

# ADEQ

ARKANSAS  
Department of Environmental Quality

September 6, 2007

Dan Dawson, Pretreatment Coordinator  
City of Searcy  
P O Box 1319  
Searcy, AR 72145-1319

Re: City of Searcy (Permit Number: AR0021601 AFIN: 73-00055 ) Pretreatment Program  
Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Dawson:

Please find enclosed the finished report for the audit/assessment conducted by me from July 23 through 27, 2007. Please make the report available for review by appropriate City officials; you and the City officials should discuss and evaluate the recommendations and required actions in the report. Please respond in writing within thirty (30) days with the City's proposed actions to my findings in the report.

The department and I thank you for your cooperation during the audit. The recommendations in the attached audit/assessment are intended to aide the City of Searcy pretreatment personnel with achieving the objectives of the Clean Water Act.

If you or any of your associates have questions , please do not hesitate to contact this office.

Sincerely,



Rufus J. Torrence  
ADEQ Pretreatment Engineer

Encl: Audit/Assessment Checklist

Cc: Lee Bohme / EPA 6WQ-PM (via e-mail w attmt)  
Frank Esry / ADEQ Inspector Supervisor (w/o attmt)  
Dennis Benson / ADEQ NPDES Enforcement (w/o attmt)



***PRETREATMENT AUDIT  
REPORT FOR THE CITY OF  
SEARCY, ARKANSAS  
NPDES PERMIT #AR0021601***

***September 6, 2007***

***PREPARED BY:  
RUFUS TORRENCE  
STATE PRETREATMENT ENGINEER***

***ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
5301 Northshore Drive  
NORTH LITTLE ROCK, ARKANSAS 72118***



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- B) Summary of Findings with Required Actions
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- E) Conclusion

***LIST OF ATTACHMENTS***

Pretreatment Program Audit Checklist:

- Section I: General Information
- Section II: Program Analysis and Profile
- Section III: Industrial User File Review
- Reportable Noncompliance (RNC) Worksheet
- SIU Site Visit Summaries

Attachments A,B,C,D & E: Supporting Documentation



## ***A) INTRODUCTION***

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, the department will perform audits to coordinate pretreatment programs within the state; audits are an important part of the department's compliance monitoring strategy.

EPA has integrated Pollution Prevention (P2) into Pretreatment Programs; therefore, EPA has expanded the scope of audits to include assessments of Cities' P2 projects.

ADEQ (Rufus Torrence, Auditor) performed a pretreatment audit from July 23 - 27, 2007 on the Pretreatment Program implemented by the City of Searcy, Arkansas. Participants included:

Rufus Torrence      ADEQ/Pretreatment Engineer

Dan Dawson      City of Searcy/Assistant General Manager

The goals of the audit/assessment were:

- \* To determine the implementation and compliance status of the City of Searcy's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403
- \* To determine the effectiveness of the City's Pretreatment and P2 Programs in controlling industrial discharges
- \* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements
- \* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and offer recommendations thereof

EPA originally approved the Searcy's Pretreatment Program on 3/5/85. The city submitted subsequent program modifications; these modifications included program narrative revisions, evaluation of Maximum Allowable Headworks Loadings (MAHL), development of Technically Based Local Limits (TBLL), incorporation of an Enforcement Response Plan (ERP) and necessary pretreatment ordinance revisions. ADEQ approved and incorporated these modifications into the City NPDES permit on 7/2/96. The local limits were later updated and ADEQ incorporated this modification into the city's NPDES permit on 11/22/04.

The auditor toured the POTW on 7/23/07. Searcy's POTW processes include primary clarification, activated sludge, secondary clarification, chlorination and dechlorination prior to discharge to the Little Red River.





The design flow of the POTW is 5 MGD; the average flow of the POTW is 3.2 MGD. Ten (10) permitted Significant Industrial Users (SIUs) contribute approximately 22% of the POTW's average daily flow; one (1) of the SIUs is regulated by categorical pretreatment standards (found in 40 CFR 405 through 471). The POTW's effluent has shown no pattern of toxicity (lethality) to the receiving stream. The POTW last land application of biosolids occurred in the summer of 2005.

The City has implemented a program ("CAN THE GREASE") to reduce the amount of fats, oils and grease which enter the POTW collection system; see attachment E-1/1.

The audit/assessment consisted of an informal discussions with Searcy's Pretreatment personnel, an examination of the industrial user files, a review of pretreatment records and five (5) site visits to permitted SIUs. The auditor utilized a checklist to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included in Attachments A, B, C, D & E.

The report is divided into four sections. Section B provides a summary of the significant findings of the audit; the findings specify actions that are required by the City of Searcy. Section C includes recommendations to help improve the implementation and enforcement of the pretreatment and pollution prevention programs. Finally, Section D shows required program modifications to the City's approved program.



**B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS**

This section of the report is a summary of deficiencies which the auditor found in the City of Searcy's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the City's approved program are shown below with quotes or paraphrased citations from both documents. The auditor has also provided a narrative explanation of the required actions.

1) Under **40 CFR 403.8(f)(1)(iii)(B)(3)**, permits must contain "Effluent limits...based on applicable general Pretreatment Standards...categorical Pretreatment Standards, local limits...". Under **40 CFR 403.4 State or local law**, the POTW must enforce "local law as long as the...local requirements are not less stringent than any set forth in National Pretreatment Standards...".

Eaton Permit No. 1349401 shows both local limits and 40CFR433 categorical limits for permit effluent limits; the City must compare local limits to federal limits and select the more stringent limit. The City must enforce the more stringent limit and the more stringent limit should be the only limit listed for permit effluent limits. See attachment A-2/7 & A-3/7 for more details; the limits for Copper (2.07 mg/l) and Nickel (2.38 mg/l) in Section 2 for categorical industries appear to pre-empt the more stringent local limits for Copper (1.79 mg/l) and Nickel (1.47 mg/l) in Section 1. Finally, the city must confirm when Eaton/Vickers installed the first 40CFR433 core process to substantiate which categorical cadmium limit is applicable for Eaton's permit.

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

The auditor noted during the file review that not all of the Chains of Custody forms included type of sample bottle or preservatives used. This information must be included to help verify that samples taken for compliance assurance were collected and preserved in accordance with 40 CFR 136 required techniques.



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

- 1) As part of the annual inspection the City should verify that all essential Eaton personnel are familiar with the Toxic Organic Management Plan (TOMP) and that the TOMP is current. The current TOMP (see attachment D) refers to "Vickers" and should be updated to specify "Eaton".
- 2) The City should show in each SIU permit whether composite samples are "24-Hour Flow Proportional" or "24-Hour Time Proportional"; see attachment A-2/7 under "SAMPLE TYPE".
- 3) As part of the annual inspection the City should make a "free-hand" sketch of Eaton flows to show the relationship between the sampling point and the regulated and non-regulated streams. Presently, the City and Eaton are sampling all and only regulated wastewater; therefore, the combined Wastestream formula shown in 40 CFR 403.6(e) is currently not applicable. Refer to attachment B-10/11 for location of sketch
- 4) The City should remove BOD and TSS "surcharge" limits from SIU permits to avoid future confusion with local limits; in the future EPA may require the City to develop local limits for BOD and TSS.
- 5) Send a copy of the reporting requirements located in 40 CFR 403.12(p) & (j) to all hazardous waste generators shown on the ADEQ website at:  
  
[http://www.adeq.state.ar.us/hazwaste/rcra2/facil\\_sum.asp#Display](http://www.adeq.state.ar.us/hazwaste/rcra2/facil_sum.asp#Display)  
  
*(Instructions: Enter "Searcy" in the box next to the title "Location City" and click "Search" to see the list.)*
- 6) Include a fact sheet in all permits that have local limits. The fact sheet should show how the city allocated the MAHL (Maximum Allowable Headworks Loading) and derived the equivalent concentration limit ("local limit").
- 7) The city should show in the pretreatment ordinance which official has the authority to impose administrative fines. Section 6.1 (Administrative Fines) does not list which official has the authority to impose administrative fines.
- 8) The city should include questions about facility operations on the Industrial User Survey, Update Form. Since the city relies on these periodic survey questionnaires instead of permit re-application forms, the city should request more information (flows, regulated processes, etc.) from the permittees; see attachment C-1/1.
- 9) The City may include the RCRA notification in the IU Survey/Application to insure that any future SIU is not overlooked.
- 10) The City should show "Ordinance No. 96-15" on the cover page of each SIU permit.
- 11) The City should show the exact sampling location in each permit with this corresponding label "Sampling Location:". The permits specify discharge locations and should also indicate that if these locations are also the sampling locations; see Section 1 on attachment A-2/7 for the suggested paragraph for the sampling location label.



**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**

1) The City of Searcy shall, within sixty (60) days of the effective date of their next NPDES permit, (1) submit a WRITTEN CERTIFICATION that a technical evaluation has demonstrated that the existing technically based local limits (TBLL) are based on current state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, worker health and safety problems, and sludge contamination, OR (2) submit a WRITTEN NOTIFICATION that a technical evaluation revising the current TBLL and draft sewer use ordinance which incorporates such revisions will be submitted within 12 months of the effective date of the City's next NPDES permit.

2) Comply with most the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply.

The following is a summary of changes required by the Streamlining Rule; some of these changes may not be applicable to the City of Searcy's pretreatment program.

1. Updated removal credits provisions relating to Overflows [§ 403.7(h)]
2. Slug control requirements must be included in SIU control mechanisms [§ 403.8(f)(1)(iii)(B)(6)]
3. SIUs must be evaluated for the need for a plan or other action to control slug discharges within a year from the final rule's effective date or from becoming an SIU [§ 403.8(f)(2)(vi)]
4. Expand SNC to include additional types of Pretreatment Standards and Requirements [§ 403.8(f)(2)(viii)(A-C)]
5. SIU reports must include BMP compliance information [§ 403.12(b), (e), (h)]
6. Require periodic compliance reports to comply with sampling requirements and require non-categorical SIUs to report all monitoring results [§ 403.12(g)(3), (6)]
7. Require notifications of changed discharge to go to the Control Authority [§ 403.12(j)]

\* \* \* \* \*





## **E) CONCLUSION**

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



# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information .....Pages 1- 4  
 Section II: Pretreatment Program Analysis .....Pages 5-17  
 Section III: Industrial User File Evaluation .....Pages 18-25

### SECTION I: GENERAL INFORMATION

**A. GENERAL INFORMATION**

Control Authority Name: City of Searcy NPDES #: AR0021601  
 Mailing address: 300 N. Elm Street P O Box 1319 Searcy, AR 72145-1319  
 Permit Signatory: Dan Dawson Title: Assistant General Manager  
 Telephone: (501) 268-2481 FAX NUMBER: (501) 268-9463  
 Pretreatment Contact: (Same) Title: (Same)  
 Address: (Same)  
 Telephone: (Same) E-Mail address: d.dawson@earthlink.net  
 Pretreatment program approval date: August 5, 1985  
 Dates of approval of any substantial modifications: July 2, 1996  
 Month Annual Pretreatment Report Due: March  
 Pretreatment Year Dates: Feb to Feb Date(s) of Audit: July 23 thru 27, 2007  
(ASSESSMENT)  
 Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Rufus Torrence</u>	<u>ADEQ Pretreatment Engineer</u>	<u>(501) 682-0626</u>

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Dan Dawson</u>	<u>Assistant General Manager</u>	<u>(501) 268-2481</u>

\* Program Primary Contact

<u>Dates of Previous PCIs/Audits:</u>		
<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>05/06</u>	<u>Vague Sampling Location in permits</u>
<u>PCI</u>	<u>04/05</u>	<u>Sampling Technique/Grab vs Composite</u>
<u>PCI</u>	<u>11/03</u>	

YES NO

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

If yes, describe the required corrective action:

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      Is the Control Authority currently in SNC or RNC?

.....

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

**SECTION I: GENERAL INFORMATION**

**B. TREATMENT PLANT INFORMATION**

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0021601	Searcy Treatment Facility	12-1-02	11-30-07

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

2. **Individual Treatment Plant Information**

a. Name of Treatment Plant: Searcy Wastewater Treatment Facility

Location Address: 260 North Bypass Road

Expiration Date of NPDES Permit: 11-30-07

Treatment Plant Wastewater Flow: Design- 5 MGD; Actual (Average)- 3.2 MGD

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

**Industrial Contribution to this Treatment Plant**

# of SIUs : 10 # of CIUs : 1  
 Industrial Flow (mgd): 0.7 Industrial Flow (%) : 22 %

**Level of Treatment**

**Type of Process(es):**

Primary  Bar Screen, grit removal, primary clarification

Secondary  Activated Sludge

Tertiary \_\_\_\_\_

Method of Disinfection: Chloriation

Dechlorination  YES  NO

**Effluent Discharge**

Receiving Stream Name: Little Red River/seq 4E of the White River Basin

Receiving Stream Classification: Fishable/Swimmable

Receiving Stream Use: Primary/Secondary Contact & Fishery

If effluent is disposed of to any location other than the receiving stream, please note: Not Applicable (N/A)

Method of Sludge Disposal:

Quantity of Sludge:

- Land Application \_\_\_\_\_ dry tons/yr.
- Incineration \_\_\_\_\_ dry tons/yr.
- Monofill \_\_\_\_\_ dry tons/yr.
- Mun. Solid Waste Landfill \_\_\_\_\_ dry tons/yr.
- Public Distribution \_\_\_\_\_ dry tons/yr.
- Lagoon Storage \_\_\_\_\_ dry tons/yr.
- Other (specify) \_\_\_\_\_ dry tons/yr.

<sup>1</sup> No estimate on sludge since the last land application was in the summer 2005.

List of toxic pollutant limits in NPDES permit: Zinc<sup>2</sup>

<sup>2</sup> A zinc electroplating facility ceased operation and the City requested ADEQ to drop Zinc from the permit.

SECTION I: GENERAL INFORMATION

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

YES NO Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ  
 Issuance Date: 12-01-02  
 Expiration Date: 11-30-07

List pollutants that are specified in current sludge permit: Sludge must meet the applicable provisions of 40 CFR Part 503

YES NO N/A Has the Control Authority submitted results of whole effluent biological toxicity testing.

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

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

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

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

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

The influent concentrations of metals have stayed the same over the last five years since the influent concentrations of metals are close to "typical" domestic levels.

YES NO N/A    Has the POTW begun tracking the trends in the above samples?

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

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

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>Fecal Coliform</u>	<u>Denitrification not effectively removing nitrates hence negating disinfection.</u>
<u>TRC</u>	<u>Chlorine flow adjusted too high</u>

YES NO   Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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

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

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
10-21-04	Updated Local Limits	11-22-04

2. Modifications in Progress:

Date Requested	Nature of Modification
N/A	Ongoing review of Streamlining Changes

YES NO

Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

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

Date of original Pretreatment Program approval: 03/05/85 [WENDB-PTIM]  
 Date of most recent Ordinance approved by the Control authority: 05/30/96  
 Date of most recent Pretreatment Program modification approval: 07/02/96

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

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES    NO

    Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

- No oversight authority
- No inspection authority
- No remedies for noncompliance
- No "equivalent" standard
- No clear delineation of responsibility for program implementation
- Interjurisdictional agreements not entered into
- Other, Specify: \_\_\_\_\_

   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<sup>2</sup>) policies by contributing jurisdictions?  
List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

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

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

Problems

- Updating industrial waste survey \_\_\_\_\_ N/A \_\_\_\_\_
- Notification of IUs \_\_\_\_\_
- Permit issuance \_\_\_\_\_
- Receipt and review of IU reports \_\_\_\_\_
- Inspection and sampling of IUs \_\_\_\_\_
- Assessment of IUs for P<sup>2</sup> activity \_\_\_\_\_
- Analysis of samples \_\_\_\_\_
- Enforcement \_\_\_\_\_
- Other: \_\_\_\_\_

Briefly describe other problems: \_\_\_\_\_ N/A \_\_\_\_\_

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: PROGRAM ANALYSIS AND PROFILE

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

YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?

Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) POTW serves a small community and all IUs are well-known

How often is the survey to be updated? Ongoing

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

YES NO

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

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

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

- a. 10 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 1 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 9 Noncategorical SIUs
- d. 4 Other regulated nonsignificant IUs (Describe) liquid waste haulers
- 14 TOTAL of a. + d.

YES NO

Has the POTW identified any IUs with Pollution Prevention opportunities?

Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

If not, the Control Authority has defined "significant industrial user" to mean: <sup>1</sup>CA definition was the same but presently does not include 40 CFR 403.3(v) streamlining changes.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

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

What is the maximum term of the control mechanism? Three Years

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

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

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 Control Mechanism designate a discharge point? [403.5(b)(8)]
- ✓<sup>1</sup> Are all applicable categorical standards and local limits applied to trucked wastes ?

<sup>1</sup>No local limits are applicable to trucked wastes.

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

Pollutant	Limit
<u>N/A</u>	

Describe the discharge point(s) (including security procedures):  
Haulers must discharge at the treatment plant (into bar screen chamber)

- ✓ 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 applied to UST cleanup sites:

Pollutant	Limit
<u>N/A</u>	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

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

March 91 Date Notified Letter Method of Notification

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

Federal Register  Journals, Newsletters  
 Meetings, Training  Internet  
 Government Agencies  Other \_\_\_\_\_

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		MAHL (lb/d) Numerical Limit Adopted based on ADEQ Worksheet dated 11-6-2003
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.543
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.578
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	11.927
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3.829
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3.289
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.221
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.006
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.489
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3.260
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.652
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.421
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	10.208

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES    NO  
 \_\_\_\_\_

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

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

YES    NO

<sup>1</sup> Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

<sup>1</sup>With the exception of Chloroform (source unknown), no pollutant is impacting the POTW at this time.

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

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

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?  
 \_\_\_\_\_  
 N/A

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
<b>Inspections:</b>			
CIUs	<u>1</u>	1/year	_____
Other SIUs	<u>1</u>	1/year	_____
<b>Sampling:</b>			
CIUs	<u>2</u>	1/year	<u>Compliance Assurance</u>
Other SIUs	<u>2</u>	1/year	<u>" "</u>
<b>Reporting:</b>			
CIUs	<u>2</u>	2/year	_____
Other SIUs	<u>2</u>	2/year	_____
<b>Self-Monitoring:</b>			
CIUs	<u>12</u>	2/year	<u>Compliance Assurance</u>
Other SIUs	<u>4</u>	2/year	<u>" "</u>

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
<u>0</u>	<u>0</u>	Not sampled at least once in the past reporting year?
<u>0</u>	<u>0</u>	Not inspected at least once in the past Pretreatment reporting year?
<u>0</u>	<u>0</u>	Not inspected or not sampled at least once in the past reporting year ? [WENDB-NOIN] - [403.8(f) (2) (v)]

\* NOIN- this is a count of SIUs that are either not inspected OR not sampled in the past 12 months. This is NOT a count of SIUs that were both not sampled and not inspected. Do not count repetitive SIU names more than once.

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.

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
<u>✓</u>	<u>   </u>	If requested?
<u>   </u>	<u>✓</u>	To verify IU self-monitoring results?

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

	Analytical Method *	Name of Laboratory
Metals	AA Flame	POTW
Cyanide	Spectro	Ark Testing
Organics	GC/MS	American Interplex
Other	Biomonitoring	" "

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

     Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
    ADEQ certifies both the contract lab (Arkansas Testing) and the  
    POTW lab.

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

<u>    1-5 d</u>	Conventionals
<u>    &lt; 1 wk</u>	Metals
<u>    2 wk</u>	Organics
<u>    2 wk</u>	Biomonitoring

     <sup>1</sup> Is there an established protocol clearly detailing sampling location and procedures?

<sup>1</sup>CA has only 10 SIUs and the prèt coor has sampled them since the program was approved in 1985; the auditor suggested a protocol may be helpful in the event new or temporary personnel had to do the sampling.

      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.

I. ENFORCEMENT

YES NO

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

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

YES NO

- Describe how the Control Authority will investigate instances of noncompliance
- Describe the Control Authority's types of escalating enforcement responses and the periods for each response
- Identify by Title the Official(s) responsible for implementing each type of enforcement response
- Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards



SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

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

YES NO

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

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

	<u>Number</u>	<u>Amount</u>
Civil	0	\$ _____
Administrative	0	\$ _____
Total	0	\$ _____

[WENDB-IUPN]



SECTION III: INDUSTRIAL USER FILE REVIEW

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

YES NO  
  computerized  
  hard copy  
  OTHER: \_\_\_\_\_

Are the following files computerized:

YES NO  
  Control Mechanism Issuance  
  Inspection and Sampling schedule  
  Monitoring Data  
  IU Compliance Status Tracking  
  Other: \_\_\_\_\_

Can IU monitoring data can be retrieved by:

Industry name  
  Pollutant type  
  Industrial category or type  
  SIC Code  
  IU discharge volume  
  Geographic location  
 N/A Receiving treatment plant (i.e.if > one plant in the system)  
  Other (specify) \_\_\_\_\_

<sup>1</sup>CA currently has only 10 SIUs and a computerized system may be of little benefit; nonetheless, the CA should attempt to go to a "paperless" filing system.

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

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

Are there significant public or community issues impacting the POTW's pretreatment program?  
 If yes, please explain: \_\_\_\_\_  
 \_\_\_\_\_

Are all records maintained for at least 3 years?

SECTION III: INDUSTRIAL USER FILE REVIEW

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] \* - FTE = Full Time Equivalent Employee  
 <2 FTE

YES NO

Have any problems in program implementation been observed which appear to be related to inadequate funding?  
 If yes, describe and show below the source(s) of funding for the program:

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general operating fund	<u>&gt;94%</u>
<input checked="" type="checkbox"/> IU permit fees	<u>&lt; 1%</u>
monitoring charges	<u>          </u>
<input checked="" type="checkbox"/> industry surcharges	<u>5%</u>
other (describe) _____	<u>          </u>
Total	<u>100%</u>

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

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

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

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>	<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment <u>ISCO Samplers</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment <u>Gas monitors, blowers</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles <u>Truck</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment <u>AA Flame</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):

CA has implemented the "CAN THE GREASE" program designed to reduce the amount of FOG which enter the sewer.

2. Has the source of any toxic pollutants been identified?  
If yes, what was found?

N/A

3. Has the POTW implemented any kind of public education program? If yes, describe:

POTW has sent letters and distributed brochures to the public on "Fat-Free Sewers".

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

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?

No

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? NO

If yes, which of the "Guides to Pollution Prevention" were used?

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Land O'Frost, Inc File/ID No. 3201301  
Industry Address 911 Hastings Ave 72143  
Industry Description Food Processor (Sandwich Meat)  
Industrial Category N/A 40 CFR N/A SIC Code: 2013  
Ave. Total Flow (gpd) 140,000 Ave. Process Flow (gpd) 140,000

Industry visited during audit: YES

Comments: Conscientious management force

FILE #: 2 Industry Name Kohler Co File/ID No. 1346901  
Industry Address 920 E. Lincoln St. 72143  
Industry Description Manufacturer of Stainless Steel Sinks  
Industrial Category N/A 40 CFR N/A SIC Code: 3469  
Ave. Total Flow (gpd) 297,000 Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: YES

Comments: UAW union workers on strike during visit

FILE #: 3 Industry Name Eaton Hydraulics File/ID No. 1349401  
Industry Address 400 E. Lincoln St 72143  
Industry Description Manufacturer of Hydraulic Valves, Pump Parts & Filters  
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3494  
Ave. Total Flow (gpd) 5000 Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: YES

Comments: Effluent occasionally violates pH

FILE #: 4 Industry Name Yarnell Ice Cream File/ID No. 3202401  
Industry Address 205 S. Spring St. 72143  
Industry Description Food Producer  
Industrial Category N/A 40 CFR N/A SIC Code: 2024  
Ave. Total Flow (gpd) 17,000 Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: YES

Comments: Family owned business

FILE #: 5 Industry Name Cintas, Inc File/ID No. 3721801  
Industry Address 101 Beebe Capps Expy 72143  
Industry Description Laundry of Uniforms and Shop Towels  
Industrial Category N/A 40 CFR \_\_\_\_\_ SIC Code: 7218  
Ave. Total Flow (gpd) 27,000 Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit: YES

Comments: Cintas claims not to accept towels saturated with oils and cleaning fluids

## SECTION III: INDUSTRIAL USER FILE REVIEW

A. <u>Industrial User Characterization</u>	✓ => Yes	X => No	N/A => Not Applicable		
	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Is the user subject to categorical pretreatment standards?	<u>X</u>	<u>X</u>	<u>✓</u>	<u>X</u>	<u>X</u>
a. New source or existing source (NS or ES)?	<u>N/A</u>	<u>N/A</u>	<u>1</u>	<u>N/A</u>	<u>N/A</u>
b. Is this IU one identified as having P <sup>2</sup> potential?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
B. <u>Control Mechanism</u>	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Does the file contain an application for a control mechanism?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
If yes, what is the application date?	<u>1-24-05</u>	<u>1-22-05</u>	<u>1-24-05</u>	<u>2-4-05</u>	<u>1-24-05</u>
Does it ask for Pollution Prevention information?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
2. Does the file contain a permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Permit Expiration Date?	<u>3-15-08</u>	<u>3-15-08</u>	<u>3-15-08</u>	<u>3-15-08</u>	<u>3-15-08</u>
Is a fact sheet included?	<u>X</u>	<u>X</u>	<u>3</u>	<u>X</u>	<u>X</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Statement of nontransferability?	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>
d. Appropriate discharge limitations?	<u>6</u>	<u>✓</u>	<u>✓</u>	<u>6</u>	<u>✓</u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1. CA is applying existing source regs to Eaton but CA records do not show when the regulated process was installed; CA is to confirm that the first metal finishing processes were installed before Aug 31, 1982. 2. CA uses short IWS form; see attachment C. 3. Eaton permit shows both local limits and cat limits on ELG sheets which would normally appear on a fact sheet. 4. "Ord No. 96-15" does not appear on cover page. 5. Para 3.L in Permit 6. Permits have BOD and TSS limits, too.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Sampling locations?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
k. Standard conditions for:					
Right of Entry?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>
Records retention?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>
Civil and Criminal Penalty provisions?	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>	<u>5</u>
Revocation of permit?	<u>6</u>	<u>6</u>	<u>6</u>	<u>6</u>	<u>6</u>
l. Compliance schedules/ progress reports	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
m. General/Specific Prohibitions?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
n. Where technologically and economically achievable, are P <sup>2</sup> aspect included?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>

C. Application of Standards

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>7</u>	<u>8</u>	<u>9</u>	<u>7</u>	<u>7</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>	<u>10</u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

Comments: 1. Permits do not specifically state "Sampling Location". 2. Permits do not show if composites are "Flow" or "Time" proportional. 3. Para 3.H in permits 4. Para 3.M 5. Para 3.N 6. Para 3.N 7. Permit has BOD and TSS surcharge limits only. 8. Permit has local limits only. 9. Permit has both; neither pre-empted by more stringent limit. 10. Permits issued before Oct 2005.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Comments: 1. Para 3.I in permits 2. Chain-of-Custody does not show type of bottles or preservatives.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>N/A</u>	<u>N/A</u>	<u>1</u>	<u>N/A</u>	<u>N/A</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
<u>Inspections</u>					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Date of last Inspection	<u>7-21-06</u>	<u>9-25-06</u>	<u>9-20-06</u>	<u>8-22-06</u>	<u>9-27-06</u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Verification of production rates?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>✓</u>	<u>✓</u>	<u>3</u>	<u>✓</u>	<u>✓</u>
f. Evaluation of pretreatment facilities?	<u>4</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>5</u>

Comments: 1. EATON Tomp refers to "Vickers" only. 2. All composites are "Time-Proportional". 3. Need to update Eaton's schematic. 4. Land O'Frost has grease traps only. 5. Cintas has screening only.



SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>
i. Manufacturing facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
j. Chemical handling and storage procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
l. Hazardous waste storage areas and handling procedures?	<u>✓</u>	<u>N/A</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
m. Sampling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
n. Laboratory procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
p. Evaluation of Pollution Prevention opportunities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments: 1. CA has evaluated all SIUs for Slug Plans and the CA has deemed that no SIU needs a plan.

## SECTION III: INDUSTRIAL USER FILE REVIEW

### IU Self-Monitoring and Reporting

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
11. Does the file include:					
a. BMR?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>
b. 90-Day Report?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>
c. All periodic reports?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>
d. Compliance schedule reports?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
14. Did the IU report flow?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. Did POTW respond to the spill?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

Comments: 1. Land O'Frost letter dated 6-27-07 has the certification but no signature.

## SECTION III: INDUSTRIAL USER FILE REVIEW

### E. Enforcement

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>X</u>	<u>X</u>	<u>N/A</u>	<u>N/A</u>	<u>X</u>
b. IU self-monitoring results?	<u>✓</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>one</u>	<u>two</u>	<u>none</u>	<u>none</u>	<u>one</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>1</u>	<u>1</u>	<u>N/A</u>	<u>N/A</u>	<u>1</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>2</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u>3</u>
5. Were all nondischarge violations identified in the file?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
6. Was the IU notified of all violations?	<u>✓</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>✓</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
8. Did the Control Authority follow its approved ERP?	<u>✓</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>2</u>	<u>✓</u>	<u>N/A</u>	<u>N/A</u>	<u>4</u>
10. Is there a compliance schedule? If yes:	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
11. Were there any compliance schedule violations?	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>

Comments: 1. Files contained no Record of Communication to confirm 24 hour notification. 2. Land O'Frost pH violation was an isolated occurrence. 3. No (per Cintas' letter dated 4-14-07 the violation occurred on 1-18-07 with corrective actions planned on 5-1-07 and compliance expected on 6-1-07). 4. No lab report in file to confirm Cintas compliance.

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement (continued)

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. TRC	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
c. Pass through/Interference	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
d. Spill/slug loads	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
e. Reporting	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
f. Compliance schedule	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
g. others (specify)	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
13. Was the SIU published for SNC?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
Date of publication.	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

Comments:

# REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Searcy NPDES #: AR0021601

Date of Audit: July 23 - 27, 2007 Date entered into QNCR: 8/15/07

(ASSESSMENT)

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

### SIGNIFICANT NONCOMPLIANCE (SNC)

NO            Is the Control Authority in SNC for violation of any Level I criterion.

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





# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

## Section A: National Data System Coding

Transaction Code 1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/>	NPDES AR 002160111	yr/mo/day 07/07/23	Inspection Type 18 <input type="checkbox"/> 9 <input type="checkbox"/>	Inspector 19 <input type="checkbox"/> S <input type="checkbox"/>	Fac Type 20 <input type="checkbox"/> 1 <input type="checkbox"/>
Remarks SEARCY PRETREATMENT PROGRAM					
Reserved 67 <input type="checkbox"/> 69 <input type="checkbox"/>	Facility Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 80 <input type="checkbox"/>	

Transaction Code 1 <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/>	NPDES AR 002160111	yr/mo/day 07/07/25	Inspection Type 18 <input type="checkbox"/> U <input type="checkbox"/>	Inspector 19 <input type="checkbox"/> S <input type="checkbox"/>	Fac Type 20 <input type="checkbox"/> 2 <input type="checkbox"/>
Remarks 05 SIU SITE VISITS					
Reserved 67 <input type="checkbox"/> 69 <input type="checkbox"/>	Facility Evaluation Rating 70 <input type="checkbox"/>	BI 71 <input type="checkbox"/>	QA 72 <input type="checkbox"/>	Reserved 73 <input type="checkbox"/> 74 <input type="checkbox"/> 75 <input type="checkbox"/> 80 <input type="checkbox"/>	

## Section B: Facility Data

Name and Location of Facility Inspected City of Searcy 300 N. Elm St P.O. Box 1319 Searcy, AR 72145-1319	Entry Time <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM 9:30 7/23/07	Permit Effective Date 12/01/02
	Exit Time/Date 11:45 am 7/27/07	Permit Expiration Date 11/30/07

### CODE SHEET

Pretreatment Audit

	CODE
Auditor's Name	Torrence
Permit Number	AR 0021601
Audit Date	7-23 to 27-07
Date Permit Modified to require pretreatment	3/5/85
	DTIA
	PTIM

### PPETS WENDBR DATA ELEMENTS

Significant IUs without Control Mechanisms	0	NOCM
Number of Significant IUs	10	SIUS
Number of Categorical IIIs	1	CIUS
Technical Evaluation for Local Limits	Y	EVLL
Adoption of Technically-Based Local Limits	Y	ADLL
Significant IUs not inspected or sampled	0	NOIN*
Significant IUs in significant noncompliance with standards or reporting	0	PSNC*
Significant IUs in significant noncompliance with self-monitoring	0	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	0	SNIN*





# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Searcy NPDES #: AR0021601

Name, address and phone number of industry:  
CINTAS 101 Beebe Capps Expy 72143 (501)268-8614

Type of industry: Industrial Laundry

(Include regulatory citation if CIU)

Date/Time of visit: 7-25-07 @ 1:00 pm

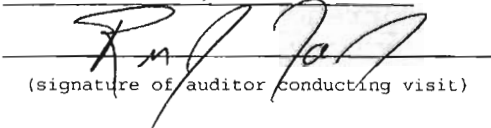
Industry contacts: Brian Busbea, Production Supv

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

Additional comments:

1. Shake screens and pH adjustment only
2. Uses contract lab (Ark Testing Co.) to take samples and analyze them.

Visit conducted by: Torrence/Dawson Date: 7-25-07

  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

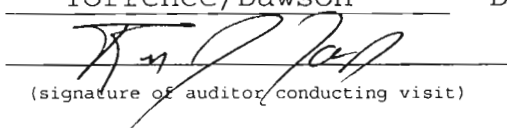
**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Searcy NPDES #: AR0021601

Industry name: CINTAS

Additional comments: Facility has industrial washer and dryers to laundry uniforms, red towels and floor mats.

Visit conducted by: Torrence/Dawson Date: 7-25-07

  
(signature of auditor conducting visit)

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Searcy NPDES #: AR0021601

Name, address and phone number of industry:

Eaton Hydraulics 400 East Lincoln Ave 72143  
(501)268-5854

Type of industry: Manufacturer of Valves & Fittings 40CFR433  
(Include regulatory citation if CIU)

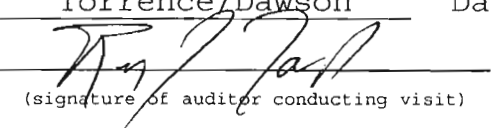
Date/Time of visit: 7-25-07 @ 10:15 am

Industry contacts: Matt Shephard, EHS Engineer

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

Additional comments: 1. The pretreatment equipment is exceptionally well maintained. 2. Facility has no open floor drains.

Visit conducted by: Torrence/Dawson Date: 7-25-07

  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Searcy NPDES #: AR0021601

Industry name: Eaton Hydraulics

Additional comments:

This facility makes hydraulic valves and pump parts from grey ("green") iron castings and steel bar stock.

The metal finishing core processes include electroplating, coloring (blackening) and coating (phosphating).

Facility has an ISO 9000 and 14001 certifications.

Visit conducted by: Torrence/Dawaon Date: 7-25-07

  
\_\_\_\_\_  
(signature of auditor conducting visit)

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Searcy NPDES #: AR0021601

Name, address and phone number of industry:  
Land O'Frost Inc. 911 Hasting Ave 72143 (501) 268-2473

Type of industry: Meat Preparation & Packaging  
(Include regulatory citation if CIU)

Date/Time of visit: 7-26-07 @ 10:15 am

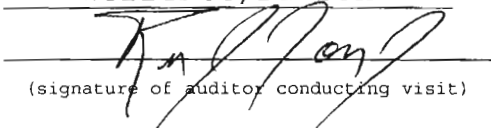
Industry contacts: Travis Ellis, EHS Director  
Michael Wammack, Facilities Maintenance Mgr.

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

Additional comments:

1. Grease Traps; pH adjustment; floatation and settling
2. In Lab Area Only

Visit conducted by: Torrence/Dawson Date: 7-26-07

  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

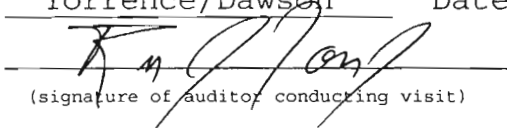
Control Authority: City of Searcy NPDES #: AR0021601

Industry name: Land O'Frost Inc.

Additional comments:

Facility receives turkey, chicken, pork and beef; the raw meat is ground to a liquid pulp. The pulp is pumped into edible skins to create both circular and square logs which are several feet long. The logs are cooked, sliced and packaged as sandwich meat.

Visit conducted by: Torrence/Dawson Date: 7-26-07

  
(signature of auditor conducting visit)

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Searcy NPDES #: AR0021601

Name, address and phone number of industry:  
Kohler Co. 920 East Lincoln Street 72143 (501)268-3521

Type of industry: Manufacturer of Stainless Steel Sinks  
(Include regulatory citation if CIU)

Date/Time of visit: 7-26-07 @ 1:00 pm

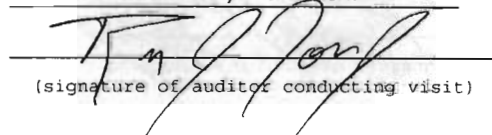
Industry contacts: Sue Dooley, Safety Specialist  
Lisa Pearson, Senior Analyst

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

Additional comments:

1. pH adjustment only
2. No open floor drains

Visit conducted by: Torrence/Dawson Date: 7-26-07

  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Searcy NPDES #: AR0021601

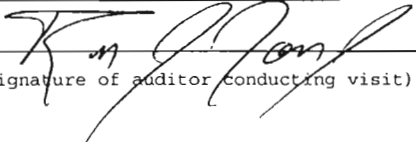
Industry name: Kohler Company

Additional comments:

This facility receives stainless steel coils. The coils are straightened, sheared and stamped to form the sinks. The sinks are washed in an alkaline solutions, polished and packaged for shipping.

The wastewater is pH adjusted before it is released to the POTW.

Visit conducted by: Torrence/Dawson Date: 7-26-07

  
(signature of auditor conducting visit)



# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Searcy NPDES #: AR0021601

Name, address and phone number of industry:  
Yarnell's Ice Cream Co. 205 South Spring 72143 (501)268-2414

Type of industry: Food Products (Ice Cream)  
(Include regulatory citation if CIU)

Date/Time of visit: 7-26-07 @ 2:45 pm

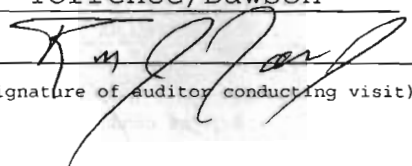
Industry contacts: Floyd J. Washburn, QA & HR Director

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

Additional comments:

Facility receives various dairy items from suppliers to make ice cream

Visit conducted by: Torrence/Dawson Date: 7-26-07

  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

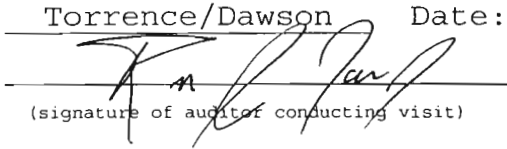
Control Authority: City of Searcy NPDES #: AR0021601

Industry name: Yarnell Ice Cream Co.

Additional comments:

None

Visit conducted by: Torrence/Dawson Date: 7-26-07

  
(signature of auditor conducting visit)

## SEARCY WATER AND SEWER SYSTEM

300 NORTH ELM STREET

P. O. BOX 1319

SEARCY, ARKANSAS

72145-1319

CLARENCE O. BUCKNER, MANAGER

### AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL PRETREATMENT PROGRAM AND THE CITY OF SEARCY PRETREATMENT ORDINANCES

Permit No. 1349401

In compliance with the provisions of the Clean Water Act (33 USC 1251, et. Seq.), and the General Pretreatment Standards (40 CFR 403),

**EATON Hydraulics, Inc.**

is authorized to discharge industrial wastewater into the City of Searcy publicly owned treatment works (POTW) from a facility located at:

400 E. Lincoln St.  
Searcy, AR 72143

in accordance with effluent limitations, monitoring requirements and other conditions set forth in the provisions of this permit.

This permit shall become effective on: **3/16/2005**

This permit and the authorization to discharge shall expire at midnight, **3/15/2008**.

Signed this 2 day of March, 2005.

  
Clarence O. Buckner  
Manager, SEARCY BOARD OF PUBLIC UTILITIES

1. FINAL EFFLUENT LIMITS

During the period beginning the effective date of this permit through the expiration date of the permit, the permittee is authorized to discharge into the City of Searcy POTW at a final effluent located:

**Final Wastewater Discharge in Treatment Bldg., N side of plant**

Such discharges shall be limited and monitored by the permittee as specified below.

EFFLUENT PARAMETERS TO MONITOR =====	DISCHARGE LIMITATIONS	
	Maximum Loading (24-hour period) lbs./day =====	Maximum Concentration (24-hour period) mg/L =====
BOD	n/a	225
TSS	n/a	225
pH	-----See Note (1) below -----	
Flow	-----See Note (2) below -----	
Cadmium	REPORT	6.37
Chromium	REPORT	REPORT
Copper	REPORT	1.79
Lead	REPORT	0.47
Nickel	REPORT	1.47

PARAMETERS =====	FREQUENCY OF ANALYSIS =====	SAMPLE TYPE =====
BOD	1/month	Composite
TSS	1/month	Composite
pH	1/month	Grab
Flow	-----See Note (2) below -----	
Cadmium	1/month	Composite
Chromium	1/month	Composite
Copper	1/month	Composite
Lead	1/month	Composite
Nickel	1/month	Composite

Note (1): pH shall not be less than 5.0 standard units nor greater than 11.0 standard units and shall be monitored by grab sample at the frequency indicated above.

Note (2): Flow shall be monitored and reported in accordance with supplemental permit condition 3.P. of this permit.

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2. PROCESS EFFLUENT LIMITS (Categorical Industries only)

During the period beginning the effective date of this permit through the expiration date of the permit, the permittee is authorized to discharge into the City of Searcy POTW a process effluent located:

**Final Wastewater Discharge in Treatment Bldg., N side of plant**

Such discharges shall be limited and monitored by the permittee as specified below.

EFFLUENT PARAMETERS TO MONITOR	DISCHARGE LIMITATIONS	
	Maximum Concentration (24-hour period) mg/L	Monthly Average mg/L
Cadmium	0.69	0.26
Chromium	2.77	1.71
Copper	3.38	2.07
Lead	0.69	0.43
Nickel	3.98	2.38
Silver	0.43	0.24
Zinc	2.61	1.48
Cyanide	1.20	0.65
TTO	2.13	-----

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Cadmium	See note (2) below	See note (3) below
Chromium		
Copper		
Lead		
Nickel		
Silver		
Zinc		
Cyanide		
TTO		

Note (1): Flow shall be monitored and reported in units of million gallons per day (MGD).

Note (2): An actual analysis of the process effluent must be made twice yearly, and a compliance report as per 40 CFR 403.12(e) must accompany the analysis. This report shall be due June 30 and December 31 each year, unless other dates are noted in writing by the Utility.

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Note (3): The sample type for the semi-annual analysis shall be a composite sample in accordance with the special requirements of 40 CFR 403.12(b)(5)(iv).

Note (4): A written certification regarding compliance with the applicable categorical Standards, and the industrial user's Toxic Organic Management Plan (TOMP) shall be made at the time of the semi-annual analysis report. See 40 CFR 403.12(b)(6).

### 3. SUPPLEMENTAL PERMIT CONDITIONS

A. The monthly monitoring period is defined as beginning on the 16<sup>th</sup> of one calendar month and ending on the 15<sup>th</sup> of the following calendar month.

B. Self-monitoring analyses for monitoring periods must be received by the Utility no later than the last day of the month in which the monitoring period ended. FOR EXAMPLE: A typical monitoring period can be from the 16<sup>th</sup> of March to the 15<sup>th</sup> of April (dates inclusive). The number of samples required by this permit to be taken can be taken ANY time during this period when normal operations are taking place. The results of these tests, however, must be received at the Utility office by 5:00 p.m. on the last day of April. If the last day of the month is a week-end day, then reports may be submitted no later than the following business day.

C. Users that are required to perform analyses less often than once per month will be charged a surcharge for the entire monitoring period if their sample analysis during that period meets the criteria of City of Searcy Ordinance #679.

D. All analyses and correspondence pertaining to this permit must be mailed or hand delivered to the following address:

Pretreatment Coordinator  
Searcy Board of Public Utilities  
300 North Elm Street  
P. O. Box 1319  
Searcy, AR 72145-1319

E. All laboratory analyses and correspondence pertaining to the provisions and requirements of this permit must be signed by a responsible corporate officer or an authorized representative of that individual. {40 CFR 403.12(l)}

F. If sampling performed by the permittee indicates a violation, the permittee shall notify the Utility within 24 hours of becoming aware of the violation. The permittee shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Utility within 30 days after becoming aware of the violation. Regularly scheduled sampling may be substituted for this resampling requirement if it occurs during the required 30-day period. This resampling is not required in the case of BOD, TSS or Oil & Grease parameters. These constituents are listed in Section 2 of

this permit for the purpose of determining applicability to the City of Searcy Ordinance #679 (the surcharge Ordinance), and not for compliance purposes. {40 CFR 403.12 (g)}

- G. The Utility must be notified when plans are being made for batch or slug discharges so that if the Utility elects, monitoring equipment can be stationed in time to monitor the batch load. The telephone number to call for this notification is (501) 268-1679. {Ordinance 96-15, Section 4.2.4}
- H. The Utility shall retain Right of Entry of the user's premises where wastewater is created, for the purposes of inspection, sampling or records examination. {Ordinance 96-15, Section 4.5.2}
- I. **Bypass** or diversion of wastes from any portions of the treatment facilities is prohibited unless the following conditions are met:
  - 1. Bypass is unavoidable to prevent loss of life, personal injury, or severe property damage;
  - 2. There are no feasible alternatives to bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime;
  - 3. The permittee submits written notice of an unanticipated bypass within 24 hours of the event;
  - 4. The permittee submits prior notice of an anticipated bypass, if possible, at least 10 days before the date of the anticipated bypass. {40 CFR 403.17; Ordinance 96-15, Section 2.8}
- J. The purpose of this permit is to limit constituents in the permittee's normal process discharge which could pose a potential threat to the POTW. Therefore, the permittee is required to take monitoring samples which are representative of the normal production process, and not a reflection of scheduled downtimes, plant shutdowns, or periods of plant idleness such as weekends. {Ordinance 96-15, Sections 4.2.4, 4.3}
- K. The permittee is required to promptly notify the Utility in advance, in writing, of any substantial change in the volume or character of pollutants in the permittee's discharge. Such change could be a result of plant expansion, change in production or treatment process, or significant increase in business. {40 CFR 403.12 (j)}
- L. This permit is issued to a specific industrial user named on Page 1 of 7 of this permit, for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new User, different premises, or a new or changed operation without prior written approval of the Utility. Any succeeding owner or User shall also comply with the terms and conditions of the existing permit. {Ordinance 96-15, Section 4.2.6}

- M. Industrial Users shall be required to retain all records pertaining to monitoring activities required by this permit, or the General and/or Categorical Pretreatment Standards, for a minimum of 3 years. {40 CFR 403.12 (n)}
- N. Failure to comply with all the requirements of this permit, the National Pretreatment Standards, and Ordinance 96-15 and its amendments may entitle the Utility to revoke the permission to discharge industrial wastewater granted in this permit. Discharging industrial wastewaters without a permit, or any other significant violations, may subject the industry to enforcement action as defined in Sections 5 and 6 of Ordinance 96-15 and its amendments. {Ordinance 96-15, Sections 4.1, 4.2.1, 5.2}
- O. The Utility is required from time to time to modify the criteria on which the specific limitations on Page 2 of 7 are based. Such modification is usually the result of State and Federal mandates to do so. The Utility retains the right to reopen this permit for review and change the appropriate limitations in order to accomplish the goals as set forth by Federal and State water quality standards.
- P. Flow measurement shall be by one of the following methods:
  - 1. Instantaneous measurement in a primary measuring device in the permittee's monitoring facility, measured at the same frequency as that noted for pH. All flow measurements using this method, even if taken at a greater frequency, shall be reported.
  - 2. An approved totalizing flow meter that is calibrated by a qualified technician at least once per year.
  - 3. Total facility water consumption as measured by the facility's water meter and reported on the monthly water bill. If this method is used, the industry is not required to include the water consumption on the self-monitoring report. NO CREDIT for water loss due to evaporation or inclusion in product will be allowed. Industries wanting more accurate measurement of discharge flow than that which can be afforded using water consumption should use method 2 above.

All categorical industries are required to use method 2, the totalizing meter, for their regulated process flows, unless another method has specifically been approved. Furthermore, for non-categorical industries, if no flow data is included with the self-monitoring analysis that is signed and submitted to the Utility, then it will be understood that flow measurement method 3 is being employed.



#### 4. DEFINITIONS

BOD (Biochemical Oxygen Demand)—The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure, five (5) days at 20 degrees centigrade expressed in terms of weight and concentration (mg/L).

CFR—The Code of Federal Regulations.

Composite—A combination of individual samples of water or wastewater taken at selected intervals, either as separate, discrete, samples or collectively in a single vessel, to minimize the effect of the variability of the individually collected samples. Such sample must be taken over the course of a normal operating day, taking into consideration all shifts in a 24-hour period that production may be taking place. This sample may be flow-proportional, or it can be time-proportional, but in either case should be as representative of the normal discharge as can be practicably addressed.

Grab—A sample which is taken from a waste stream on a one-time basis with no regard to the flow in the waste stream and in less than a 15-minute period of time.

pH—The logarithm (base 10) of the reciprocal of the concentration of hydrogen ions usually expressed in terms of standard measurement units.

POTW—Publicly Owned Treatment Works.

TSS (Total Suspended Solids)—The total suspended matter that floats on the surface of, or is suspended in, water, wastewater, or other liquids, and which is removable by laboratory filtration.

TTO—Total Toxic Organics.

SMP—Solvent Management Plan, or, Toxic Organic Management Plan (TOMP).

Other definitions—Refer to Section 1.2 and 1.3 of the City of Searcy Ordinance 96-15 for additional definitions and abbreviations.

A-7/7



COPY

Industrial Inspection Report

1	Inspection Date:	9/20/2006	File Review Date:	9/19/2006
2	Time In:	9:55 AM		
3	Inspector No. 1 Name:	Daniel K. Dawson		
4	Title:	Assistant General Manager		
5	Inspector No. 2 Name:			
6	Title:			

Question & Answer

7	Industry Name:	Eaton Hydraulics		
8	Site Address:	400 E. Lincoln St.		
9		Searcy, AR 72143		
10	Mailing Address:	same		
11				
12	Industry Representative (1):	Matt Sheppard		
13	Title:	Environmental, Health & Safety Manager		
14	Industry Representative (2):	Daniel Martin		
15	Title:	Environmental Tech.		
16	Wastewater Discharge Permit No:	AR0021601-	1349401	
17	East access to permit? y/n	yes		
18	If no explain:			
19				
20	No. of Employees:	407		
21	No. of Shifts/Day:	3	Just 30 or so on 3rd shift	
22	No. of Days/Week	5	Some weekend work	

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Industrial Inspection Report

Industry:

23	Raw materials used ( in general):	<input type="text" value="Gray iron, steel bar stock"/>	
<input type="text"/>			
24	Products & by-products:	<input type="text" value="Hydraulic valves, pump parts and filters"/>	
<input type="text"/>			
25	Number of Process Flows:	<input type="text" value="1"/>	
26	Number of Dilution Flows:		
27	Number of Sanitary Flows:	<input type="text" value="2"/>	
28	Number of Other Flows:		

Sketch basic flow diagram of all connections or obtain copy of facility drawings and make notations of the above connections.

29	Indicate on the sketch, the connections listed in items 25-28 above:	<input type="text" value="x"/>
30	Indicate on the sketch, where sample is taken for permit purposes:	<input type="text" value="x"/>
31	Indicate on the sketch, where categorical sample is taken if applicable:	<input type="text" value="x"/>
32	Indicate where flow monitoring is conducted:	<input type="text" value="x"/>
33	How is flow monitored at the Industry:	<input type="text" value="Flowmeter located at the end of pretreatment process"/>
<input type="text"/>		
34	Is the sample for categorical monitoring taken at the end of the process?	<input type="text" value="yes"/>
	If not, is combined wastream formula being employed?	<input type="text"/>
35	Is the POTW & the Industry (or the Industry's lab) taking the samples at the same place? Y/N	<input type="text" value="yes"/>
	If not, describe reason:	<input type="text"/>
<input type="text"/>		
<input type="text"/>		

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Industrial Inspection Report

Industry: Eaton Hydraulics

36 Does the industry keep records of self-monitoring analyses?

yes

37 Does the industry's records appear to be in order?

yes

If not, explain:


38 Describe the Process(es) in which wastewater is generated:

*Plating overflows, parts washers, batch processing of plating rinse, spent machine coolants, mop water, sanitary waste.*


39 Is the wastewater pretreated prior to discharge to the collection system?

yes

40 Who is directly responsible for operation & maintenance of the pretreatment system?

Name:

*Daniel Martin*

Title:

*Environmental Tech.*

41 Has the industry experienced any problem or difficulty with its pretreatment equipment or process?

no

If yes, explain:


**Industrial Inspection Report**

Industry:

42 What chemicals are used in processing? List Below or obtain MSD sheets:

<i>No changes from previous year's sheets, except one new MSDS for a "drop out" chemical.</i>

43 What chemicals are used in maintenance? List Below or obtain MSD sheets:

<i>No changes.</i>

44 Does the IU have an approved Solvent Management Plan (SMP) or Total Organic Management Plan (TOMP)?

45 Have any new chemicals been added since the SMP's or TOMP's submittal?

If yes, list:


**Hazardous Waste:**

46 Does the IU have a RCRA permit?

47 What is the permit number?

48 Where are the hazardous wastes stored?

49 Name of processing company that removes hazardous wastes from the site?

50 How often are hazardous wastes removed from the site?

Industrial Inspection Report

Industry:

Walk-Through, Inspectors Notes:

51 Did the inspector visit the manufacturing area of the facility?

If no, explain:

52 Briefly describe the manufacturing process:

*Assembly and testing of hydraulic valves*

*and filters for heavy equipment. Includes machining, washing, blackening and/or plating. Some painting.*

53 Have there been any significant changes in the manufacturing process or the apparent volume of production?

If yes, explain:

*Production has been steady.*

54 Did the inspector visit the regulated process (if categorical)?

If no, explain:

55 Briefly describe the regulated process:

*Nickel plating process that includes: soak-clean>*

*rinse>electro-clean>rinse>HCL rinse>city water rinse>city water rinse>nickel bath>hot water rinse> out. There is also one blackening line with similar processes.*

*The IU has changed the plating process to use less chemicals.*

56 Have there been any significant changes in the regulated process or the apparent volume?

If yes, explain:

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**Industrial Inspection Report**

Industry:

**Chemical Storage Area**

57 Did the inspector visit the chemical storage area(s)?   
If no, explain:

58 Is there adequate storage space for bulk chemicals?   
If no, explain:

59 Have chemical storage areas been dyked off from floor drains in order to prevent accidental spills from entering the collection system?

60 Is there a list of procedures to follow in case of an accidental spill posted in a prominent place?

61 Is there visible evidence of leaks in the past?   
If yes, describe:

**Hazardous Waste Storage Area ( If applicable)**

62 Did the inspector visit the hazardous waste storage area?   
If no, explain:

63 Did the hazardous waste storage area appear to be properly built, maintained, and protected from accidental spills?   
If no, explain:



Industrial Inspection Report

Industry:

Pretreatment Area:

64 Did the inspector visit the pretreatment area?

If no, explain:

65 Briefly describe the pretreatment process:

*Normal Treatment: Oil skimmer tank >*

*paper filter & oil skimmer > Ultra-filtration > 6000 gal. holding tank including plating rinse > Memtek*

*filtration > pH adjustment > clarifier > sludge press > pH adjustment > out.*

*Batch Treatment: pH adjustment > sludge press > back to main holding tank > Memtek filtration > pH*

*adjustment > clarifier > sludge press > pH adjustment > out.*

*Lime, caustic soda and acid used for pH adjustment.*

66 Does the industry appear to be performing adequate maintenance on the pretreatment equipment?

If no explain:

67 Is there visible evidence of leaks, bypasses, or overflows in the area?

If yes, describe:

Flow Monitoring & Sampling Area

68 Did the inspector visit the flow monitoring & sampling area?

If no, explain:

69 Did the flow monitoring & sampling equipment appear to be installed and operated properly?

If no, explain:

B-7/11

Industrial Inspection Report

Industry:

70 Did the IU appear to be performing adequate maintenance on flow monitoring & sampling equipment?

If no, explain:

71 Does the flow monitoring equipment appear to be adequate to handle the expected range of flow?

**Analytical Techniques:**

72 Is flow measuring device calibrated a minimum of once per year?

73 Describe Calibration Process:

74 If IU is doing their own flow measurement, are they keeping proper records including date, time, results, and sampler initials?

If no, explain:

75 Is self-monitoring equipment being calibrated and maintained properly?

Briefly describe calibration process:

76 Is the correct type of sample being collected?

77 Is the correct sampling point being utilized?

78 Is IU doing any of their own analysis for the monthly reports (pH, flow etc.)?

If yes, is the IU using the proper methods?

79 If the IU is conducting their own pH analysis are they doing the following?:

Using approved method:

Noting the method number:

Calibrating the pH meter properly:

Keeping proper calibration records:

Industrial Inspection Report

Industry: Eaton Hydraulics

79 (continued)

Noting the date, time, & sampler initials:	n/a
Noting the date, time, & analyst initials:	n/a
Analyzing the sample within 15 minutes:	n/a
Control limits for dup. analyses	n/a
Control charts for dup. analyses	n/a
Eliminating out/control data?	n/a

**Slug Control & TOMP Compliance:**

80 Based on findings during the inspection did the IU appear to be implementing the Slug Control Plan as described in the plan document (if applicable)? n/a

If no, explain:

81 Based on findings during the inspection did the IU appear to be implementing the TOMP as described in the plan document (if applicable)? yes

If no, explain:

82 Does the IU implement any Pollution Prevention Methodologies? yes

If yes, describe: *Reducing soap use in mop water; currently testing other treatment chemicals for removing nickel; still reducing solvent use (about 70% reduction so far). The blackening lines have been combined into 1. Distillation of solvents and coolants enabling reuse.*

Industrial Inspection Report

Industry: *Eaton Hydraulics*

This Sheet Reserved for sketch (if needed):





## INDUSTRIAL USERS SURVEY, UPDATE FORM

1. LEGAL name of industry: EATON HYDRAULICS INC.
2. Mailing address: 400 E. LINCOLN AVE SEARCY, AR 72143
3. Physical address (if different): SAME AS ITEM 2
4. Name and title of local individual who has local signatory authority and is responsible for all local operations:  
Name: CHIEF DAVIDSON  
Title: MANAGER MANUFACTURING
5. Name and title of local individual to whom all correspondence should be directed, if different from above:  
Name: ROGER LEA  
Title: MANAGER, FACILITY MAINTENANCE
6. If your sample collection point has changed recently, on the back of this form, include a brief, accurate description of the location of your company's new sample collection point. Please use exact measurements, making directional references to non-movable objects. Use additional paper, if necessary.
7. Normal hours of production: 24 HOURS/DAY 5<sup>1</sup>/<sub>6</sub> DAYS/week
8. How many employees do you employ, per shift:  
1<sup>st</sup> - 328, 2nd - 53, 3rd - 37

### CERTIFICATION (To be completed by individual named in #4 above)

I certify that I am the individual responsible for local signatory authority at the above identified industry and that the information contained in this survey form is familiar to me and to the best of my knowledge and belief, is true, complete and accurate.

Signed: Chief E. Davidson

Date: 1/24/05

Please return this completed form to Daniel K. Dawson, Searcy Water and Sewer System, P. O. Box 1319, Searcy, AR 72145-1319.

Thank you for your prompt attention to this matter.

C-1/1

✓  
Rec'd del  
01/26/05





Vickers, Incorporated  
400 Lincoln Avenue  
Searcy, Arkansas 72143  
U.S.A.  
Tel. 501/268-5854



January 18, 1999

Mr. Daniel K. Dawson  
Searcy Water and Sewer System  
P. O. Box 1319  
Searcy, AR 72143

**RE: Vickers Toxic Organic Management Plan**

Dear Mr. Dawson:

In compliance with Searcy City Ordinance and Federal regulations 40 CFR Part 433.12, Vickers, Inc. submits the following Solvent Management Plan. The plan has been updated from previous plan.

If you have any questions or additional information is required please let me know.

Sincerely,

Jay Nuckols  
Environmental & Safety Engineer

SEARCY CITY ORDINANCE ENFORCEMENT		
Toxic Organic Management		
DATE	INITIALS	
1-20	[Signature]	

D-1/2

## Solvent Management Plan

### 1.0 Description of Facilities

Vickers Searcy manufactures an extensive range of high pressure control valves to recognized international standards. The valves produced are used to control equipment such as: presses, machine tools and injection molding machines, specialty mobile equipment and components for off-highway, agricultural and marine use. Also produced is a full line of hydraulic filter products for fluid conditioning and hydraulic pump components.

Processes include laser welding, heat treating, plating, grinding, screw machining, multi-spindle drilling and dial index machines for the production of valve and pump components. CNC Machining centers are employed to provide manufacturing flexibility. A complete test facility is dedicated to product reliability. Hydraulic components produced include industrial valve assemblies, mobile valve assemblies, filter assemblies and steering booster assemblies.

Approximately average water usage is 20,400 gpd with a maximum of 36,600 gpd. Wastewater types and current wastewater treatment system are depicted in Attachment 2. Sources of wastewater include non-recyclable coolants, non-recyclable cleaners, plating rinse waters, blackening line wastes, mop waters, decant water waste from oil tanks, soaps and acids.

### 2.0 Toxic Organic Compounds used in Manufacturing Operations

#### 2.1 Acetone

Acetone is used in the Paint & Pack area to clean parts.

#### 2.2 Kermac 300-360 Naphtha, Rule 66

Kermac 300-360 Naphtha, Rule 66 is used throughout the plant in part washers.

#### 2.3 Calgon P3778

Calgon P3778 is used for part washing throughout the plant.

MSDS for above are attached to the plan and are kept at the plant in the nurses first aid office and the Environmental & Safety Engineer office.

(1)

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## SEARCY WATER AND SEWER SYSTEM

300 NORTH ELM STREET

P.O. BOX 1319

SEARCY, ARKANSAS

72145-1319

CLARENCE O. BUCKNER, MANAGER

June 2007

Dear Customer:

Many of us know that fat and grease are bad for us. Bigger waistlines and clogged arteries can be the cost of high fat and grease consumption. Did you also know that fat and grease are bad for the sewer system? Ordinary cooking grease (such as lard, shortening, butter and margarine) has been identified as one of the leading causes of dry weather overflows from the sewer system. In fact, at least one-third of all the overflows last year in the Searcy's sewer system were the result of stoppages from grease. It has been estimated that the average cost to respond to a grease-clogged main sewer line overflow is \$360. As you know, since all our revenue comes from our customers in the form of rates, you, the customer, end up paying for these blockages and their clean-up.

Fat and grease can also clog the sewer service line from your home or business, costing you money and hassle whenever your own sewer line gets clogged. You can help solve this problem by following a simple message: **"Can the Grease."** **"Can the Grease"** is a program adopted by the Searcy Board of Public Utilities to help combat our grease problem. By pouring your used cooking grease into a can, such as a canned vegetable can, and then throwing it away, you will help get rid of fat and grease from ever getting into the sewer to begin with. As a service to you, we are providing the enclosed **"Can the Grease"** reusable plastic lid that you can use to cover your "grease can." The lid will fit a number of different sizes of commonly used cans, and you can store your "grease can" in the freezer until it is full. Then, just throw the can and the grease in the garbage, and reuse the lid on another can. We have also enclosed a brochure entitled, "Fat-Free Sewers." This brochure outlines problems related to grease buildup in sewer systems, and lists some other easy options for disposing of cooking grease.

Thank you for accepting this small token from your wastewater utility and for assisting us in fighting this greasy problem. We hope that you find this reusable plastic lid useful and practical for your needs. If you have any questions, please call us at 268-2481.

Sincerely,

SEARCY WATER AND SEWER SYSTEM



Daniel K. Dawson  
Assistant Manager

E-1/1

