ADEQ

ARKANSAS
Department of Environmental Quality

SEP 9 2013

Jimmy Smith, Pretreatment Coordinator
Searcy Water Utilities
P.O. Box 1319
Searcy, AR 72145

Re: Searcy WWTF (AFIN 73-00055 NPDES #AR0021601) Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Smith:

Please find enclosed the finished report for the audit/assessment conducted August 20th through 22nd, 2013. The report should be made available for review to appropriate industrial officials. Searcy Water Utilities staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

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

If the City has questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us .

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist/Attachments

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)
Jason Bolenbaugh / ADEQ Branch Manager-Field Services (w/o attmt)
Craig Uyeda / ADEQ Branch Manager-Enforcement (w/o attmt)

PRETREATMENT AUDIT

REPORT FOR THE CITY OF

SEARCY, ARKANSAS

NPDES PERMIT #AROO21601

September 9, 2013

PREPARED BY:
RUFUS TORRENCE

WATER DIVISION ENGINEER

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 NORTHSHORE DRIVE

NORTH LITTLE ROCK, ARKANSAS 72218

TABLE OF CONTENTS

LIST OF ATTACHMENTS

A) INTRODUCTION

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

With Pollution Prevention (P2) being integrated into Pretreatment Programs, the Department will make assessments of Cities' P2 projects and programs.

ADEQ (Rufus Torrence, Auditor) performed a pretreatment audit on the Pretreatment Program implemented by the City of Searcy, Arkansas from August 17th to 19th, 2010. Participants included:

Rufus Torrence	ADEQ/Pretreatment Engineer
Dan Dawson	City of Searcy/General Manager
Tim Cleveland	City of Searcy/Assistant General Manager
Jimmy Smith	City of Searcy/Pretreatment Coordinator

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 March 3, 1985. The City submitted subsequent Program modifications. The Department approved and incorporated the modifications into the City's NPDES permit on July 2, 1996 & May 17, 2011. The last modification updated the City's program to comply with recent revisions to 40 CFR 403. These recent revisions were promulgated on October 14, 2005 and are commonly referred to as the "Streamlining Revisions". The Department appreciates the contribution of Dan Dawson's input on these revisions. Mr. Dawson served on the EPA workgroup which developed the revisions.

Searcy's POTW processes include primary clarification, activated sludge, secondary clarification, chlorination and dechlorination. The POTW's average flow of 3.62 MGD consists approximately of 6.7% industrial (0.24 MGD) flow. Currently the City has a total of eleven (11) SIUs. The one categorical industrial user, Eaton Corporation [40 CFR 433] has specific limits determined by EPA and these limits are based on technological treatment standards. The other significant industrial users are subject to general pretreatment standards and local limits only. The SIUs appear to be having no significant impact on the POTW or the receiving stream. The POTW discharges its effluent to the Little Red River, the receiving stream. The POTW's effluent has shown no pattern of toxicity (lethality) to the receiving stream. The City has not reported any lethal or sub-lethal failures in the past five years.

In 2010 the City land applied about 2232 dry tons of biosolids to nearby sites.

The audit/assessment consisted of informal discussions with Searcy's Pretreatment personnel, examination of five (5) industrial user files (Land-of-Frost, Schulze-Burch, Eaton, Cintas & Yarnell), pretreatment records and site visits to six (6) of the permitted SIUs (The Auditor make an extra site visit to the Bryce Company to ensure that none of the printing chemicals contained Molybdenum).

On September 20, 2012 the Molybdenum influent concentration (120 µg/l) exceeded the Maximum Allowable Headworks Concentration (MAHC = 16.7 µg/l reported in 2012 Annual Report) at the POTW (see Attachment G-1/1). The Department updated the MAHC for Molybdenum (MAHC = 60.8 µg/l) based on the 2010 sludge data (see Attachment I-1/1). During the site visits the Auditor confirmed that Eaton has a number of products containing Molybdenum. Eaton agreed to investigate and control the Molybdenum loading to the POTW. The Auditor requested Eaton to abate the source(s) of Molybdenum by switching to products with no Molybdenum.

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.

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

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Searcy Pretreatment Program. The auditor has paraphrased with CFR citations the actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program. A narrative explanation of the finding will follow each citation.

Under **40CFR403.5(c)(1),** *"Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limit."*

The Department has developed MAHCs for all POTWs with an approved pretreatment program. Each POTW is expected to take actions to avoid exceeding each MAHC. The City's 2012 annual report indicated that the actual headworks loading for Molybdenum is exceeding the established MAHC (see Attachment G-1/1). The City must take steps to ensure that the actual loading for Molybdenum does not exceed the established MAHC in the future.

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

1) The Department encourages the City to nominate those SIUs with exemplary Pollution Prevention programs for the annual ADEQ Envy Award. For more details contact ADEQ Public Outreach Division (Katherine Benenati, Chief: 501-682-0821) or visit:

http://www.adeq.state.ar.us/poa/envy_award/envy_award.asp

2) The Department requests that the City correct future annual reports to satisfy the requirements in ADEQ letter dated March 15, 2013 (see Attachment H-1/1). These requirements are:

a. *Please note that the Water Quality Standard/Level for Arsenic is 1596.7µg/l and for Beryllium is 30.5 µg/l.*

b. *The City listed three (3) NOVs on Attachment C. The City must list the Industrial User(s) which received the NOVs on Attachment B.*

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.

4) The City should document Land O'Frost Spill/Slug prevention plans. Land O'Frost currently has a procedure to prevent barrels of chemical from accidental spilling and slug loading the POTW.

5) The Department encourages the City to assist SIUs with BMPs. For example, Land O'Frost can implement a management practice to capture animal blood entering the sewer system. Animal blood has phosphorus and the City may have a phosphorus limit in its next NPDES permit.

6) Include a "Statement of Basis" in all permits that have local limits. The basis should show how the city allocated the MAHL (Maximum Allowable Headworks Loading) and derived the equivalent concentration local limits.

7) The City should become familiar with the TBLL Excel spreadsheet provided by the Department (see Attachment I-1/1). The City may use the spreadsheet to track changes in the MAHCs from quarter to quarter. When a MAHC for a particular pollutant changes by more than 20%, the City should consider updating the MAHC for that pollutant.

8) The Streamlining Rule stresses the importance of using BMPs as local limits. The Department recommends that the City discover the source(s) of the Molybdenum entering the POTW and abate the pollutant at its source. For example, require Eaton to modify the TOMP (which is a BMP for toxic organics only) to include Molybdenum as a pollutant-of-concern. Eaton should substitute all Molybdenum oils and solvents with equivalent Molybdenum free oils and solvents where possible or educate/train employees on the proper use of Molybdenum bearing products.

9) The City may include the RCRA notification in the IU Survey/Application to insure that any future SIU is not overlooked and as a reminder to existing SIUs. The Department recommends that the City use the new EPA Streamlining updated application form (see Attachment J).

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) [Reserved]

* * * * * * * *

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 the Department for review and approval.

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

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: *General Manager*

Telephone: *(501) 268-2481* FAX NUMBER: *(501) 268-9463*

Pretreatment Contact: *Jimmy Smith* Title: *Pretreatment Coordinator*

Address: *(Same)*

Telephone: *(Same)* E-Mail address: *jsmith67@cablelynx.com*

Pretreatment program approval date: *August 5, 1985*

Dates of approval of any substantial modifications: *May 17, 2011*

Month Annual Pretreatment Report Due: *March*

Pretreatment Year Dates: *Feb to Feb* Date(s) of Audit: *August 20 to 22, 2010* (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Rufus Torrence	*Water Div Engineer / ADEQ*	*(501) 682-0626*

Control Authority representative(s):

	NAME	TITLE	PHONE NUMBER
*	*Jimmy Smith*	*Pretreatment Coordinator*	*(501) 268-2481*
	Dan Dawson	*General Manager*	*Same*
	Tim Cleveland	*Ass't General Manager*	*Same*

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*12/2011*	*None Apparent*

YES	NO	
___	✓	Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action:

___	✓	Is the Control Authority currently in SNC or RNC?

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

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	New Permit being issued.	

* 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: 01/31/2013 (New Permit being issued)

Treatment Plant Wastewater Flow: Design- 5 MGD; Actual (Average)- 4.97 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 11 # of CIUs : 1
Industrial Flow (mgd): 0.19 Industrial Flow (%) : 3.9 %

Level of Treatment		Type of Process(es):
Primary	✓	Bar Screen, grit removal, primary clarification
Secondary	✓	Activated Sludge
Tertiary		

Method of Disinfection: Chlorination

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Little Red River/seg 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:
✓[1]	Land Application	2232 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.

[1] The City reported 2035.5 DT/Yr in the 2010 Annual Report but reported 2232 DT/yr on the DMRs in 2010.

List of toxic pollutant limits in NPDES permit: None

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*** *(Permit No. 4605.WR-2)*
Issuance Date: ***11-01-2011***
Expiration Date: ***10-31.2016***

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?) _____

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Biomonitoring		4		
TCLP				
Other: _____				

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

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

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?

___ ✓[1] ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated — Cause(s)

___ _____

[1] ***POTW has not violated it's NPDES Permit but reported Molybdenum influent concentrations above the MAHC in the 2012 Annual Pretreatment Report.***

YES NO

___ ✓ Has the treatment plant sludge violated the TCLP Test?

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

SECTION II: PROGRAM ANALYSIS AND PROFILE

___ ✓ 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
5-17-2011	*Streamlining Rule Update*	*5-17-2011*

2. Modifications in Progress:

Date Requested	Nature of Modification
N/A	*Not Applicabe*

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: *02/15/2011*
Date of most recent Pretreatment Program modification approval: *05/17/2011*

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

YES	NO	
✓	___	Deny or condition pollutant discharges
✓	___	Require compliance with standards
✓	___	Control discharges through permit or similar means
✓	___	Require compliance schedules and IU reports
✓	___	Carry out inspection and monitoring activities
✓	___	Obtain remedies for noncompliance
✓	___	Comply with confidentiality requirements
✓	___	Establish Pollution Prevention
✓	___	Has the city developed and adopted a Pollution Prevention policy?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

✓ ___ Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:

N/A Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

N/A Have provisions been made for the incorporation of Pollution Prevention (P^2) policies by contributing jurisdictions?
List the 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	***N/A***
___	Permit issuance	***N/A***
___	Receipt and review of IU reports	***N/A***
___	Inspection and sampling of IUs	***N/A***
___	Assessment of IUs for P^2 activity	***N/A***
___	Analysis of samples	***N/A***
___	Enforcement	***N/A***
___	Other: _____	***N/A***

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)			

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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^2 activity?

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

___ ✓ If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

✓ Review of newspaper/phone book
✓ Review of plumbing/building permits
✓ Review of water billing records
✓ Permit reapplication requirements
✓ Onsite inspections
✓ Citizen involvement
✓ Other (specify) *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:

Name of IU	Type of Industry	Is the IU Permitted?

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

a. *11* SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. *1* Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. *10* Noncategorical SIUs
d. *19* Other regulated nonsignificant IUs (Describe) *liquid waste haulers**
30 TOTAL of a. + d.

**See Attachment F for list of waste haulers*

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(v)(1)(i-ii)*]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

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

What is the maximum term of the control mechanism? ***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
N/A	

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)]

✓[1] ___ Are all applicable categorical standards and local limits applied to trucked wastes ?

[1]*Same local limits and standards are applicable to trucked wastes.*

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

Pollutant	Limit
N/A	

Describe the discharge point(s) (including security procedures):
Haulers must discharge at the treatment plant (SW Corner of North Lagoon)

___ ✓ 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
N/A	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

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

Feb 2009 Date Notified ***Letter*** Method of Notification

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

___	Federal Register	✓	Journals, Newsletters
✓	Meetings, Training	✓	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[1]
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓	___	___	✓	___	✓	0.543
Cadmium (Cd)	✓	___	___	✓	___	✓	0.578
Chromium-Total	✓	___	___	✓	___	✓	11.927
Copper (Cu)	✓	___	___	✓	___	✓	3.829
Cyanide (CN)	✓	___	___	✓	___	✓	3.289
Lead (Pb)	✓	___	___	✓	___	✓	1.221
Mercury (Hg)	✓	___	___	✓	___	✓	0.006
Molybdenum (Mo) *	✓	___	___	✓	___	✓	0.489
Nickel (Ni)	✓	___	___	✓	___	✓	3.260
Selenium (Se) *	✓	___	___	✓	___	✓	0.652
Silver (Ag)	✓	___	___	✓	___	✓	0.421
Zinc (Zn)	✓	___	___	✓	___	✓	10.208

**** - Molybdenum and Selenium are regulated pollutants in 40 CFR 503 for Land Application.***

[1]*Refer to ADEQ EXCEL TBLLL Worksheet dated 11-06-2003*

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

___ ✓[1] Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

[1]*If the influent concentration of Molybdenum exceeds the MAHC, then the POTW need to identify the source(s).*

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)	_____	✓	_____
Chromium-Total	_____	✓	_____
Copper (Cu)	_____	✓	_____
Cyanide (CN)	_____	_____	_____
Lead (Pb)	_____	✓	_____
Mercury (Hg)	_____	_____	_____
Molybdenum (Mo)	_____	*	_____
Nickel (Ni)	_____	✓	_____
Selenium (Se)	_____	_____	_____
Silver (Ag)	_____	_____	_____
Zinc (Zn)	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**The POTW may implement BMPs to control Molybdenum loading(s).*

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	Cite Location in Approved IPP Documemt
Inspections:			
CIUs	*1*	1/year	*Section 12.2; page 22*
Other SIUs	*1*	1/year	*"* *"*
Sampling:			
CIUs	*2*[1]	1/year	*Section 12.1; page 21*
Other SIUs	*2*[1]	1/year	*"* *"*
Reporting:			
CIUs	*2*	2/year	*Section 12.0; page 19*
Other SIUs	*2*	2/year	*"* *"*
Self-Monitoring:			
CIUs	*12*	2/year	*Section 12.0; page 20*
Other SIUs	*4*	2/year	*"* *"*

[1]Plus two random samples

#	%	
		How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
0	*0*	Not sampled at least once in the past reporting year?
0	*0*	Not inspected at least once in the past Pretreatment reporting year?
0	*0*	Not inspected 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	
✓		If requested?
	✓	To verify IU self-monitoring results?

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

	Analytical Method *	Name of Laboratory
Metals	*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:

1-5 d	Conventionals
< 1 wk	Metals
2 wk	Organics
2 wk	Biomonitoring

___ ✓[1] Is there an established protocol clearly detailing sampling location and procedures?

[1] *CA has only 11 SIUs and the pret coor has sampled them since for the past three years; the auditor suggested a protocol may be helpful for 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.

SECTION II: PROGRAM ANALYSIS AND PROFILE

I. ENFORCEMENT

YES NO

✓[1] ___ Is the Control Authority definition of SNC consistent with EPA's? *[403.8(f)(2)(viii)]*

[1]*Control Authority references "403.8(f)(2)(viii)" in Section 28-34-1 of Ord #2011-9.*

✓ ___ 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

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

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

civil	$ 1000 /day/violation
criminal	$ 1000 /day/violation
administrative	$ 500 /day/violation

✓ Imprisonment
✓ Termination of Service
_____ Other: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: ***The industries consistently comply with the requirements in their permits and the City has not had any major problems in implementing or enforcing the program.***

YES NO

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

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

N/A If no, does the Control Authority conduct all of the monitoring?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	N/A	
✓			Does the pattern of enforcement conform to the ERP?

Complete the following table for SIUs identified as SNC.

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

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

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

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?	_____

SECTION III: INDUSTRIAL USER FILE REVIEW

YES	NO	
✓		Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]
0		How many SIUs are currently on compliance schedules?
	✓	Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

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

	Number	Amount
Civil	0	$
Administrative	0	$
Total	0	$

[WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES	NO	
✓		Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES	NO	
	✓	computerized
✓		hard copy
		OTHER: _____

Are the following files computerized:

YES	NO	
	✓[1]	Control Mechanism Issuance
	✓[1]	Inspection and Sampling schedule
	✓[1]	Monitoring Data
	✓[1]	IU Compliance Status Tracking
		Other: _____

Can IU monitoring data can be retrieved by:

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

[1]CA currently has only 11 SIUs and a computerized system may be of little benefit here; nonetheless, the CA should attempt to go to a "paperless" filing system.

SECTION III: INDUSTRIAL USER FILE REVIEW

YES NO

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

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

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

If yes, please explain: _____

✓ ___ Are all records maintained for at least 3 years?

K. RESOURCES

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

<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:

		Percent of Total Funding
✓	POTW general operating fund	>94%
✓	IU permit fees	< 1%
_____	monitoring charges	_____
✓	industry surcharges	5%
_____	other (describe) _____	_____
		Total 100%

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

SECTION III: INDUSTRIAL USER FILE REVIEW

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	ISCO Samplers
✓	___	Safety equipment	Gas monitors, blowers
✓	___	Vehicles	Truck
✓	___	Analytical equipment	AA Flame

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 continues to implement 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 continues to send letters and distribute 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.

SECTION III: INDUSTRIAL USER FILE REVIEW

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) 136,000 Ave. Process Flow (gpd) <136,000

Industry visited during audit: YES

Comments: Conscientious management force

FILE #: 2 Industry Name Schulze & Burch File/ID No. 3205201
Industry Address 200 Queensway Street 72143
Industry Description Food Processor (Pastry)
Industrial Category N/A 40 CFR N/A SIC Code: 2051

Ave. Total Flow (gpd) 5000 Ave. Process Flow (gpd) <5000

Industry visited during audit: YES

Comments:

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) <5000

Industry visited during audit: YES

Comments: Eaton has number of products with Molybdenum in them

---

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) 6,000 Ave. Process Flow (gpd) ≈<6,000

Industry visited during audit: YES

Comments: Yarnell recently filed bankruptcy and was sold to Schulze & Burch

---

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 N/A SIC Code: 7218
Ave. Total Flow (gpd) 27,000 Ave. Process Flow (gpd) ≈27,000

Industry visited during audit: YES

Comments: Cintas claims not to accept towels saturated with blood, oils or cleaning fluids

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

✓ => Yes X => No N/A => Not Applicable

	LoF	Schulze	Eaton	Yarnell	Cintas
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	✓
2. Is the user subject to categorical pretreatment standards?	X	X	✓	X	X
a. New source or existing source (NS or ES)?	N/A	N/A	1	N/A	N/A
b. Is this IU one identified as having P^2 potential?	2	2	2	2	2

B. Control Mechanism

	LoF	Schulze	Eaton	Yarnell	Cintas
1. Does the file contain an application for a control mechanism?	3	3	4	3	3
If yes, what is the application date?	01-08-11	01-18-11	01-10-11	02-16-11	01-14-11
Does it ask for Pollution Prevention information?	X	X	X	X	X
2. Does the file contain a permit?	✓	✓	✓	✓	✓
Permit Expiration Date?[5]	03-15-14	03-15-14	03-15-14	03-15-14	03-15-14
Is a fact sheet included?	X	X	6	X	X
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	Cover Pg	Cover Pg	Cover Pg	Cover Pg	Cover Pg
b. Expiration date?	Cover Pg	Cover Pg	Cover Pg	Cover Pg	Cover Pg
c. Statement of nontransferability?	§3.L	§3.L	§3.L	§3.L	§3.L
d. Appropriate discharge limitations?	§1	§1	§1	§1	§1
e. Appropriate self-monitoring requirements?	§1	§1	§1	§1	§1
f. Sampling frequency?	§1	§1	§1	§1	§1

Comments: 1. CA is applying existing source regs to Eaton; CA claims Eaton installed the regulated process in 1977. 2. The Auditor questioned each SIU during the site visits and each SIU claimed to have some type of P2 activity. 3. CA uses short IWS form; see attachment A-1/2. 4. The City used the application in Attachment A-1/2 for Eaton's permit. 5. All permits expire on 03-15-2014. 6. Eaton permit shows both local limits and cat limits on ELG sheets which would normally appear on a fact sheet or Statement of Basis.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X => No N/A => Not Applicable

		LoF	Schulze	Eaton	Yarnell	Cintas
g.	Sampling locations?	§1	§1	§1	§1	§1
h.	Requirement for flow monitoring?	§1	§1	§1	§1	§1
i.	Types of samples (grab or composite) for self-monitoring?[7]	§1	§1	§1	§1	§1
j.	Applicable IU reporting requirements?	§3.B	§3.B	§3.B	§3.B	§3.B
k.	Standard conditions for:					
	Right of Entry?	§3.H	§3.H	§3.H	§3.H	§3.H
	Records retention?[8]	§3.M	§3.M	§3.M	§3.M	§3.M
	Civil and Criminal Penalty provisions?	§3.N	§3.N	§3.N	§3.N	§3.N
	Revocation of permit?	§3.N	§3.N	§3.N	§3.N	§3.N
l.	Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	N/A
m.	General/Specific Prohibitions?[9]	X	X	X	X	X
n.	Where technologically and economically achievable, are P^2 aspect included?	X	X	X	X	X

C. Application of Standards

1.	Has the IU been properly categorized?	✓	✓	✓	✓	✓
2.	Were both Categorical Standards and Local Limits properly applied?	10	10	11	10	10
3.	Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	12	12	12	12	12
4.	For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	N/A	N/A	N/A

Comments: 7. Section 4 in each permit allows "Composites" to be either "Timed" or "Flow". 8. Eaton's permit shows the correct cite [40 CFR 403.12(o)]. 9. The City add the "General/Specific" cite and language to Section 3 in each permit shown in Attachment G-1/1. 10. Permit has BOD, TSS and O&G limits only. 11. Eaton's permit has both local limits and categorical limits. 12. The City is trying to implement an "Awards Day" seminar to keep users informed and recognized.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X => No N/A => Not Applicable

	LoF	*Schulze*	*Eaton*	*Yarnell*	*Cintas*
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	*N/A*	*N/A*	*N/A*	*N/A*	*N/A*
7. Is the Control Authority applying a bypass provision to this IU?	*§3.I*	*§3.I*	*§3.I*	*§3.I*	*§3.I*

D. Compliance Monitoring

Sampling

1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	✓
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	✓
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?					
b. Sample date and time?	✓	✓	✓	✓	✓
c. Sample type?	✓	✓	✓	✓	✓
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	✓
e. Sample preservation procedures?	✓	✓	✓	✓	✓
f. Chain-of-custody records?	✓	✓	✓	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	✓

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X => No N/A => Not Applicable

	LoF	Schulze	Eaton	Yarnell	Cintas
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	N/A	N/A	✓	N/A	N/A
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	13	13	13	13	13
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓
Inspections					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	✓
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	✓
b. **Date of last Inspection**	01-28-13	01-14-13	02-14-12	02-14-13	01-30-13
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	Pg 1	Pg 1	Pg 1	Pg 1	Pg 1
b. Inspection date and time?	Pg 1	Pg 1	Pg 1	Pg 1	Pg 1
c. Name and title of IU official contacted?	Pg 1	Pg 1	Pg 1	Pg 1	Pg 1
d. Verification of production rates?	N/A	N/A	N/A	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	Pg 2	Pg 2	14	Pg 2	Pg 2
f. Evaluation of pretreatment facilities?	15	16	Pg 7	N/A	17

Comments: 13. All composites are "Time-Proportional". 14. Inspection form has a space for a sketch but it was left blank; see attachment C-11/12. 4. Land O'Frost has four bay settling chambers to trap grease; this building was recently remodeled. 16. Shulze has a settling tank. 17. Cintas has screening & pH adjustment only.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X => No N/A => Not Applicable

		LoF	Schulze	Eaton	Yarnell	Cintas
g.	Evaluation of self-monitoring equipment and techniques?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
h.	(Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	Pg 9	Pg 9	Pg 9	Pg 9	Pg 9
i.	Manufacturing facilities?	Pg 5	Pg 5	Pg 5	Pg 5	Pg 5
j.	Chemical handling and storage procedures?	Pg 6	Pg 6	Pg 6	Pg 6	Pg 6
k.	Chemical spill prevention areas?	Pg 6	Pg 6	Pg 6	Pg 6	Pg 6
l.	Hazardous waste storage areas and handling procedures?	Pg 5	N/A	Pg 5	N/A	Pg 5
m.	Sampling procedures?	Pg 7	Pg 7	Pg 7	Pg 7	Pg 7
n.	Laboratory procedures?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
o.	Monitoring records?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
p.	Evaluation of Pollution Prevention opportunities?	Pg 9	Pg 9	Pg 9	Pg 9	Pg 9
q.	Control Authority inspector signature?	Pg 11	Pg 11	18	Pg 11	Pg 11

Comments: 18. Page 11 in Eaton's inspection has a space for signature but was not signed; see attachment C-11/11. 19. The City is accepting some self-monitoring reports by fax and the 40 CFR 403.12(l) official does not always sign the report first. 20. Land O'Frost has a spill/slug plan and Eaton has a SPCC plan for surface spills.

SECTION III: INDUSTRIAL USER FILE REVIEW

IU Self-Monitoring and Reporting

✓ => Yes X => No N/A => Not Applicable

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

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement

✓ => Yes X => No N/A => Not Applicable

	LoF	Schulze	Eaton	Yarnell	Cintas
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	N/A	N/A	N/A	N/A	N/A
b. IU self-monitoring results?	N/A	N/A	N/A	N/A	N/A
c. If NS CIU was it compliant within 90 days from commencement of discharge?	N/A	N/A	N/A	N/A	N/A
2. How many reports submitted during the past reporting year indicated discharge violations?	One	One	Zero	One	One
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	✓	✓	N/A	✓	✓
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	✓	✓	N/A	✓	✓
5. Were all nondischarge violations identified in the file?	N/A	N/A	N/A	N/A	N/A
6. Was the IU notified of all violations?	✓	✓	N/A	✓	✓
7. Was follow-up enforcement action taken by the Control Authority?	✓	✓	N/A	✓	✓
8. Did the Control Authority follow its approved ERP?	✓	✓	N/A	✓	✓
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	✓	✓	N/A	✓	✓
10. Is there a compliance schedule? If yes:	N/A	N/A	N/A	N/A	N/A
11. Were there any compliance schedule violations?	N/A	N/A	N/A	N/A	N/A

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement (continued)

✓ => Yes X => No N/A => Not Applicable

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

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: *City of Searcy* NPDES #: *AR0021601*

Date of Audit: *August 20 - 22, 2013* Date entered into QNCR: *08/26/13*

(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.

Compliance Monitoring Information

Compliance Activity Type: *Inspection/Evaluation* Compliance Monitoring Type: *Audit*

Compliance Monitoring Activity Name: Searcy Pretreatment Audit

NPDES Tracking Permit No. AR0021601 Covered by: N/A

Compliance Monitoring Dates

Planned Start Date: 8/20/2013 Actual Start Date: 8/20/2013

Planned End Date: 8/22/2013 Actual End Date: 8/22/2013

Statutes and Sections Information

Programs: *NPDES – Pretreatment*

Compliance Monitoring Action Reasons: *Core Program*

Compliance Monitoring Agency Type: *State*

Compliance Monitoring Agency Name: *ADEQ*

Did EPA Assist? No

Was this a State or Joint Compliance Monitoring Activity? State

Government Contacts

Affliliation Type: State First Name: Rufus Last Name: Torrence

Phone: 501-682-0626 Office: North Little Rock Organization: ADEQ

Codes

SIC Codes: 4952

NAICS Codes:

Compliance Monitoring Information

Number of Days Physically Conduction Activity: 3 Compliance Monitoring Action Outcome: Compliant

Compliance Monitoring Rating Code (SATISFACTORY, MARGINAL, UNSATISFACTORY, UNRATED): Satisfactory

Compliance Monitoring Comments

Molybdenum headworks loading exceeding Max Allowable Headworks Loading

Special Programs

Significant Industrial Users (SIUs)

SIUs:	11
SIUs Without Control Mechanism:	0
SIUs Not Inspected:	0
SIUs Not Sampled:	0
SIUs in SNC with Pretreatment Standards:	0
SIUs in SNC with Reporting Requirements:	0
SIUs in SNC with Pretreatment Schedule:	0
SIUs in SNC Published in Newspaper:	0
SIUs Schedules:	0
Violation Notices Issued to SIUs:	4
Administrative Orders Issued to SIUs:	0
Civil Suits Filed Against SIUs:	0
Criminal Suits Filed Against SIUs:	0

Categorical Industrial Users (CIUs)

CIUs:	1
CIUs in SNC:	0

Penalties

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

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: *8-21-2013 @ 11:00 am*
Industry contacts: *Kevin Caldwell, EHS Manager*
Richard Roark, EHS Technician, Specialist

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	1		
4. Pretreatment equipment maintained and operational?	1		
5. Hazardous waste generated or stored?	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?	3		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments: ***1. The pretreatment equipment consists of pH adjustment, settling and ultrafiltration. 2. Stored in exterior bldg. 3. Facility has no open floor drains in process area.***

Visit conducted by: *Torrence* Date: *8-21-2013*

(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* Date: *8-21-2013*

(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:
CINTAS 101 Beebe Capps Expy 72143 (501)268-8614

Type of industry: *Industrial Laundry*

Date/Time of visit: *8-21-2013 @ 2:00 pm*

Industry contacts: *Heath Fancher, Plant Manager*

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

Additional comments:

1. *Shake screens and pH adjustment only*

Visit conducted by: *Torrence* Date: *8-21-2013*

(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* Date: *8-21-2013*

(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: *8-21-2013 @ 8:00 am*

Industry contacts: *Pat Strickland, Plant Mgr*
Teddy Townsend, EHS Mgr; Michael Wammack, Fac Mnt Mgr.

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

Additional comments:

1. Grease Traps; pH adjustment; floatation and settling

2. Pret Bldg recently renovated

Visit conducted by: *Torrence* Date: *8-21-2013*

(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 log. The logs are cooked, sliced and packaged as sandwich meat.

Visit conducted by: *Torrence* Date: *8-21-2013*

(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:
Schuzle and Burch Biscuit Co 200 Queensway Street
(501)368-0700

Type of industry: *Food Processor (Toaster Pastries)*

Date/Time of visit: *8-21-2013 @ 9:30 am*

Industry contacts: *Dhaval Joshi, Quality Assurance Manager*

	Yes	No	N/A
1. Significant industrial user?	✓	---	---
2. Classified correctly?	✓	---	---
3. Pretreatment equipment or procedures?	1	---	---
4. Pretreatment equipment maintained and operational?	1	---	---
5. Hazardous waste generated or stored?	---	✓	---
6. Proper solid waste disposal?	2	---	---
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. Settling tanks only

2. Solid waste goes to Grisson Farms for animal feed.

Visit conducted by: *Torrence* Date: *8-21-2013*

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: *City of Searcy* NPDES #: *AR0021601*
Industry name: *Schulze & Burch*
Additional comments:

This facility has three process lines which makes toaster pastries & granola bars.

Tanker trucks deliver flour, corn syrup, oats, etc which are stored onsite in "silos". The ingredients are mixed, pressed, fruit filler added or coated in chocolate and baked in a continuous operation.

Visit conducted by: *Torrence* Date: *8-21-2013*

(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)*

Date/Time of visit: *8-21-2013 @ 3:30 pm*

Industry contacts: *Richard Taylor, Quality Assurance Mgr*

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

Additional comments:

Facility receives various dairy items from suppliers to make ice cream.

Visit conducted by: *Torrence* Date: *8-21-2013*

(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:

This facility is capable of generating high-strength BOD and TDS wastewater.

Visit conducted by: *Torrence* Date: *8-21-2013*

(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:
The Bryce Company 450 South Benton 72143 (501)268-2414
501-279-9600

Type of industry: *Printer (Food Packages)*

Date/Time of visit: *8-21-2013 @ 4:30 pm*

Industry contacts: *Teddy Townsend*

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

Additional comments:

This facility prints labels on food packages (such as a potato chip bags).

Visit conducted by: *Torrence* Date: *8-21-2013*

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: *City of Searcy* NPDES #: *AR0021601*

Industry name: *Bryces*

Additional comments:

The Auditor visited this facility to confirm that none of Bryces' printing inks contained Molybdenum.

Visit conducted by: *Torrence* Date: *8-21-2013*

(signature of auditor conducting visit)

INDUSTRIAL USERS SURVEY, UPDATE FORM

1. LEGAL name of industry: Eaton Hydraulics LLC.
2. Mailing address: 400 E. Lincoln Ave
3. Physical address (if different): _____
4. Name and title of **local** individual who has local signatory authority and is responsible for all local operations. This person should have a position within the industry of a Plant Manager, General Manager, Administrator, Operations VP, or other similar position of authority.

   Name: James Gardner

   Title: Plant Mgr
5. Name and title of **local** individual to whom all day-to-day correspondence should be directed, if different from above:

   Name: Kevin Caldwell

   Title: EHS Mgr
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: 3 Shifts. 1ST 7:15-3:30 2ND 3:30-11:30 3RD 11:30-7:30
8. How many employees do you employ, per shift:

   1ST: 222 2ND = 59 3RD = 30
9. Describe the wastewater-generating process(es) that is (are) regulated within your facility by either federal, state or local regulations. Use additional paper, if necessary.

   Plating & Blacking Lines, Parts Washing, Machining and Paint Line operations

   Do you anticipate any changes to your regulated wastewater-generating processes in the next 3 years? If so, please describe. looking into Greener processes
10. Average monthly wastewater flow over the last 12 months: ~~25K~~ 120K gallons

A - 1/2

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: _____

Date: 1/10/11

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

SEARCY WATER AND SEWER SYSTEM
300 NORTH ELM STREET
P.O. BOX 1319
SEARCY, ARKANSAS
72145-1319

DANIEL K. DAWSON, MANAGER

March 4, 2011

CERTIFIED MAIL, Return Receipt Requested: 7009 0820 0002 0667 0379

Kevin Caldwell, EHS Manager
EATON Hydraulics, Inc.
400 E. Lincoln St.
Searcy, AR 72143

Re: Industrial Discharge Permit No. 1349401

Dear Mr. Caldwell:

Enclosed you will find your new industrial wastewater discharge permit, referenced above. This permit becomes effective on March 16, 2011.

If you will please notice on page 4, section 3, "Supplemental Permit Conditions" it states: All analyses and correspondence pertaining to this permit must be mailed or hand delivered. We are no longer allowed to receive electronic mailings of your monthly wastewater analyses.

Please take a few minutes and familiarize yourself again with the Supplemental Conditions of the permit. Even though they have not changed from your last permit, you should be fully aware of these conditions, particularly as they pertain to your monitoring samples being representative of your normal production, and your certification requirements. May we also suggest that you forward a copy of this new permit to your contract laboratory for their information.

If you have any questions regarding your permit, please feel free to call me.

Sincerely,

SEARCY WATER AND SEWER SYSTEM

Jimmy Smith
Pretreatment Inspector

Enclosure

B1- 1/8

SEARCY WATER AND SEWER SYSTEM
300 NORTH ELM STREET
P.O. BOX 1319
SEARCY, ARKANSAS
72145-1319

DANIEL K. DAWSON, MANAGER

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL PRETREATMENT PROGRAM AND THE CITY OF SEARCY PRETREATMENT ORDINANCE NO. 2011-9 AND ITS AMENDMENTS

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: 3/16/2011

This permit and the authorization to discharge shall expire at midnight, 3/15/2014.

Signed this 7 day of March, 2011.

Daniel K. Dawson
Manager, SEARCY BOARD OF PUBLIC UTILITIES

B1-2/8

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 sampling location as follows:

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	9.95
Chromium	REPORT	REPORT
Copper	REPORT	REPORT
Lead	REPORT	11.32
Nickel	REPORT	REPORT

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.

B1- 3/8

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 sampling location as follows:

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 Chromium Copper Lead Nickel Silver Zinc Cyanide TTO	See note (2) below	See note (3) below

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.

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 16th of one calendar month and ending on the 15th 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 16th of March to the 15th 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)} and analyses must include the certification statement in 40 CFR 403.6(a)(2)(ii).

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 2011-9, Section 28-31-6 (A) }

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 2011-9, Section 28-32-1}

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 2011-9, Section 28-38-3 (C) (1) }

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 2011-9, Sections 28-31-11}

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 2011.9, Section 28-30-4}

BL 6/8

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 (o)}

N. Failure to comply with all the requirements of this permit, the National Pretreatment Standards, and Ordinance 2011-9 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 Section 28 of Ordinance 2011-9 and its amendments. {Ordinance 2011-9, Sections 28-29-2 (C), 28-35 through 28-37}

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 facilty'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.

Q. All users must comply with the general and specific prohibitions found in 40 CFR 403.5 (a) & (b).

BF 7/8

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, discreet, 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 28-26-3 and 28-26-4 of the City of Searcy Ordinance 2011-9 for additional definitions and abbreviations.

BI- 8/8

SEARCY WATER AND SEWER SYSTEM
300 NORTH ELM STREET
P.O. BOX 1319
SEARCY, ARKANSAS
72145-1319

DANIEL K. DAWSON, MANAGER

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL PRETREATMENT PROGRAM AND THE CITY OF SEARCY PRETREATMENT ORDINANCE NO. 2011-9 AND ITS AMENDMENTS

Permit No. 3202401

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

Yarnell Ice Cream Company, Inc.

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

205 S. Spring 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: **3/16/2011**

This permit and the authorization to discharge shall expire at midnight, **3/15/2014**.

Signed this 7 day of March, 2011.

Daniel K. Dawson
Manager, SEARCY BOARD OF PUBLIC UTILITIES

B2-1/3

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 sampling location as follows:

MH in Spring St. @ front 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 ----------	
Oil & G.	n/a	100

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
BOD	2/month	Composite
TSS	2/month	Composite
pH .	2/month	Grab
Flow	---------See Note (2) below---------	
Oil & G.	2/month	Grab

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.

B2 - 2/3

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 sampling location as follows:

Not applicable to this industry

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

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE

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.

B2-3/3

SEARCY WATER AND SEWER SYSTEM
300 NORTH ELM STREET
P.O. BOX 1319
SEARCY, ARKANSAS
72145-1319

DANIEL K. DAWSON, MANAGER

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL PRETREATMENT PROGRAM AND THE CITY OF SEARCY PRETREATMENT ORDINANCE NO. 2011-9 AND ITS AMENDMENTS

Permit No. 3205201

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

Schulze & Burch Biscuit Co.

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

200 Queensway
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: **3/16/2011**

This permit and the authorization to discharge shall expire at midnight, **3/15/2014**.

Signed this 7 day of March, 2011.

Daniel K. Dawson
Manager, SEARCY BOARD OF PUBLIC UTILITIES

B3-1/3

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 sampling location as follows:

MH 23' 3" W and 23' 7" S of SE corner of building

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 ----------	
Oil & G.	n/a	100

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
BOD	1/month	Composite
TSS	1/month	Composite
pH .	1/month	Grab
Flow	---------See Note (2) below---------	
Oil & G.	1/month	Grab

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.

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 sampling location as follows:

Not applicable to this industry

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

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE

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.

SEARCY WATER AND SEWER SYSTEM
300 NORTH ELM STREET
P.O. BOX 1319
SEARCY, ARKANSAS
72145-1319

DANIEL K. DAWSON, MANAGER

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL PRETREATMENT PROGRAM AND THE CITY OF SEARCY PRETREATMENT ORDINANCE NO. 2011-9 AND ITS AMENDMENTS

Permit No. 3721301

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

Cintas

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

101 W. Beebe Capps Expwy.
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: **3/16/2011**

This permit and the authorization to discharge shall expire at midnight, **3/15/2014**.

Signed this 7 day of March, 2011.

Daniel K. Dawson
Manager, SEARCY BOARD OF PUBLIC UTILITIES

BA-1/3

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 sampling location as follows:

Cleanout in discharge line by loading dock

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 ----------	
Oil & G.	n/a	100

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
BOD	1/month	Composite
TSS	1/month	Composite
pH .	1/month	Grab
Flow	---------See Note (2) below---------	
Oil & G.	1/month	Grab

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.

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 sampling location as follows:

Not applicable to this industry

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

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE

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.

B4- 3/3

SEARCY WATER AND SEWER SYSTEM
300 NORTH ELM STREET
P.O. BOX 1319
SEARCY, ARKANSAS
72145-1319

DANIEL K. DAWSON, MANAGER

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL PRETREATMENT PROGRAM AND THE CITY OF SEARCY PRETREATMENT ORDINANCE NO. 2011-9 AND ITS AMENDMENTS

Permit No. 3201301

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

Land O' Frost, Inc.

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

911 Hastings Ave.
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: **3/16/2011**

This permit and the authorization to discharge shall expire at midnight,**3/15/2014**.

Signed this 7 day of March, 2011.

Daniel K. Dawson
Manager, SEARCY BOARD OF PUBLIC UTILITIES

B5-1/3

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 sampling location as follows:

MH#3; south-most MH of 3 on Main St.

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 ----------	
Oil & G.	n/a	100

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE
BOD	1/month	Composite
TSS	1/month	Composite
pH .	1/month	Grab
Flow	---------See Note (2) below---------	
Oil & G.	1/month	Grab

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.

B5 - 2/3

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 sampling location as follows:

Not applicable to this industry

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

PARAMETERS	FREQUENCY OF ANALYSIS	SAMPLE TYPE

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.

B5-3/3

Searcy Water Utilities

COPY

June 15, 2012

Kevin Caldwell
Eaton Hydraulics
400 East Lincoln
Searcy, AR 72143

Re: Industrial Pretreatment Inspection
Discharge Permit No. **3721301**

Dear Mr. Caldwell:

Enclosed you will please find a copy of the inspection report from a recent inspection made by our staff at your facility. This is your copy for your records.

We would like to thank you for the time and cooperation of your staff during this annual inspection and for your efforts in helping to protect our water environment. If you have any questions regarding this inspection, please feel free to call me at 268-2481.

Sincerely,

Searcy Water Utilities

Jimmy Smith
Pretreatment Coordinator

Enclosure

C - 1/12

300 North Elm St. • P.O. Box 1319 • Searcy, Arkansas 72145-1319 • Phone (501) 268-2481 • Fax (501) 268-9463

Industrial Inspection Report

6/11/12

1	Inspection Date:	2/14/2012	6/12/12	File Review Date: 2/13/2012
2	Time In:	2:00 PM	1:00 pm.	
3	Inspector No. 1 Name:	Jimmy Smith ✓		
4	Title:	Pretreatment Coordinator ✓		
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):	Daniel Martin ✓	
13	Title:	Lead Environmental Tech.	
14	Industry Representative (2):	Kevin Caldwell	Richard Roarke EHS Tech.
15	Title:	EHS: Manager	
16	Wastewater Discharge Permit No: AR0021601-	1349401 ✓	
17	Easy access to permit?	yes ✓	
18	If no explain:		
19			
20	No. of Employees:	353	- 352
21	No. of Shifts/Day:	3	- 3
22	No. of Days/Week	7	- 7

C-2/12

Industrial Inspection Report Industry: Eaton Hydraulics

23	Raw materials used (in general):	Gray iron, steel bar stock, some stainless steel and brass, and aluminum
24	Products & by-products:	Hydraulic valves and filters
25	Number of Process Flows:	1 — Environmental Flow in heat treat closed.
26	Number of Dilution Flows:	
27	Number of Sanitary Flows:	3 — 2 west side, 1 east side
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:	x
30	Indicate on the sketch, where sample is taken for permit purposes:	x
31	Indicate on the sketch, where categorical sample is taken if applicable:	x
32	Indicate where flow monitoring is conducted:	x
33	How is flow monitored at the Industry:	Flowmeter located at the end of pretreatment process
34	Is the sample for categorical monitoring taken at the end of the process?	yes
	If not, is combined wastream formula being employed?	
35	Is the POTW & the Industry (or the Industry's lab) taking the samples at the same place? Y/N	yes
	If not, describe reason:	

C-3/12

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, spent nickel bath and cold and hot blackening.

The non-contact cooling water from heat treatment is not running now. It is for back up only. (Gonna See that)

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: *Lead Environmental Tech.*

41 Has the industry experienced any problem or difficulty with its pretreatment equipment or process? *no* - Changed Filter last week. Otherwise normal

If yes, explain: operation. Normal maintenance. Better access to POTW outfall.

C- 4/12

Board of Public Utilities

Industrial Inspection Report Industry: *Eaton Hydraulics*

Walk-Through, Inspectors Notes:

51 Did the inspector visit the manufacturing area of the facility? *yes* ✓

If no, explain: *(NO) today due to two previous walk-thrus during the year. Staff has kept me up up to date on the work they have been doing to plug old drains and reduce water usage.*

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? *yes*

If yes, explain: – *Production is Up!* – Busy Day.

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

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>out. There is also a "cold" blackening line and a "hot" blackening line, each with similar processes.*

56 Have there been any significant changes in the regulated process or the apparent volume? *no*

If yes, explain:

C- 6/12

Industrial Inspection Report Industry: *Eaton Hydraulics*

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

MSDS are on file ✓ Doing to Update our MSDS Books. Changes all Have been good for environment.

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

Same as above. ✓

44 Does the IU have an approved Solvent Management Plan (SMP) or Total Organic Management Plan (TOMP)? *yes* I need to review it.

45 Have any new chemicals been added since the SMP's or TOMP's submittal? *no*

If yes, list: Make sure up to date.

Hazardous Waste:

46 Does the IU have a RCRA permit? *yes*

47 What is the permit number? *ARD006355341*

48 Where are the hazardous wastes stored? *Hazardous waste storage building, located outside behind pretreatment area, and in environmental bldg.* No Change

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

Rineco, Benton, AR

50 How often are hazardous wastes removed from the site?

Eaton is now a large quantity generator due to the increase in painting and the painting waste. Removal every 90 Days =

C- 5/12

Industrial Inspection Report Industry: *Eaton Hydraulics*

Chemical Storage Area

57 Did the inspector visit the chemical storage area(s)? ✓ *no*

If no, explain: *No changes since last inspection.*

58 Is there adequate storage space for bulk chemicals? *yes*

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? *yes*

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

61 Is there visible evidence of leaks in the past? *no*

If yes, describe:

Hazardous Waste Storage Area (If applicable)

62 Did the inspector visit the hazardous waste storage area? *no* ✓

If no, explain: *No changes since last inspection*

63 Did the hazardous waste storage area appear to be properly built, maintained, and protected from accidental spills? *yes*

If no, explain:

C-7/12

Industrial Inspection Report Industry: *Eaton Hydraulics*

Pretreatment Area:

64 Did the inspector visit the pretreatment area? *yes*

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 → pH + out.*

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

Batch Treatment: pH adjustment > sludge press > back to main holding tank > Memtek filtration >pH adjustment > ~~sludge press~~ > pH adjustment > ~~out.~~ manually if needed > then out to POTW.

Lime, caustic soda and acid used for pH adjustment.

Pulled Inspection

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

If no explain:

67 Is there visible evidence of leaks, bypasses, or overflows in the area? *no*

If yes, describe:

Flow Monitoring & Sampling Area

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

If no, explain:

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

If no, explain:

C - 8/12

Industrial Inspection Report Industry: *Eaton Hydraulics*

70 Did the IU appear to be performing adequate maintenance on flow monitoring & sampling equipment? *yes*
If no, explain:

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

Analytical Techniques:

72 Is flow measuring device calibrated a minimum of once per year? 12 *yes*

73 Describe Calibration Process: *Manufacturer's specifications.*

74 If IU is doing their own flow measurement, are they keeping proper records including date, time, results, and sampler initials? *yes*
If no, explain:

75 Is self-monitoring equipment being calibrated and maintained properly? *n/a*
Briefly describe calibration process:

76 Is the correct type of sample being collected? *yes*

77 Is the correct sampling point being utilized? *yes*

78 Is IU doing any of their own analysis for the monthly reports (pH,flow etc.)? *no*
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: *n/a*
Noting the method number: *n/a*
Calibrating the pH meter properly: *n/a*
Keeping proper calibration records: *n/a*

C-9/12

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)? *yes*

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; using "super drop-out" for removing nickel; still reducing solvent use; IU is using operator knowledge to get more use out of the plating bath resulting in reduced chemical use; using a dual purpose oil for both cutting and oiling, thus cutting overall usage; recycling computers and electronics, paper and cardboard, have most drains sealed off that were found, and have built a new building for scrap hoppers, thus eliminating water run-off to the storm drains.*

Plastic bottles

C-10/12

Industrial Inspection Report

Industry: *Eaton Hydraulics*

This Sheet Reserved for sketch (if needed):

Industrial Inspection Report

Industry: *Eaton Hydraulics*

Additional Notes & Summary:

No major problems noted during this inspection.

83 Time Out: *3:25 PM*

84 Signature of Inspector No 1: _____

85 Signature of Inspector No 2: _____

C-12/12

TOMP & SPCC

August 20, 2012

To: Mr. Jim Smith
Searcy Water and Sewer System
P. O. Box 1319
Searcy, AR 72143

Dear Mr. Smith:

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

If you have any questions or need additional information please feel free to call.

Sincerely,

Kevin Caldwell
EHS Manager

SEARCY INDUSTRIAL PRETREATMENT
Lab Analysis Routing

ACTIVITY	DATE	INIT.
Received	8/20/12	
Entered		
Surcharged		
Filed		

UNCONTROLLED WHEN PRINTED

D-1/8

Solvent Management Plan

1.0 Description of Facilities

Eaton Hydraulics manufactures high-pressure control valves for industrial applications such applications include: Presses, Machine tools and Injection Molding Machines, Specialty Mobile Equipment and Components for off-highway, Agricultural and Marine use. Eaton also produces is a full line of hydraulic filter products for fluid conditioning and hydraulic pump components.

Our processes include laser welding, heat-treating, plating, hot blacking, cold blackening, grinding, screw machining, multi-spindle drilling and dial index machines and CNC Machining centers. We also have Valve testing machines dedicated to product reliability. The Hydraulic products produced include industrial valve assemblies, mobile valve assemblies, filter assemblies and steering booster assemblies.

Water usage summery

The Approximate average water usage is 6,000 GPD with a maximum of 12,000 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 Rinse Water, Cleaners and Phosphate, Used mop Water, Decant Water from used oil tanks.

2.0 Toxic Organic Compounds used in Manufacturing Operations

2.1 Acetone

Acetone is used throughout the facility to clean parts. Spent Acetone is picked up reused to strip paint from paint hooks or shipped as waste.

2.2 Calumet 300-360 Naphtha,

Calumet 300-360 Naphtha is used throughout the plant to clean oily parts. Spent Naphtha is picked up and taken to the Environmental Building for reclamation.

MSDS for above are attached to the plan and are in our 3 E on line Data Base and in the Environmental office.

3.0 Toxic Organic Management Plan

3.1 Solvent Substitution

Eaton Hydraulics will continue to explore the feasibility of replacing toxic organic containing materials. At the present time, Eaton Hydraulics knows of no alternative solvents and/or paint compounds that could be used without adversely affecting the process and final products.

3.2 Solvent Delivery / Storage Procedures

3.2.1 Solvent Storage

We have up to eight fifty-five gallon drums of solvent stored in the Environmental Building. We have up to (9) five-gallon pails stored in the environmental Building and up to (4) fifty-five gallon drums in the Hazardous waste building. The concrete floor of both building is depressed approximately Thirteen inches below the exterior ground elevation. All leaks or spills from drums would be contained within the building.

3.2.2 Solvent Delivery

Solvents are unloaded from commercial carriers in the Environmental Building. Both Clean and spent solvents are stored in the Hazardous waste Building and in the Environmental Building. Solvent storage areas are recessed and can hold several times the volume of the largest container stored.

3.2.3 Facility Drains

There is one floor drains located in the environmental Building sealed to the floor. The facility drains are not located near solvent washers.

3.3 Spill Response Procedures

Spill prevention and control within the Eaton Hydraulics facility is base on several levels of control. These different levels are:

Prevention: Preventing releases of solvents during filling, transfer and off loading procedures are the first step to eliminating spills.

Control: The next level of defense is to control the release should one occur. Control is comprised of containment systems.

Response: After all practical prevention and control systems have been installed; the next level of defense is spill response. The Eaton Hydraulics facility maintains an Emergency Response Coordinators (Kevin Caldwell, Daniel Martin). The coordinators will determine the severity of the spill and assign the proper plant personnel and or contractors to respond to the spill. Coordinators are trained in response procedures and have the authority to procure necessary resources to properly respond to spills. Response measures will consist of the following elements, listed in order of priority.

1. Stop the Release at the Source: This will be accomplished through whatever means necessary including but not limited to plugging the release point, calving pipe section off, and off loading tank contents.

2. Containing Released Material: This will be accomplished through various means including but not limited to: Constructing Barricades ahead of or within the body of the released material; using absorbent materials and reducing the mobility of the released material.

3. Recovering the Released Material: This will be accomplished after #1 and #2 above is complete. The recovery of released material will be supervised by the Emergency Response Coordinator and recovered using qualified personnel and or contractors. Spills will be recovered by but not limited to the use of absorbent material and pneumatic pumps ect.

3.4 Spill Clean-Up Equipment Stations

Spill clean-up equipment storage areas are located at the shipping dock, ECB, plating, Blackening line, All three mechanical rooms, and the Hazardous waste Building,

3.5 Spent Solvent Disposal Practices

3.5.1 Acetone

Used acetone is taken to the paint line paint hook stripper. What cannot be used there is drummed and deemed waste. Waste is shipped offsite.

3.5.2 Calumet 300-360 Naphtha,

Used Calumet 300-360 naphtha from parts washers is taken to the ECB and recycled in a vacuum distillation unit and reused. Solvent that cannot be recycled is deemed contaminated and shipped offsite as hazardous waste. Still bottoms from the process are. Are drummed and ship as waste.

3.6 Training

All personnel involved in using, handling, and clean-up activities will receive instruction in the proper handling and disposal of solvents, paints, and clean-up materials in order to keep regulated toxic organics out of industrial wastewater. New employees will be trained in these procedures immediately. All personnel working in these activities are familiar with this toxic organic plan and will follow the procedure established in this standard to eliminate regulated organics from entering the wastewater system.

3.7 Inspections and Records

Weekly inspections (Attachment 3) are performed by an Environmental technician to verify procedures and adherence to this plan to insure that TTO does not spill or leak into the plant wastewater treatment system.

The coordinator will review inspection records and take appropriate corrective actions as needed.

4.0 Certification of Plan

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

Plan
Prepared by: Daniel Martin Approved by: Kevin Caldwell

5.0 ATTACHMENTS

Attachment 1 – Weekly Facility Inspection Form (SPCC)
Attachment 2 – ECB Process Flow Schematic

6.0 REVISION HISTORY

Revision Level	Date	Description of Changes	Initial:
A	8/18/2010	Updated Document	DM
B	8/18/2012	Added header & footer, added new document number and made changes to procedure.	RR

D- 6/8

SPCC Plan Revision E Dated: August 13, 2010	Weekly Inspection Form 1

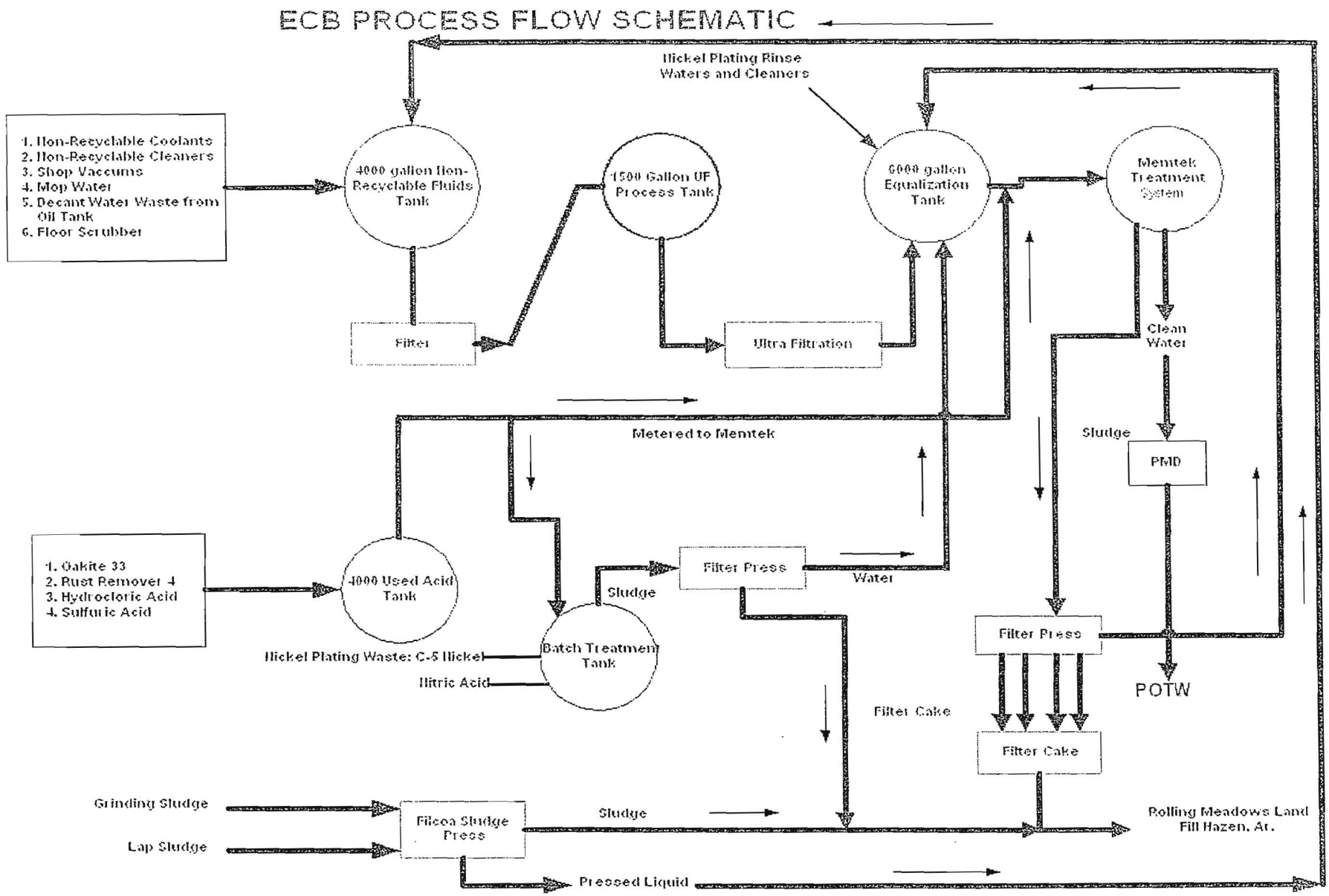
Weekly Facility Inspection

Inspection Points	Pass	Fail
1(A): Outside Perimeter of plant neat and in order, no signs of oil leaks.		
(B): Court Yard area, no signs of oil leaks.		
2: Chemical Drums and Waste Storage in Environmental Control Building		
All containers in good condition (No signs of deterioration, no bulging drums.)		
No signs of leaking drums.		
All materials properly labeled and sealed as appropriate.		
Adequate aisle space		
3: Storage Tanks in Environmental Control Building		
Condition of storage tanks (No signs of deterioration or leaking).		
Signs of leaking (No leaks in valves or piping connected to tanks).		
All tanks properly labeled.		
Adequate aisle		
Condition of secondary containment. (Cracks, breakdown of concrete, etc.)		
4: Plating Line		
All containers in good condition (No signs of deterioration, no bulging drums).		
No signs of leaking drums.		
All materials properly labeled and sealed as appropriate.		
Adequate aisle space		
No signs of leaking tanks, or valves / piping connected to tanks.		
Eye wash stations clear (Not blocked).		
Non-compatible chemicals segregated.		
5: Check AED stations (Refer to Facility Inspection Form 2)		
6: Check Eyewash Stations (Refer to Facility Inspection Form 3)		
7: Cold Black Line Area		
All containers in good condition (No signs of deterioration, no bulging drums).		
No signs of leaking drums.		
All materials properly labeled and sealed as appropriate.		
Adequate aisle space		
No signs of leaking tanks, or valves / piping connected to tanks.		
Eyewash stations clear (Not blocked).		
Non-compatible chemicals segregated.		

Inspectors Name:
Date:

D-7/8

Attachment 2



8/8-1

Arkansas Testing Laboratories
3301 Langley Drive · Searcy, AR 72143 (501) 268-6431 f(501) 268-9314

NPDES Wastewater Monitoring
Water and Wastewater Analysis
Concrete, Asphalt, and Aggregate Testing
Geotechnical Testing
Industrial and Construction Quality Control

Mr. Jimmy Smith
Searcy Water & Sewer Department
P.O. Box 1319
Searcy, AR 72145

Monday, April 29, 2013

Re: Report on Continued Compliance 40CFR403.12 Catagorical Industries

Dear Mr. Smith:

In compliance with Searcy City Ordinance and Federal Regulation 40CFR403.12, Eaton submits the following report on continued compliance.

A laboratory analysis has been performed of the same parameters as included on our DMR with the following result:

pH, Std.	10.17	Silver, ppm	< 0.001
Cadmium, ppm	< 0.002	Zinc, ppm	0.115
Chromium, ppm	0.004	Cyanide, ppm	< 0.01
Copper, ppm	< 0.001		
Lead, ppm	0.006		
Nickel, ppm	0.077		*Data sheet attached*

Those responsible for the maintenance of the Solvent Management Plan have assured me that the plan is still in effect and no discharge of concentrated organic solvents has occurred since the last compliance report was submitted.

The average amount of water used by Eaton Hydrolics since November 2012 has been 6940 gallons per day with a maximum of 8230 gallons per day.

CERTIFICATION

I certify that I am personally familiar with the information submitted in the above report. Based on my inquiry of those individuals responsible for obtaining the information, I believe the information is true, accurate and complete.

Signed: _____
Authorized Agent for Eaton

Signed: _____
Manager for Arkansas Testing Laboratories

SEARCY INDUSTRIAL PRETREATMENT
Lab Analysis Routing

ACTIVITY	DATE	INIT
Received	5/1/13	
Entered	6/7	
Surcharged	6/7	
Filed		

E1-1/1

EATON
Powering Business Worldwide

40 CFR 12(e)
Semi-Annual Report

Mr. Jimmy Smith
Assistant Manager
Searcy Water & Sewer System
P.O. Box 1319
Searcy, AR 72145-1319

RE: Monthly Compliance with
Federal Pretreatment Standards

Dear Mr. Smith:

In compliance with Searcy City ordinance and Federal Regulation 40 CFR 403.12, Eaton Hydraulics, Inc. submits the attached Laboratory Analysis Report and the following statement of certification on continued compliance with Federal Pretreatment Standards.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Kevin Caldwell
EHS Manager

SEARCY INDUSTRIAL PRETREATMENT Lab Analysis Routing		
ACTIVITY	DATE	INIT.
Received	7/18/13	
Entered		
Surcharged		
Filed		

KEVIN CALDWELL
ENVIRONMENTAL HEALTH & SAFETY MANAGER
800 EAST LINCOLN AVE.
SEARCY, AR 72143
OFFICE DIRECT 501-279-2197
CELL 501-580-0030

E2-1/2

Arkansas Testing Laboratories
3301 Langley Drive · Searcy, AR 72143 (501) 268-6431 f(501) 268-9314

NPDES Wastewater Monitoring
Water and Wastewater Analysis
Concrete, Asphalt, and Aggregate Testing
Geotechnical Testing
Industrial and Construction Quality Control

Eaton (Searcy, AR)

Collection Date / Time: Start June 17, 2013 10:04 AM
End June 18, 2013 9:14 AM
Collection Place: Final Discharge Point
Grab Collection: June 17, 2013 10:06 AM KLB

Wastewater Analysis

Parameter	Date / Time Begin	Date / Time End	Results	Unit	Ldg (lbs/dy)	Analyst	% Spike	Rel %	Sample Type	Ref #
Flow	06/17 10:04 AM	06/18 9:14 AM	0.0046	mgd		KLB	NA	NA	Comp	
BOD	06/19 8:00 AM	06/24 9:00 AM	444.8	mg/l	16.9	KLB / KLB	88.8	4.84	Comp	1
TSS	06/19 2:00 PM	NA	10	mg/l	0.4	JDR	NA	7.62	Comp	2
pH	06/17 10:06 AM	NA	9.67	S.U.	NA	KLB	NA	0.21	Grab	3
Oil & Grease	06/18 10:30 AM	NA	9	mg/l	0.3	JDR	93.9	3.97	Grab	4
Cadmium	07/01 3:33 PM	NA	< 0.01	mg/l	0.0	KLB	107.3	0.63	Comp	5
Chromium	07/01 3:33 PM	NA	0.005	mg/l	0.0	KLB	106.5	0.10	Comp	5
Copper	07/01 3:33 PM	NA	< 0.01	mg/l	0.0	KLB	100.1	0.34	Comp	5
Lead	07/01 3:33 PM	NA	< 0.01	mg/l	0.0	KLB	105.0	0.58	Comp	5
Nickel	07/01 3:33 PM	NA	0.041	mg/l	0.0	KLB	103.7	0.52	Comp	5

Quality Assurance: All Parameters include 10% duplication studies by random selection. The following equipment is checked and calibrated daily: pH meter, balance, incubators, water baths, drying oven and sterilizing apparatus. Ammonia Nitrogen and Oil & Grease Analysis include duplication and spike studies at a rate of at least 10%.

Notes: Samples iced at collection. Preserved with H_2SO_4 to pH_2: Oil & Grease, Ammonia, COD

References:

Analysis complies with 40 CFR Part 136:

1. SM 5210 B
2. SM 2540 D
3. SM 9222 D
4. EPA 1664A
5. SM 3111B
6. SM 4500-CN-E

SEARCY INDUSTRIAL PRETREATMENT
Lab Analysis Routing

ACTIVITY	DATE	INIT
Received	7/18/13	
Entered		
Surcharged		
Filed		

Neville Adams, Manager

E2 - 2/2

SEARCY WATER AND SEWER SYSTEM

SAMPLE CHAIN OF CUSTODY RECORD

Nº 330

SAMPLED BY Jimmy Smith SIGNATURE Jimmy Smith

AFFILIATION / TITLE OF PERSON SAMPLING Pretreatment Coordinator

Composite Date / Time START 8/20/12 9:40am. STOP 8/21/12 9:40am.

Grab Date / Time 8/20/12 9:42am.

Facility Sampled Eaton Permit No.

Facility Location 400 E. Lincoln

Sampling Location Tank at end of pretreatment facilities; Inside - Environmental

Remarks

Sample Identification	PO No. / Sample Matrix: GRAB	COMP	WATER	SOIL	NO. OF BOTTLES	ANALYSIS REQUIRED: pH	TSS, BOD	Cd, Cr, Cu, Ni, Pb, Ag, Zn, Cr	Cr
Eff	✓					1			
Eff		✓					2		
Eff.		✓						1	
Eff	✓								1
Container Type						P	P	P	G
Preservative						NO	NO	N	B

Symbol References: G = Glass; P = Plastic; V = VOA vials; T = Sodium Thiosulfate; NO = None; S = Sulfuric Acid pH2; N = Nitric acid pH2; B = NaOH to pH12; Z = Zinc Acetate

Turnaround Time Requested: (Please Circle)
NORMAL OR EXPEDITED IN 5 DAYS

Expedited results requested by:

Fax:

Report Attention to:

Address to: Searcy Water & Sewer P.O. Box 819 Searcy, AR 72145

Relinquished By:	Date / Time	Received By:	Date / Time
Jimmy Smith	8/21/12 10:23am.	Wallace Whitlow	8-21-12 10:23 AM
Jimmy Smith	8/22/12 11:08am.		8/22/12 11:08 AM

Comments

E3- 1/3

Searcy Wastewater Treatment Plant
Industrial Analysis

Sample ID Eaton Chain of Custody # 330

Sample (grab) Date/Time: 8/20/12 / 9:47a.m. Flow Full

Sample (composite) Start date/time 8/20/12 / 9:40am Stop date/time 8/21/12 / 9:40am

BOD/TSS Date/time/temp stored 8-21-12 10:23Am / 3.5 degree C.

date/time analyzed	Parameter	Units	Results	Initial
8/20/12 / 9:43a.m.	Ph	SU	8.9	
8/20/12 / 9:46a.m.	ph dup	SU	8.7	
8-21-12 4:38 pm	TSS	MG/L	30	LA
8-21-12 4:38 pm	TSS dup	MG/L	30	LA
8-26-12 3:35 pm	BOD	MG/L	864 Avg=872	WW/LA
8-26-12 3:35 pm	BOD dup	MG/L	880	WW/LA
	Oil & Grease	MG/L		
	Oil & Grease dup	MG/L		

28.9°C

Reference Std Methods 20th Edition
BOD method # 5210B
TSS method # 2540D* shake sample and measure with graduated cylinder
O&G method # 5520B
Ph method # 4500B

PERMIT # 1349401

ADDRESS 400 E. Lincoln

SEARCY, ARKANSAS 72143

Arkansas Testing Laboratories
3301 Langley Drive · Searcy, AR 72143 (501) 268-6431 f(501) 268-9314

NPDES Wastewater Monitoring
Water and Wastewater Analysis
Concrete, Asphalt, and Aggregate Testing
Geotechnical Testing
Industrial and Construction Quality Control

SEARCY WATER DEPARTMENT
EATON

METAL ANALYSIS

Collection Date / Time: August 20, 2012 9:42 AM
Collection Place: Final Discharge Point J SMITH PO # 330

Parameter	Date / Time Begin	Date / Time End	A	Unit	Analyst	% Spike	Rel %	Sample Type	Ref #
Cadmium	09/10 12:00 PM	NA	< 0.005	mg/l	BET	96.4	2.11	Comp	5
Chromium	09/10 12:15 PM	NA	< 0.05	mg/l	BET	99.1	4.93	Comp	5
Copper	09/10 12:30 PM	NA	0.05	mg/l	BET	97.5	6.90	Comp	5
Lead	09/10 12:45 PM	NA	< 0.05	mg/l	BET	93.9	9.14	Comp	5
Nickel	09/10 1:00 PM	NA	< 0.02	mg/l	BET	100.0	0.00	Comp	5
Silver	09/10 1:15 PM	NA	< 0.01	mg/l	BET	99.3	3.08	Comp	5
Zinc	09/10 1:30 PM	NA	0.060	mg/l	BET	99.6	3.05	Comp	5

Quality Assurance: All Parameters include 10% duplication studies by random selection. The following equipment is checked and calibrated daily: pH meter, balance, incubators, water baths, drying oven and sterilizing apparatus. Ammonia Nitrogen and Oil & Grease Analysis include duplication and spike studies at a rate of at least 10%.

Notes: Samples iced at collection. Preserved with H_2SO_4 to pH_2: Oil & Grease, Ammonia, COD

References:

Analysis complies with 40 CFR Part 136:

5. SM 3111 B

Neville Adams, Manager

E3- 3/3

Liquid Waste Hauler (LWH) Dates 2013

Searcy Industrial Pretreatment Program

Permit No.	Name	Permit Expires	Send Reminder
26	Texas Transco	02/12	01/12
39	Cheryl's Country Kitchen	02/12	01/12
37	Fleetwash	02/21	01/21
27	Rigsby's Septic Tank Cleaning	03/08	02/08
~~05~~	~~Ray Rigsby~~	~~03/10~~	~~02/10~~ Closed Out
~~29~~	A-1 Portable Toilet Systems Inc.	~~03/28~~	~~02/28~~ Sold to Sean Kearns
18	Sims	05/17	04/17
21	Artexoma	06/30	05/30
03	Christopher	06/30	05/30
01	Jimmy Rigsby	07/05	06/05
02	Harlen Rigsby	07/16	06/16
11	Outback	08/12	07/12
38	Tri-State Transport	08/14	07/14
04	J-Mar Express	09/10	08/10
44	A-1 Portable Toilets	09/20	08/20
40	National Fluid Carriers	09/25	08/25
12	Murdock	10/03	09/03
20	Quick Construction	11/03	10/03
28	1st Class Facilities	01/18	12/18
08	Boone's	01/18	12/18
15	Aqua Source	01/20	12/20

F-1/1

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: February 16, **2012TO** February 15, 2013
TREATMENT PLANT: City of Searcy, Board of Public Utilities **NPDES PERMIT #**AR0021601
AVERAGE POTW FLOW: 3.62 MGD **% IU FLOW:** 6.7 %

METALS, CYANIDE and PHENOLS (Total)	MAHC ug/l (2)	INFLUENT DATES SAMPLED (ug/l) Once/quarter				WQ level/ limit ug/l (2)	EFFLUENT DATES SAMPLED (ug/l) Once/quarter				LABORATORY ANALYSIS		
		3-8-2012	6-7-2012	9-20-2012	12-5-2012		3-8-2012	6-7-2012	9-20-2012	12-5-2012	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
Antimony	N/A	0	0	0	0	N/A	0	0	0	0	60	200.8	60
Cadmium	19.7	0	0	0	0	9.5	0	0	0	0	0.5	200.8	0.5
Copper	130.4	12	47	29	27	29.6	7.1	6.2	6.5	6.6	0.5	200.8	0.5
Lead	41.6	2.7	6.8	3.1	3.4	14	0	.59	0	..51	0.5	200.8	0.5
Mercury	0.20	.0082	.066	.09	.055	0.07	.0021	.0024	.0044	.0050	.005	245.7	.0018
Nickel	111	4.6	6.1	8.1	8.9	500	4.8	4.7	4.6	4.8	0.5	200.8	0.5
Selenium	22.2	0	0	0	0	28.8	0	0	0	0	5	200.8	5
Silver	14.3	0	.74	0	0	2.8	0	0	0	0	0.5	200.8	0.5
Zinc	347.7	55	100	120	120	261	47	33	43	45	20	200.7	20
Chromium	406.3	0	0	0	0	1520	0	0	0	0	10	200.8	10
Cyanide	112	0	0	0	0	30	0	0	0	0	10	SM4500-CN C,E	10
Arsenic	18.5	.99	0	.93	.90	N/A	0	0	.51	0	0.5	200.8	0.5
Molybdenum	16.7	0	15	120	0	N/A	0	0	21	0	--	200.8	8
Phenols	N/A	66	56	44	100	N/A	55	17	10	32	5	420.1	5
Beryllium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Thallium	N/A	0	0	0	0	N/A	0	0	0	0	0.5	200.8	0.5
Flow, MGD	N/A					N/A	5.44	2.75	3.01	3.30			
	N/A					N/A							

G-1/1

Peltier, Hannah

From:	Torrence, Rufus
Sent:	Friday, March 15, 2013 4:14 PM
To:	Jimmy Smith (jsmith67@cablelynx.com)
Cc:	Peltier, Hannah
Subject:	AFIN 73-00055 AR0021601 City of Searcy 2011 Annual Report
Attachments:	SRCY 2012 Annual Report.pdf

ADEQ

ARKANSAS
Department of Environmental Quality

March 15, 2013

Jimmy Smith, Pretreatment Inspector
Searcy Water and Sewer System
300 North Elm Street
Searcy, Arkansas 72145-1319

Re: City of Searcy 2012 Pretreatment Annual Report
(Permit No. AR0021601, AFIN 73-00055)

Dear Mr. Smith:

The Department has reviewed the City's 2012 Annual Report and the report has been deemed "complete". Nonetheless, the report did not contain all the required information. Please note that the 2010 and 2011 report had the same deficiencies and were listed in the Department letters dated March 10, 2011 and March 16, 2012. The two deficiencies are relisted below:

"Please note that the Water Quality Standard/Level for Arsenic is 1596.7µg/l and for Beryllium is 30.5 µg/l.

The City listed four (4) NOVs on Attachment C. The City must list the Industrial User(s) which received the

NOVs on Attachment B."

H - 1/2

If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us .

Sincerely,

Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF E
5301 NORTHSHORE DRIVE : NORTH LITTLE ROCK / ARKANSAS 7
www.adeq.st

H - 2/2

Searcy ***Maximum Allowable Headworks Loading***

Pollutant	% Rem***	Water Quality mg/l	Water Quality* lbs/day	Sludge mg/kg	Sludge+ lbs/day	Inhibition** mg/l	Inhibition++ lbs/day	MAHL lbs/day	MAHC mg/l	Domestic lbs/day	Allocation for %SF lbs/day^	MAIL lbs/day	Max Inf Exceeded MAHC	Max Effluent vs WQS(mg/l)
Cadmium Total	67	0.0095	0.8698	85	1.552	1.00	30.19	0.8698	0.02881	0.01	0.65	0.638	No	No
Copper Total	74	0.0296	3.4384	4300	71.067	1.00	30.19	3.4384	0.11389	0.64	2.58	1.938	42.0000	7.6000
Lead Total	61	0.0140	1.0830	840	16.842	1.00	30.19	1.0830	0.03587	0.07	0.81	0.739	No	No
Mercury Total	60	0.00007	0.0052	57	1.162	0.10	3.02	0.0052	0.00017	0.0008	0.0039	0.003	No	No
Nickel Total	22	0.5006	19.3775	420	23.348	1.00	30.19	19.3775	0.64183	0.17	14.53	14.361	10.0000	12.0000
Selenium Total	50	0.0288	1.7396	100	2.446	0.20	6.04	1.740	0.05762	0.14	1.30	1.164	No	No
Silver Total	75	0.0028	0.3437	0	0.000	0.25	7.548	0.3437	0.01139	0.05	0.26	0.210	No	No
Zinc Total	49	0.2609	15.4451	7500	187.196	0.300	9.06	9.0572	0.30000	3.16	6.79	3.631	190.0000	100.0000
Chromium Total	82	1.5253	255.8415	3000	44.744	1.00	30.19	30.1908	1.00000	0.28	22.64	22.361	No	No
Cyanide Total	69	0.0300	2.9180	0	0.000	0.10	3.019	2.9180	0.09665	0.28	2.19	1.907	No	No
Arsenic	45	1.5968	87.6503	75	2.038	0.10	3.02	2.0384	0.06752	0.01	1.53	1.515	No	No
Molybdenum	50	0.0000	0.0000	75	1.835	0.20	6.04	1.8345	0.06076	0.11	1.38	1.263	No	No
Beryllium	50	0.030539	1.8440	0	0.000	0.10	3.0191	1.8440	0.06108	0.01	1.38	1.376	No	No

Dry tons/day of sludge**** 6.12 Saftey Factor 0.25

* lbs/day = mg/l * 8.34 * average flow / (1-%Rem)
** Page 3-44 of EPA 833B87202 Be est @ 0.10 mg/l and Appendix G of EPA 833R04002B
\+ lbs/day = (dry tons/day * 0.002 * critria(mg/kg))/ % Rem; sludge data not available since the last land application occurred in 2005.
++ lbs/day = mg/l * Flow * 8.34
^ lbs/day = (1 - SF) * MAHL
MAIL = Maximum allowable industrial loading = Allocation for % SF - Domestic
*** EPA Default Removal Eff from Page 3-56 EPA 833B87202; except Cu, Ni & Zn from "Rem" Worksheet and Be & Mo est @ 50
****Dry tons/day of sludge from City's 2010 DMR at 2232 Dry Tons per year or 2232/365 = 6.12 DT/day

APPENDIX C

Sample Permit Application Form

Disclaimer

The U.S. Environmental Protection Agency (EPA), Office of Wastewater Management, Water Permits Division has prepared this sample permit application as a guide for Control Authorities in developing a permit application form. The Control Authority is not required to use this permit application form and may develop either its own form or choose to modify the sample form to reflect specific conditions at the publicly owned treatment works (POTW) and requirements of state and local law. For the Control Authority choosing to use a modified version of the sample application, the EPA sample permit application provides, as an aid to the Control Authority, blank spaces or brackets throughout the application. These identify areas in which additions and changes to the sample application might be needed to address the circumstances at a POTW. The sample has additional bracketed notes that further explain issues the Control Authority might wish to consider when developing its permit application form.

APPENDIX C.
SAMPLE PERMIT APPLICATION FORM

Note: Please read all attached instructions prior to completing this application.

SECTION A – GENERAL INFORMATION

1.	Facility Name:		
	a. Operator Name:		
	b. Is the operator identified in 1.a., the owner of the facility?	Yes	No
	If no, provide the name and address of the operator and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.		
2.	Facility Address: Street:		
	City:	State:	Zip:
3.	Business Mailing Address: Street or P.O. Box:		
	City:	State:	Zip:
4.	Designated signatory authority of the facility: [Attach similar information for each authorized representative]		
	Name:		
	Title:		
	Address:		
	City:	State:	Zip:
	Phone #		
5.	Designated facility contact:		
	Name:		
	Title:		
	Phone #		
6.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** Do you wish to be considered for regulation under a general permit, if the Control Authority considers it to be appropriate? If so, you must file a request for coverage under a general control mechanism. **[POTW's should include list of available general control mechanisms]**	Yes	No

J-3/32

SECTION B – BUSINESS ACTIVITY

1. If your facility employs or will be employing processes in any of the industrial categories or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), place a check beside the category of business activity (check all that apply).

	Industrial Categories
☐	Aluminum Forming
☐	Asbestos Manufacturing
☐	Battery Manufacturing
☐	Can Making
☐	Canned and Preserved Fruit and Vegetable Processing
☐	Canned and Preserved Seafood
☐	Carbon Black Manufacturing
☐	Cement Manufacturing
☐	Centralized Waste Treatment
☐	Coal Mining
☐	Coil Coating
☐	Concentrated Animal Feeding Operation and Feedlots
☐	Concentration Aquatic Animal Production
☐	Copper Forming
☐	Dairy Product Processing or Manufacturing
☐	Electric and Electronic Components Manufacturing
☐	Electroplating
☐	Explosives Manufacturing
☐	Fertilizer Manufacturing
☐	Ferroalloy Manufacturing
☐	Foundries (Metal Molding and Casting)
☐	Glass Manufacturing
☐	Grain Mills
☐	Gum and Wood Chemicals Manufacturing
☐	Hospital
☐	Ink Formulation
☐	Inorganic Chemicals
☐	Iron and Steel
☐	Landfill
☐	Leather Tanning and Finishing
☐	Meat and Poultry Products
☐	Metal Finishing
☐	Metal Products and Machinery
☐	Mineral Mining and Processing
☐	Nonferrous Metals Forming
☐	Nonferrous Metals Manufacturing
☐	Oil and Gas Extraction
☐	Ore Mining
☐	Organic Chemicals Manufacturing
☐	Paint and Ink Formulating

J- 4/32

- ☐ Paving and Roofing Manufacturing
- ☐ Pesticides Chemical Manufacturing, Formulating, and/or Packaging
- ☐ Petroleum Refining
- ☐ Pharmaceutical Manufacturing
- ☐ Phosphate Manufacturing
- ☐ Photographic Processing
- ☐ Plastic and Synthetic Materials Manufacturing
- ☐ Porcelain Enameling
- ☐ Printed Circuit Board Manufacturing
- ☐ Pulp, Paper, and Fiberboard Manufacturing
- ☐ Rubber Manufacturing
- ☐ Soap and Detergent Manufacturing
- ☐ Steam Electric Power Generating
- ☐ Sugar Processing
- ☐ Textile Mills
- ☐ Timber Products
- ☐ Transportation Equipment Cleaning
- ☐ Waste Combustors
- ☐ Other (Describe)

2. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

3. Indicate applicable North American Industry Classification System (NAICS) for all processes:

a.	
b.	
c.	
d.	
e.	

4. Production Rate

Product	Past Calendar Year Amounts per Day (Daily Units)		Estimate This Calendar Year Amounts Per Day (Daily Units)	
	Average	Maximum	Average	Maximum

5. For production-based categorical IUs only:

What is the facility's long-term average categorical production rate for the past 5 years?

J-5/32

SECTION C – WATER SUPPLY

1.	Water Sources: (Check as many as are applicable.)			
		Private Well		
		Surface Water		
		Municipal Water Utility (Specify City):		
		Other (Specify):		
2.	Name (as listed on the water bill):			
	Street:			
	City:		State:	Zip:
3.	Water service account number:			
4.	List average water usage on premises: [new facilities may estimate]			
		Type	Average Water Usage (GPD)	Indicate Estimated (E) or Measured (M)
	a.	Contact cooling water		
	b.	Non-contact cooling water		
	c.	Boiler feeding		
	d.	Process		
	e.	Sanitary		
	f.	Air pollution control		
	g.	Contained in product		
	h.	Plant and equipment washdown		
	i.	Irrigation and lawn watering		
	j.	Other		
	k.	Total of a through j		

J-6/32

SECTION D – SEWER INFORMATION

1. a. For an existing business:
Is the building presently connected to the public sanitary sewer system?

Yes	Sanitary sewer account number—		
No	Have you applied for a sanitary sewer hookup?	Yes	No

b. For a new business:

(i).	Will you be occupying an existing vacant building (such as in an industrial park)?	Yes	No
(ii).	Have you applied for a building permit if a new facility will be constructed?	Yes	No
(iii).	Will you be connected to the public sanitary sewer system?	Yes	No

2. List size, descriptive location, and flow of each discharge pipe or discharge point which connects to the City's sewer system. (If more than three, attach additional information on another sheet.)

Descriptive Location of Sewer Connection or Discharge Point	Average Flow (GPD)

J-7/32

SECTION E – WASTEWATER DISCHARGE INFORMATION

1.	Does (or will) this facility discharge any wastewater other than from restrooms to the City sewer?						
	Yes	If the answer to this question is "yes," complete the remainder of the application.					
	No	If the answer to this question is "no," skip to Section I.					
2.	Provide the following information on wastewater flow rate. [New facilities may estimate.]						
	a. Hours/day discharged (e.g., 8 hours/day)						
	M	T	W	TH	F	SAT	SUN
	b. Hours of discharge (e.g., 9 a.m. to 5 p.m.)						
	M	T	W	TH	F	SAT	SUN
	c. Peak hourly flow rate	(GPD)					
	d. Maximum daily flow rate	(GPD)					
	e. Annual daily average	(GPD)					
3.	If batch discharge occurs or will occur, indicate: [New facilities may estimate.]						
	a. Number of batch discharges	(per day)					
	b. Average discharge per batch	(GPD)					
	c. Time of batch discharges	(days of week)	(hours of day)				
	d. Flow rate	(gallons per minute)					
	e. Percent of total discharge						

J-8/32

4.	Schematic Flow Diagram – For each major activity in which wastewater is or will be generated, draw a diagram of the **flow of materials, products, water, and wastewater** from the start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum daily volume of each wastestream [new facilities may estimate]. If estimates are used for flow data this **must** be indicated. **Number each unit process** having wastewater discharges to the community sewer. Use these numbers when showing this unit processes in the building layout in Section H.

J - 9/32

5. List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each plant process. Include the reference number from the process schematic that corresponds to each process. [New faculties should provide estimates for each discharge].

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

6. List the average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both) for each of nonprocess wastewater flows (i.e., cooling tower blowdown, boiler blowdown)

No.	Nonprocess Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (bath, continuous, none)

7. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow equipment at this facility?

		Yes	No	N/A
Current	Flow Metering			
	Sampling Equipment			
Planned	Flow Metering			
	Sampling Equipment			

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

8. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Consider production processes as well as air or water pollution treatment processes that may affect the discharge.

	Yes
	No, (skip to Question 10)

J-16/32

9.	Briefly describe these changes and their effects on the wastewater volume and characteristics: (attach additional sheets if needed).		
10.	Are any recycling or reclamation system in use or planned? ☐ Yes ☐ No (skip to Question 12)		
11.	Briefly describe recovery process, substance recovered, percent recovered, and the concentration in the spent solution. Submit a flow diagram for each process (attach additional sheets if needed):		
12.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** As allowed at 40 CFR 403.6(c)(5) when the limits in a categorical Pretreatment Standard are expressed only in terms of pollutant concentration, an Industrial User may request that the Control Authority convert the limits to equivalent mass limits. Do you anticipate that you will make this request?	Yes	No
13.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** As allowed at 40 CFR 403.6(c)(6), an Industrial User subject to the mass limits of categorical Pretreatment Standards to 40 CFR Parts 414, 419, and/or 455 may request that the Control Authority convert the mass limits to equivalent concentration limits. Do you anticipate that you will make this request?	Yes	No

J - 11/32

SECTION F – CHARACTERISTICS OF DISCHARGE

All current industrial users are required to submit monitoring data on all pollutants that are regulated specific to each process. Use the tables provided in this section to report the analytical results. **Do not leave blanks.** For all other (nonregulated) pollutants, indicate whether the pollutant is known to be present (P), suspected to be present (S), or known not to be present (O), by placing the appropriate letter in the column for average reported values. Indicate on either the top of each table, or on a separate sheet, if necessary, the sample location and type of analysis used. Be sure methods conform to 40 CFR Part 136; if they do not, indicate what method was used.

New dischargers should use the table to indicate what pollutants will be present or are suspected to be present in proposed wastestreams by placing a P (expected to be present), S (may be present), or O (will not be present) under the average reported values.

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Acenaphthene								
Acrolein								
Acrylonitrile								
Benzene								
Benzidine								
Carbon Tetrachloride								
Chlorobenzene								
1,2,4-Trichlorobenzene								
Hexachlorobenzene								
1,2-Dichloroethane								
1,1,1-Trichloroethane								
1,1,2,2,-Tetrachloroethane								
Chloroethane								
Bis(2-Chloroethyl)ether								
17 Bis (chloro methyl) ether								
2-Chloroethyl vinyl Ether								
2-Chloronaphthalene								
2,4,6-Trichlorophenol								
Parachlorometa cresol								
Chloroform								
2-Chlorophenol								
1,2-Dichlorobenzene								
1,3-Dichlorobenzene								
1,4-Dichlorobenzene								
3,3'-Dichlorobenzidine								
1,1-Dichloroethylene								
1,2-Trans-Dichloroethylene								
2,4-Dichlorophenol								
1,2-Dichloropropane								
1,2-Dichloropropylene								
1,3-Dichloropropylene								
2,4-Dimethylphenol								
2,4-Dinitrotoluene								
2,6-Dinitrotoluene								
1,2-Diphenylhydrazine								
Ethylbenzene								
Fluoranthene								

J - 12/32

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
4-Chlorophenyl Phenyl Ether								
4-Bromophenyl Phenyl Ether								
Bis(2-Chloroethyl)ether								
Bis(2-chloroethoxy)methane								
Methylene Chloride								
Methyl Chloride								
Bromoform								
Dichlorobromomethane								
Chlorodibromomethane								
Hexachlorobutadiene								
Hexachlorocyclopentadiene								
Isophorone								
Naphthalene								
Nitrobenzene								
Nitrophenol								
2-Nitrophenol								
4-Nitrophenol								
2,4-Dinitrophenol								
4,6-Dinitro-O-Cresol								
N-Nitrosodimethylamine								
N-Nitrosodiphenylamine								
N-Nitrosodi-N-Propylamine								
Pentachlorophenol								
Phenol								
Bis(2-ethylyhexyl)phthalate								
Butylbenzyl Phthalate								
Di-N-Butyl Phthalate								
Di-N-Octyl Phthalate								
Diethyl Phthalate								
Dimethyl Phthalate								
Benzo(a)anthracene								
Benzo(a)pyrene								
3,4-Benzofluoranthene								
Benzo(k)fluoranthene								
Chrysene								
Acenaphthylene								
Anthracene								
Benzo(ghi)perylene								
Fluorene								
Phenanthrene								
Dibenzo(a,h)anthracene								
Indeno(1,2,3-cd)pyrene								
Pyrene								
Tetrachloroethylene								
Toluene								
Trichloroethylene								
Vinyl Chloride								
Aldrin								
Dieldrin								
Chlordane								
4,4'-DDT								
4,4'-DDE								

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
4,4'-DDD								
Alpha-Endosulfan								
Beta-Endosulfan								
Endosulfan Sulfate								
Endrin								
Endrin Aldehyde								
Heptachlor								
Heptachlor Epoxide								
Alpha-BHC								
Beta-BHC								
Gamma-BHC								
Delta-BHC								
PCB-1242								
PCB-1254								
PCB-1221								
PCB-1232								
PCB-1248								
PCB-1260								
PCB-1016								
Toxaphene								
(TCDD)								
Asbestos								
Acidity								
Alkalinity								
Bacteria								
BOD_3								
Chloride								
Chlorine								
Fluoride								
Hardness								
Magnesium								
NH_3-N								
Oil and Grease								
TSS								
TOC								
Kjeldahl N								
Nitrate N								
Nitrite N								
Organic N								
Orthophosphate P								
Phosphorous								
Sodium								
Specific Conductivity								
Sulfate (SO_4)								
Sulfide (S)								
Sulfite (SO_3)								
Antimony								
Arsenic								
Barium								
Beryllium								
Cadmium								
Chromium								

J-14/32

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Copper								
Cyanide								
Lead								
Mercury								
Nickel								
Selenium								
Silver								
Thallium								
Zinc								
Any additional pollutants regulated by state or local laws:								

[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.] Do you anticipate requesting a monitoring waiver for regulated pollutants which you believe to not be present in your process wastestream(s)?	Yes	No
[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.] In order to request a monitoring waiver for pollutants not present, you must provide data from at least one sampling of your facility's wastewater prior to any treatment present at your facility that is representative of all wastewater from all processes. The request of a monitoring waiver must be signed in accordance with 40 CFR 403.12(l), and include the certification statement in 40 CFR 403.6(a)(2)(ii). Do you wish to make this request?	Yes	No

J-15/32

SECTION G - TREATMENT

1.	Is any form of wastewater treatment (see list below) practiced at this facility?	
	☐	Yes
	☐	No
2.	Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the next three years?	
	☐	Yes, describe:
	☐	No
3.	Treatment devices or processes used or proposed for treating wastewater or sludge (check as many as appropriate).	
	☐	Air flotation
	☐	Centrifuge
	☐	Chemical precipitation
	☐	Chlorination
	☐	Cyclone
	☐	Filtration
	☐	Flow equalization
	☐	Grease or oil separation, type:
	☐	Grease trap
	☐	Grinding filter
	☐	Grit removal
	☐	Ion exchange
	☐	Neutralization, pH correction
	☐	Ozonation
	☐	Reverse osmosis
	☐	Screen
	☐	Sedimentation
	☐	Septic tank
	☐	Solvent separation
	☐	Spill protection
	☐	Sump
	☐	Rainwater diversion or storage
	☐	Biological treatment, type:
	☐	Other chemical treatment, type:
	☐	Other physical treatment, type:
	☐	Other, type:
4.	Is process wastewater mixed with nonprocess wastewater prior to the sampling point?	
	☐	Yes, describe:
	☐	No

J-16/32

4.	Description Describe the pollutant loadings, flow rates, design capacity, physical size, and operating procedures of each treatment facility checked above.			
5.	Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by-product disposal method, waste and by-product volumes, and design and operating conditions.			
6.	Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.			
7.	Do you have a treatment operator?		Yes	No
	(If Yes)	Name:		
		Title:		
		Phone:		
		Full time (specify hours):		
		Part time (specify hours):		
8.	Do you have a manual on the correct operation of your treatment equipment?		Yes	No
9.	Do you have written maintenance schedule for your treatment equipment?		Yes	No

J-17/32

SECTION H – FACILITY OPERATIONAL CHARACTERISTICS

1. Shift Information

		Mon	Tues	Wed	Thur	Fri	Sat	Sun
Work days								
Shifts per work day								
Employees per shift	1st							
	2nd							
	3rd							
Shift start and end times	1st							
	2nd							
	3rd							

2. Indicate whether the business activity is:

☐ Continuous through the year, or

☐ Seasonal (circle the months of the year during which the business occurs):

J	F	M	A	M	J	J	A	S	O	N	D

Comments:

3. Indicate whether the facility discharge is:

☐ Continuous through the year, or

☐ Seasonal (circle the months of the year during which the business occurs):

J	F	M	A	M	J	J	A	S	O	N	D

Comments:

4. Does operation shut down for vacation, maintenance, or other reasons?

☐ Yes, indicate reasons and period when shutdown occurs

☐ No

5. List types and amounts (mass or volume per day) of raw materials used or planned for use (attach list if needed):

J - 18/32

6. List types and quantity of chemicals used or planned for use (attach list if needed). Include copies of Material Safety Data Sheets (if available) for all chemicals identified.

Chemical	Quantity

7. Building Layout -- Draw to scale the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), public sewers, and each facility sewer line connected to the public sewers. **Number each sewer** and show existing and proposed sampling locations.

A blueprint or drawing of the facilities showing the above items may be attached in lieu of submitting a drawing on this sheet.

J-19/32

SECTION I – SPILL PREVENTION

1.	Do you have chemical storage containers, bins, or ponds at your facility?	Yes	No
	If yes, please give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to a sewer or storm drain. Indicate if buried metal containers have cathodic protection.		
2.	Do you have floor drains in your manufacturing or chemical storage area(s)?	Yes	No
	If yes where do they discharge to?		
3.	If you have chemical storage containers, bins, or ponds in manufacturing area, could an accidental spill lead to a discharge to (check all that apply):		
	☐ an onsite disposal system		
	☐ public sanitary sewer system (e.g., through a floor drain)		
	☐ storm drain		
	☐ to ground		
	☐ other, specify:		
	☐ not applicable, no possible discharge to any of the above routes		
4.	Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or slug discharges from entering the Control Authority's collection systems?		
	☐ Yes – **[Please enclose a copy with the application.]**		
	☐ No		
	☐ N/A, not applicable since there are no floor drains and/or the facility discharge(s) only domestic wastes.		
5.	Please describe below any previous spill events and remedial measures taken to prevent their reoccurrence.		

J-20/32

SECTION J – BEST MANAGEMENT PRACTICES

1.	Describe the types of best management practices (BMPs) you employ to prevent pollutants from entering a facility's wastestream or from reaching a discharge point. BMPs are management and operational procedures such as schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the general and specific prohibitions listed in 40 CFR 403.5(a)(1) and (b). BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.		
2.	Do you have the potential for a slug discharge to the sewer system? A slug discharge is any discharge of a non-routine episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause interference or pass through, or in any other way violate the POTW's regulations, local limits or permit conditions [40 CFR 403.8(f)(2)(v).	Yes	No
	Please describe the type of the potential slug discharge, including quality and content.		
	Please describe current mechanisms for prevention of slug discharges.		
	Please describe where and how raw materials are stored.		

J - 21/32

SECTION K – NON-DISCHARGED WASTES

1. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?

☐ Yes, please describe below

☐ No, skip the remainder of Section J

Waste Generated	Quantity (per year)	Disposal Method

2. Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site.

3. If any of your wastes are sent to an off-site centralized waste treatment facility, identify the waste and the facility.

4. If an outside firm removes any of the above checked wastes, state the name(s) and address(es) of all waste haulers:

a. _____

_____

_____

Permit No. (if applicable): _____

b. _____

_____

_____

Permit No. (if applicable): _____

5. Have you been issued any Federal, State, or local environmental permits?

☐ Yes

☐ No

If yes, please list the permit(s):

6. Describe where and how waste liquids and sludges are stored.

SECTION L – AUTHORIZED SIGNATURES

Compliance certification:

1. Are all applicable Federal, State, or local pretreatment standards and requirements being met on a consistent basis?

	Yes
	No
	Not yet discharging

2. If **No**:

a.	What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.
b.	Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note +that if the Control Authority issues a permit to the applicant, it may establish a schedule for compliance different from the one submitted by the facility.

Milestone Activity	Completion Date

J-23/32

Authorized Representative Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name(s) Title

Signature Date Phone

J - 24/32

INSTRUCTIONS TO FILL OUT WASTEWATER DISCHARGE PERMIT APPLICATION

The permit application must be completed through question E.1. If you answer "no" to question E.1., you may skip to Section I. Otherwise, if a question is not applicable, indicate so on the form. Instructions to some questions on the permit application are given below.

SECTION A – INSTRUCTIONS (GENERAL INFORMATION)

1. Enter the facility's official or legal name. Do not use a colloquial name.

    a. Operator Name: Give the name, as it is legally referred to, of the person, firm, public organization, or any other entity which operates the facility described in this application. This may or may not be the same name as the facility.

    b. Indicate whether the entity which operates the facility also owns it by marking the appropriate box:

        (i) If the response is "No," clearly indicate the operator's name and address and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.

2. Provide the physical location of the facility that is applying for a discharge permit.

3. Provide the mailing address where correspondence from the Control Authority may be sent.

4. Provide all the names of the authorized signatories for this facility for the purposes of signing all reports. The designated signatory is defined as:

    a. A responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

        (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or

        (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

    b. A general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

    c. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.

J-25/32

d. A duly authorized representative of the individual designated in paragraph (a), (b), or (c) of this section if:

(i) the authorization is made in writing by the individual described in paragraph (a), (b), or (c);

(ii) the authorization specifies either an individual or position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

(iii) the written authorization is submitted to the City.

e. If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the City prior to or together with any reports to be signed by an authorized representative.

5. Provide the name of a person who is thoroughly familiar with the facts reported on this form and who can be contacted by the Control Authority (e.g., the plant manager).

6. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

Indicate if the facility would like to be considered for regulation under a general permit.

SECTION B – INSTRUCTIONS (BUSINESS OPERATIONS)

1. Check off all operations that occur or will occur at your facility. If you have any questions regarding how to categorize your business activity, contact the Control Authority for technical guidance.

2. Provide a brief narrative description of all operations at this facility.

3. For all processes found on the premises, indicate the NAICS (North America Industry Classification System) code which replaces the Standard Industrial Classification (SIC) system. To determine the NAICS code for a facility see *North American Industry Classification System--United States, 2002* which includes definitions for each industry, tables showing correspondence between 2002 NAICS and 1997 NAICS for codes that changed, and a comprehensive index--features also available on this web site. To order the 1400-page *2002 Manual*, in print, call NTIS at (800) 553-6847 or (703) 605-6000, or check the NTIS web site. The 1250-page *1997 Manual*, showing correspondence between 1997 NAICS and 1987 SIC, is also available. The 2002 and 1997 versions of NAICS are available on CD-ROMs, which can be ordered at NTIS. See http://www.census.gov/epcd/www/naics.html which lists NAICS codes and definitions for each industry.

4. List the types of products, giving the common or brand name and the proper or scientific name. Enter from your records the average and maximum amounts produced daily for each operation for the previous calendar year, and the estimated total daily production for this calendar year. Be sure to specify the daily units of production. Attach additional pages as necessary.

5. Provide the facility's long-term average production value for the past 5 years.

J-26/32

SECTION C – INSTRUCTION (WATER SUPPLY)

4. Provide daily average water usage within the facility. Contact cooling water is cooling water that during the process comes into contact with process materials, thereby becoming contaminated. Non-contact cooling water does not come into contact with process materials. Sanitary water includes only water used in restrooms. Plant and equipment washdown includes floor washdown. If sanitary flow is not metered, provide an estimate based on 15 gallons per day (gpd) for each employee.

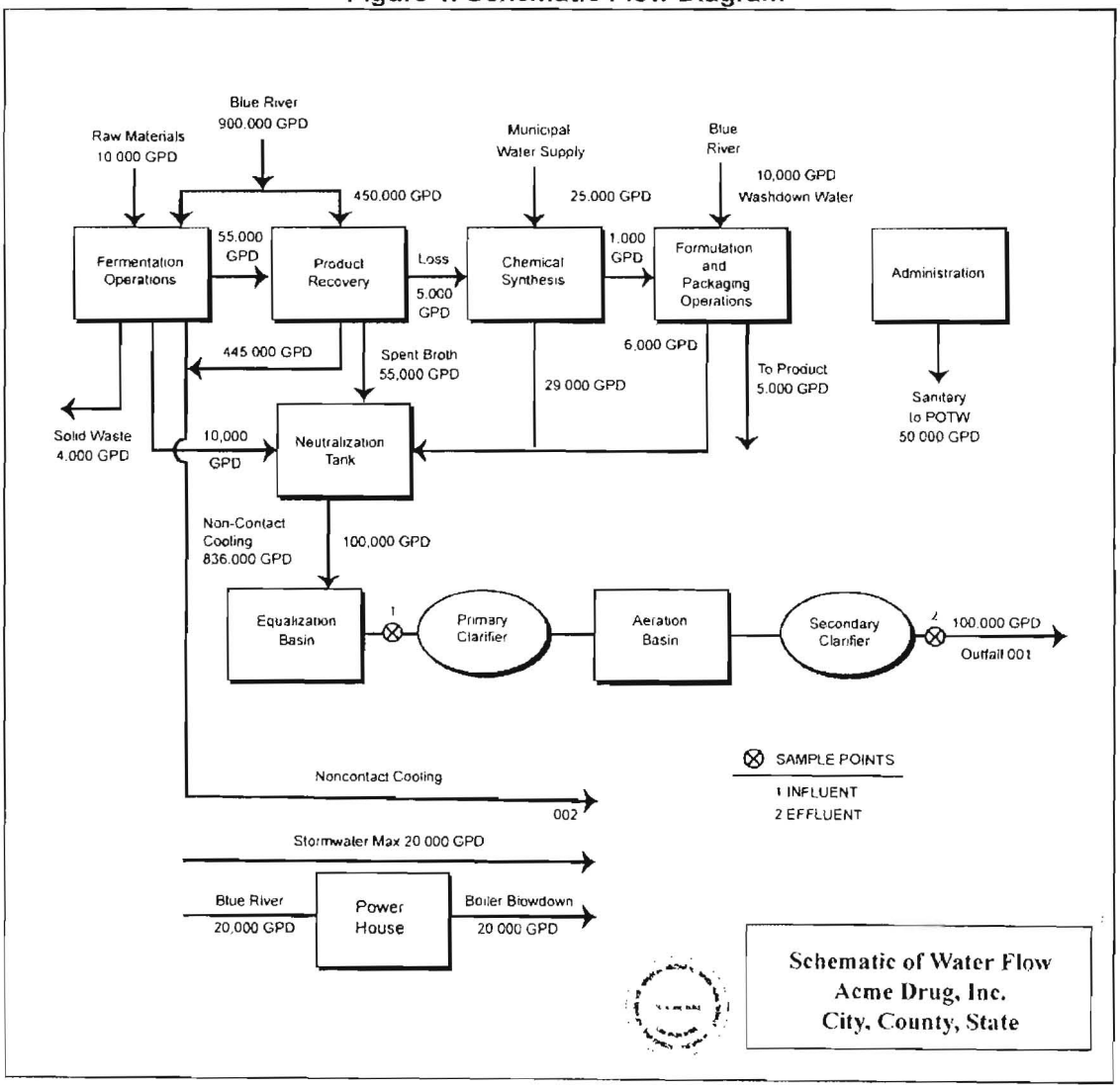
J-27/32

SECTION E – INSTRUCTION (WASTEWATER DISCHARGE INFORMATION)

1. If you answer "no" to this question, skip to Section I, otherwise complete the remainder of the application.

4. A schematic flow diagram is required to be completed and certified for accuracy by a State registered professional engineer. Assign a sequential reference number to each process starting with No. 1. An example of a drawing is shown below in Figure 1. To determine your average daily volume and maximum daily volume of wastewater flow, you may have to read water meters, sewer meters, or make estimates of volumes that are not directly measurable.

Figure 1. Schematic Flow Diagram



J-28/32

5. Users should report average daily and daily maximum wastewater flows from each process, operation, or activity present at the facility. Categorical users should report average daily and maximum daily wastewater flows from every regulated, unregulated, and dilution process. A regulated wastestream is defined as wastewater from an industrial process that is regulated for a particular pollutant by a categorical pretreatment standard. Unregulated wastestreams are wastestreams from an industrial process that are not regulated by a categorical pretreatment standard and are not defined as a dilution wastestream. Dilution wastestreams include sanitary wastewater, boiler blowdown, noncontact cooling water or blowdown, stormwater streams, demineralized backwash streams and process wastestreams from certain industrial subcategories exempted by EPA from categorical pretreatment standards. [For further details see 40 CFR 403.6 (e).]

6. Users should report the average daily and daily maximum wastewater flows for each nonprocess wastewater flows. Nonprocess wastewater flows include, but are not limited to, cooling tower blowdown and boiler blowdown.

12. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

    The facility should indicate whether or not it anticipates requesting for equivalent mass limits.

13. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

    If the facility is subject to 40 CFR Parts 414, 419, or 455, it should indicate whether or not it anticipates requesting for equivalent concentration limits.

SECTION F – INSTRUCTION (CHARACTERISTICS OF DISCHARGE)

Provide the results of sampling and analysis identifying the nature and concentration (or mass, if required) or regulated pollutants in the discharge from each regulated process. Both daily maximum and average concentration values (or mass, if required) must be reported. The sample must be representative of daily operations.

If the User is subject to categorical effluent limits, the user must take a minimum of one representative sample to compile the necessary data. Samples should be taken immediately downstream from pretreatment facilities if such exists or immediately downstream from the regulated process if no pretreatment exists. If other wastewaters are mixed with the regulated wastewater prior to pretreatment, the user should measure the flows and concentrations. Sampling and analysis must be performed in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto. Furthermore, the date and place, and the methods of analysis must be submitted with the application.

Historical data may be used if the data provides sufficient information to determine the need for industrial pretreatment measures.

J-29/32

SECTION H – INSTRUCTION (FACILITY OPERATIONAL CHARACTERISTICS)

2. Indicate whether the business activity is continuous throughout the year or if it is seasonal. If the activity is seasonal, circle the months of the year during which the discharge occurs. Make any comments you feel are required to describe the variation in operation of your business activity.

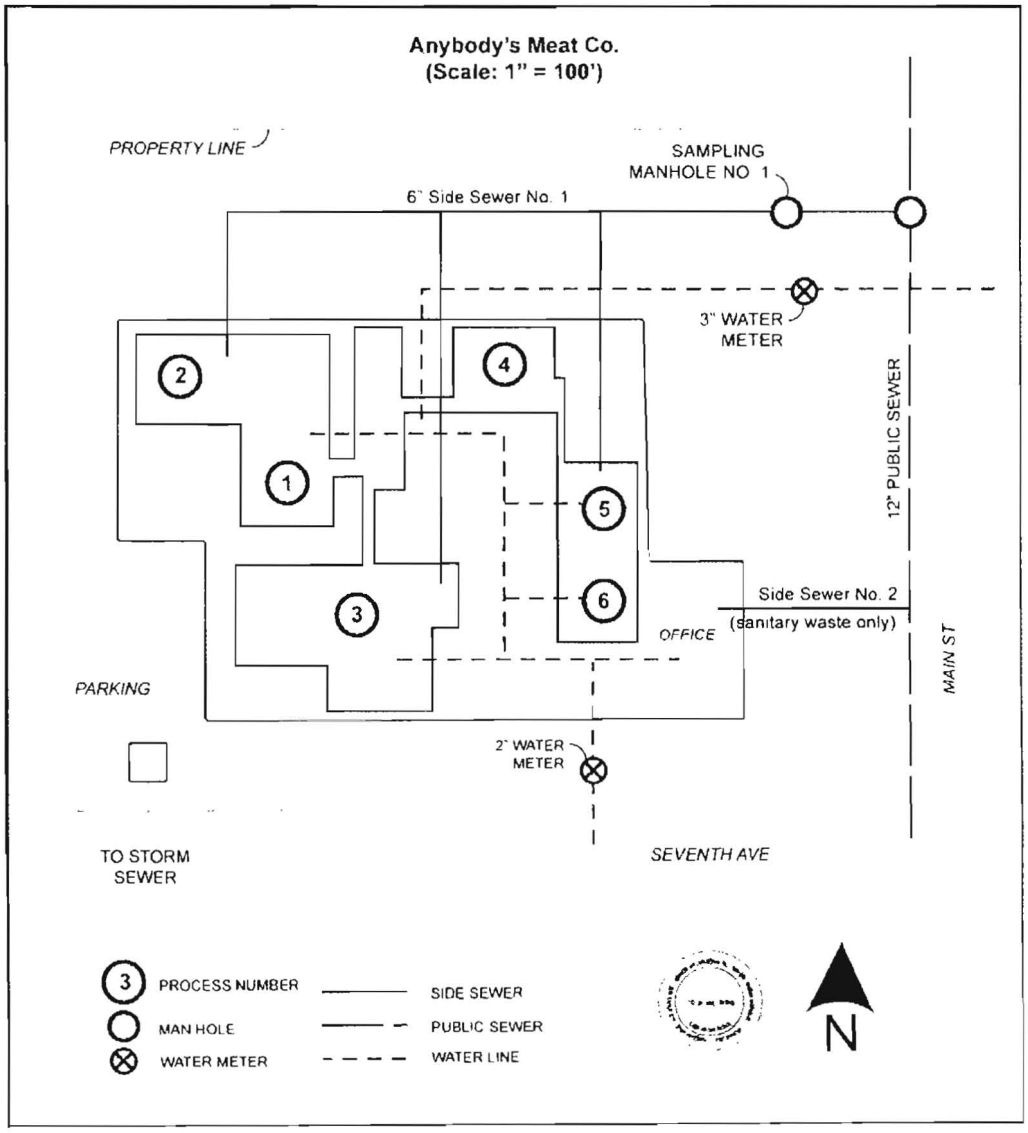
4. Indicate any shut downs in operation which may occur during the year and indicate the reasons for shutdown.

5. Provide a listing of all primary raw materials used (or planned) in the facility's operations. Indicate amount of raw material used in daily units.

6. Provide a listing of all chemicals used (or planned) in the facility's operations. Indicate the amount use of planned in daily units. Avoid the use of trade names of chemicals. If trade names are used, also provide chemical compounds. Provide copies of all available material safety data sheets for all chemical identified.

7. A building layout or plant site plan of the premises is required to be completed and certified for accuracy by a State registered professional engineer. Approved building plans may be submitted. An arrow showing North as well as the map scale must be shown. The location of each existing and proposed sampling location and facility sewer line must be clearly identified as well as all sanitary and wastewater drainage plumbing. Number each unit process discharging wastewater to the public sewer. Use the same number system shown in Figure 2, the schematic flow diagram. An example of the drawing required is shown below.

Figure 2. Building Layout



J-31/32

SECTION I – INSTRUCTION (SPILL PREVENTION)

5. Describe how the spill occurred, what was spilled, when the spill happened, where it occurred, how much was spilled, and whether or not the spill reached the sewer. Also explain what measures have been taken to prevent a reoccurrence or what measures have been taken to limit damage if another spill occurs.

SECTION J – INSTRUCTIONS (NON-DISCHARGED WASTES)

1. For wastes not discharged to the Control Authority's sewer, indicate types of waste generated, amount generated, the way in which the waste is disposed (e.g., incinerated, hauled, etc.), and the location of disposal.

2. Onsite disposal system could be a septic system, lagoon, holding pond (evaporative-type), etc.

5. Types of permits could be: air, hazardous waste, underground injection, solid waste, NPDES (for discharges to surface water), etc.

SECTION K – INSTRUCTIONS (AUTHORIZED SIGNATURES)

See instructions for question 4 in Section A, for a definition of an authorized representative.

J-32/32