondary contact recreation; raw water source for domestic, industrial, and agricultural water supplies; and propagation of desirable species of fish and other aquatic life
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*	~610	dry metric tons/year
	Incineration		dry tons/year
	Monofill		dry tons/year
	Municipal Solid Waste Landfill		dry tons/year
	Public Distribution		dry tons/year
	Lagoon Storage		dry tons/year
	Other (specifiy)		dry tons/year

* Facility last land applied sludge in October 2015.

List of toxic pollutant(s) limited in NPDES Permit: Copper and Zinc

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:
Issuance Date:
Expiration Date:
List pollutants that are specified in current sludge permit:

SECTION I: GENERAL INFORMATION

✓ ____ Has the Control Authority submitted results of whole effluent toxicity (WET) testing?
✓ ____ Has there been a pattern of toxicity demonstrated by WET testing?

If yes, explain what has been or is being done to resolve it. (*e.g.*, Is there an ongoing TRE?)
There has been no lethality shown for the fathead minnow, but lethality and sublethality have been shown for the water flea in Nov 2013 and Jan 2014 over the last three years (12 tests). The facility conducted a Toxicity Reduction Evaluation (TRE) due to the lethal failures. The TRE began in Apr 2015 and the final report was received in June 2016. No failures were noted during the TRE, and therefore, no cause or corrective actions were determined. The facility continues to conduct Toxicity Identification Evaluation (TIE) screening tests even though toxicity has not been shown since Jan 2014.

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

	Influent	Effluent	Sludge	Ambient
Metals[1]	1	1		
Priority[2]	1	1		
Biomonitoring		4		
TCLP				
Other				

[1] As identified at 40 CFR 122, Appendix D, Table III.
[2] As identified at 40 CFR122, Appendix D, Table II.

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

YES NO

____ ✓ Has the POTW begun tracking the trends in the above samples?
____ ✓ Has the POTW violated its 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	

____ ✓ Has the sludge from the POTW violated the TCLP Test?

SECTION I: GENERAL INFORMATION

4. Individual POTW Information

Facility Name: Lee Creek Industrial Park
Facility Address: 1200 Block of Lee Creek Road, Van Buren, AR 72956

Design flow: 0.04 MGD Average flow: 0.006 MGD

Sewer system: 100 % Separate 0 % Combined Number of SSOs (due to grease blockages): 0

Industrial Contribution

Number of SIUs: 0 Number of CIUs: 0
Industrial flow: 0 MGD Percent of average flow: 0%

Level of Treatment		Type of Process(es)
Primary		Extended aeration activated sludge package treatment plant
Secondary	✓	
Tertiary		

Method of Disinfection: Chlorine
Dechlorination: YES ✓ NO N/A

Effluent Discharge

Receiving Stream Name: Arkansas River in Segment 3H of the Arkansas River Basin
Receiving Stream Classification: H.U.C. 11110104 and Reach #013
Receiving Stream Use(s): primary and secondary contact recreation; raw water source for domestic, industrial, and agricultural water supplies; and propagation of desirable species of fish and other aquatic life
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 metric tons/year
	Incineration		dry tons/year
	Monofill		dry tons/year
	Municipal Solid Waste Landfill		dry tons/year
	Public Distribution		dry tons/year
	Lagoon Storage		dry tons/year
✓	Other (specifiy)*		dry tons/year

* Sludge is stored in a holding tank and sent to the North Plant for disposal.

List of toxic pollutant(s) limited in NPDES Permit: None [only conventional pollutants]

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:
Issuance Date:
Expiration Date:
List pollutants that are specified in current sludge permit:

SECTION I: GENERAL INFORMATION

_____	✓	Has the Control Authority submitted results of whole effluent toxicity (WET) testing?
_____	✓	Has there been a pattern of toxicity demonstrated by WET testing?

If yes, explain what has been or is being done to resolve it. (*e.g.*, Is there an ongoing TRE?)
N/A; WET testing is not required by this facility's NPDES permit.

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

	Influent	Effluent	Sludge	Ambient
Metals[1]	0	0		
Priority[2]	0	0		
Biomonitoring		0		
TCLP				
Other				

[1] As identified at 40 CFR 122, Appendix D, Table III.
[2] As identified at 40 CFR122, Appendix D, Table II.

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

YES	NO	
✓	_____	Has the POTW begun tracking the trends in the above samples?
_____	✓	Has the POTW violated its 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	

_____	✓	Has the sludge from the POTW violated the TCLP Test?

SECTION II: PRETREATMENT PROGRAM ANALYSIS

A. Control Authority Pretreatment Program Modification [40 CFR 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? [40 CFR 403.5(c)(3)]
_____	✓	Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify the modifications below.

1. Modifications:

Date of Approval by ADEQ	Ordinance Citation / Nature of Modification	Date of Incorporation into NPDES Permit

2. Modifications in Progress:

Date Requested	Nature of Modification

YES	NO	
_____	✓	Have any changes been made to any pretreatment program components (excluding any listed above)? If yes, list the changes below:
_____	N/A	Has the Control Authority notified the Approval Authority of all program changes (*e.g.*, modified forms, procedures, or legal authorities)? If no, please provide a copy of the modified form, procedure, *etc.*

SECTION II: PRETREATMENT PROGRAM ANALYSIS

B. Legal Authority [40 CFR 403.8(f)(1)]

Date of original Pretreatment Program approval: October 1, 1981
Date of most recent Ordinance approved by the Control Authority: October 19, 2009
Date of most recent Pretreatment Program modification approval: March 18, 2011

Does the Control Authority's legal authority enable it to:
[40 CFR 403.18(f)(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
	✓	Has the City developed and adopted a Pollution Prevention policy?

YES	NO	
	✓	Has the Control Authority experienced difficulty in implementing the sewer use ordinance?

If yes, identify the 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: _____

✓		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 (P^2) policies by contributing jurisdictions?

List the names of contributing jurisdictions, if any, as well as the number of CIUs, SIUs, and types of multijurisdictional agreements in those jurisdictions:

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

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

Briefly describe other problems that are not listed above: _____

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
None			

SECTION II: PRETREATMENT PROGRAM ANALYSIS

C. Industrial User Characterization [40 CFR 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? [40 CFR 403.8(f)(2)(i)]
	✓	If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?
✓	✓	Does the CA have written procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [40 CFR 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 that 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 city offices

How often is the survey to be updated? Approximately every 3 years

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

YES	NO	
	✓	Have any new SIUs been identified within the last 12 months? If yes, specify:

Name of IU	Type of Industry	Is the IU Permitted?

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)
b.	4	Categorical Industrial Users (CIUs)
c.	5	Noncategorical SIUs
d.	0	Other regulated nonsignificant IUs (Describe)
	9	TOTAL of (a + d)

SECTION II: PRETREATMENT PROGRAM ANALYSIS

YES	NO	
	✓	Has the POTW identified any IUs with Pollutant Prevention opportunities?
✓		Is the Control Authority's definition of "significant industrial user" the same as the EPA's? [40 CFR 403.3(v)]

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

_____

_____

SECTION II: PRETREATMENT PROGRAM ANALYSIS

D. Control Mechanism Evaluation [40 CFR 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

How many SIUs are not covered by an existing, unexpired permit or other control mechanism? 0

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	
		Does the control mechanism designate a discharge point? [40 CFR 403.5(b)(8)]
		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

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

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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
_____	_____
_____	_____
_____	_____

SECTION II: PRETREATMENT PROGRAM ANALYSIS

E. Application of Pretreatment Standards and Requirements

YES	NO	
✓		Has the POTW notified the IUs of their potential requirement to report hazardous wastes to the EPA, the ADEQ, and the POTW itself?

Date notified: August 2000 Method of Notification: Letter

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

	Federal Register		Journals, Newsletters
✓	Meetings, Training	✓	Internet
✓	Government Agencies		Other (specify):

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

YES	NO	
✓		Has the Control Authority **technically evaluated** the need for local limits for all required pollutants listed below? [40 CFR 403.5(c)(1); 40 CFR 403.8(f)(4)]

Pollutant[1]	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/L)
	YES	NO	YES	NO	YES	NO	
Arsenic	✓			✓		✓	
Cadmium	✓			✓		✓	
Chromium	✓			✓		✓	
Copper	✓		✓ [3]			✓	
Cyanide	✓			✓		✓	
Lead	✓			✓		✓	
Mercury	✓			✓		✓	
Molybdenum[2]	✓			✓		✓	
Nickel	✓			✓		✓	
Selenium[2]	✓			✓		✓	
Silver	✓			✓		✓	
Zinc	✓		✓ [3]			✓	
BOD_5	✓			✓		✓	
TSS	✓			✓		✓	

[1] Metals and Cyanide are expressed as Total Recoverable.
[2] Only required if necessary for the sludge disposal option chosen.
[3] Only for the North Plant.

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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[1]	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/L)
	YES	NO	YES	NO	YES	NO	

YES	NO	
	N/A	Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

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

Pollutant[1]	Type of Allocation		
	Uniform Concentration	Mass	Hybrid
Arsenic			
Cadmium			
Chromium			
Copper			
Cyanide			
Lead			
Mercury			
Molybdenum			
Nickel			
Selenium			
Silver			
Zinc			

[1] Metals and Cyanide are expressed as Total Recoverable.

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? Specifically for the North Plant.

SECTION II: PRETREATMENT PROGRAM ANALYSIS

F. Compliance Monitoring

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	
Other SIUs	1	1/year	
Sampling:			
CIUs	1	1/year	
Other SIUs	1	1/year	
Reporting:			
CIUs	(This varies	2/year	
Other SIUs	from IU to IU)	2/year	
Self-Monitoring:			
CIUs	2	2/year	
Other SIUs	2	2/year	

How many (#) and what percentage (%) of SIUs were:
(Refer to page 1 for Pretreatment year.)

#	%	
2*	22.2	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? [40 CFR 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.
* SIUs were not sampled due to no discharge.

Does the Control Authority routinely split samples with industrial personnel:

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

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

Pollutant	Analytical Method[1]	Name of Laboratory
Metals	200.8	American Interplex
Cyanide	335.2	American Interplex
Organics	GC/MS	American Interplex
Other	Phenols – 420.1 &	American Interplex
	NH_3-N at North Plant	Data testing

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

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

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:

5 days	Conventionals
> 2 weeks	Metals
> 2 weeks	Organics

✓*	✓*	Is there an established protocol clearly detailing sampling location and procedures?
	✓	Has the Control Authority had any problems performing compliance monitoring? If yes, explain:

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

YES	NO	
✓		Scheduled compliance monitoring
✓		Unscheduled compliance monitoring
✓		Demand monitoring for IU compliance
✓		IU self-monitoring
		Other:

YES	NO	
	✓	Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

* The individual permits for the SIUs show sampling location, but there is no manual/guidebook with all of the sampling locations and procedures.

SECTION II: PRETREATMENT PROGRAM ANALYSIS

G. Enforcement

YES	NO	
✓		Is the Control Authority's definition of SNC consistent with the EPA's? [40 CFR 403.8(f)(2)(viii)]
✓		Does the Control Authority have a written enforcement response plan? [40 CFR 403.8(f)(5)]

If yes, does the plan:

YES	NO	
✓		Describe how the Control Authority will investigate instances of non-compliance
✓		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: [40 CFR 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 $ 1,000.00 /day/violation
  - criminal $ 1,000.00 /day/violation
  - administrative $ 1,000.00 /day/violation
- Imprisonment
- ✓ Termination of Service
- Other: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: None apparent

YES	NO	
✓		When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [40 CFR 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? [40 CFR 403.12(g)(2)]
✓*	✓*	If no, does the Control Authority conduct all of the monitoring?
✓		Does the pattern of enforcement conform to the Enforcement Response Plan?

* City does monitoring for some SIUs, but not for all, depending on permit requirements.

SECTION II: PRETREATMENT PROGRAM ANALYSIS

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Type	Action Date	Return to Compliance? YES (Date)	NO
None					

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 (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements
0	0	Reporting requirements
0	0	Pretreatment compliance schedule
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled?

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 Identify Industrial User
	✓	Interference	
	✓	Pass through	
	✓	Fire or explosions? *(including flash point violations)*	
	✓	Corrosive structural damage? *(including pH < 5.0 s.u.)*	
	✓	Flow obstructions?	
	✓	Excessive flow or pollutant concentrations?	
	✓	Heat problems?	
	✓	Interference due to oil or grease?	
	✓	Toxic fumes?	
	✓	Illicit dumping of hauled wastes?	

✓		Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [40 CFR 403.8(f)(2)(iv)]
		How many SIUs are currently on compliance schedules? 0
	✓	Have any **CIUs** been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [40 CFR 403.6(b)]

SECTION II: PRETREATMENT PROGRAM ANALYSIS

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

Penalty	Number	Amount
Civil	0	$0.00
Administrative	3	$12,472.00
Total	3	$12,472.00

SECTION II: PRETREATMENT PROGRAM ANALYSIS

H. Data Management / Public Participation

YES	NO	
✓		Are inspection and sampling records well documented, organized, and readily retrievable?

Are files/records:

YES	NO	
✓		Computerized
✓		Hard copy
		Other (specify): _____

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
	✓	Inspection and Sampling schedule
✓*	✓*	Monitoring Data
	✓	IU Compliance Status Tracking
		Other (specify): _____

Can IU monitoring data be retrieved by:

YES	NO	
	✓	Industry name
	✓	Pollutant type
	✓	Industrial category or type
✓	✓	SIC Code
✓		IU discharge volume
	✓	Geographic location
✓		Receiving treatment plant *(if more than one plant in the system)*
		Other (specify): _____

✓		Does the POTW have provisions to address claims of confidentiality? [40 CFR 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?

* Yes for POTW influent and effluent data. For IUs, only flow data is computerized.

SECTION II: PRETREATMENT PROGRAM ANALYSIS

I. Resources

What is the current level of resources dedicated to the Pretreatment Program in terms of full time-equivalent employees (FTEs) and funding amounts? [40 CFR 403.8(f)(3)]
One FTE

YES	NO		
	✓	Have any problems in program implementation been observed which appear to be related to inadequate funding?	
		If yes, describe and show below the source(s) of funding for the program:	
			Percent of Total Funding
✓		POTW general operating fund	100%
*		IU permit fees	
*		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:	

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

YES	NO		If no, please explain:
✓		Legal assistance	
✓		Permitting	
✓		IU inspections	
✓		Sample collection	
✓		Sample analyses	
✓		Data analysis, review, and response	
✓		Enforcement	
✓		Administration *(includes record keeping/data management)*	

Does the Control Authority have access to adequate:

YES	NO		If yes, list items:	If no, please explain:
✓		Sampling equipment	6 automatic samplers	
✓		Safety equipment	Standard equipment	
✓		Vehicles	City truck	
✓		Analytical equipment	Conventional parameter equipment	

* These items are funneled into the POTW general operating fund.

SECTION II: PRETREATMENT PROGRAM ANALYSIS

J. 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 application, surveys, etc.

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

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

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

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? If yes, which of the "Guides to Pollution Prevention" were used?
   No

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name: River City Coatings, Inc. File/ID No.: VBC1721-22
Industry Address: 306 Sycamore Street, Van Buren, AR 72956
Industry Description: Powder coat paint metal lamp bases
Industrial Category: Metal Finishing 40 CFR 433 SIC Code: 1721
Avg. Total Flow (gpd): ~6,000 Avg. Process Flow (gpd): 3,540
Industry visited during audit? ____ YES ✓ NO

Comments: Began operations in 1997. Phosphatizing and powder coating cold rolled steel, zinc, and aluminum.

FILE #: 2 Industry Name: Fab-Tech, Inc. File/ID No.: VBC3400-26
Industry Address: 12 N 25th Street, Van Buren, AR 72956
Industry Description: Fabrication of precision metal parts (from sheet)
Industrial Category: Metal Finishing 40 CFR 433 SIC Code: 3444, 3499
Avg. Total Flow (gpd): >320 Avg. Process Flow (gpd): >320
Industry visited during audit? ✓ YES ____ NO

Comments: Began operations in 1992. Steel, aluminum, and stainless steel as raw stock.

FILE #: 3 Industry Name: Simmons Prepared Foods, Inc. File/ID No.: VB2015-24
Industry Address: 2101 Twin Circle Drive, Van Buren, AR 72956
Corporate: P.O. Box 430, 601 N Hico Street, Siloam Springs, AR 72761
Industry Description: Further processing of poultry parts, partially and fully cooked
Industrial Category: N/A 40 CFR N/A SIC Code: 2015
Avg. Total Flow (gpd): 333,000 Avg. Process Flow (gpd): 250,000
Industry visited during audit? ✓ YES ____ NO

Comments: ____

FILE #: 4 Industry Name: Arkansas Valley TWA, Inc. File/ID No.: VB7542-22
Industry Address: 121 Access Road, Van Buren, AR 72956
Industry Description: Truck wash (exterior)
Industrial Category: N/A 40 CFR N/A SIC Code: 7542
Avg. Total Flow (gpd): ~13,000 Avg. Process Flow (gpd): ~11,000
Industry visited during audit? ✓ YES ____ NO

Comments: ____

FILE #: 5 Industry Name: N/A (Only four files were reviewed in the allotted time.) File/ID No.: ____
Industry Address: ____
Industry Description: ____
Industrial Category: ____ 40 CFR ____ SIC Code: ____
Avg. Total Flow (gpd): ____ Avg. Process Flow (gpd): ____
Industry visited during audit? ____ YES ____ NO

Comments: ____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	
2. Is the user subject to categorical pretreatment standards?	✓	✓	No	No	
a. New Source (NS) or Existing Source (ES)?	NS	NS	N/A	N/A	
b. Is this IU identified as having P^2 potential?	No	No	No	No	

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

B. Control Mechanism

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Does the file contain an application for a control mechanism?	✓	✓	✓	✓	
If yes, what is the application date?	Oct 19, 2016	Dec 2015	June 19, 2014	Jan 2016	
Does it ask for Pollution Prevention information?	✓	[1]	✓	✓	
2. Does the file contain a permit?	✓	✓	✓	✓	
Permit expiration date:	Sep 18, 2019	Feb 2019	Apr 15, 2017	Dec 2019	
Is a fact sheet included?	✓	[2]	✓	[4]	
3. Has the SIU been issued a control mechanism that contains: [40 CFR 403.8(f)(iii)(A) - (E)]					
a. Legal Authority citation?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of non-transferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	✓	[3]	✓	[3 & 5]	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	[6]	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	[3]	
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	
Records retention?	✓	✓	✓	✓	
Civil and criminal penalty provisions?	✓	✓	✓	✓	
Revocation of permit?	✓	✓	✓	✓	
l. Compliance schedules / progress reports?	N/A	N/A	N/A	N/A	
m. General / Specific Prohibitions?	No	No	No	No	

Comments:

[1] Yes, but section was left blank.

SECTION III: INDUSTRIAL USER FILE REVIEW

[2] The fact sheets need more pertinent information, such as start-up date, NAICS Code, contact name, compliance history, average discharge flow, etc.
[3] It is recommended to monitor flow in permits as "Report" only, rather than a numerical limit.
[4] In the fact sheets, the City needs to provide better explanation for how the permit limit of zinc was calculated based on local limits. Remove any reference to total toxic organics (TTO) as well.
[5] The local limit-based permit limit of zinc should be reevaluated to determine if the calculations are correct.
[6] The sampling frequency is listed as "two times per year." This should be clarified to be understood as "semi-annually" (e.g., June/December).

SECTION III: INDUSTRIAL USER FILE REVIEW

C. Application of Standards

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Has the IU been properly categorized?	✓	✓	N/A	✓	
2. Were both Categorical Standards and Local Limits properly applied?	✓ [1]	✓	N/A	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [40 CFR 403.8(f)(2)(iii)]	N/A	N/A	N/A	N/A	
4. For IUs subject to production-based standards, have the standards been properly applied? [40 CFR 403.8(f)(1)(iii)]	N/A [2]	N/A [2]	N/A [2]	N/A [2]	
5. For IUs with combined wastestreams, is the Combined Wastestream Formula or the Flow-Weighted Average Formula correctly applied? [40 CFR 403.6(d) and (e)]	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	
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	

Comments:

[1] Local limits determined to be not necessary.
[2] No mass limits applied to discharge.

SECTION III: INDUSTRIAL USER FILE REVIEW

D. Compliance Monitoring

Sampling

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [40 CFR 403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [40 CFR 403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? (SIUs & CIUs) [40 CFR 403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	No [1]	No [2]	N/A	N/A	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	✓	✓	✓	✓	
6. Were the analytical methods used, in accordance with 40 CFR 136? [40 CFR 403.8(f)(2)(vi)]	✓	✓	✓	✓	

Comments:

[1] Certification statement not signed.
[2] A Toxic Organic Management Plan (TOMP) was not located in the file, however, the permittee certified that they have one.

SECTION III: INDUSTRIAL USER FILE REVIEW

Inspections

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Does the IU file contain inspection reports?	✓	✓	✓	✓	
2. Has the Control Authority inspected the IU at least as frequently as required by the Approved Program or permit? [40 CFR 403.8(c)]	✓	✓	✓	✓	
Date of last inspection:	July 21, 2016	June 2016	June 14, 2016	Sep 2016	
3. Does the inspection report(s) include: [40 CFR 403.8(f)(2)(vi)]					
a. Inspector Name(s):	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	N/A	N/A	N/A	N/A	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, *etc.*)?	[1]	[1]	✓	✓	
f. Evaluation of pretreatment facilities?	✓	✓	✓	✓	
g. Evaluation of self-monitoring equipment and techniques?	[2]	[2]	✓	[2]	
h. (Re)-Evaluation of slug discharge control plan and need to develop? [40 CFR 403.8(f)(2)(v)]	[3]	[3]	[3]	[3]	
i. Manufacturing facilities?	[4]	[4]	[4]	N/A	
j. Chemical handling and storage procedures?	[4]	[4]	✓	[4]	
k. Chemical spill prevention areas?	[4]	[4]	✓	[4]	
l. Hazardous waste storage areas and handling procedures?	[4]	[4]	N/A	[4]	
m. Sampling procedures?	[2]	[2]	✓	[2]	
n. Laboratory procedures?	N/A	N/A	N/A	N/A	
o. Monitoring records?	✓	✓	✓	✓	
p. Evaluation of Pollution Prevention opportunities?	No	No	No	No	
q. Control Authority inspector signature?	✓	✓	✓	✓	

Comments:

[1] Sources are identified, but not flow or type of discharge. This inspection item needs a more comprehensive description of processes that generate wastewater.

SECTION III: INDUSTRIAL USER FILE REVIEW

[2] This IU contracts its self-monitoring.
[3] It appears that the slug control evaluation was not conducted as there is no documentation.
[4] The descriptions for these items are vague and could use more detail.

IU Self-Monitoring and Reporting

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Does the IU file contain self-monitoring reports?	✓	✓	✓	✓	
2. Does the file include:					
a. BMR?	Archive	Archive	N/A	N/A	
b. 90-day Report?	Archive	Archive	N/A	N/A	
c. All periodic reports?	✓	✓	✓	✓	
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	
3. Did the IU report on all required parameters?	✓	✓	✓	✓	
4. Did the IU comply with the sampling frequency requirements?	✓	✓	✓	✓	
5. Did the IU report flow?	✓	✓	✓	[2]	
6. Did the IU comply with the reporting frequency requirements?	✓	✓	✓	✓	
7. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	No	
8. Did the IU report all changes in its discharge? [40 CFR 403.12(j)]	✓	N/A	✓	N/A	
9. Has the IU developed a Slug Control and Prevention Plan?	[1]	[1]	[1]	[1]	
10. Has the industry been responsible for spills or slug loads discharged to the POTW? If yes, does the file contain documentation regarding:	No	No	No	No	
a. Did the spill cause Pass Through or Interference?	N/A	N/A	N/A	N/A	
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	

Comments:

[1] It appears that a Plan has not been developed.
[2] The City uses incoming potable water meter readings to determine IU's flow.

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Were all IU discharge violations identified in: [40 CFR 403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	N/A	N/A	✓	✓	
b. IU self-monitoring results?	N/A	N/A	N/A [1]	✓	
c. If New Source CIU, was it compliant within 90 days from commencement of discharge?	✓	✓	N/A	N/A	
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	10	8	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	N/A	N/A	[1]	[2]	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	N/A	N/A	✓	✓	
5. Were all non-discharge violations identified in the file?	N/A	N/A	N/A	N/A	
6. Was the IU notified of all violations?	N/A	N/A	✓	✓	
7. Was follow-up enforcement action taken by the Control Authority?	N/A	N/A	✓	✓	
8. Did the Control Authority follow its approved ERP?	N/A	N/A	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	N/A	N/A	✓	✓	
10. Is there a compliance schedule?	No	No	No	No	
11. Were there any compliance schedule violations?	N/A	N/A	N/A	N/A	
12. Was SNC calculated for the violations on a quarterly basis? [40 CFR 403.8(f)(2)(vii)] During evaluation for SNC, did the Control Authority consider each of the following criteria?	N/A	N/A	N/A	N/A	
a. Chronic violations	N/A	N/A	N/A	N/A	
b. TRC	N/A	N/A	N/A	N/A	
c. Pass Through/Interference	N/A	N/A	N/A	N/A	
d. Spill/slug loads	N/A	N/A	N/A	N/A	
e. Reporting	N/A	N/A	N/A	N/A	
f. Compliance schedule	N/A	N/A	N/A	N/A	
g. Other (specify):	N/A	N/A	N/A	N/A	
13. Was the SIU published for SNC?	N/A	N/A	N/A	N/A	
Date of publication:	N/A	N/A	N/A	N/A	

SECTION III: INDUSTRIAL USER FILE REVIEW

Comments:

[1] The City calculates loads based on the IU's reported concentrations and flows in order to determine violations.
[2] The IU's contract lab cannot determine if the IU is in violation of a permit limit because the lab does not have access to the IU's daily water usage.

PRETREATMENT AUDIT
REPORTABLE NONCOMPLIANCE (RNC)

Control Authority: Van Buren Municipal Utilities NPDES Permit No. (Tracking): AR0021482

Date of Audit: November 15-17, 2016 Date Entered into ICIS: _____

Level	Assessment	YES	NO
I	Failure to enforce against *Pass Through* and/or *Interference*		✓
	Failure to submit required reports within 30 days		✓
	Failure to meet compliance schedule milestone date within 90 days		✓
II	Failure to (re)issue control mechanisms to 90% of SIUs within 6 months		✓
	Failure to inspect or sample 80% of SIUs within the last reporting year		✓
	Failure to enforce pretreatment standards and reporting requirements		✓
	Other violations of concern		✓

Significant Noncompliance (SNC)

	YES	NO
Is the Control Authority in SNC for violation of any Level I criteria?		✓
Is the Control Authority in SNC for violation of two or more Level II criteria?		✓

PRETREATMENT AUDIT
INDUSTRIAL USER SITE VISIT

Control Authority: Van Buren Municipal Utilities NPDES Permit No. (Tracking): AR0021482

Industrial User Information

Name: Arkansas Valley TWA, Inc.
Address: 121 Access Road, Van Buren, AR 72956
Phone Number: N/A (i.e., did not request)
Industry Description: Truck wash (exterior)
Contact Name(s): Brian Taylor, Manager

Date & Time of Site Visit: November 16, 2016 – 1:15 PM

		YES	NO	N/A
1.	Significant Industrial User (SIU)?	✓		
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 and equipment?	✓		
10.	Adequate spill prevention and control?	✓		
11.	Industry familiar with limits and requirements?	✓		
12.	Pollution Prevention activity?		✓	

Additional comments:

The IU washes the exterior of truck tractor trailers and the interior of refrigerated trailers. The exterior wash is covered, while the refrigerated trailer wash is exposed to the elements. Both activities are conducted on concrete pads with the covered wash area sloped to a middle sump and the refrigerated exposed wash pad sloped to grated troughs, which gravity flow the wash water to three (3) 1,500 gallon in-ground/covered "septic tanks" (serpentine flowed). Basic settling takes place here and the wastewater is pH adjusted as necessary. Before discharge to the City, wastewater is tested in a nearby manhole behind the facility. This is an adequate sampling point.

PRETREATMENT AUDIT
INDUSTRIAL USER SITE VISIT

Control Authority: Van Buren Municipal Utilities NPDES Permit No. (Tracking): AR0021482
Industry Name: Arkansas Valley TWA, Inc.

Additional comments *(continued)*:

Solids are periodically pumped out and sent to neighboring Fort Smith. There, they are added to the biosolids from Fort Smith's WWTP and are eventually hauled to a landfill. During the warmer seasons, a typical business day involves cleaning 50-70 trucks per day (Monday-Friday), while it picks up during the winter. The exterior truck wash is conducted manually with hand wands that have two feeds. By switching a ball valve on their handles, the wands release either pre-soak (strong soap) or pressure wash using an acid (hydrofluoric) brightener with surfactants. The final rinse uses City water from a garden hose. Soft brushes on extension poles are used on the upper reaches of the trucks. The lower parts of the trucks are hand washed with either soft brushes or mitts. Aluminum wheels are not washed with the acid brightener. Instead, a dilute citric acid is used on an as-needed basis. Typically, 5-7 employees clean and rinse a truck. The IU has a small, separate chemical storage room for the soap and acid brightener. The soap is a powder and is mixed in a 250 gallon tote. The acid is stored in a separate 250 gallon tote. Both are diaphragm-pumped overhead to the hand wands in the wash bay. The IU washes very few engine blocks so there has been no problem with Oil and Grease (O&G).

Site visit conducted by: Allen Gilliam, Adam Yates, Kim Redo and James Dunn Date: November 16, 2016

Signature of Auditor: _____

PRETREATMENT AUDIT
INDUSTRIAL USER SITE VISIT

Control Authority: Van Buren Municipal Utilities NPDES Permit No. (Tracking): AR0021482

Industrial User Information

Name: Fab-Tech, Inc.
Address: 12 N 25th Street, Van Buren, AR 72956
Phone Number: (479) 474-1788
Industry Description: Fabrication of precision metal parts (from sheet) – Metal Finishing [40 CFR 433]
Contact Name(s): Mike Fisher, Treatment Supervisor and Kevin Treece, Co-Owner

Date & Time of Site Visit: November 16, 2016 – 2:15 PM

		YES	NO	N/A
1.	Significant Industrial User (SIU)?	✓		
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 and equipment?	✓		
10.	Adequate spill prevention and control?	✓		
11.	Industry familiar with limits and requirements?	✓		
12.	Pollution Prevention activity?		✓	

Additional comments:

The raw materials used in the IU's fabrication process include carbon steel (70%), galvanized steel (very little), stainless steel (5%) and aluminum sheet stock (25%). They laser cut precision parts, manufacturing outdoor electrical connection boxes to other various shapes to customer-specific pieces. They "break," "punch," grind and weld some pieces. The conversion coating process with phosphoric acid followed by powder coating captures them under the metal finishing standards in 40 CFR 433.

PRETREATMENT AUDIT
INDUSTRIAL USER SITE VISIT

Control Authority: Van Buren Municipal Utilities NPDES Permit No. (Tracking): AR0021482
Industry Name: Fab-Tech, Inc.

Additional comments *(continued)*:

The operations layout includes a simple series of dip tanks beginning with a heated alkaline (NaOH) tank (pH ~10-10.5 s.u.), fresh water rinse tank, iron phosphate tank (pH ~6.5 s.u.), fresh water rinse and a final sealant tank. The rinse tanks are continually overflowing and this is essentially what is sampled. The aluminum parts are sent through an etching/brightener solution (H_2SO_4, HF acid, ethylene glycol, monobutyl ether). It is also rinsed off with fresh water and allowed to drain to the City. The sampling point is at the loading dock (with drain to City) where the City simply catches wastewater being gravity flowed through a ~4 inch PVC pipe. There was a leak noticed where some of the wastewater was flowing onto the ground outside the loading dock.

No pretreatment is necessary as iron-phosphatizing carbon steel produces very little, if any, pollutants regulated under 40 CFR 433. Carbon steel (only) parts (cathode) are hung on a rack to air dry and then wheeled over to the powder coating area where they are powder-coated by hand. This open area was about 7-8 feet tall, ~15 feet wide and ~10 feet front to back. After powder coating, parts are placed back on their hangers and wheeled into the "bake" oven (~400 °F). The industry representatives are familiar with their permit limits/conditions and the City is familiar with the IU's operations.

Site visit conducted by: Allen Gilliam, Adam Yates, Kim Redo and James Dunn Date: November 16, 2016

Signature of Auditor: _____

PRETREATMENT AUDIT
INDUSTRIAL USER SITE VISIT

Control Authority: Van Buren Municipal Utilities NPDES Permit No. (Tracking): AR0021482

Industrial User Information

Name: Simmons Prepared Foods, Inc.
Address: 2101 Twin Circle Drive, Van Buren, AR 72956
Phone Number: (479) 410-3035
Industry Description: Further processing of poultry parts, partially and fully cooked
Contact Name(s): Monty Moore, Wastewater Operator; Bryan Clifton, Wastewater Supervisor; Anthony Howard, Maintenance; and Brian Burke

Date & Time of Site Visit: November 17, 2016 – 8:30 AM

		YES	NO	N/A
1.	Significant Industrial User (SIU)?	✓		
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 and equipment?	✓		
10.	Adequate spill prevention and control?		✓	
11.	Industry familiar with limits and requirements?	✓		
12.	Pollution Prevention activity?		✓	

Additional comments:

Poultry parts are received, placed in the cooler and X-rayed for bones, if necessary. The parts are marinated, pre-dust breaded, batter mixed then final breading or pre-grilled, partial frying, sauce bath (as necessary) and final cooking then 2nd sauce bath or slicing depending on customer specifications. Afterwards, the product is frozen, bagged, cased and palletized before moving to cold storage prior to shipment.

PRETREATMENT AUDIT
INDUSTRIAL USER SITE VISIT

Control Authority: Van Buren Municipal Utilities NPDES Permit No. (Tracking): AR0021482
Industry Name: Simmons Prepared Foods, Inc.

Additional comments *(continued)*:

Wastewater is generated from the clean-up of the various vats and production building. Screened wash water is sent to a 200,000 gallon equalization basin where surface aeration is used for stirring and maintaining biomass, with pH monitored and adjusted accordingly. Polymers, coagulants and compressed air are injected into floc tubes before entering a dissolved air flotation (DAF) unit. Here, sludge is skimmed of biosolids into a thickener tank and then pumped into a holding tank. Pretreated water is pumped to a 300,000 gallon basin where surface aeration is again used for stirring and to maintain biomass. In case of overfilling, the 300,000 gallon basin is designed to gravity flow to a smaller basin. Similar to above, wastewater from the 300,000 gallon basin is pumped to the DAF unit where the five-chemical process is used for the mechanical removal of biosolids. The biosolids are skimmed into the thickener tank and then pumped to a holding tank where NEBO Services hauls off-site for land application. "Production" now has marination "traps" to prevent slug loads of high BOD_5 from going through the pretreatment process. Some quaternary ammonia is used for clean-up in production. Sodium hypochlorite is also used as a disinfectant. Chemical storage is fairly condensed, with coagulants stored in metal-caged totes or an outside 7,000 gallon tank. Wastewater from the DAF unit is discharged through a 6 inch Parshall flume into the city sewer. The grounds around the perimeters of both the production and treatment areas are kept clean. The IU's representatives were very open and transparent and knew their permit limits/conditions. The City seemed to know the IU's operations very well and everyone was familiar with each other.

Site visit conducted by: Allen Gilliam, Adam Yates, Kim Redo and James Dunn Date: November 17, 2016

Signature of Auditor: _____

ATTACHMENT I

Application for Industrial User Permit (Blank)

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

Please complete the attached form and return it by_____
to the following address: Van Buren Municipal Utilities
2806 Bryan Road
Van Buren, Arkansas 72956
Attn: Kim Redo, Environmental Coordinator

If you have any questions please contact Kim Redo at 479-474-0941

SPECIFIC INSTRUCTIONS

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

Item 2. Self-explanatory

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

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

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

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

Item 6. Self- explanatory.

Item 7. Self-explanatory.

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

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:_____
Mailing Address:_____
_____Zip:_____
Corporate Address: _____
_____

B. Facility Name:_____
Location:_____
_____
_____Zip:_____

C. Name of Owner(s):_____
_____

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

E. Number of Full-Time Employees:_____Number of Part-Time Employees___
Number of Shifts_____

F. Number of Months/Year in Operation_____
Number of days/week in operation_____

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.)_____
_____

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

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

Title of the Permit	Permit No.	Issuing Office	Expiration Date

(3) Description of Operations:

A. List raw Materials Used:

B. List Chemicals Used:

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

D. Summarize each Regulated Process:

Process Description	Production Rate	Pretreatment Standard Category	Subpart	SIC Code

E. Provide on a separate sheet:

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

2) a schematic drawing showing all wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations and estimated flows for each individual waste stream.

3) a schematic process diagram which indicates points of discharge to the POTW from regulated processes.

(4) Flow Measurement:

A. Total Plant Flow in Gallons Per Day (gpd):
Average_____ Maximum_____
Disclosure of time and duration of discharges:_____
_____

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

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

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

(5) Measurement of Pollutants:

A. Provide on a Separate Sheet:

1) The user shall identify the Pretreatment Standards applicable to each regulated process.

2) A description of any and all wastewater treatment utilized (show treatment system location in relation to process flows and sampling points on schematic drawing required by Question 3.E.).

B. Analysis of Regulated Flows:

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

Regulated Process:_____

Pollutant (mg/L)									
Maximum									
Average									

Sample Location:_____

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

_____

Number of samples and Frequency Collected:_____

_____

Analytical Methods Used:_____

_____

C. Analysis of Total Plant Flow (if appropriate)

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

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

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

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

(6) Certification:

A. Is the facility meeting applicable categorical pretreatment standards on a consistent basis? YES_____ NO_____

B. If no, do you require:

1) additional operation and maintenance (O & M) to achieve compliance?
YES_____ NO_____

2) new or additional pretreatment facilities to achieve compliance?
YES_____ NO_____

3) Name of Qualified Professional that reviewed this certification:

Name & Title_____

Signature_____Date_____

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

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

_____

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

_____

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

_____

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

_____

_____

(8) Compliance Schedule:

A. If additional O & M or additional pretreatment will be required to meet categorical pretreatment standards or local ordinances (#26-2009 & 27-2009) on a consistent basis, attach a schedule on a separate sheet projecting increments of progress indicating dates for the commencement and completion of major events leading to compliance with the standard/ordinances. Note: the final compliance date in this schedule shall not be later than the compliance date for the applicable pretreatment standard. Written progress reports are required within 14 days of each of the compliance dates specified in the compliance schedule.

B. Signatory Requirement:

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

Name - Authorized Representative

_____

Signature

_____

Official Title

_____

Date

_____

ATTACHMENT II

File #1 – River City Coatings, Inc.

FACT SHEET

General 48 full-time employees; 2 shifts; 5 days/week

Flow 5,000 gallons per day based on highest flow over previous year times 1.25 safety factor for growth: 2,121 gallons/day * 1.25 = 2,651 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 limits based on Maximum Discharge concentration limits as set forth in 40 CFR Part 433

	Daily Max./Monthly Max.
Cadium:	0.11/0.07 mg/L
Chromium:	2.77/1.71 mg/L
Copper:	3.38/2.07 mg/L
Lead:	0.69/0.43 mg/L
Nickel:	3.98/2.38 mg/L
Silver:	0.43/0.24 mg/L
Zinc:	2.61/1.48 mg/L
Cyanide:	1.20/0.65 mg/L
Oil & Grease	52/26 mg/L
Total Toxic Organics:	2.13 mg/L

Certification Statement

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.

(This statement is due in June and December of each year)

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

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

Address: 306 Sycamore Street POTW Name: South Plant

Date & Time of Visit: March 22, 2016 @ 9:00 a.m.

Last inspection: 4/29/15

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

Description of Manufacturing Process: washing of metal (hot & cold rolled steel, some aluminum, and some Cu. Have done ~~some~~ vinyl fire galvanized coated metals) parts in liquid phospatizer (iron phosphate) for spray wash system and powder coating

Sources of Process Wastewater: Stage 2 & 4 (rinse stages) only.

Categorical Industry? yes

Basis for Permit Discharge Limits: 40 CFR Part 433

Description of pretreatment equipment and procedures: n/a

Spill prevention & Solvent Management Procedures: Lockdown – shut off valve (manual) in sampling box. Sand bags for spills. Call Safety Kleen* for clean up.

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

TOMP submitted & received Oct. 6, 2006 (last cert. rec'd 12/9/2010)

SLUDGE: Safety Kleen pumps this out completely every ~~4-6 months~~ 2x/year. In house personnel use a power washer to wash down the sides of the tanks. (Invoices on file. Last clean out was ~~March 2015~~ Friday, March 18, 2016)

4 chemicals used: Duraseal (fluorozirconic & hydrofluoric acids); Spectralink-proprietary (alcohol); Alkali cleaner (Superterj by Dubois Chemical. SecuretechES in Tanks 1 & 4)
Tank #3-phosphate tank: – Hytherm150 by Dubois (this additive raises the pH by a metered [automatic] pump with auto pH read)
SecuretecES – Iron Phosphate; pgaf – Aluminum enhancer (enhances the adhesion on Al)

→ Not being used ndV as Securetech contains this but it is on site

INSPECTION REPORT

INSPECTION OF LABORATORY/RECORDS

1. Records & reports for analysis and monitoring maintained for three (3) years? yes
2. Records of lab equipment calibration and maintenance? n/a
   (pH for in-house operations control only – not for reporting purposes)
3. Pass on-site visual inspection of lab equipment calibration? No, ~~n/a~~
4. Records of Analytical Methods & Techniques used? yes
5. Approved Analytical Testing procedures used? yes
6. Records of analysis date & time performed? yes
7. Records of individual performing analysis? yes
8. Record of sampling date, time, & location? yes
9. Parameters and sampling frequency agree with permit? yes
10. Parameters other than those required by permit analyzed? no
11. Monitoring and analysis being performed more frequently than required by permit? no
12. Calculation of analysis satisfactory? yes
13. Are duplicate samples analyzed? yes
14. Is a private laboratory used? Yes-ChemLab
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: n/a

*ChemLab of Fort Smith used for permit testing requirements

*Using a pH meter – ~~from Du~~bois

Oakton (Eutech Instruments)
35634-30
pH test 30

Not being calibrated daily – need to be sure to follow proper procedure(s)

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? ~~NO will update asap~~ yes

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

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

20. Has discharge loading (organic, hydraulic) changed since last inspection? no (~~running 2 shifts from 6:30a.m. to 10:30/11:00 P.M.~~) 1 shift (6Am-3pm)

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

23. Has permittee exceeded effluent limits (BOD, TSS, pH, Oil & Grease, metals, etc.) since last inspection? List cause(s) no

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

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

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

27. Has permittee complied with all aspects of the Industrial Discharge Permit under which it operates? ~~No – no self-monitoring reports submitted since August 2014~~ yes

INSPECTION OF PRETREATMENT or SAMPLING FACILITY

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

2. Qualified operating staff provided? n/a

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

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

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

6. Describe procedural plan to prevent accidental discharges from entering municipal sewer system:
same The sampling box (outside) has a manual shut off valve.

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

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

9. How are sludge and solids disposed of? Who hauls this waste and where does it go?
✓ Safety Clean. Clean out twice per year. Sludges go to ~~Tulsa~~ OK (not Haz. Waste) ~~Mar. 2015~~ Mar. 18, 2016 last clean out.

10. Sludge hauling documented by manifest? Invoices

11. Type of flow measuring device? City meter (usage only)

12. Flow measuring device properly installed? yes

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

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

15. Does permittee have an Operations & Maintenance Manual on site? No, but Tony has workers on site trained to close valve in case of an emergency (i.e. chemical spill)

*MSDS sheets in notebook/manual in office

INSPECTION OF "CHEMICAL STORAGE & PRODUCTION AREA"

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

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

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? None. Nothing changed since last inspection.

MISCELLANEOUS

1. Does the permittee have any questions regarding current or past actions of the VBMU in the pretreatment program? No
2. Does the permittee have any questions regarding the local pretreatment program, rules, regulations, etc.? No

Inspector Kim Reed Date & Time 3/22/16

Industry Representative Jerry Jones Date/Time 3-22-16

Comment Area:

ATTACHMENT III

File #2 – Fab-Tech, Inc.

Rec'd 12/23/15

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

Please complete the attached form and return it by_____
to the following address: Van Buren Municipal Utilities
2806 Bryan Road
Van Buren, Arkansas 72956
Attn: Kim Redo, Environmental Coordinator

If you have any questions please contact Kim Redo at 479-474-0941

SPECIFIC INSTRUCTIONS

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

Item 2. Self-explanatory

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

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

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

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

Item 6. Self- explanatory.

Item 7. Self-explanatory.

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

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: Fab Tech, Inc.
Mailing Address: 12 N. 25th St.
Van Buren, AR Zip: 72956
Corporate Address: same as above

B. Facility Name: Fab Tech, Inc.
Location:
12 N. 25th St.
Van Buren, AR Zip: 72956

C. Name of Owner(s): Myron Kirksey
Kevin Treece

D. Facility Contact (provide the name, title & phone number of a designated person to contact if additional information is necessary.)
Myron Kirksey, owner, 479-474-1788

E. Number of Full-Time Employees: 25 Number of Part-Time Employees 0
Number of Shifts 1

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

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 Utilities

H. Provide the date the facility began/will begin discharging to the publicly owned treatment works (sewage authority, municipality, etc.)
Date facility began operation 1992

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

Title of the Permit	Permit No.	Issuing Office	Expiration Date

(3) Description of Operations:

A. List raw Materials Used: Sheet Metal
Aluminum

B. List Chemicals Used: Dynadet, CrysCoat 747, Gardolene,
See Attached SDS Sheets

C. Describe Manufacturing of Service Activities Conducted and the Final Products: Fabrication of Precision Sheet Metal Components

D. Summarize each Regulated Process:

Process Description	Production Rate	Pretreatment Standard Category	Subpart	SIC Code
Pre-Paint Phosphate Conversion		Y33	A	3400

E. Provide on a separate sheet:

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

2) a schematic drawing showing all wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations and estimated flows for each individual waste stream.

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): estimates
Average 1000 Maximum 2400
Disclosure of time and duration of discharges: _____

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

9

Regulated Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Batch, etc.)
Metal Finishing	1000	2400	Continuous

Historical data not reflect finishing Flow Rate

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

Discharge from Restrooms, etc, is totally separate from the regulated stream and the two do not mix

(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: Metal Finishing

Pollutant (mg/L)									
Maximum		See analysis report from Chem-Lab, Inc (Attached)							
Average									

Sample Location: _____

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

_____

Number of samples and Frequency Collected: _____

_____

Analytical Methods Used: _____

_____

C. Analysis of Total Plant Flow (if appropriate)

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

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

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

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

(6) Certification:

A. Is the facility meeting applicable categorical pretreatment standards on a consistent basis? YES ✓ NO_____

B. If no, do you require:

1) additional operation and maintenance (O & M) to achieve compliance?
YES_____ NO_____

2) new or additional pretreatment facilities to achieve compliance?
YES_____ NO_____

3) Name of Qualified Professional that reviewed this certification:

Name & Title_____

Signature_____Date_____

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

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

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

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

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

(8) Compliance Schedule:

A. If additional O & M or additional pretreatment will be required to meet categorical pretreatment standards or local ordinances (#26-2009 & 27-2009) 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
Myron Kirksey	
Official Title	Date
Owner	12-22-15

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name	:	CrysCoat® 747
Substance number	:	REL_3838
Chemical usage	:	Surface Pre-treatment material

Manufacturer or supplier's details

Company	:	Chemetall US, Inc.
Address	:	675 Central Avenue New Providence NJ 07974
Telephone	:	(800) 526-4473
Telefax	:	(908) 464-4658
Emergency telephone no	:	CHEMTREC - 800-424-9300, 1-703-527-3887 (International)

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

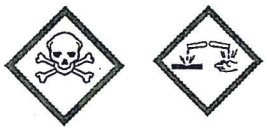
Appearance	liquid
Colour	yellow
Odour	surfactant
Hazard Summary	Causes severe burns. Liquid or vapor causes burns which may be delayed. Harmful by inhalation and if swallowed.

GHS Classification

Acute toxicity (Oral)	:	Category 3
Skin corrosion	:	Category 1A
Serious eye damage	:	Category 1

GHS Label element

Hazard pictograms :



Signal word	:	Danger
Hazard statements	:	Toxic if swallowed. Causes severe skin burns and eye damage.

Precautionary statements : **Prevention:**
Wash skin thoroughly after handling.
Do not eat, drink or smoke when using this product.
Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response:
IF SWALLOWED: Immediately call a POISON CENTER or doctor/ physician. Rinse mouth.
IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.
Wash contaminated clothing before reuse.
Storage:
Store locked up.
Disposal:
Dispose of contents/ container to an approved waste disposal plant.

Potential Health Effects

Inhalation : yes

Skin : yes

Ingestion : yes

Aggravated Medical Condition : None known.

Carcinogenicity:

IARC No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

ACGIH Confirmed animal carcinogen with unknown relevance to humans

Sodium Molybdate 10102-40-6

OSHA No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture :

Hazardous components

Component	CAS-No.	Weight percent
Phosphoric acid	7664-38-2	5 - 10
Sodium Molybdate	10102-40-6	1 - 5
Diethylene Glycol Butyl Ether	112-34-5	1 - 5
Hydrofluoric acid	7664-39-3	1 - 5

Unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard (29CFR 1910.1200).

Specific chemical identity of composition has been withheld as a trade secret.

Exact percentage of composition has been withheld as a trade secret.

SECTION 4. FIRST AID MEASURES

If inhaled : If inhaled, remove to fresh air.
If symptoms persist, call a physician.
If breathing is irregular or stopped, administer artificial respiration.

In case of skin contact : Wash off immediately with plenty of water for at least 15 minutes.
Pay particular attention to skin under nails.
Take off contaminated clothing and shoes immediately.
First treatment with calcium gluconate paste.
Get medical attention immediately if irritation develops and persists

In case of eye contact : Rinse immediately with plenty of water for at least 15 minutes.
Keep eye wide open while rinsing.
Get medical attention immediately

If swallowed : Rinse mouth.
Give several glasses of water to drink followed by milk of magnesia.
Never give anything by mouth to an unconscious person.
Get medical attention immediately

SECTION 5. FIREFIGHTING MEASURES

Suitable extinguishing media : Dry chemical
Carbon dioxide (CO2)
Foam
Water spray

Further information : Use water spray to cool unopened containers.

Special protective equipment for firefighters : In the event of fire, wear self-contained breathing apparatus.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures : Ensure adequate ventilation.

Methods and materials for containment and cleaning up : Ventilate area.
Neutralize with lime milk or soda and flush with plenty of water.
Clean up with inert absorbant material.
Keep in suitable, closed containers for disposal.
Flush with plenty of water.

Additional advice : Never return spills in original containers for re-use.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling : Use only with adequate ventilation.
Add this product to surface of solution slowly to avoid spattering
Do not add large amounts of product to solution at any one time.

Conditions for safe storage : Keep containers dry and tightly closed to avoid moisture absorption and contamination.
Store indoors in a cool, well-ventilated place

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
Phosphoric acid	7664-38-2	TWA	1.000000 mg/m3	ACGIH
		STEL	3.000000 mg/m3	ACGIH
		TWA	1.000000 mg/m3	NIOSH REL
		ST	3.000000 mg/m3	NIOSH REL
		TWA	1.000000 mg/m3	OSHA Z-1
		TWA	1.000000 mg/m3	OSHA P0
		STEL	3.000000 mg/m3	OSHA P0
Sodium Molybdate	10102-40-6	TWA (total dust)	15.000000 mg/m3	OSHA Z-1
		TWA	5.000000 mg/m3	OSHA Z-1
		TWA (Inhalable fraction)	10.000000 mg/m3	ACGIH
		TWA	3.000000 mg/m3	ACGIH

		(Respirable fraction)		
		TWA (Respirable fraction)	0.500000 mg/m3	ACGIH
		TWA	5.000000 mg/m3	OSHA P0
		TWA (Total dust)	10.000000 mg/m3	OSHA P0
Diethylene Glycol Butyl Ether	112-34-5	TWA (Inhalable fraction and vapor)	10 ppm	ACGIH
Hydrofluoric acid	7664-39-3	TWA	0.5 ppm	ACGIH
		C	2 ppm	ACGIH
		TWA	3 ppm 2.500000 mg/m3	NIOSH REL
		C	6 ppm 5.000000 mg/m3	NIOSH REL
		TWA	3 ppm	OSHA Z-2
		TWA	3 ppm	OSHA P0
		STEL	6 ppm	OSHA P0

Biological occupational exposure limits

Component	CAS-No.	Control parameters	Biological specimen	Sampling time	Permissible concentration	Basis
Hydrofluoric acid	7664-39-3, 7664-39-3	Fluoride	Urine	Prior to shift (16 hours after exposure ceases)	2.0000 mg/l	ACGIH BEI
Hydrofluoric acid		Fluoride	Urine	End of shift (As soon as possible after exposure ceases)	3.0000 mg/l	ACGIH BEI

Personal protective equipment

Respiratory protection : If the occupational exposure limits cannot be met, suitable respirator equipment shall be worn.

Hand protection
Remarks : Impervious gloves

Eye protection : Chemical resistant goggles must be worn.
Face-shield

Skin and body protection : Complete suit protecting against chemicals

Hygiene measures : Avoid contact with skin, eyes and clothing.
Wear suitable gloves and eye/face protection.

Wear suitable protective clothing.
Wash hands before breaks and immediately after handling the product.
Provide adequate ventilation.
Do not inhale fumes.
Keep away from food and drink.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	:	liquid
Colour	:	yellow
Odour	:	surfactant
pH	:	2.5 - 3.5
Freezing point	:	-1.11 °C
Boiling point/boiling range	:	no data available
Flash point	:	does not flash
Evaporation rate	:	1 (Water =1) Less than 1
Upper explosion limit	:	Not applicable.
Lower explosion limit	:	Not applicable.
Vapour pressure	:	no data available
Relative density	:	1.146
Bulk density	:	9.55 lb/gal
Solubility(ies)		
Water solubility	:	completely soluble
Auto-ignition temperature	:	No data available
Thermal decomposition	:	No data available
Viscosity, dynamic	:	No data available

SECTION 10. STABILITY AND REACTIVITY

Conditions to avoid	:	Direct sources of heat.
Incompatible materials	:	Bases Warning! Do not use together with other products. May release dangerous gases (chlorine). Avoid prolonged contact of concentrate with glass, ceramic, or concrete.
Hazardous decomposition	:	Carbon dioxide (CO_2)

products	Carbon monoxide Nitrogen oxides (NOx) Hydrogen, by reaction with metals Traces of Fluorides Oxides of phosphorus

SECTION 11. TOXICOLOGICAL INFORMATION

Acute toxicity

Product:

Acute oral toxicity	:	Acute toxicity estimate : 198.030000 mg/kg Method: Calculation method
Acute dermal toxicity	:	Acute toxicity estimate : > 5,000.000000 mg/kg Method: Calculation method

Components:

Phosphoric acid:

Acute oral toxicity	:	LD50 rat: 3,500.000000 mg/kg
Acute dermal toxicity	:	LD50 rabbit: 2,740.000000 mg/kg

Sodium Molybdate:

Acute oral toxicity	:	LD50 rat: 4.000000 mg/kg

Diethylene Glycol Butyl Ether:

Acute oral toxicity	:	LD50 rat: 6,560.000000 mg/kg LD50 rat: 4,500.000000 mg/kg
Acute dermal toxicity	:	LD50 rabbit: 4,120.000000 mg/kg

Hydrofluoric acid:

Acute inhalation toxicity	:	LC50 mouse: 342 ppm Exposure time: 1 h LC50 rat: 1276 ppm Exposure time: 1 h

Skin corrosion/irritation

Components:

Phosphoric acid:
Result: Corrosive

Hydrofluoric acid:
Result: Severe skin irritation

Serious eye damage/eye irritation

Components:

Phosphoric acid:
Result: Risk of serious damage to eyes.

Hydrofluoric acid:
Result: Corrosive

Respiratory or skin sensitisation

no data available

Germ cell mutagenicity

no data available

Carcinogenicity

no data available

Reproductive toxicity

no data available

STOT - single exposure

no data available

STOT - repeated exposure

no data available

Aspiration toxicity

no data available

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

no data available

Other adverse effects

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Refer to all federal, provincial, state and local regulation prior to disposition of container and unused contents by reuse, recycle or disposal.

SECTION 14. TRANSPORT INFORMATION

International regulation

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

National Regulations

SECTION 15. REGULATORY INFORMATION

TSCA Status : All components of this material comply with US TSCA requirements.

OSHA Hazards : Toxic by inhalation., Highly toxic by ingestion, Corrosive to skin
WHMIS Classification : E: Corrosive Material
D2B: Toxic Material Causing Other Toxic Effects

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
Hydrofluoric acid	7664-39-3	100	5,556

SARA 304 Extremely Hazardous Substances Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
Hydrofluoric acid	7664-39-3	100	5,556

SARA 311/312 Hazards : Acute Health Hazard

SARA 302 : The following components are subject to reporting levels established by SARA Title III, Section 302:
Hydrofluoric acid 7664-39-3

SARA 313 : The following components are subject to reporting levels established by SARA Title III, Section 313:
Diethylene Glycol Butyl Ether 112-34-5
Hydrofluoric acid 7664-39-3

US State Regulations

Massachusetts Right To Know

Phosphoric acid 7664-38-2
Hydrofluoric acid 7664-39-3

Pennsylvania Right To Know

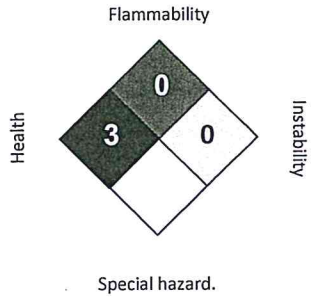
water 7732-18-5
Trade secret registry 735517-5190P

Phosphoric acid	7664-38-2
Trade Secret Registry	735517-5111P
Diethylene Glycol Butyl Ether	112-34-5
Hydrofluoric acid	7664-39-3

New Jersey Right To Know

water	7732-18-5
Trade secret registry	735517-5190P
Phosphoric acid	7664-38-2
Trade Secret Registry	735517-5111P
Trade Secret Registry	735517-5145P
Diethylene Glycol Butyl Ether	112-34-5
Hydrofluoric acid	7664-39-3

NFPA:



HMIS III:

HEALTH	3
FLAMMABILITY	0
PHYSICAL HAZARD	0

0 = not significant, 1 =Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

Corrosive Acid

Splash Goggles, Gloves, Apron, Vapour Respirator

SECTION 16. OTHER INFORMATION

Further information

Version *1.0*
Revision Date 06/04/2015

Chemetall US, Inc. warrants that the products described herein will conform with its published specifications.

The products supplied by Chemetall and information related to them are intended for use by buyers having necessary industrial skill and knowledge. Buyers should undertake sufficient verification and testing to determine the suitability of the Chemetall materials for their own particular purpose. Since buyer's conditions of use of products are beyond Chemetall's control, Chemetall does not warrant any recommendations and information for the use of such products. CHEMETALL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name : Dynadet®

Substance number : REL_4050

Chemical usage : Cleaning Compound

Manufacturer or supplier's details

Company : Chemetall US, Inc.

Address : 675 Central Avenue
New Providence NJ 07974

Telephone : (800) 526-4473

Telefax : (908) 464-4658

Emergency telephone no : CHEMTREC - 800-424-9300, 1-703-527-3887 (International)

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	powder
Colour	amber
Odour	pine
Hazard Summary	Harmful by inhalation and if swallowed. Causes severe burns.

GHS Classification

Skin corrosion : Category 1A

Serious eye damage : Category 1

Skin sensitisation : Category 1

GHS Label element

Hazard pictograms :

Signal word : Danger

Hazard statements : Causes severe skin burns and eye damage.
May cause an allergic skin reaction.

Precautionary statements : **Prevention:**

Do not breathe dust or mist.
Wash skin thoroughly after handling.
Contaminated work clothing should not be allowed out of the workplace.
Wear protective gloves/ protective clothing/ eye protection/ face protection.
Response:
IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.
IF ON SKIN (or hair): Remove/ Take off immediately all contaminated clothing. Rinse skin with water/ shower.
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. Immediately call a POISON CENTER or doctor/ physician.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.
If skin irritation or rash occurs: Get medical advice/ attention.
Wash contaminated clothing before reuse.
Storage:
Store locked up.
Disposal:
Dispose of contents/ container to an approved waste disposal plant.

Potential Health Effects

Inhalation	: yes
Skin	: yes
Ingestion	: yes
Aggravated Medical Condition	: None known.

Carcinogenicity:

IARC	No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.
ACGIH	No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by ACGIH.
OSHA	No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.
NTP	No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture :

Hazardous components

Component	CAS-No.	Weight percent
Sodium hydroxide	1310-73-2	30 - 50
Tetrasodium pyrophosphate	7722-88-5	20 - 30
Trade Secret Registry	735517-5122P	10 - 20
Terpene solvent	138-86-3	1 - 5
Trade secret registry	735517-5189P	1 - 5

Unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard (29CFR 1910.1200).

Specific chemical identity of composition has been withheld as a trade secret.

Exact percentage of composition has been withheld as a trade secret.

SECTION 4. FIRST AID MEASURES

If inhaled : Remove to fresh air.
If symptoms persist, call a physician.
If breathing is irregular or stopped, administer artificial respiration.

In case of skin contact : Wash off immediately with plenty of water for at least 15 minutes.
Take off contaminated clothing and shoes immediately.
Get medical attention immediately if irritation develops and persists

In case of eye contact : Rinse immediately with plenty of water for at least 15 minutes.
Keep eye wide open while rinsing.
Get medical attention immediately

If swallowed : Rinse mouth.
Drink plenty of water.
Never give anything by mouth to an unconscious person.
Get medical attention immediately

SECTION 5. FIREFIGHTING MEASURES

Suitable extinguishing media : Dry chemical
Carbon dioxide (CO2)
Foam
Water spray

Special protective equipment for firefighters : In the event of fire, wear self-contained breathing apparatus.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, : Ensure adequate ventilation.

protective equipment and emergency procedures		Avoid dust formation. Material can create slippery conditions.
Methods and materials for containment and cleaning up	:	Ventilate area. Avoid dust generation Sweep up and remove immediately. Keep in suitable, closed containers for disposal. Flush with plenty of water.
Additional advice	:	Never return spills in original containers for re-use.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling	:	Add this product to surface of solution slowly to avoid spattering Do not add large amounts of product to solution at any one time. Do not add to hot water warmer than 43 degrees to 49 degrees C (110 degrees to 120 degrees F). Never add liquids to product
Conditions for safe storage	:	Keep containers dry and tightly closed to avoid moisture absorption and contamination. Store indoors in a cool, well-ventilated place Protect from direct contact with water or excessive moisture.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
Sodium hydroxide	1310-73-2	C	2.000000 mg/m3	ACGIH
		C	2.000000 mg/m3	NIOSH REL
		TWA	2.000000 mg/m3	OSHA Z-1
		C	2.000000 mg/m3	OSHA P0
Tetrasodium pyrophosphate	7722-88-5	TWA	5.000000 mg/m3	NIOSH REL
		TWA	5.000000 mg/m3	OSHA P0
Terpene solvent	138-86-3	TWA	30 ppm	US WEEL

Personal protective equipment

Respiratory protection	:	If the occupational exposure limits cannot be met, suitable respirator equipment shall be worn.
Hand protection Remarks	:	Impervious gloves
Eye protection	:	Chemical resistant goggles must be worn.

Skin and body protection	:	Rubber or plastic apron
Hygiene measures	:	Avoid contact with skin, eyes and clothing. Wear suitable gloves and eye/face protection. Wear suitable protective clothing. Wash hands before breaks and immediately after handling the product. Provide adequate ventilation. Avoid breathing dust or vapor. Keep away from food and drink.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	:	powder
Colour	:	amber
Odour	:	pine
pH	:	> 12.5, Concentration: 40.00000 g/l
Freezing point	:	no data available
Boiling point/boiling range	:	no data available
Flash point	:	does not flash
Evaporation rate	:	GLP: No information available.
Upper explosion limit	:	Not applicable.
Lower explosion limit	:	Not applicable.
Vapour pressure	:	no data available
Relative density	:	not applicable
Bulk density	:	67.32 lb/ft3
Solubility(ies)		
Water solubility	:	178.00000 g/l
Auto-ignition temperature	:	No data available
Thermal decomposition	:	No data available
Viscosity, dynamic	:	No data available

SECTION 10. STABILITY AND REACTIVITY

Conditions to avoid	:	Exposure to moisture.
Incompatible materials	:	Acids

Hazardous decomposition products	:	Oxides of phosphorus Hydrogen, by reaction with metals

SECTION 11. TOXICOLOGICAL INFORMATION

Acute toxicity

Product:

Acute oral toxicity	:	Acute toxicity estimate : 4,415.000000 mg/kg Method: Calculation method
Acute inhalation toxicity	:	Acute toxicity estimate : > 10.000000 mg/l Exposure time: 4 h Test atmosphere: dust/mist Method: Calculation method
Acute dermal toxicity	:	Acute toxicity estimate : 2,872.000000 mg/kg Method: Calculation method

Components:

Sodium hydroxide:

Acute oral toxicity	:	LD50 mouse: 6,600.000000 mg/kg
		LD50 rat: 4,090.000000 mg/kg
Acute inhalation toxicity	:	LC50 mouse: 1,200.000000 mg/l Exposure time: 2 h Test atmosphere: dust/mist
		LC50 rat: 2,300.000000 mg/l Exposure time: 2 h Test atmosphere: dust/mist
Acute dermal toxicity	:	LD50 rabbit: 1,350.000000 mg/kg

Tetrasodium pyrophosphate:

Acute oral toxicity	:	LD50 mouse: 2,980.000000 mg/kg
		LD50 rat: 4,000.000000 mg/kg

Trade Secret Registry:

Acute oral toxicity	:	LD50 rat: 4,090.000000 mg/kg
		LD50 mouse: 6,600.000000 mg/kg
Acute inhalation toxicity	:	LC50 rat: 2.300000 mg/l Exposure time: 4 h

Test atmosphere: dust/mist

LC50 mouse: 1.200000 mg/l
Exposure time: 2 h
Test atmosphere: dust/mist

Terpene solvent:
Acute oral toxicity : LD50 mouse: 5,550.000000 mg/kg

LD50 rat: 5,300.000000 mg/kg

Acute inhalation toxicity : LC50 mouse: 67.500000 mg/l

Trade secret registry:
Acute oral toxicity : LD50 rat: 2,000.000000 mg/kg

Skin corrosion/irritation

Components:

Sodium hydroxide:
Result: Corrosive

Serious eye damage/eye irritation

Components:

Sodium hydroxide:
Result: Corrosive
Classification: Corrosive

Respiratory or skin sensitisation

no data available

Germ cell mutagenicity

no data available

Carcinogenicity

no data available

Reproductive toxicity

no data available

STOT - single exposure

no data available

STOT - repeated exposure

no data available

Aspiration toxicity

no data available

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

no data available

Other adverse effects

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Refer to all federal, provincial, state and local regulation prior to disposition of container and unused contents by reuse, recycle or disposal.

SECTION 14. TRANSPORT INFORMATION

International regulation

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

National Regulations

SECTION 15. REGULATORY INFORMATION

TSCA Status : All components of this material comply with US TSCA requirements.

OSHA Hazards : Combustible dust, Harmful by ingestion., Harmful by skin absorption., Corrosive to skin

WHMIS Classification : E: Corrosive Material
D2B: Toxic Material Causing Other Toxic Effects

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

Components	CAS-No.	Component RQ (lbs)	Calculated product RQ (lbs)
Sodium hydroxide	1310-73-2	1,000	2,128

SARA 311/312 Hazards : Acute Health Hazard

SARA 302 : SARA 302: No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : SARA 313: This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

US State Regulations

Massachusetts Right To Know

Sodium hydroxide	1310-73-2
Tetrasodium pyrophosphate	7722-88-5

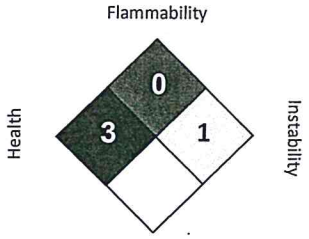
Pennsylvania Right To Know

Sodium hydroxide	1310-73-2
Tetrasodium pyrophosphate	7722-88-5
Trade Secret Registry	735517-5122P
Pure Substance for Unknown Mixtures	0-00-0
Trade Secret Registry	735517-5145P

New Jersey Right To Know

Sodium hydroxide	1310-73-2
Tetrasodium pyrophosphate	7722-88-5
Trade Secret Registry	735517-5122P
Pure Substance for Unknown Mixtures	0-00-0
Trade Secret Registry	735517-5145P
Terpene solvent	138-86-3

NFPA:



HMIS III:

HEALTH	3
FLAMMABILITY	0
PHYSICAL HAZARD	1

0 = not significant, 1 =Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

Corrosive Alkaline

Splash Goggles, Gloves, Apron, Dust and Vapour Respirator

SECTION 16. OTHER INFORMATION

Further information

Version *1.0*
Revision Date 05/29/2015

Chemetall US, Inc. warrants that the products described herein will conform with its published specifications.

The products supplied by Chemetall and information related to them are intended for use by buyers having necessary industrial skill and knowledge. Buyers should undertake sufficient verification and testing to determine the suitability of the Chemetall materials for their own particular purpose. Since buyer's conditions of use of products are beyond Chemetall's control, Chemetall does not warrant any recommendations and information for the use of such products. CHEMETALL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name	:	Gardolene® D 6871
Substance number	:	REL_10232
Chemical usage	:	Surface Pre-treatment material

Manufacturer or supplier's details

Company	:	Chemetall US, Inc.
Address	:	675 Central Avenue New Providence NJ 07974
Telephone	:	(800) 526-4473
Telefax	:	(908) 464-4658
Emergency telephone no	:	CHEMTREC - 800-424-9300, 1-703-527-3887 (International)

SECTION 2. HAZARDS IDENTIFICATION

Emergency Overview

Appearance	liquid
Colour	straw
Odour	mild
Hazard Summary	Combustible material May cause eye irritation May be harmful if swallowed Repeated or prolonged ingestion of Ethanol may cause cancer

GHS Classification

Flammable liquids	:	Category 4
Carcinogenicity	:	Category 1A

GHS Label element

Hazard pictograms :

Signal word	:	Danger
Hazard statements	:	Combustible liquid. May cause cancer.
Precautionary statements	:	**Prevention:**

Obtain special instructions before use.
Do not handle until all safety precautions have been read and understood.
Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking.
Wear protective gloves/ eye protection/ face protection.
Use personal protective equipment as required.
Response:
IF exposed or concerned: Get medical advice/ attention.
In case of fire: Use dry sand, dry chemical or alcohol-resistant foam for extinction.
Storage:
Store in a well-ventilated place. Keep cool.
Store locked up.
Disposal:
Dispose of contents/ container to an approved waste disposal plant.

Potential Health Effects

Inhalation	: no
Skin	: no
Ingestion	: yes
Aggravated Medical Condition	: None known.

Carcinogenicity:

IARC	Group 1: Carcinogenic to humans	
	Ethanol	64-17-5
ACGIH	Confirmed animal carcinogen with unknown relevance to humans	
	Ethanol	64-17-5
OSHA	No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.	
NTP	No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.	

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture :

Hazardous components

Component	CAS-No.	Weight percent

Ethanol	64-17-5	1 - 5

Unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard (29CFR 1910.1200).

Specific chemical identity of composition has been withheld as a trade secret.

Exact percentage of composition has been withheld as a trade secret.

SECTION 4. FIRST AID MEASURES

If inhaled	:	Remove to fresh air. If symptoms persist, call a physician.
In case of skin contact	:	Wash off with plenty of water. If skin irritation persists, call a physician.
In case of eye contact	:	Keep eye wide open while rinsing. Rinse immediately with plenty of water for at least 15 minutes. If eye irritation persists, consult a specialist.
If swallowed	:	Rinse mouth. Never give anything by mouth to an unconscious person. Obtain medical attention.

SECTION 5. FIREFIGHTING MEASURES

Suitable extinguishing media	:	Carbon dioxide (CO_2) Dry chemical Foam Water spray
Further information	:	Use water spray to cool unopened containers.
Special protective equipment for firefighters	:	In the event of fire, wear self-contained breathing apparatus.

SECTION 6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures	:	Ensure adequate ventilation. Remove all sources of ignition.
Methods and materials for containment and cleaning up	:	Ventilate area. Use nonsparking equipment when cleaning up flammable spill. Clean up with inert absorbant material. Flush with plenty of water. Keep in suitable, closed containers for disposal.
Additional advice	:	Never return spills in original containers for re-use.

SECTION 7. HANDLING AND STORAGE

Advice on safe handling : Unscrew closure slowly. Allow all pressure to escape through threads before removing closure
Use with adequate ventilation.

Conditions for safe storage : Keep containers tightly closed in a cool, well-ventilated place.
KEEP FROM FREEZING

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
Ethanol	64-17-5	TWA	1,000 ppm 1,900.000000 mg/m3	NIOSH REL
		TWA	1,000 ppm 1,900.000000 mg/m3	OSHA Z-1
		TWA	1,000 ppm 1,900.000000 mg/m3	OSHA P0
		STEL	1,000 ppm	ACGIH

Personal protective equipment

Respiratory protection : If the occupational exposure limits cannot be met, suitable respirator equipment shall be worn.

Hand protection
Remarks : Impervious gloves

Eye protection : Safety glasses with side-shields

Skin and body protection : Rubber or plastic apron

Hygiene measures : Avoid contact with eyes.
Wear suitable gloves and eye/face protection.
Wear suitable protective clothing.
Wash hands before breaks and immediately after handling the product.
Provide adequate ventilation.
Do not inhale fumes.
Keep away from heat and flame.
Keep away from food and drink.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	:	liquid
Colour	:	straw
Odour	:	mild
pH	:	10.5 - 11.5
Freezing point	:	-4.44 °C
Boiling point/boiling range	:	no data available
Flash point	:	61 °C Method: Tag closed cup
Evaporation rate	:	1 Water = 1
Upper explosion limit	:	no data available
Lower explosion limit	:	no data available
Vapour pressure	:	no data available
Relative vapour density	:	no data available
Relative density	:	1.007
Bulk density	:	8.40 lb/gal
Solubility(ies)		
Water solubility	:	completely soluble
Partition coefficient: n-octanol/water	:	no data available
Auto-ignition temperature	:	No data available
Thermal decomposition	:	No data available
Viscosity, dynamic	:	No data available

SECTION 10. STABILITY AND REACTIVITY

Conditions to avoid	:	Heat, flames and sparks. freezing
Incompatible materials	:	Strong oxidizing agents Acids
Hazardous decomposition products	:	Carbon dioxide (CO2) Carbon monoxide

SECTION 11. TOXICOLOGICAL INFORMATION

Acute toxicity

Product:

Acute oral toxicity : Acute toxicity estimate : > 5,000.000000 mg/kg
Method: Calculation method

Components:

Ethanol:
Acute oral toxicity : LD50 rat: 6,200.000000 mg/kg

LD50 rat: 7,060.000000 mg/kg

LDlo Humans: 1,400.000000 mg/kg

Acute inhalation toxicity : LC50 rat: 8,001.000000 mg/l
Exposure time: 4 h

Acute dermal toxicity : LD50 rabbit: 19,999.000000 mg/kg

Skin corrosion/irritation

no data available

Serious eye damage/eye irritation

Components:

Ethanol:
Result: Eye irritation

Respiratory or skin sensitisation

no data available

Germ cell mutagenicity

no data available

Carcinogenicity

no data available

Reproductive toxicity

no data available

STOT - single exposure

no data available

STOT - repeated exposure

no data available

Aspiration toxicity

no data available

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

no data available

Bioaccumulative potential

Product:

Partition coefficient: n-octanol/water : Remarks: no data available

Other adverse effects

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Refer to all federal, provincial, state and local regulation prior to disposition of container and unused contents by reuse, recycle or disposal.

SECTION 14. TRANSPORT INFORMATION

International regulation

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

National Regulations

SECTION 15. REGULATORY INFORMATION

TSCA Status : All components of this material comply with US TSCA requirements.

OSHA Hazards : Combustible Liquid, Carcinogen, Moderate eye irritant
WHMIS Classification : B3: Combustible Liquid
D2B: Toxic Material Causing Other Toxic Effects

EPCRA - Emergency Planning and Community Right-to-Know Act

SARA 311/312 Hazards : Fire Hazard
Chronic Health Hazard
Acute Health Hazard

SARA 302 : SARA 302: No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : SARA 313: This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

US State Regulations

Massachusetts Right To Know

Ethanol	64-17-5

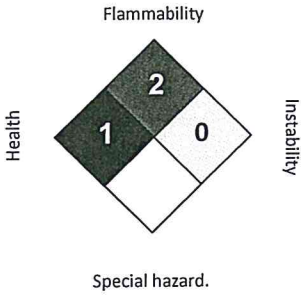
Pennsylvania Right To Know

water	7732-18-5
Ethanol	64-17-5
Trade Secret Registry	735517-5062P
2-Propanol	67-63-0

New Jersey Right To Know

water	7732-18-5
Ethanol	64-17-5
Trade Secret Registry	735517-5062P

NFPA:



HMIS III:

HEALTH	1
FLAMMABILITY	2
PHYSICAL HAZARD	0

0 = not significant, 1 =Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

Safety Glasses, Gloves

SECTION 16. OTHER INFORMATION

Further information

Version *1.0*
Revision Date 05/18/2015

Chemetall US, Inc. warrants that the products described herein will conform with its published specifications.

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particular purpose. Since buyer's conditions of use of products are beyond Chemetall's control, Chemetall does not warrant any recommendations and information for the use of such products. CHEMETALL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.

CHEM LAB INC.

ANALYTICAL SERVICES

4302 WHEELER AVENUE, FORT SMITH, AR 72901 (501) 646-1585 FAX (501) 646-0016

Client: Fab-Tech
Date of Sample: 9/18/00
Date Received: 9/18/00
Time Received: 10:45
Collected by: MK
Collected From: Effluent

Control Number: 00-09-1086
Report Issued: 9/27/00
P.O. Number:
Sample ID: Water

PARAMETER	CONCENTRATION	UNITS	ANALYST	DATE	TIME	METHOD	BATCH #
Composite			JE	9/18/00	10:45		
Cadmium	<0.005	mg/L	JC	9/26/00	09:16	200.7	9391
Chromium	0.012	mg/L	JC	9/26/00	09:16	200.7	9391
Copper	0.085	mg/L	JC	9/26/00	09:16	200.7	9391
Lead	<0.100	mg/L	JC	9/26/00	09:16	200.7	9391
Nickel	<0.130	mg/L	JC	9/26/00	09:16	200.7	9391
Silver	<0.010	mg/L	JC	9/26/00	09:16	200.7	9391
Zinc	0.634	mg/L	JC	9/26/00	09:16	200.7	9391
TSS	29.0	mg/L	DE	9/22/00	14:15	160.2	9390
BOD 5-Day	6.93	mg/L	DE	9/22/00	15:30	405.1	9389
Oil & Grease	34.1	mg/L	DE	9/23/00	09:00	413.1	9393
CN	<0.020	mg/L	JE	9/27/00	07:42	335.2-1	9402

Quality Assurance Data:

	PRD	Acceptable Range	% Recovery	Acceptable Range	MDL mg/L
Cd	8.87	17.0 to -16.0	106	77.0 to 129	0.005
Cr	-7.18	22.0 to -17.0	103	77.0 to 118	0.010
Cu	-12.0	20.0 to -18.0	111	63.0 to 131	0.010
Pb	-9.19	17.0 to -11.0	97.5	79.0 to 117	0.100
Ni	-10.8	18.0 to -14.0	104	80.0 to 121	0.130
Ag	-0.096	12.0 to -13.0	103	82.0 to 118	0.010
Zn	-8.77	4.9 to - 2.8	96.8	85.0 to 118	0.007
TSS	0.00	-14.8 to 18.3	N/A	N/A	1.00
BOD	3.74	39.0 to -35.0	92.9	84.0 to 115	1.00
O&G	-4.26	15.0 to -14.8	100	95.0 to 113	1.00
CN	2.13	10.4 to -11.0	94.0	83.0 to 109	0.020

< symbol means concentration is below methodology detection limit

Approved by : _____ Date : 9-27-00

THIS SAMPLE WAS A COMPOSITE OF SEVERAL GRAB SAMPLES TAKEN DURING TIMES THE SYSTEM WAS OPERATIONAL OVER A PERIOD OF SEVERAL DAYS.

CHEM LAB INC.
ANALYTICAL SERVICES

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

Phone (479) 64f
FAX (479) 646-91[illegible]
Emergency Numbers
(479) 420-9033
(918) 658-5127

Site/Facility Location	Fab Tech iren, AR
Client Sample I.D.	Effluent
Date of Sample	8/20/15
Lab I.D.#	15-08-0768

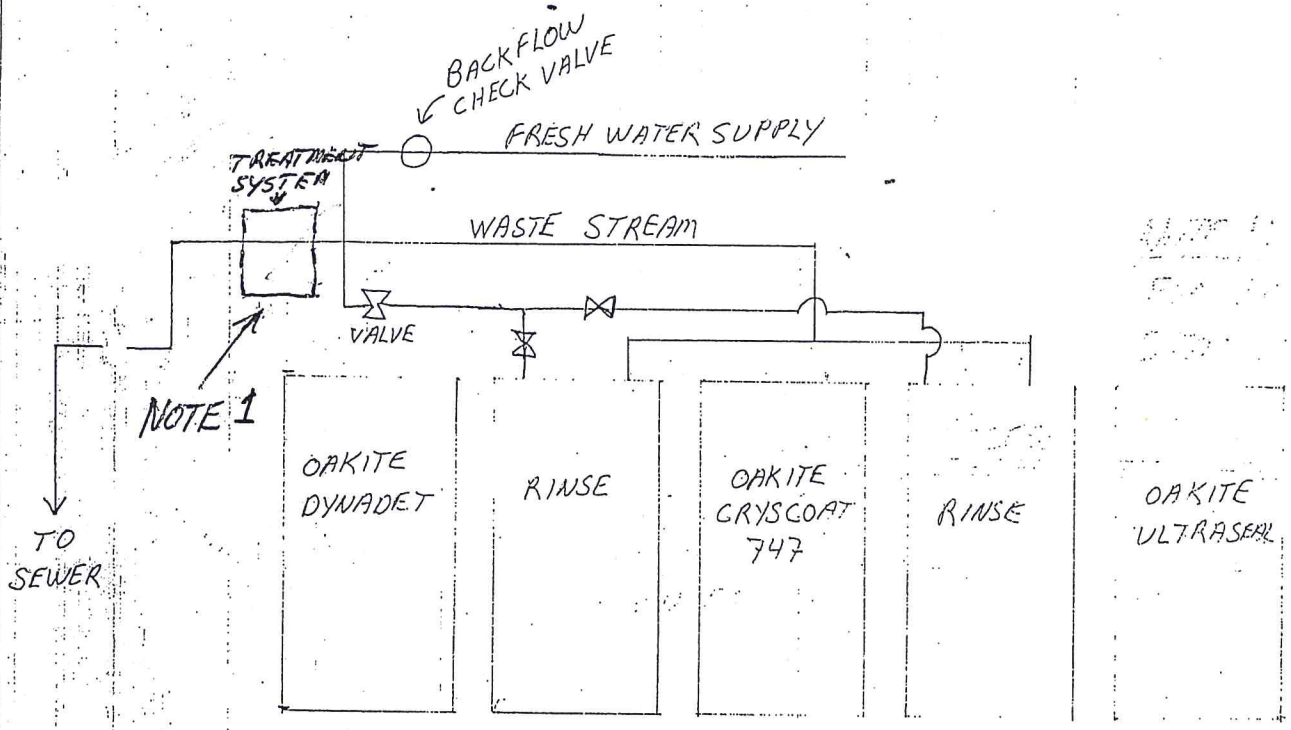
Client-- Fab Tech
Control Number-- 15-08-0768
Date/Time Sampler on-- 8/19/15 12:15
Report Issued-- 8/31/15
Meter On Reading-- 16540
Total Flow= 10
Date/Time Sampler off-- 8/20/15 10:50
PO Number--
Meter Off Reading-- 16550
Units-- Gallons
Date/Time Received in Lab-- 8/20/15 12:30
Sample ID-- Effluent
Difference-- 10
Collected From-- Outfall #001
Sample Phase-- Liquid
Units-- Gallons

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
Grab														
pH	8.08	SU	TD	8/19/15 12:18	TD	8/19/15 12:15	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
pH	8.76	SU	TD	8/19/15 15:35	TD	8/19/15 12:30	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
pH	8.48	SU	TD	8/20/15 10:30	TD	8/20/15 10:42	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
pH	8.45	SU	TD	8/20/15 10:46	TD	8/20/15 10:49	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	28.5	°C	TD	8/19/15 15:35	TD	8/19/15 12:15	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
Temperature	28.1	°C	TD	8/20/15 10:30	TD	8/19/15 12:30	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
Temperature	23.5	°C	TD	8/20/15 10:46	TD	8/20/15 10:42	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
Temperature	22.8	°C	TD	8/19/15 15:35	TD	8/20/15 10:49	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	TD	8/19/15 12:19	JC	8/20/15 16:18	SM 4500-CN E	08332	yes	-7.57	98.0	83.9	90.5	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
Cyanide	<0.010	mg/L	TD	8/19/15 12:26	JC	8/20/15 16:18	SM 4500-CN E	08332	yes	-7.57	98.0	83.9	90.5	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
Cyanide	<0.010	mg/L	TD	8/20/15 10:31	JC	8/20/15 16:18	SM 4500-CN E	08332	yes	-7.57	98.0	83.9	90.5	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
Cyanide	<0.010	mg/L	TD	8/20/15 10:47	JC	8/20/15 16:18	SM 4500-CN E	08332	yes	-7.57	98.0	83.9	90.5	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	<2.50	mg/L	TD	8/19/15 12:15	DE	8/24/15 8:40	SM 5520 B	08345	yes	9.64	104	94.5	85.8	1.00 mg/L
										-17.1 to 19.5	55.8 to 127	55.8 to 127	55.8 to 127	2.50 mg/L
Oil & Grease	<2.50	mg/L	TD	8/19/15 12:30	DE	8/24/15 8:40	SM 5520 B	08345	yes	9.64	104	94.5	85.8	1.00 mg/L
										-17.1 to 19.5	55.8 to 127	55.8 to 127	55.8 to 127	2.50 mg/L
Oil & Grease	2.78	mg/L	TD	8/20/15 10:42	DE	8/24/15 8:40	SM 5520 B	08345	yes	9.64	104	94.5	85.8	1.00 mg/L
										-17.1 to 19.5	55.8 to 127	55.8 to 127	55.8 to 127	2.50 mg/L
Oil & Grease	<2.50	mg/L	TD	8/20/15 10:49	DE	8/24/15 8:40	SM 5520 B	08345	yes	9.64	104	94.5	85.8	1.00 mg/L
										-17.1 to 19.5	55.8 to 127	55.8 to 127	55.8 to 127	2.50 mg/L
24 Hour Composite														
BOD	<5.00	mg/L	TD	8/20/15 10:50	JC	8/20/15 19:00	SM 5210 B	08338	yes	-5.15	101	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	3.00	mg/L	TD	8/20/15 10:50	DE	8/21/15 10:00	SM 2540 D	08339	yes	2.74	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	0.005	mg/L	TD	8/20/15 10:50	JC	8/21/15 17:20	SM 3120 B	08342	yes	-2.11	102	84.2	86.0	0.00000004 mg/L
										-23.4 to 19.0	20.0 to 145	20.0 to 145	20.0 to 145	0.002 mg/L
Chromium	0.007	mg/L	TD	8/20/15 10:50	JC	8/21/15 17:20	SM 3120 B	08342	yes	1.66	100	93.4	91.8	0.0006 mg/L
										-18.5 to 19.8	71.4 to 123	20.0 to 156	20.0 to 156	0.002 mg/L
Copper	0.017	mg/L	TD	8/20/15 10:50	JC	8/21/15 17:20	SM 3120 B	08342	yes	-1.87	107	102	104	0.002 mg/L
										-11.9 to 13.4	42.3 to 130	42.3 to 130	42.3 to 130	0.004 mg/L
Lead	0.175	mg/L	TD	8/20/15 10:50	JC	8/21/15 17:20	SM 3120 B	08342	yes	0.329	71.0	89.6	89.3	0.015 mg/L
										-39.4 to 29.0	6.52 to 147	5.43 to 158	5.43 to 158	0.012 mg/L
Nickel	0.009	mg/L	TD	8/20/15 10:50	JC	8/21/15 17:20	SM 3120 B	08342	yes	0.132	103	87.8	87.6	0.000004 mg/L
										-22.1 to 22.3	10.6 to 155	12.0 to 143	12.0 to 143	0.002 mg/L
Silver	0.003	mg/L	TD	8/20/15 10:50	JC	8/21/15 17:20	SM 3120 B	08342	yes	1.39	103	82.3	81.2	0.0004 mg/L
										-23.2 to 24.4	26.4 to 135	26.4 to 135	26.4 to 135	0.003 mg/L
Zinc	0.051	mg/L	TD	8/20/15 10:50	JC	8/21/15 17:20	SM 3120 B	08342	yes	-1.43	106	88	89.3	0.002 mg/L
										-18.9 to 17.7	26.7 to 131	43.3 to 152	43.3 to 152	0.004 mg/L

Approved by _____

Date 8/31/15

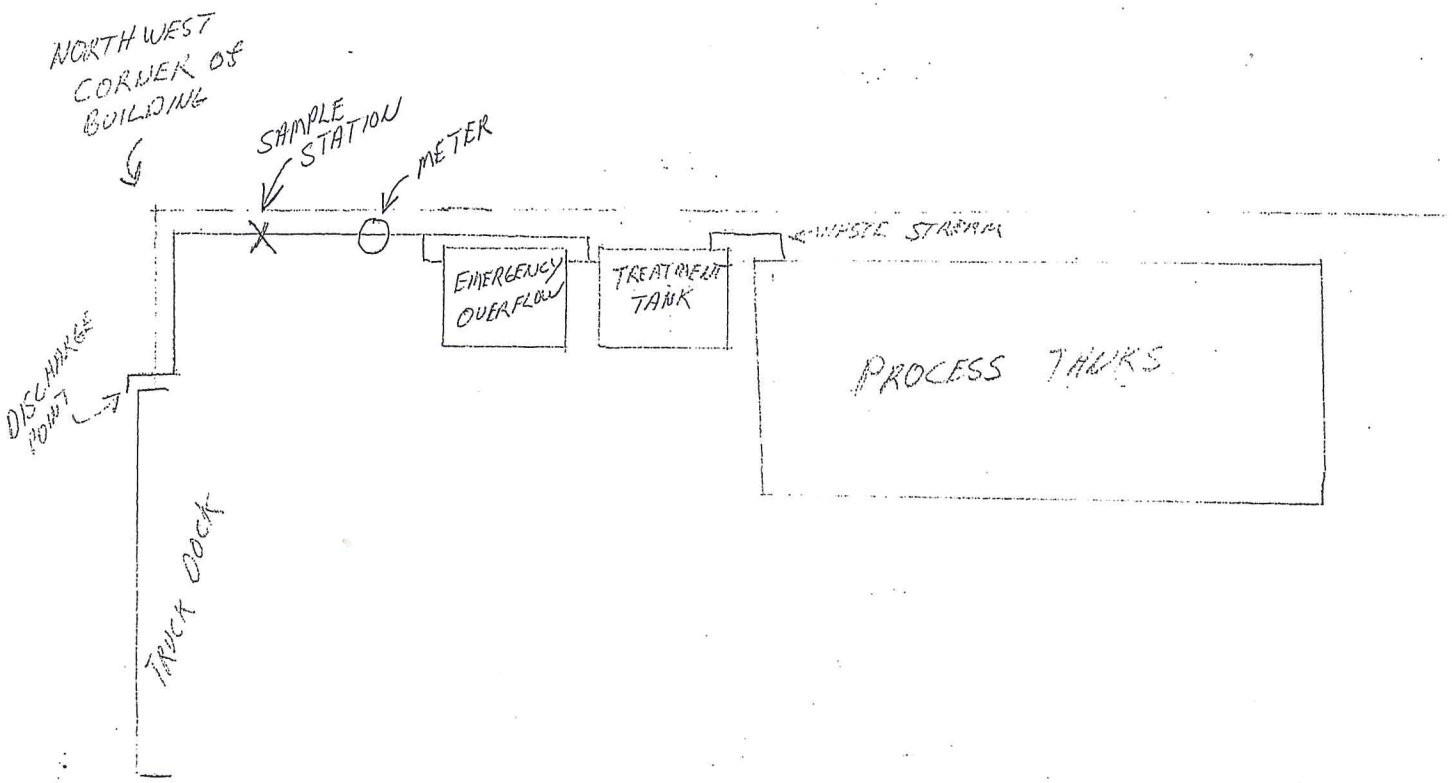
symbol denotes matrix interference



NOTE 1: SEE DETAIL A
FOR LOCATION OF SAMPLING
STATION & METER

SCHEMATIC OF FePHOSPHATE CONVERSION PROCESS

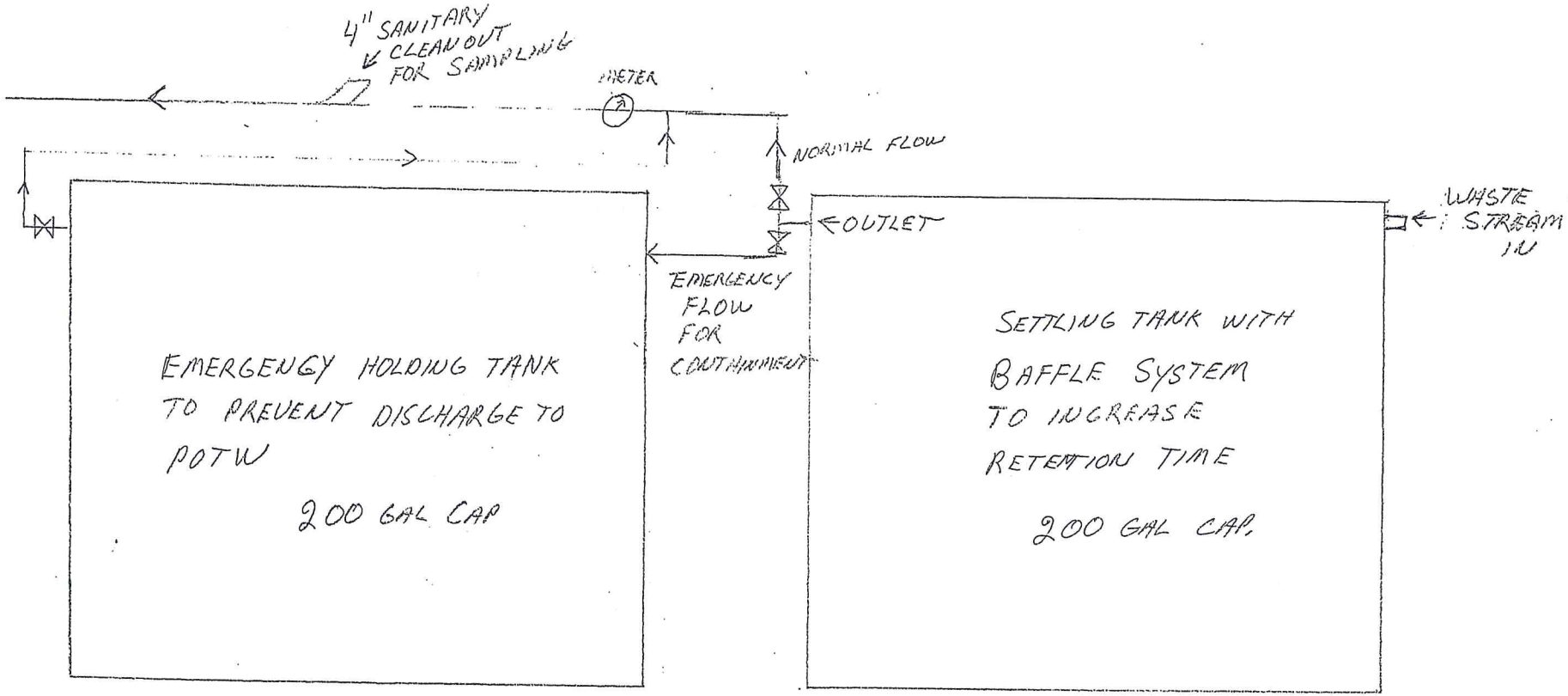
FAB TECH, INC.
12 N. 25TH
VAN BUREN



DETAIL A

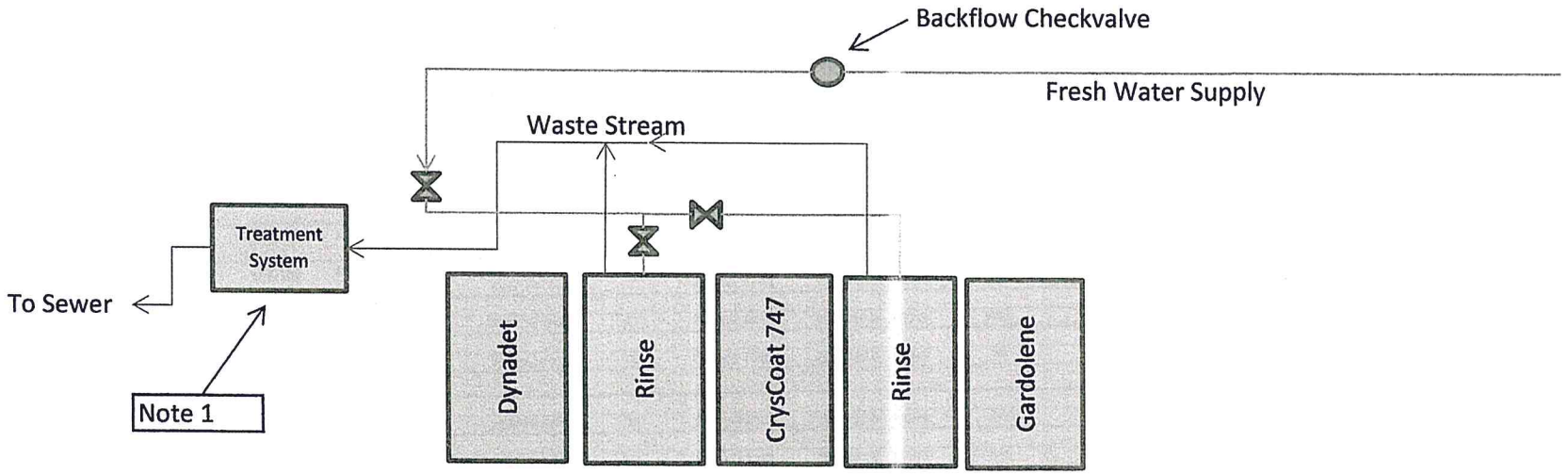
NOTE

DETAIL B SHOWS PARTICULARS OF TREATMENT SYSTEM.



DETAIL B

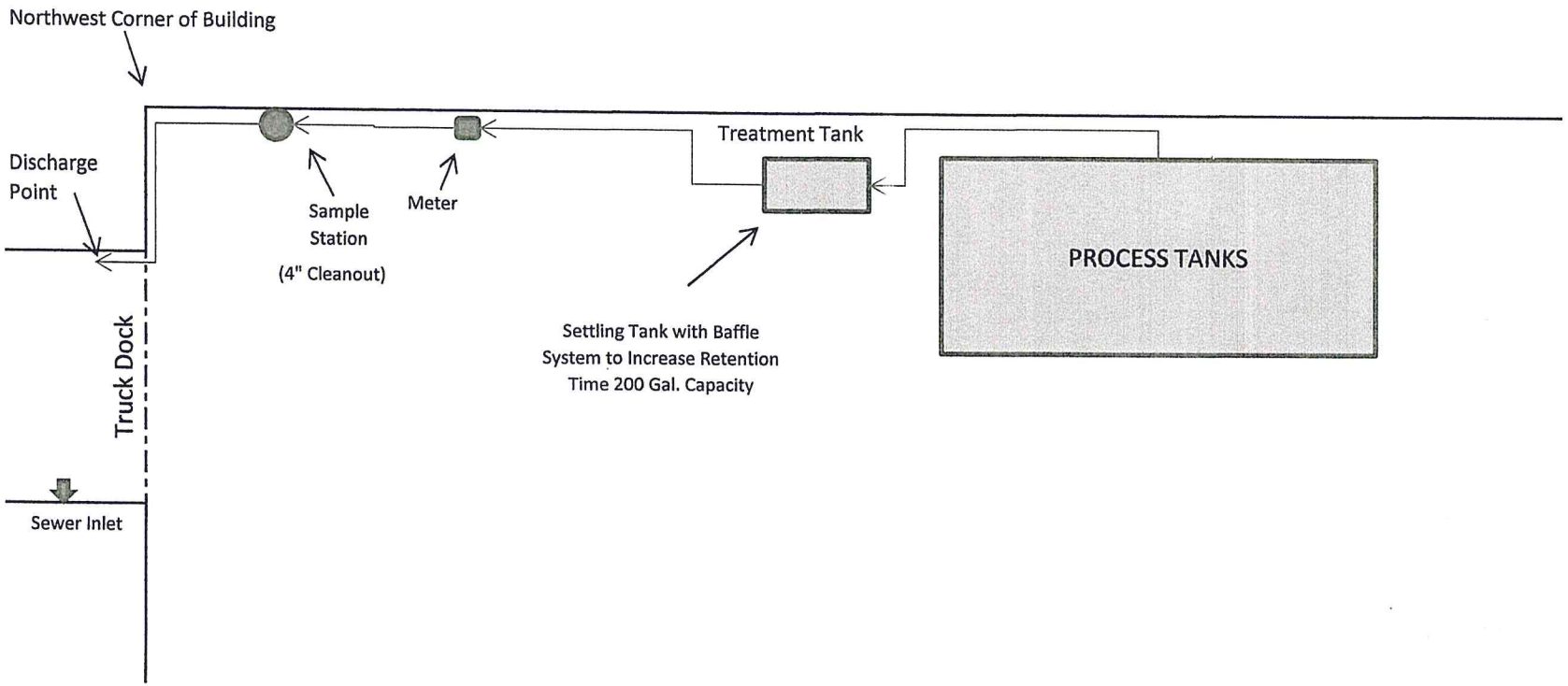
FAB TECH, INC



Note1: See Detail A for location of sampling Station & Meter

Schematic of Fe Phosphate Conversion Process

Fab-Tech, Inc
12N 25th
Van Buren, AR


Northwest Corner of Building
Discharge Point
Sample Station
(4" Cleanout)
Meter
Treatment Tank
PROCESS TANKS
Settling Tank with Baffle System to Increase Retention Time 200 Gal. Capacity
Truck Dock
Sewer Inlet

Detail A

VAN BUREN MUNICIPAL UTILITIES COMMISSION

C. E. Dougan
Chairman

MEMBERS

Todd Young

John Barnwell

Jim Williamson

J. W. Floyd

Larry Weir, Engineer

Jacob Howell, Attorney

Steve Dufresne
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)

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: 2-1-16

TABLE OF CONTENTS

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

Company Name: FabTech, Inc.

Address: 12th North 25th Street
Van Buren, Arkansas 72956

Telephone Number: (479) 474-1788

Name of Applicant: Myron Kirksey, Owner
Kevin Treece, Owner

Authorization to discharge to the
Van Buren Wastewater Treatment Facility

FabTech, Inc. is authorized by the Municipal Utilities Commission to discharge wastewater
(Company Name)
from 12th North 25th Street, Van Buren, Arkansas to the Van Buren Wastewater Treatment
(address of company)
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 March 1, 2016
(Date)
This Permit and Authorization to discharge shall expire at Midnight, February 28, 2019.
(Date)

Signed this 19th of January, 2016.
(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.

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 #27-2009, 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. 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 4" clean out after the flow meter in the northwest corner of the building labeled as "sample station" prior to discharging into the truck bay drainage and flowing into the municipal sewer;

2. Discharge flow shall be determined by the 1" flow meter;

3. Drawing & 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 - Ordinance #27-2009, Section 10.08.07 establishes the procedure for establishing Administrative, Surcharge, Civil and Criminal 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 BOD_5 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. 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
Oil & Grease	52/26 mg/L	2X/year	4 grabs/24 hours

*Permittee shall be required to meet discharge limits upon issuance of this permit. Monitoring Data shall be submitted monthly on Reporting Forms provided by the Department. (attached) One grab sample shall substitute for 4 grabs/24 hrs. due to batch type discharge.

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

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

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

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

b. COMPOSITE WASTEWATER SAMPLE - A combination of individual samples of water or wastewater taken at selected intervals, generally hourly for some specified 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. In the northwest corner of the building there is a sampling station consisting of a 200 gallon settling tank with a baffle system to increase the retention time. The outlet can be channeled into an emergency holding tank (200 gallon capacity) to prevent discharges from entering the municipal sewer system or into the discharge line which has a one inch flow meter followed by a four inch clean out on a four inch PVC discharge line. This discharges into the adjacent truck bay, flows through the floor drain and into the municipal sewer.

3. All electrical fixtures must be 110V AC.

4. Meter readings on the discharge line will be accepted as the sewage discharge flow reading. This meter shall be calibrated at least once per year to assure accuracy.

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

6. Automatic Sampler must be installed in station (unless contract laboratory utilizes private sampling equipment) to be able to fulfill your permit requirements, such as weekly sampling and monthly reporting.

VAN BUREN INDUSTRIAL WASTE PRE-TREATMENT DISCHARGE MONITORING REPORT

Check here for NO DISCHARGE ☐

NAME FabTech

ADDRESS 12 North 25th Street
Van Buren, AR 72956

FACILITY _____

LOCATION _____

(1)

(2)

VBC3400- 26
PERMIT NUMBER

NOTE: Read instructions before filling out form.

(3)

MONITORING PERIOD						
YEAR	MONTH	DAY		YEAR	MONTH	DAY
FROM			TO			

	QUALITY OR CONCENTRATION					
PARAMETER (4)	(5) MINIMUM	(5) AVERAGE	(5) MAXIMUM	(6) UNITS	FREQUENCY OF ANALYSIS (7)	SAMPLE TYPE (8)
pH						
Temperature						
BOD_5						
TSS						
Cd						
Cr						
Cu						
Pb						
Ni						
Ag						
Zn						
CN-, Total						

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.

TITLE: PRINCIPAL EXECUTIVE OFFICER Telephone Number: _____

Date: Year/Month/Day

Signature of Principal ExecutiveOfficer _____

(Comments & Explanation of any violations) Reference all attachments

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.

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.

ADDENDUM

I. Compliance Schedules shall be issued as per Section 40 of the Code of Federal Regulations Part 403.

II. 40 CFR Part 403.8(f)(vii)(E) defines non-compliance as "…failure to meet within 90 days after the compliance schedule date, a compliance schedule milestone date… for starting construction, completing construction, or attaining final compliance."

III. 40 CFR Part 403.8(f)(vii)(F) states an industry is considered to be in Significant Non-Compliance if any of the following are 30 days late after the due date: Baseline Monitoring Report, 90-day Compliance Reports, or Self-Monitoring Reports.

FACT SHEET

Employees: Full time-25; one shift.

Facility: In operation 12 months; 5 days/week. Began operation in 1992

Process: Pre-paint (electrostatic) phosphate conversion of steel, aluminum or stainless steel parts (SIC Code #3400; Preatreatment Standard Category #433) & fabrication.

Average daily discharge: **250 gpd** (as per permit application). Regulated waste stream only (sanitary lines are separate)

Chemicals on site: Paints & paint additives; Dynadet, CrysCoat 747, Gardolene
MSDS sheets on file

Flow 5,000 gpd based on similar categorical industry with electrostatic painting of metal parts. Permit for 5,000 based on plant headworks flow at 2/3 total capacity.

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

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

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

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

Metals: concentration limits as set forth in 40 CFR Part 433 (maximum monthly limits listed)

Cadium:	0.07 mg/L
Chromium:	1.71 mg/L
Copper:	2.07 mg/L
Lead:	0.43 mg/L
Nickel:	2.38 mg/L
Silver:	0.24 mg/L
Zinc:	1.48 mg/L
Cyanide:	0.65 mg/L

Total Toxic Organics: 2.13 mg/L as per Section 40 CFR Part 433 (no testing necessary due to absence in wastewater of like industries---submit TTO certification statement twice per year)

Fab Tech

Certification Statement

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.

6-10-16 _____ _____

(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.

474-1780

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: Fab Tech Permit Number: VBC3400-26

Address: 12 North 25th Street

POTW Name: South Plant Date of last inspection: April 30, 2015 @ 2:00 P.M.

Industry Contact(s), Position: Myron Kirksey (owner); Mike Fisher: ~~new~~ QA mgr. be over pretreatment

Date & Time of Visit: June 28, 2016 @ ~~[illegible]~~ 10 Am Tuesday

Description of Manufacturing Process: job shop fabrication of sheet metal. Make parts ww generating out of cold rolled steel. Little bit of aluminum & little bit of galvanized, some stainless steel fabrication

Sources of Process Wastewater: clean and rinse tanks for metal parts (just run cold rolled steel through process tanks which eliminates probability of chrome from stainless steel)

Categorical Industry? yes

Basis for Permit Discharge Limits: 40 CFR Part 433

Description of pretreatment equipment and procedures: n/a

Spill prevention & Solvent Management Procedures: is on computer and copy on clipboard -- Copy on file (VBMU)—no recent updates (same)

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

Add physical blocker tacity if spill

INSPECTION REPORT

INSPECTION OF LABORATORY/RECORDS

1. Records & reports for analysis and monitoring maintained for three (3) years? Yes & more (~~Deano~~ Mike keeps the records)

*2. Records of lab equipment calibration and maintenance? yes

*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? no

12. Calculation of analysis satisfactory? Yes

13. Are duplicate samples analyzed? yes

14. Is a private laboratory used? yes*

15. Are analytical results consistent with self-monitoring reports? yes*

16. If a private lab is used, do the monthly reports agree with the laboratory reports?
If no, list details: yes

*Chem Lab of Fort Smith is the contract laboratory being utilitized for permit testing requirements

Last test results from ~~May~~ April 2016

Aug-15

Sept-Mar. No metals testing

need 2nd test in 365 days by end of August

INSPECTION OF LABORATORY/RECORDS (continued)

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

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

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

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

23. Has permittee exceeded effluent limits (BOD, TSS, pH, Oil & Grease, metals, etc.) since last inspection? List cause(s) no

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

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

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

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

INSPECTION OF PRETREATMENT or SAMPLING FACILITY (on-site pretreatment - settling only)

1. Are all treatment units in service? n/a (only settling in tanks)

2. Qualified operating staff provided? n/a

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

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

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

6. Describe procedural plan to prevent accidental discharges from entering municipal sewer system:
No floor drains. Put a physical barrier at the back door.

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

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

9. How are sludge and solids disposed of? Who hauls this waste and where does it go?
Oil Skimmer skims off 1-2 gallons every month or two. or less. This is collected in a barrel and hauled off by a recycler. Sell used oil that is kept in a barrel.

10. Sludge hauling documented by manifest? Yes. Hazardous waste manifests

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

12. Flow measuring device properly installed? yes

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

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

15. Does permittee have an Operations & Maintenance Manual on site? Just the procedure for the tanks including how and when to discharge; continuous overflow on rinse tanks when cleaning metal (slow rate of flow)

INSPECTION OF "CHEMICAL STORAGE & PRODUCTION AREA"

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

They have no floor drains

*Sludge: Permafix last hauler. ~~Looking at other options for contract hauler. Only needed once every 2-3 years.~~ None hauled since last inspection.

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?
Yes. By the TANKS

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 - everything is the same.

POLLUTION PREVENTION

1. Is the discharger aware of Pollution Prevention? Yes

2. What measures, if any, have been taken to reduce the pollutants discharged into the municipal sewer?
slow business - less discharge - less volume.
Good housekeeping - Time the dragout

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 6/28/16 10AM

Industry Representative Michael J Fisher Date/Time 6/28/16

Comment Area:

ATTACHMENT IV

File #3 – Simmons Prepared Foods, Inc.

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: Simmons Foods Permit Number: VB2015-24

Address: 2101 Twin Circle Drive POTW Name: South Plant

Industry Contact(s), Position: Charles Van Pelt, Jr. --WW Lead Operator; Mark Holley: Supervisor over refrigeration & wastewater;

Date & Time of Visit: June 14, 2016 @ 2:30p.m. . Last inspection Date: June 8, 2015

Description of Manufacturing Process: further poultry processing

Sources of Process Wastewater: process/production line

Categorical Industry? no

Basis for Permit Discharge Limits: modified TBLLs

Description of pretreatment equipment and procedures: All waste water goes into the basins--- 200K EQ Basin for solids separation, pH correction and aeration then to the second EQ basin (300K gallons) (Treated w/polymers each time ww leaves an EQ basin) Here, bacteria has (6-8 hrs. detention time) then to the DAF for final treatment with polymers for solids separation then thru the parshall flume to the sewer

Spill prevention & Solvent Management Procedures 2011 Waste Water Slug and Spill Prevention procedure plan in notebook in Waste Water office

Sampling location & equipment: ISCO automatic sampler is located inside the wastewater building. Tubing extends through the building wall to the parshall flume

INSPECTION REPORT

INSPECTION OF LABORATORY/RECORDS

1. Records & reports for analysis and monitoring maintained for three (3) years? yes

2. Records of lab equipment calibration and maintenance? yes

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? yes
COD, soluble BOD, NH_3-N*, Phosphate…all for process control and a daily TSS

11. Monitoring and analysis being performed more frequently than required by permit?
Testing TSS daily

12. Calculation of analysis satisfactory? Yes

13. Are duplicate samples analyzed? yes

14. Is a private laboratory used? yes**

15. Are analytical results consistent with self-monitoring reports? yes

16. If a private lab is used, do the monthly reports agree with the laboratory reports?
If no, list details: yes

* Now reporting NH_3-N monthly (on composite sample)

**Data Testing of Fort Smith is the contract laboratory being utilitized for permit testing requirements

INSPECTION REPORT
INSPECTION OF LABORATORY/RECORDS (continued)

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

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

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

20. Has discharge loading (organic, hydraulic) changed since last inspection? Same

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

23. Has permittee exceeded effluent limits (BOD, TSS, pH, Oil & Grease, metals, etc.) since last inspection? List cause(s) Dec.2015:1/4XBOD; Feb.2016:3X-BOD; April 2016: 2X-BOD

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

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

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

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

INSPECTION OF PRETREATMENT or SAMPLING FACILITY

1. Are all treatment units in service? yes

2. Qualified operating staff provided? yes* (Monte Moore –Class III Advcd. Industrial; C. V. Pelt – Class III & Adv. Industrial; Stan Cayjun & Wayne Pledger (Basic Indus.); Joseph Wynn – fills in occasionally (Class I & Basic Industrial)

INSPECTION OF PRETREATMENT or SAMPLING FACILITY (continued)

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?

Yes. Charles Van Pelt – consultant (in-house for maintenance)

6. Describe procedural plan to prevent accidental discharges from entering municipal sewer system:
Everything flows into the WWTP --- design is for gravity flow to send everything to the WW treatment (slope & containment). They can shut off discharge to zero discharge to city in case of spill.

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

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

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

Terra Renewal Services. Hauled to offsite locations for land application (usually to Mulberry or to the Kibler bottoms or north of Paris or Hacket.)

10. Sludge hauling documented by manifest? Wastewater personnel maintain a sludge log. Guard shack receives receipt of gallonage picked up. CVP keeps only a sludge log list of daily loads being hauled out. Debbie Allen in accounting is the contact person for payment and recordkeeping on sludge accounts.

11. Type of flow measuring device? ISCO 4230 Bubbler on 6 inch parshall flume

12. Flow measuring device properly installed? yes

INSPECTION OF PRETREATMENT or SAMPLING FACILITY (continued)

13. Is facility conducting regular flow calibration checks on the effluent flow meter?

Yes. On file in wastewater office. Done about 1X/month

14. Does facility have the flow meter calibrated regularly by an authorized representative? Last official calibration by Isco— 7/10/2015. Due 7/10/2016.

15. Flow measuring device adequate to handle flow rates? Yes

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

17. Does permittee have an Operations & Maintenance Manual on site? Have an SOP

INSPECTION OF "CHEMICAL STORAGE & PRODUCTION AREA"

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

Co-agulant (alum type mixture); caustic (goes into first EQ tank); Cationic and anionic polymers. Everything can be self-contained in emergency.

2 pits near truck bay are large enough to hold about 500,000 gallons in case of emergency in WW area.

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?
Yes

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.?)
No Changes.

POLLUTION PREVENTION

1. Is the discharger aware of Pollution Prevention? Yes

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

MISCELLANEOUS

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

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

Inspector Kim Reed Date & Time 6/14/16 @ 3PM

Industry Representative [signature] Date/Time 6-14-16- 3:00PM)
Comment Area:

ATTACHMENT V

File #4 – Arkansas Valley TWA, Inc.

FACT SHEET

Operation: External body washing of trucks and trailers
Employees: 8 full-time; 3 part-time. 3Shifts.
Hours of Operation: 24 hours/day; 7 days/week
Chemicals Used: Soap, brightener, wax

Flow 15,000 gallons per day based on actual maximum daily flow rates plus safety factor.

Average flow from Oct. 2014-September 2015 = 11,047 gpd

pH limits: 5.0 – 11.0 s.u. as per Van Buren Pretreatment Ordinance #VB26-2009

Temperature: 5 – 40°C as per Van Buren Pretreatment Ordinance #VB26-2009

Oil & Grease: maximum of 100 mg/L as per Van Buren Pretreatment Ordinance #VB26-2009;

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

Metals: Mass based metal limits based on percentage of SIU flow into the North Treatment Plant. Estimated Maximum allowable headworks loading for total SIU Zinc loading = 0.60 lbs/day. Due to no other SIU loading limits for Zinc allow 1.0 mg/L.

Zinc: 1.0 mg/L * 8.34 lbs/gal. * 0.015 MGD = 0.1251 lbs/day

Total Toxic Organics: 2.13 mg/L as per Section 40 CFR Part 433 (no testing necessary due to absence in wastewater of like industries---submit TTO certification statement twice per year)

TABLE I

XIV. SELF MONITORING REQUIREMENTS PERMIT NO. VB 7542-22

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

Parameter	Maximum Discharge Limitations*	Monitoring Requirements Measuring Frequency	Sample Type
Flow	0.015 MGD	continuous	Flow Measurement
pH	5.0 - 11.0 S.U.	1/7	4 grabs/24 hours
Temperature	Maximum 40 C	1/7	4 grabs/24 hours
	lbs/day		
BOD_5	37.53 lbs/day	1/90 days	24 hr. Time Comp.
Total Suspended Solids	37.53 lbs/day	1/90 days	24 hr. Time Comp.
Zinc	0.1251 lbs/day	1/30 days	24 hr. Time Comp.
Oil & Grease	100 mg/L	1/90 days	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)

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

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