ADEQ

ARKANSAS
Department of Environmental Quality

NPDES PERMIT FILE
NPDES # AR0021750
AFIN # 60-00226
Permit PN
✓ Correspondence
Technical Backup
12/23/08 VH Date Scanned

December 22, 2008

Randy Easley
Environmental Manager
Fort Smith Utility Department
3900 Kelley Hwy
Fort Smith, Arkansas 72904

Re: City of Fort Smith (Permit Number: AR0021750 AFIN: 60-00226) Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Easley:

Please find enclosed the finished report for the audit/assessment conducted by me from October 20 through 23, 2008. Please make the report available for review by appropriate City officials. You and the City officials should discuss and evaluate the recommendations and required actions in the report. Please respond in writing within thirty (30) days with the City's proposed actions to my findings in the report.

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

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

Sincerely,

Rufus J. Torrence
ADEQ Engineer II

Encl: Audit/Assessment Checklist

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

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF FORT SMITH, ARKANSAS

NPDES PERMIT #AROO21750

DECEMBER 22, 2008

PREPARED BY: RUFUS TORRENCE

WATER DIVISION ENGINEER II

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

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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) now integrated into Pretreatment Programs, ADEQ will conduct assessments of cities' P2 projects and programs in conjunction with the audits.

ADEQ performed an audit/assessment from October 20 through 23, 2008 on the Pretreatment Program implemented by City of Fort Smith, Arkansas. Participants included:

Rufus Torrence	ADEQ / Water Division Engineer
Allen Gilliam	ADEQ / Water Division Engineer
Steve Parke	City / Director of Utilities
Paul Easley	City / Environmental Manager
Brad Stewart	City / Environmental Coordinator
Lance McAvoy	City / Environmental Chemist

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Fort Smith's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403

* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges

* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements

* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof

EPA approved Fort Smith's pretreatment program on 8/31/85. The City modified the program and ADEQ reviewed and approved the modification on 12/5/97. The modification included incorporation of an enforcement response plan, revisions to the pretreatment ordinance and a headworks loading evaluation that indicated a local limit was necessary for Cyanide. Later in November 2004 the City revaluated the headworks loading with the assistance of ADEQ pretreatment staff and software. The City concluded that local limits were not necessary. The City is currently modifying the program to comply with the recent Streamlining revisions to 40 CFR 403.

Fort Smith's pretreatment program and personnel are among the best statewide and nationally. The auditor appreciates the special efforts by the city personnel in determining jurisdictional issues over industries located outside the city limits. The City attorney has concluded that Fort Smith has full control over significant industrial users located outside the city limits (see attachment A-1/2 for more details).

Fort Smith operates two (2) POTWs. Neither POTW has shown a pattern of toxicity in the effluent that is discharged to the Arkansas River. The Massard POTW consists of primary clarification, grit/grease removal, trickling filtered followed by secondary clarification and activated sludge. The wastewater is disinfected by ultraviolet radiation before it is discharged to the Arkansas River. The design flow is 10 MGD and average influent rate is about 7.9 MGD. The POTW receives approximately 0.40 MGD from 10 significant industries, 5 of these industries are regulated by categorical (federal) standards. Sludge is thickened, vacuum dewatered and sent to the local landfill (as cover). The sludge rate averages about 2,110 dry tons/year. The "P" Street POTW consists of grit/grease removal, primary clarification and activated sludge followed by secondary clarification. Recent upgrades at this POTW include a ballasted floc storm treatment system. The effluent is disinfected by chlorination. Then it is de-chlorinated and discharged to the Arkansas River. The "P" Street POTW design flow is 15 MGD and averages 10.22 MGD. This POTW receives approximately 1.52 MGD from 10 SIUs, 4 of which are categorical (one, recently was disconnected from the collection system). The sludge is thickened by gravity, pressed in a belt filter and disposed of at the local landfill (again as cover). The sludge rate averages about 5006 dry tons/year.

The audit consisted of informal discussions with the City's Pretreatment personnel and an examination of industrial user files and pretreatment records. The auditors utilized a checklist to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachments. The auditors visited eight (8) of the City's significant industrial users. Finally, the auditors conducted an exit interview with key City personnel to discuss findings during audit.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, Section D outlines 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 Fort Smith's Pretreatment Program. The auditor has paraphrased with CFR citations the actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program. A narrative explanation of the finding will follow the citations.

1) Under ***40 CFR 403.8(f)(5)*** *"The POTW will...implement an Enforcement Response Plan [ERP]."* Under ***40 CFR 403.8(f)(5)(iii)*** The ERP will "*Identify (by title) the official(s) responsible for each type of response*".

The Guide in the ERP does not identify by title the officials responsible for each type of response (see attachment J-1/3 for a copy of the ERP). The Guide must be modified to show the responsibilities of the Environmental Coordinator, the Environmental Manager and Director of Utilities.

2) Under ***40 CFR 403.8(f)(1)(iii)(B)(2)*** control mechanisms must not be transferred to a new owner or operator "*without, at a minimum, prior notification to the POTW and provisions of a copy of the existing control mechanism to the new owner or operator*".

The City transferred "Quantex MacSteel" permit to "Gerdau MacSteel" without documenting a notification or the provisions for the transfer of the existing mechanism to the new owner. The "transferred" permit still refers only to "Quantex, MacSteel Div." (see attachment B-1/31). At a minimum the permit should have two cover letters attached to the front of the permit. The first letter (with Gerdau's letterhead) should be one from Gerdau giving "notification" of a new owner and the second letter should be one from the City (also with Fort Smith's letterhead) stating the provisions of the transfer. The original letters should remain in the new owner's pretreatment file and the City should attach copies of the letters to the transferred permit.

3) Under ***40 CFR 403.12(g)*** *"Monitoring and analysis to demonstrate continued compliance. (1) ....the reports required in paragraphs (b), (d), and (e) of this section shall contain the results of sampling and analysis of the Discharge, <u>including the flow</u> and the nature and concentration, or production and mass where requested by the Control Authority, of pollutants contained therein which are limited by the applicable Pretreatment Standards."*

Include permit specific language for flow monitoring [for at least the CIU processes(s)] even if they are reporting it already.

4) Under ***40 CFR 403.12(p)(1)*** *"The Industrial User [non-domestic user] shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, <u>which, if otherwise disposed of</u>, would be a hazardous waste under 40 CFR part 261...."*

Notify ALL haz waste generators (potentially discharging haz waste to the city's sewer system) of their notification requirement. The ADEQ list was provided during the audit. Include a modified cover letter to ask specific questions regarding disposal practices of Hg, Ag, "P" & "U" pharmaceuticals from your dentists/clinics, doctors, X-ray clinics, veterinarians, pharmacies, hospitals, nursing homes, film processors, etc. These conditionally exempt small quantity generators most likely don't realize they are generators disposing it into the City's sewer system.

5) Under **40 CFR 403.8(f)(2)(iii)** *"Notify Industrial Users identified under paragraph (f)(2)(i) of this section, of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act."*

Notify ALL effected IUs of the "Streamlining" revisions to 40 CFR 403 (10/05) possibly including a cover letter with the EPA Federal Register website:

http://www.epa.gov/npdes/regulations/streamlining_fr_notice.pdf.

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

1) Recommend revising the ERP to require P2 audits as another enforcement option [Gilliam 2004].

2) Revise the ERP (Enforcement Response Plan) to include termination of service.

3) Provide a mechanism for free exchange of ideals and information on local pollution prevention success stories (for example, LEED, EPA Performance Track, etc). The mechanism can be the "Award Day". See recommendation number 12 below for more details on the "Award Day". The City should document these success stories in the IU pretreatment file.

4) Compile successful P2 stories for possible networking into the National Pollution Prevention Resource Exchange (P2RX)[Gilliam 2004].

5) Recommend modifying IU applications, IU surveys and general city-wide IU questionnaires to include questions about pollution prevention (P2), best management practices (BMP), environmental management systems, etc. ongoing or planned [Gilliam 2004].

6) Recommend revising existing fact sheets for each IU updating pertinent information to include:

(a) processes/flows with schematics (succinct product flow, process flow diagrams identifying where pertinent operations and chemicals are used,
(b) rationale for being deemed "Significant", pertinent category with subparts (where appropriate),
(c) IU contact as well as their corporate environmental contact,
(d) monitoring frequency and monitored parameters,
(e) brief chronological history (including start-up date) of IU's compliance history, etc.
(f) rationale for IU conducting timed vs. flow proportional samples and composite vs. grab samples.
(g) use English dimensions only, to avoid confusion do not convert between metric and English dimensions [Torrence 2008]

As we discussed during the audit, the basic information contained in a comprehensive IU inspection provides the bulk of a good fact sheet and shouldn't change substantially from year to year. See Appendix I in EPA's "IU Permitting Guidance Manual" (9/89) for an example of EPA's idea of a comprehensive fact sheet [Gilliam 2004].

7) Recommend establishing a Pollution Prevention policy whether through a City Board resolution or written policy or modification to the Pretreatment Ordinance (see EPA's Guides to Pollution Prevention (for) Municipal Pretreatment Programs, page 10 for example resolution) [Gilliam 2004].

8) Inspection reports should be modified to include:

(a) pollution prevention practices,
(b) handling procedures (hard line, totes, dollies, etc),
(c) a page for inspector's and IU representative's names, signature and date,
(d) and chemical handling procedures (conveyance equipment and route).

9) Continue efforts with ADEQ Lab for "Municipal Certification".

10) Should include the type of sampling bottles (plastic, glass, etc.) on the Chain of Custody [Gilliam 2004].

11) Conduct more public outreach via newspaper, fliers, etc. regarding P2 [Gilliam 2004].

12) Hold annual "IU Award Day" for both 100% compliant IUs and IUs with measurable P2 successes. The event would be an ideal venue for the City and the IUs to network and discuss both pretreatment and P2 issues [Gilliam 2004].

13) Consider allowing an employee to have time designated exclusively to P2 [Gilliam 2004].

14) Consider developing and implementing a City Utility wide Environmental Management System (EMS). Other utilities in Region VI have realized thousands of dollars of savings annually after implementing an EMS [Gilliam 2004].

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) Make revisions to the City's Program in response to this audit's requirements.

2) Comply with most the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply. The City has commenced efforts to update the existing program by submitting a draft ordinance to include the changes listed below.

   The following is a summary of changes required by the Streamlining Rule.

   1. Updated removal credits provisions relating to Overflows [§ 403.7(h)]

   2. Slug control requirements must be included in SIU control mechanisms [§ 403.8(f)(1)(iii)(B)(6)]

   3. SIUs must be evaluated for the need for a plan or other action to control slug discharges within a year from the final rule's effective date or from becoming an SIU [§ 403.8(f)(2)(vi)]

   4. Expand SNC to include additional types of Pretreatment Standards and Requirements [§ 403.8(f)(2)(viii)(A-C)]

   5. SIU reports must include BMP compliance information [§ 403.12(b), (e), (h)]

   6. Require periodic compliance reports to comply with sampling requirements and require non-categorical SIUs to report all monitoring results [§ 403.12(g)(3), (6)]

   7. Require notifications of changed discharge to go to the Control Authority [§ 403.12(j)]

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: *City of Fort Smith* NPDES #: *AR0021750*
Mailing address: *3900 Kelley Hwy 72904*

Permit Signatory: *Steve Parke* Title: *Director of Utilities*

Telephone: *(479) 784-2331* FAX NUMBER: *(479) 784-2358*

Pretreatment Contact: *Randy Easley* Title: *Env. Manager*
Address: *Same*
Telephone: *(479) 784-2337*
e-mail *reasley@fsark.com*

Pretreatment program approval date: *8/31/85*

Dates of approval of any substantial modifications: *12/5/97*

Month Annual Pretreatment Report Due: *August*

Pretreatment Year Dates: *8/1 - 7/31* Date(s) of Audit: *10/20 - 23/08* (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Rufus Torrence	*Engineer II / ADEQ*	*(501) 682-0626*
Allen Gilliam	*Engineer II / ADEQ*	*(501) 682-0625*

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* *Randy Easley*	*Environmental Manager*	*(479) 784-2337*
Brad Stewart	*Environmental Coordinator*	*(479) 784-2335*
Lance McAvoy	*Environmental Chemist*	*(479) 784-2332*
Steve Parke	*Director of Utilities*	*(479) 784-2331*

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*05/2008*	*CopperFab permit expired/O&G Implementation*
PCI	*11/2006*	*Industrial User Survey incomplete*

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.

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
*AR0021750	Massard	(Going to Public Notice Soon)	
AR0033278	"P" Street	1-1-2007	12-31-2011

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Massard
Location Address: 1500 North 9th Street

Expiration Date of NPDES Permit: N/A

Treatment Plant Wastewater Flow: Design- 10 MGD; Actual (Average)- 7.9 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 10 # of CIUs : 5
Industrial Flow (mgd): 0.40 Industrial Flow (%) : 8 %

Level of Treatment		Type of Process(es):
Primary	✓	Primary clarification; grit/grease removal
Secondary	✓	Trickling filter
Tertiary	✓	Clarification; activated sludge

Method of Disinfection: Ultraviolet

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3H

Receiving Stream Use: Primary contact recreation, raw water source

If effluent is disposed of to any location other than the receiving stream, please note: N/A

Method of Sludge Disposal:		Quantity of Sludge:
_____	Land Application	_____ dry tons/yr.
_____	Incineration	_____ dry tons/yr.
_____	Monofill	_____ dry tons/yr.
✓	Mun. Solid Waste Landfill	2110 dry tons/yr.
_____	Public Distribution	_____ dry tons/yr.
_____	Lagoon Storage	_____ dry tons/yr.
_____	Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: Cyanide

a. (continuation of individual treatment plant information for Massard 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: *N/A*
Issuance Date: "
Expiration Date: "

List pollutants that are specified in current sludge permit:
N/A

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*	*4*	*Upstream &*
Priority **	*1*	*1*	*1*	*4*	*downstream*
Biomonitoring		*4*			
TCLP			*6*		
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.

YES NO N/A

✓ ___ ___ Has the POTW begun tracking the trends in the above samples?

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

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

Parameters Violated	Cause(s)
Fecal (04/08)	*Algae coated fouled UV system*
Fecal (03/08)	*Algae coated fouled UV system*
NH3-N (05/08)	*A.S. not conditioned for NH3-N removal*

YES NO

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

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0033278	"P" Street	01/01/07	12/31/11

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Same
Location Address: 13 North "P" Street

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 15 MGD; Actual (Average)- 10.22 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 10 # of CIUs : 4
Industrial Flow (mgd): 1.52 Industrial Flow (%) : 15 %

Level of Treatment		Type of Process(es):
Primary	✓	Grit/grease removal; primary clarification;
Secondary	✓	Activated sludge; secondary clarification;
Tertiary		Ballasted Floc Storm flow treatment

Method of Disinfection: Chlorination/Dechlorination

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3H

Receiving Stream Use: primary contact recreation; raw water source

If effluent is disposed of to any location other than the receiving stream, please note: N/A

Method of Sludge Disposal:		Quantity of Sludge:
_____	Land Application	_____ dry tons/yr.
_____	Incineration	_____ dry tons/yr.
_____	Monofill	_____ dry tons/yr.
✓	Mun. Solid Waste Landfill	5006 dry tons/yr.
_____	Public Distribution	_____ dry tons/yr.
_____	Lagoon Storage	_____ dry tons/yr.
_____	Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: (None)

a. (continuation of individual treatment plant information for "P" Street 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: *N/A*
Issuance Date: "
Expiration Date: "

List pollutants that are specified in current sludge permit:
N/A

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*	*4*	*Upstream &*
Priority **	*1*	*1*	*1*	*4*	*downstream*
Biomonitoring		*4*			
TCLP			*6*		
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.

YES NO N/A

✓ ___ ___ Has the POTW begun tracking the trends in the above samples?

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

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

Parameters Violated	Cause(s)
N/A	

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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

__✓*__ Have any substantial modifications been made or requested to any pretreatment program components since the last audit?
If yes, identify below.
**The City is re-evaluating its MAHLs and/or the need for TBLLs; this evaluation is a permit requirement.*

1. Modifications:

Date Approved by DEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permits
N/A	*N/A*	

2. Modifications in Progress:

Date Requested	Nature of Modification
None	**see above*

YES NO

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

___*N/A*___ 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: 8/31/85 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: *11/18/97*
Date of most recent Pretreatment Program modification approval: *12/5/97*

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

✓* ___ Are all industrial users located within the jurisdictional boundaries of the Control Authority? **Some SIUs are located outside the city limits but the CA has demonstrated jurisdictional authority over these SIUs (see attachment A-1/2)*

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

___ ✓ 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. **City of Arkhoma*	*0*	*0*	*Permit*
2.			

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation. *"Fort Smith would not rely on the city to perform these."*

		Problems
___	Updating industrial waste survey	*N/A*
___	Notification of IUs	
___	Permit issuance	
___	Receipt and review of IU reports	
___	Inspection and sampling of IUs	
___	Assessment of IUs for P^2 activity	
___	Analysis of samples	
___	Enforcement	
___	Other: _____	

Briefly describe other problems: _____

Identify any IUs that have caused problems of interference, upset, pass through, sludge contamination, problems in the collection system, or worker health and safety in the past 12 months:

IU Name	Problem	NPDES Permit Violation Yes	No
None		___	___

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

✓ ___ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^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)_____

How often is the survey to be updated? Ongoing

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

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?

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

a. 19 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 8 Categorical Industrial Users (CIUs) [WENDB-CIUS] (one recently was disconnected)
c. 11 Noncategorical SIUs
d. 21 Other regulated nonsignificant IUs (Describe) 8 non-SIUs, 11 septage haulers & 2 just monitor/report

40 TOTAL of a. + d.

YES NO

___ ✓ Has the POTW identified any IUs with Pollution Prevention opportunities?
___ X Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

If not, the Control Authority has defined "significant industrial user" to mean:
The Control Authority has defined "significant industrial user" the same as EPA's 403.3t but the recent streamlining update [403.3(v)] has added new language.

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 (See Attachment B for permit example)*

What is the maximum term of the control mechanism? *5 years*

__0__ How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT EXPIRATION DATE

YES NO

✓ ___ Does the Control Authority accept trucked septage wastes?

___ ✓ Does the Control Authority accept other trucked wastes?

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

YES NO

✓ ___ Does Control Mechanism designate a discharge point? [403.5(b)(8)]

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

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

Pollutant	Limit
Narrative prohibitions	

Describe the discharge point(s) (including security procedures):
Separate manhole prior to headworks

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

N/A Does the Control Authority have a control mechanism for regulating wastes from UST sites?

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

Pollutant	Limit
N/A	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

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

2000 Date Notified *Letter* Method of Notification

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

✓ Federal Register
✓ Meetings, Training
✓ Government Agencies
✓ Journals, Newsletters
✓ Other Internet
___ 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:

City is presently re-evaluating each of their POTW's MAHLs for assessment of the need for new TBLLs; the current TBLL were developed in 1995. Under the oversight of ADEQ the City assessed the MAHLs in 2004 and again in 2008; at this time local limits appear unnecessary.

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?		MAHLs Calculated "P" Street/Massard (Lb/day)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			✓		✓	*1.23 / n/a*
Cadmium (Cd)	✓			✓		✓	*0.54 / 0.39*
Chromium-Total	✓			✓		✓	*13.65 / 14.78*
Copper (Cu)	✓			✓		✓	*21.53 / 16.42*
Cyanide (CN)	✓			✓		✓	*8.11 / 19.02*
Lead (Pb)	✓			✓		✓	*4.59 / 3.7*
Mercury (Hg)	✓			✓		✓	*0.05 / 0.03*
Molybdenum (Mo) *	✓			✓		✓	*1.4 / 1.02*
Nickel (Ni)	✓			✓		✓	*14.51 / 25.87*
Selenium (Se) *	✓			✓		✓	*1.02 / 0.74*
Silver (Ag)	✓			✓		✓	*9.23 / 3.41*
Zinc (Zn)	✓						*24.33 / 33.88*

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

___ X* Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?
*The POTW has decided that local limits are not necessary at this time.

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

	TYPE OF ALLOCATION		
	Uniform Concentration*	Mass	Hybrid
Arsenic (As)	✓		
Cadmium (Cd)	✓		
Chromium-Total	✓		
Copper (Cu)	✓		
Cyanide (CN)	✓		
Lead (Pb)	✓		
Mercury (Hg)	✓		
Molybdenum (Mo)	✓		
Nickel (Ni)	✓		
Selenium (Se)	✓		
Silver (Ag)	✓		
Zinc (Zn)	✓		

**Based on contributory flow w/safety factor to maintain existing levels. These uniform concentration limits were developed in 1995 and are no longer applicable.*

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?
Headworks allowable loadings were calculated specific to the particular POTW

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference*
Inspections:			
CIUs	1	1/year	*Page 66 in program*
Other SIUs	1	1/year	*Page 66 in program*
Sampling:			
CIUs	1	1/year	*Page 66 & 40CFR403.8(f)(2)(v)*
Other SIUs	1	1/year	*Page 66 & 40CFR403.8(f)(2)(v)*
Reporting:			
CIUs	2	2/year	*Ord 69-97 9.C & Page 64 in program*
Other SIUs	2	2/year	*Ord 69-97 9.C & Page 64 in program*
Self-Monitoring:			
CIUs	2	2/year	*Ord 69-97 9.C & Page 64 in program*
Other SIUs	2	2/year	*Ord 69-97 9.C & Page 64 in program*

**No difference; cites from approved program.*

#	%	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. *(Not Applicable)*

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	ICP (Hg)	In-house (AI)
Cyanide	Spectrophotometric	American Interplex
Organics	GC/MS	"
Other	Biomonitoring	Bio-analytical

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:

Adequate cleaning of equip.; established set-up procedures; proper preservatives and chain of custody forms; sample containers used only one time; use of trip blanks and duplicates on only 10% of samples.

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

5 days Conventionals
" Metals
10 day Organics

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

___ ✓ Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

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

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

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

___ X* Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] **The CA definition does not include the recent streamlining updates*

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

YES NO

✓ ___ Describe how the Control Authority will investigate instances of noncompliance

✓ ___ Describe the Control Authority's types of escalating enforcement responses and the periods for each response

___ X* Identify by Title the Official(s) responsible for implementing each type of enforcement response. **Plan lists officials but not which official is responsible for each type of enforcement.*

✓ ___ 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
civil
criminal
administrative
✓ Imprisonment
✓ Termination of Service
_____ Other: _____

✓ Administrative Order
✓ Revocation of permit
✓ Fines (maximum amount):
$ 1000 /day/violation
$ " /day/violation
$ " /day/violation

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

YES NO

✓ ___ When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [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 Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Date	Return to Compliance? Yes (Date)	No
Southern Steel	8/07	AO	9/29/08		✓
Hiland Dairy	11/07	AO	8/16/08		✓
Twin River	11/07	AO	9/02/08		✓

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

#	%	
3	15.7	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
3	15.7	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. *(Not applicable at this time)*

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 II: PROGRAM ANALYSIS AND PROFILE

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	1	$7000
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

✓ ___ Control Mechanism Issuance
✓ ___ Inspection and Sampling schedule
✓ ___ Monitoring Data
✓ ___ IU Compliance Status Tracking
___ ___ Other: _____

Can IU monitoring data can be retrieved by:

✓ ___ Industry name *(see Attachment A-2 for examples)*
✓ ___ Pollutant type
___ ✓ Industrial category or type
___ ✓ SIC Code
✓ ___ IU discharge volume
✓ ___ Geographic location
✓ ___ Receiving treatment plant (i.e. if > one plant in the system)
___ ___ Other (specify) _____

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

___ ✓ Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?
"The information is locked in a file & has to go thru the FOI process"

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Approximately 3 & 1/3 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 (G.O.F.)	100
✓*	IU permit fees	
✓*	monitoring charges	
✓*	industry surcharges	
____	other (describe) ____	
	*These go back into the G.O.F. Total	100%

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

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	Standard list
✓	___	Safety equipment	"
✓	___	Vehicles	"
✓	___	Analytical equipment	POTW has an impressive lab with qualified personnel

SECTION II: PROGRAM ANALYSIS AND PROFILE

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.): *(Mainly working on same programs as 5 yrs ago)*
Household hazardous waste program monthly; sampling for the prior. poll. at various lift stations in drainage sub-basins every 3 years for hot spots; working with outside agencies on the city's drinking water watersheds; doing a priority poll. scan 2/yr and metals 4/yr on a domestic-only basin

2. Has the source of any toxic pollutants been identified?
If yes, what was found?
None apparent

3. Has the POTW implemented any kind of public education program? If yes, describe:
School age kids' tours; helping with science projects; ads in the newspaper regarding the household haz. waste collection program

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

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No (will be recommended to include in their ERP)

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants?
If yes, which of the "Guides to Pollution Prevention" were used? No

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

FILE #: 1 Industry Name Trane File/ID No. 00105
Industry Address 4811 South Zero Street
Industry Description Mfg A/C and Heater Units
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3585
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 26,000

Industry visited during audit: YES

Comments: Trane was selected as an alternate; originally, plans were to review and visit CopperFab. CopperFab recently stopped discharging process wastewater to the POTW.

FILE #: 2 Industry Name Southern Steel & Wire File/ID No. 084102
Industry Address PO Box 6537, 3501 S. Tulsa 72906
Industry Description Mfg. Steel wire, shelves, & gaskets
Industrial Category Metal finishing 40 CFR 433 SIC Code: 33496
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 40,000

Industry visited during audit: YES

Comments: This company is expericing a reduction in staff due to cutbacks at Whirlpool located nearby in Fort Smith; company placed in SNC during previous year.

FILE #: 3 Industry Name Gerdau MacSteel Div. File/ID No. 109304
Industry Address 5225 Planters Rd. 72916
Industry Description Mfg. steel bars from scrap steel
Industrial Category Iron and steel 40 CFR 420 SIC Code: 3312, 3398
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 53,000

Industry visited during audit: YES

Comments: Subparts E, F & G existing source with equivalent limits derivation shown in Fact Sheet.

FILE #: 4 Industry Name Exide Technologies File/ID No. 036304
Industry Address 4115 South Zero 72908
Industry Description Mfg. batteries from lead ingots and plastic castings
Industrial Category _____ 40 CFR 461 SIC Code: 3691
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 15,500

Industry visited during audit: YES

Comments: Exide batteries are primary for commercial use (for example, emergency back up power for hospitals). Eff limits based on 40CFR461 Subpart C: Lead (see att C-1/2).

FILE #: 5 Industry Name Hiland Dairy File/ID No. 00302
Industry Address 415 South 10th St
Industry Description Bottling Milk and other fruit drinks
Industrial Category N/A 40 CFR N/A SIC Code: 2026
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 77,750

Industry visited during audit: YES

Comments: Hiland was in SNC during the previous pretreatment reporting year.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

FILE #: 6 Industry Name Fort Smith Plating File/ID No. 028102
Industry Address 4302 Wheeler Ave
Industry Description Job Shop Electroplating
Industrial Category Electroplating 40 CFR 413 SIC Code: 3471
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 46,000

Industry visited during audit: YES

Comments:

FILE #: 7 Industry Name Twin River Foods File/ID No. _____
Industry Address 8427 Highway 45
Industry Description Poultry De-boning & Packaging (Raw Meat)
Industrial Category N/A 40 CFR N/A SIC Code: 2015
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 26,000

Industry visited during audit: YES

Comments: This company was placed in SNC during the previous pretreatment year.

FILE #: 8 Industry Name Hickory Springs File/ID No. _____
Industry Address 4925 Stateline Road
Industry Description Mfgr of RV steps, sleeper beds with Foam Plant attached
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3429,3086
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 2900

Industry visited during audit: YES

Comments: Raw metal galvanized coil steel. Hot & Cold rolled coil steel
Polyurethane

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

A. Industrial User Characterization

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltq	TRFoods	HicSpgs
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	✓	✓	✓	✓
2. Is the user subject to categorical pretreatment standards?	✓	✓	✓	✓	X	✓	X	✓
a. New source or existing source (NS or ES)?	NS	NS	ES	ES	N/A	ES	N/A	ES
b. Is this IU one identified as having P^2 potential?	X	X	X	X	X	X	X	X

B. Control Mechanism

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltq	TRFoods	HicSpgs
1. Does the file contain an application for a control mechanism?	✓	✓	✓[1]	✓	✓	✓	✓	✓
If yes, what is the application date?	8/18/05	9/30/05	9/15/04	9/8/04	10/08	02/07	11/04	05/05
Does it ask for Pollution Prevention information?	X	X	X	X	X	X	X	X
2. Does the file contain a Permit?	✓	✓	✓[2]	✓	✓	✓	✓	✓
Permit Expiration Date?	11/1/10	11/1/10	1/1/10	12/14/09	12/08	06/12	01/10	09/10
Is a fact sheet included?	✓	✓	✓[3]	✓[4]	✓	✓	✓	✓

Comments: 1. See Attachment D-1/34 for example of Gerdau MacSteel application. 2. See Attachment B-1/31 for example of Gerdau MacSteel permit; CP is the Cover Page. 3. See Attachment B-30/31 for Gerdau MacSteel fact sheet. 4. See Attachment C-1/2 for Exide fact sheet. 5. See page 63 of approved program for language on nontransferability; see also attachment B-9/31 Part 4 Sect A para 8. 6. Flow paragraph is missing in Gerdau MacSteel permit.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	TRFoods	HicSpgs
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]								
a. Legal Authority Cite?	CP[2]	CP[2]	CP[2]	CP[2]	✓	✓	✓	✓
b. Expiration date?	CP[2]	CP[2]	CP[2]	CP[2]	✓	✓	✓	✓
c. Statement of nontransferability[5]?	4-A-8[5]	4-A-8[5]	4-A-8[5]	4-A-8[5]	✓	✓	✓	✓
d. Appropriate discharge limitations?	1-B	1-B	✓[3]	✓[4]	✓	✓	✓	✓
e. Appropriate self-monitoring requirements?	2-A	2-A	2-A	2-A	✓	✓	✓	✓
f. Sampling frequency?	2-A	2-A	2-A	2-A	✓	✓	✓	✓
g. Sampling locations?	2-A-1	2-A-1	2-A-1	2-A-1	✓	✓	✓	✓
h. Requirement for flow monitoring?	2-A-3	2-A-3	X[6]	2-A-3	X	X	X	X
i. Types of samples (grab or composite) for self-monitoring?	2-A	2-A	2-A	2-A	✓	✓	✓	✓
j. Applicable IU reporting requirements?	Part 2	Part 2	Part 2	Part 2	✓	✓	✓	✓
k. Standard conditions for:								
Right of Entry?	C-5[8]	C-5[8]	C-5[8]	C-5[8]	✓	✓	✓	✓
Records retention?	C-6[8]	C-6[8]	C-6[8]	C-6[8]	✓	✓	✓	✓
Civil and Criminal Penalty provisions?	D-8[8]	D-8[8]	D-8[8]	D-8[8]	✓	✓	✓	✓
Revocation of permit?	4-A-5	4-A-5	4-A-5	4-A-5	✓[9]	✓[9]	✓[9]	✓[9]
l. Compliance schedules/ progress reports	N/A[7]	N/A[7]	N/A[7]	N/A[7]	N/A[7]	N/A[7]	N/A[7]	N/A[7]
m. General/Specific Prohibitions?	4-A-13	4-A-13	4-A-13	4-A-13	✓	✓	✓	✓
n. Where technologically and economically achievable, are P[2] aspect included?	X	X	X	X	X	X	X	X

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	TRFoods	HicSpgs
C. Application of Standards								
1. Has the IU been properly categorized?	✓	✓	✓	✓	✓	✓	✓	✓
2. Were both Categorical Standards and Local Limits properly applied?	✓[10]	✓[10]	✓[10]	✓[10]	✓	✓	✓	✓
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	X	X	X	X	X	X	X	X
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	✓[3]	✓[4]	N/A	N/A	N/A	N/A
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	N/A	N/A	N/A	N/A	N/A	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	N/A	N/A	N/A
7. Is the Control Authority applying a bypass provision to this IU?	N/A[11]	N/A[11]	N/A[11]	N/A[11]	N/A[11]	N/A[11]	N/A[11]	N/A[11]

Comments: 7. N/A implies Not Applicable to this industry. 8. Standard Conditions are in an attachment (General Permit Conditions) to the permits. 9. They use "termination" instead. 10. The CA has demonstrated that local limits are not necessary at this time. 11. According to the CA, no SIU has been authorized to bypass its treatment system.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	TRFoods	HicSpgs
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?	✓[12]	✓[12]	✓[12]	✓[12]	✓	✓	✓	✓
b. Sample date and time?	✓[12]	✓[12]	✓[12]	✓[12]	✓	✓	✓	✓
c. Sample type?	✓[12]	✓[12]	✓[12]	✓[12]	✓	✓	✓	✓
d. Wastewater flow at the time of sampling?	✓[12]	✓[12]	✓[12]	✓[12]	✓	✓	✓	✓
e. Sample preservation procedures?	✓[12]	✓[12]	✓[12]	✓[12]	✓	✓	✓	✓
f. Chain-of-custody records?	✓	✓	✓[13]	✓	✓[14]	✓	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	✓	✓	✓	✓

Comments:

12. Recorded on Chain-of-Custody form. 13. See Attachment E-1/4 for example of Chain-of-Custody record for Gerdau MacSteel sampling event. 14. Type of bottles not mentioned.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	TRFoods	HicSpgs
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	✓	✓	✓[15]	✓	N/A	✓[16]	N/A	✓[17]
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Timed	Timed	Timed	Flow	✓	✓	✓	✓
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓	✓	✓	✓
Inspections								
7. Does the IU file contain inspection reports?	✓	✓	✓[18]	✓	✓	✓	✓	✓
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	4/17/08	3/13/08	1/10/08	4/24/08	4/2008	11/2007	3/2008	1/2008

Comments:

15. See Attachment G-1/15 for Gerdau MacSteel TOMP. 16. TOMP on file for Fort Smith Plating; needs to be updated. 17. TOMP on file.

18. See Attachment F-1/54 for a copy of Gerrdau MacSteel Inspection Report. 19. "Pg 4" refers to page 4 in Gerdau inspection report; see Attachment F-6/54. 20. Name only no title. 21. Description only; no comments re. appearance, maintenance, etc. 22. Only techniques are shown; all SIUs use a contract lab. 23. Referring to Attachment F-51/54; see Slug Control Plan Evaluation Appendix. 24. Storage only no handling procedures; see Attachment F-37/54. 25. See Attachment F-36/54. 26. No inspector signature on report but CA should consider including it.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

9. Does the inspection report(s) include: [403.8(f)(2)(vi)]	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	TRFoods	HicSpgs
a. Inspector Name(s)	Pg 4[19]	Pg 4[19]	Pg 4[19]	Pg 4[19]	✓	✓	✓	✓
b. Inspection date and time?	Pg 4	Pg 4	Pg 4	Pg 4	✓	✓	✓	✓
c. Name and title of IU official contacted?	✓[20]	✓[20]	✓[20]	✓[20]	✓	✓	✓	✓
d. Verification of production rates?	N/A	N/A	✓	✓	N/A	N/A	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	Pg 7	Pg 7	Pg 7	Pg 7	✓	✓	✓	✓
f. Evaluation of pretreatment facilities?	Pg 33	Pg 33	Pg 33	Pg 33	✓[21]	✓[21]	✓[21]	✓[21]
g. Evaluation of self-monitoring equipment and techniques?	✓[22]	✓[22]	✓[22]	✓[22]	✓[22]	✓[22]	✓[22]	✓[22]
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	✓[23]	✓[23]	✓[23]	✓[23]	✓	✓	✓	✓
i. Manufacturing facilities?	Pg 33	Pg 33	Pg 33	Pg 33	✓	✓	✓	✓
j. Chemical handling and storage procedures?	X[24]	X[24]	X[24]	X[24]	X	X	X	X
k. Chemical spill prevention areas?	✓[25]	✓[25]	✓[25]	✓[25]	✓	✓	✓	✓
l. Hazardous waste storage areas and handling procedures?	✓[24]	✓[24]	✓[24]	✓[24]	✓	✓	✓	✓
m. Sampling procedures?	Pg 17	Pg 17	Pg 17	Pg 17	✓[22]	✓[22]	✓[22]	✓[22]
n. Laboratory procedures?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
o. Monitoring records?	Pg 19	Pg 19	Pg 19	Pg 19	✓	✓	✓	✓
p. Evaluation of Pollution Prevention opportunities?	X	X	X	X	X	X	X	X
q. Control Authority inspector signature?	✓[26]	✓[26]	✓[26]	✓[26]	✓[26]	✓[26]	✓[26]	✓[26]

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltq	TRFoods	HicSpqs
IU Self-Monitoring and Reporting								
10. Does the file contain self-monitoring reports?	✓	✓	✓	✓	✓	✓	✓	✓
11. Does the file include:								
a. BMR?	✓[27]	✓[27]	✓[27]	✓[27]	N/A	✓[27]	N/A	✓[27]
b. 90-Day Report?	✓[27]	✓[27]	✓[27]	✓[27]	N/A	✓[27]	N/A	✓[27]
c. All periodic reports?	✓	✓	✓	✓	✓	✓	✓	✓
d. Compliance schedule reports?	N/A	N/A	N/A	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(ies)?	✓	✓	✓	✓	✓	✓	✓	✓
14. Did the IU report flow?	✓	✓	✓	✓	✓	✓	✓	✓
15. Did the IU comply with the required reporting frequency(ies)?	✓	✓	✓	✓	✓	✓	✓	✓
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	✓	✓	✓	✓	✓
17. Did the IU report all changes in its discharge? [403.12(j)]	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
18. Has the IU developed a Slug Control and Prevention Plan?	X	✓	✓	✓	X	✓	X	X
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	X	X	X	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	N/A	N/A	N/A
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	TRFoods	HicSpgs
E. Enforcement								
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]								
a. Control Authority monitoring results?	✓	✓	✓	✓	✓	N/A	✓	✓
b. IU self-monitoring results?	✓	✓	✓	✓	✓	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	N/A	N/A	N/A
2. How many reports submitted during the past reporting year indicated discharge violations?	6	22	0	6	28	0	41	3
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	✓	✓	N/A	✓	✓	N/A	✓	✓
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	✓	✓	N/A	✓	✓	N/A	✓	✓

Comments:

27. This report is archived and not included in the active folder. 28. Pending on-going effort by the CA to bring these SIUs into compliance. 29. The annual report month appears to be inappropriate. The CA current annual report month is August and has requested the AA to move the report month to October to allow the necessary time to prepare the report and provide proof of publication of SIUs in SNC; see Attachment I-1/2 for more details.

SECTION III: INDUSTRIAL USER FILE REVIEW

✓ => Yes X = No

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltq	TRFoods	HicSpgs
5. Were all nondischarge violations identified in the file?	N/A	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?	✓	✓	✓	✓	✓	✓	✓	✓
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	✓	✓[28]	✓	✓	✓[28]	N/A	✓[28]	✓
10. Is there a compliance schedule? If yes:	N/A	N/A	N/A	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	N/A	N/A	N/A
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	✓	✓	✓	✓
During such 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	N/A	N/A	N/A
d. Spill/slug loads	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
e. Reporting	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
f. Compliance schedule	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
g. others (specify)	N/A	N/A	N/A	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	8-31-08	N/A	N/A	8-31-08	N/A	8-31-08	N/A

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Ft. Smith NPDES #: AR0021750

Date of Audit: 10/21-23/2008 Date entered into ICIS: 11-07-2008

(ASSESSMENT)		Level
NO	Failure to enforce against pass through and/or interference	I
NO	Failure to submit required reports within 30 days[29]	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.

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddInspection.do?actionMethod=initiate&epaOrState=S&CMType=INS&fromICIS=

File Edit View Favorites Tools Help

Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: City of Fort Smith

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

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

*** Limited Facility**

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0021750			

Compliance Monitoring Dates

Planned Start Date: 10/20/2008

Planned End Date: 10/23/2008

Actual Start Date: 10/20/2008

Actual End Date: 10/23/2008

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

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

State Statute:

* Compliance Monitoring Action Reason: Agency Priority; Citizen Complaint/Tip; **Core Program**; For Cause; Random Inspection

* Compliance Monitoring Agency Type: State Contractor; State - Using Federal Credential; **State**; Regional; Other Federal

Compliance Monitoring Agency Name:

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

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

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

Which party had the lead?:

Government Contacts

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes: 4952 Sewerage Systems

NAICS Codes:

Priorities

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

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

Media Monitored

Media Monitored:

Compliance Monitoring Information

Number of Days Physically Conducting Activity: 4

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome: No violations

Compliance Monitoring Rating Code: Satisfactory

Multimedia Indicator

Multimedia Indicator:

Compliance Monitoring Comments

Compliance Monitoring Comments: 0808: Significant Industries Site Visits conducted

Trusted sites 100%

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do

File Edit View Favorites Tools Help

Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check Send to Settings

ICIS NPDES: Add Inspection Page Tools

Integrated Compliance Information System

HOME
HELP
LOGOUT

Special Programs

Pretreatment

Significant Industrial Users (SIUs)

SIUs :	19
SIUs Without Control Mechanism :	0
SIUs Not Inspected :	0
SIUs Not Sampled :	0
SIUs in SNC with Pretreatment Standards :	3
SIUs in SNC with Reporting Requirements :	0
SIUs in SNC with Pretreatment Schedule :	0
SIUs in SNC Published in Newspaper :	3
SIUs on Schedules :	0
Violation Notices Issued to SIUs :	130
Administrative Orders Issued to SIUs :	3
Civil Suits Filed Against SIUs :	0
Criminal Suits Filed Against SIUs :	0

Categorical Industrial Users (CIUs)

CIUs :	8
CIUs in SNC :	1

Penalties

Dollar Amount of Penalties Collected :	$ 7,000
Industrial Users (IUs) from which Penalties have been collected :	1

Other Information

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

Local Limits

Date of Most Recent Technical Evaluation for Local Limits :	9/26/2008
Date of Most Recent Adoption of Technically Based Local Limits :	
Local Limit Pollutants :	

POLLUTANTS

Removal Credits

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

POLLUTANTS

Acceptance of Waste

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

Deficiencies

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

Annual Frequency

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

<< PREVIOUS | SAVE & EXIT | SAVE & CONTINUE | SAVE & ADD ANOTHER | COPY & CREATE NEW | CANCEL

EPA U.S. Environmental Protection Agency

Trusted sites 100%

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Ft. Smith NPDES #: AR0021750

Name, address & phone number of industry: Trane
4811 South Zero St
(479) 648-4253

Date/Time of visit: 10/22/2008 from 1:30 pm to 2:25 pm

Type of industry: 40 CFR Part 433 Metal Finisher

Industry contacts: Darryl Dees Mgr Env Health & Safety
John Bradbury Env Safety Eng

		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?	✓[1]		
6.	Proper solid waste disposal?	✓		
7.	Solvent management/TTO control?	✓[2]		
8.	Suitable sampling location?	✓		
9.	Appropriate self-monitoring procedures/equipment?	✓		
10.	Adequate spill prevention and control?	✓		
11.	Industrial familiar with limits and requirements?	✓		
12.	Pollution Prevention activity	✓		

Comments: 1. Hazard Waste stored only. 2. Trane has elected to test for all 110 Toxic Organics instead of submitting the 40CFR433.12(a) certification.

Visit conducted by: Torrence/Easley Date: 12-18-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Fort Smith NPDES #: AR0021750

Industry name: Trane

Additional Comments:

The Trane plant in Fort Smith is an assembly plant only. The plant receives parts fabricated elsewhere and assembles them to form a package A/C units. To construct the housing for the units, Trane receives galvanized steel rolls which are cut to length and formed. The formed sheets are sent to a six (6) stage zinc phosphate washer prior to the powder painting operation.

The wastewater is treated in a chemical precipitation unit before it is discharged to the POTW. The pretreatment system generates a non-hazardous sludge which is shipped to a local landfill.

Visit conducted by: Torrence/Easley Date: 12-14-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Ft. Smith NPDES #: AR0021750

Name, address & phone number of industry: Southern Steel & Wire
3501 S. Tulsa,
(479)646-1651

Date/Time of visit: 10/22/2008 from 11:18 a.m. to 12:10 pm

Type of industry: Metal Finisher CFR 433

Industry contacts: Rusty Wright, WW Mgr;
Bobby White, Mgr Tech Services

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

Comments: 1. The treatment system operator recently assumed the duties of operating the system and is trying to become familiar with routine day-to-day O&M procedures.

Visit conducted by: Torrence/Stewart Date: 12-14-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Ft. Smith NPDES #: AR0021750

Industry name: Southern Steel & Wire

Additional Comments:

Southern Steel & Wire (SSW) end products include miscellaneous wire products such as shelves and baskets. Raw material comes in different sized wire raw stock (low carbon steel). Wire is straightened and cut to size, sent thru benders and resistant welded where needed. SSW has two powder coating lines and two plating lines; the second plating line was recently installed but, presently, is idle due to slowdown in business. Each plating line consists of a heated soap clean bath & fresh water rinse followed by a muriatic acid bath & rinse. Parts are then sent thru an electro-cleaner & rinse followed by an acid (muriatic) pickle bath and two rinses.

The two "powder coat" lines are identical. Raw wire products are sent thru a heated water bath followed by two separate soap cleaning baths. Products are then sent thru a Zn phosphate bath followed by a fresh water rinse, then to the final chromate sealant bath, rinse, to drying ovens then powder coat and final bake oven.

All wastewater from the three lines are sent to their pretreatment bldg. Pretreatment consists of CN destruct, holding tank for batch treatment, typical chemical precip for metals with polymers, clarification, pH adjust and sand filtration.

SSW has had numerous problems with Zn and CN in the past; the system has been upgraded but the operators are fairly new and are trying to learn routine operating procedures.

Visit conducted by: Torrence/Stewart Date: 12-18-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Ft. Smith NPDES #: AR0021750

Name, address and phone number of industry: Gerdau Macsteel, 5225 Planters Rd, (479)648-5544

Date/Time of visit: 10/22/08 from 8:35 a.m. to 11:05 a.m.

Type of industry: Iron and Steel Mfr 40 CFR 420; Subpart E, F & G

Industry contacts: Warren Taff, Senior Project Eng - Environmental

		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?	✓[1]		
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	✓		

Comments: 1. See Attachment G-1/15 for a copy of TOMP.

Visit conducted by: Torrence/Stewart Date: 12-16-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Ft. Smith NPDES #: AR0021750

Industry name: Gerdau/Macsteel

Additional comments:

Gerdau produces specialty steel cylindrical lengths of varying diameters depending on customer needs. Raw material is recycled scrap metal which is melted down (3050 °F)in electric arc furnaces at a rate of 70 tons every 50 minutes. Additional elements (Ni, Cr, Mn, V and Bo in rod form) are added to molten steel to produce the desired metallurgical properties. Gerdau has operations (vacuum degassing, continuous casting and hot forming) with contact cooling wastewater. Wastewater is recycled/reused from all three operations.

Over 70% of the end use of the steel is for the transportation industry.

The pretreatment system (chemical precipitation) had O&M problems which caused Gerdau to violate the zinc limit in their permit. Gerdau made some O&M changes and is presently in compliance with the zinc limit.

Visit conducted by: Torrence/Stewart Date: 12-18-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Fort Smith NPDES #: AR0021750

Name, address, phone number of industry: Exide Technologies
4115 South Zero
(479) 646-8341

Date/Time of visit: 10/22/2008 from 2;30 pm to 3:30 pm

Type of industry: 40 CFR Part 461 Battery Manufacturer
(Include regulatory citation if CIU)

Industry contacts: David W. Zirbel, Fac Mgr/Plt Eng

	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?	✓[1]		
8. Suitable sampling location?	✓		
9. Appropriate self-monitoring procedures/equipment?	✓		
10. Adequate spill prevention and control?	✓[2]		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Comments: 1. Exide has elected to sample for the 110 Toxic Organics.

2. Exide has no major source to cause a spill.

Visit conducted by: Torrence/Easley Date: 12-19-08

(signature of auditor conducting visit)

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

Control Authority: City of Ft. Smith NPDES #: AR0021750
Industry name: Exide

Additional comments:

Exide manufactures industrial batteries (mercury oxide, Manganese, Silver oxide, nickel sodium chloride and nickel metal hydride), battery testers, battery holders, battery adapter or accessories, Battery cabinets or covers or doors, tool kits for batteries, fluorescent ballast battery unit, drive components, clutches, clutch parts and accessories

Exide receives lead ingots and melts the ingots in a combination furnace/die casting machine. The lead die cast parts are the "building cells" for the batteries. The plastic castings for the batteries are manufactures elsewhere.

Exide submerges the completed batteries in a water bath to remove the heat generated while charging the new batteries. Most of the wastewater comes from employee showers which are mandatory; the employees are exposed to lead dust and the showers remove dust from the skin.

The pretreatment system is a chemical precipitation with an equalization tank to provide a steady-state flow of wastewater.

Visit conducted by: Torrence/Easley Date: 12-15-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Ft. Smith NPDES #: AR0021750

Name, address and phone number of industry:
Hiland Dairy Foods, 415 S. 10th Street 479.782.2833

Type of industry: Milk Products Date/Time of visit:
10/22/08 / 8:40 a.m.

Industry contacts: Jeff Ventimiglia - Quality Control Mngr.

		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 has been in operation since the 60's. Facility pasteurizes and homogenizes milk. Other associated milk by-products are also produced. On this site visit, the facility was shut down and conducting its "deep cleaning day". Every day they clean the process equipment but, 2/week (Wednesday and Sunday) they conduct the "deep cleaning" where they open all vats and fillers and pressure wash. They produce milk on Monday, Tuesday, Thursday, Friday and Saturday.

Visit conducted by: Gilliam/Easley Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Ft. Smith NPDES #: AR0021750

Industry name: Hiland Dairy Products

Additional comments: All pipes, vats and fillers are S.S. All floor drains inside the building drain to the pretreatment building. Soaps used contain a dilute phosphoric, nitric and sulfuric acids cut with water for cleaning. Other "soaps" are continually used to lubricate the conveyor system chains. Raw milk is trucked in for further processing to meet FDA standards. Facility also makes the plastic containers from beads. No contact wastewater is associated with this process. Raw milk is run through a radiator type heat exchanger to pasteurize (holds the milk at the FDA required 161 degrees for 17 seconds). They hold theirs at 180 degrees for 30 seconds. The product is then sent to the homogenizer which keeps all fats in solution. After homogenization, the milk is sent through a centrifuge to separate the fat from the skim milk. Fats are added back in to make the 1%, 2% or whole milk. Excess fats are sold off for ice cream or butter (there's about 40% of their fat/cream they don't use). The clean in place (CIP) system only discharges the first flush. They re-use the subsequent soaps/rinse/sanitizers (weak vinegar like acid). Pretreatment consists of a 20,000 gal. equalization tank. Sulfuric acid is also added if needed. Wastewater is sent through a DAF unit (5.5. to 6.5 ph) where solids are skimmed off the top into the sludge tank and sent off-site. Very adequate sampling point just past the weir. Facility and City representative were both familiar with processes and the site visit was very transparent and informative.

Visit conducted by: Gilliam/Easley Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Ft. Smith NPDES #: AR0021750

Name, address and phone number of industry:

Ft. Smith Plating, 4302 Wheeler Ave. 479.646.5266

Type of industry: Job Shop Electroplater Date/Time of visit:
40 CFR 413 10/22/08 / 10:00 a.m.

Industry contacts: Bobby Dolan, II - President

		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 is a job shop Electroplater under CFR 413. Metal plated includes copper, nickel, chrome, zinc and very seldom now, gold. Some anodizing is also done on aluminum. Customers bring in their workpieces they want plated. They began operations back in 1957.

Visit conducted by: Gilliam/Easley Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Ft. Smith NPDES #: AR0021750

Industry name: Fort Smith Plating

Additional comments: Facility has numerous plating baths and overflow rinses associated with their numerous plating operations. Overflow rinses are sent to segregated holding tanks of various sizes for treatment before discharge to City. No floor drains are in the process building. Overflow from regulated processes gravity flows to pretreatment building which is separated from the process building. Recycling of water has resulted in water usage from above 0.1 MGD to 0.05 MGD. Nickle, Zinc, Copper and Chrome are all treated using typical chemical precipitation. Meta-bisulfite is added to reduce hex- to trivalent chrome, caustic added to bring pH back up, flocculent are added to first stage of 3 bay plate clarifier to drop out metals. Fluid from clarifier is sent through a micron screen filter system. Solids drained from clarifier are sludge thickened, then pressed with supernatant sent back to clarifier with pH monitoring at each stage. Filter pads do not bust TCLP but the sludge does for Chrome. 90% of business is Zinc plating. Very clean pretreatment set-up. IU and City representatives were both knowledgeable of regs, processes and pretreatment. Sampling point adequate.

Visit conducted by: Gilliam/Easley Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Ft. Smith NPDES #: AR0021750

Name, address and phone number of industry:

Twin River Foods, 8427 Hwy. 45 South 479.649.0775

Type of industry: Chicken Deboning Date/Time of visit: 10/22/08 / 1:25 p.m.

Industry contacts: Jesus Sanchez-Plant Mngr. /Joe Lujan-Quality Assurance Mngr.

		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	✓		✓

*Basic in-ground grease trap which is not very efficient.

Additional comments:

Facility brings in fresh chicken thighs for de-boning. Some are skinned. Some of product is frozen while most is sent out fresh. From the IU rep's second floor office window, the entire process area could be seen from chicken coming in to deboning and skinning with packaged thighs going out.

Visit conducted by: Gilliam/Stewart Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Ft. Smith NPDES #: AR0021750

Industry name: Twin River Foods

Additional comments: No number of personnel was mentioned but, there were not many different jobs being conducted in a relatively small building. There were numerous work tables with many workers in close proximity. No cooking nor marination is done at this facility. "Process" cleaning operations occur every night as one shift. This is the main source of their wastewater. Other wastewater is from the melted bloody ice in which the thighs are brought in. After deboning and some skinning, thighs are iced and either sent out under several different brand names or sent to a holding freezer. USDA personnel is usually on-site. "Pretreatment" consists a manhole followed by of a basic grease trap (@~12 to 18,000 gpd). Coagulants and bacteria are added in the manhole to help the fats rise to the top with the wastewater flowing through the "grease trap". Each day the FOG is pumped and hauled off to their sister plant for further processing. Since the building is leased and there's not enough room at this facility, they cannot easily install a DAF or any type of mechanical pretreatment. Facility has had historic problems meeting their BOD limits. Sampling site is about as good as they can come up with at this time. City rep was knowledgeable about this facility's "plight" and knew their operations.

Visit conducted by: Gilliam/Stewart Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Ft. Smith NPDES #: AR0021750

Name, address and phone number of industry:
Hickory Springs, 4925 State Line Road 479.646.6161

Type of industry: Metal Finisher
40 CFR 433

Date/Time of visit:
10/22/08 / 2:35 p.m.

Industry contacts: Ron Vogeltanz- Production Mngr.

		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	?		

*Not on ADEQ Haz waste generator's list

Additional comments:

Facility makes "sleeper sofas", RV steps and foam for end products. They're "ramping up" for a new product (bus seats) due sometime in June. Cold rolled steel is the main raw substrate. Pieces are formed, some sent through rolling mills, stamped, bent, ground, welded etc. before sent to electroless or dip painting process.

Visit conducted by: Gilliam/Stewart Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Ft. Smith NPDES #: AR0021750

Industry name: Hickory Springs Manufacturing

Additional comments:

Regulated process is a typical 5 stage iron phosphatizing operation prior to either electroless or liquid painting. There's only one rinse that counter current flows back to the caustic cleaning tank (stage 1). Total process consists of caustic bath, fresh water rinse, phosphatizing followed by 2 more rinses. All overflow gravity drains in floor trenches to a sump which pretreatment. Dip paint (water based) line was in operation but the electroless powder coat paint operation wasn't. The dip painted pieces are sent through an oven. Pretreatment consists of simple chemical precipitation with floculants & polymers, clarification with sludge hauled off-site. City rep was knowledgeable of facility's operations. IU rep was knowledgeable of the pretreatment requirements and interested in learning more about pollution prevention. Adequate sampling point. Facility has an outdoor chemical storage building with a sump (no drain) for any spills. The building's floor was sloped to allow any spills to flow into that sump.

Foam production building was not visited as there is no contact wastewater generated.

Visit conducted by: Gilliam/Stewart Date: 10/22/08

Allen Gilliam

(signature of auditor conducting visit)

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WRITER'S E-MAIL ADDRESS
JCanfield@DailyWoods.com

September 26, 2008

Mr. Steve Parke
Utilities Directors
623 Garrison Avenue, 5th Floor
Fort Smith, AR 72901

Re: Significant Industrial User Permits Issued by the City of Fort Smith – Users Located Outside City Limits

Dear Mr. Parke:

Your office has inquired regarding the captioned subject. You have asked for our opinion as to whether the City of Fort Smith has the authority to issue Significant Industrial User (SIU) Permits to entities discharging wastewater into the City's sanitary sewer system if the user is located outside the City limits. You have also inquired regarding enforcement actions possible with reference to an SIU user located outside the corporate limits of the City.

The City of Fort Smith has the authority to operate a sanitary sewer system outside the corporate limits of the City within ten miles of the corporate limits. Ark. Code Ann. § 14-235-203(b). None of the areas we are discussing, including the areas being developed by the Fort Chaffee Redevelopment Authority, are of a distance greater than ten miles from the corporate limits of the City.

It is our opinion that a significant industrial user located outside the City who requests the ability to discharge into the City's sanitary sewer system pursuant to an SIU permit of the form currently being used agrees by acceptance of the permit and by making the discharge to be subject to the City's ordinances and a variety of enforcement procedures summarized below. In summary, it is our opinion the City obtains enforcement control over a SIU user located outside the City limits pursuant to the agreements accepted by the user at the time the user accepts the City's permit to discharge into the City's system.

Pertinent provisions of the agreement by the user pursuant to the permit include the following.

1. The user agrees to comply with "all applicable pretreatment regulations, standards or requirements under local, State and Federal laws, including such regulations, standards, requirements, or laws that may become effective during the term of this permit."

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2. The user acknowledges that noncompliance "with any term or condition of this permit shall constitute a violation of the Control Authority's sewer user ordinance."

3. Specifically, in paragraph D on page 3 of the standard permit, the permittee agrees that all discharges will comply with Fort Smith Ordinance 69-97 and other applicable standards, including those which may become effective during the term of the permit.

4. The permit has many specific requirements regarding notice to the City as the Control Authority – for example, see the automatic resampling and accidental discharge provisions at page 5 of the standard permit.

5. The permittee agrees to comply with the provisions of the permit and that failure to comply may be "grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief and summary abatements. While the City's criminal jurisdiction may be limited by the fact that the SIU permittee is located outside the City limits, the City has ample enforcement procedures through administrative action and civil judicial actions to enforce the provisions of the permit.

6. Specifically with reference to access to the user's facilities, the permit provides that the City may terminate the permit if the user refuses to allow timely access to the facility premises and records.

7. Finally, paragraphs 8 and 9 of section D-Additional Reporting Requirements-make it clear that the permittee is subject to both civil and criminal liability for violations of Fort Smith Ordinance 69-97. The permittee is subject to civil penalties of at least $1,000 per day for violations.

To repeat, it is our opinion that the City has a full range of and ample authority to enforce the regulations applicable to its public sewer facilities pursuant to the provisions each of the SIU permit accepted by each SIU permittee.

Thank you for your attention in this matter.

Very truly yours,

Jerry L. Canfield
JLC/cmm

A - 2/2

PERMIT NO: SIU109304

INDUSTRIAL USER PERMIT

In accordance with the provisions of Section 8. Ordinance 69-97

Quanex, MacSteel Div.
5225 Planters Road
Fort Smith, AR 72916-9549

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfall(s) identified herein into the Control Authority's sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the Control Authority's sewer use ordinance.

This permit shall become effective on January 1, 2005 and shall expire at midnight on January 1, 2010.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Section 8. Ordinance 69-97, a minimum of 90 days prior to the expiration date.

By: _____
Steve Parke, Director of Utilities

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PART 1 - EFFLUENT LIMITATIONS

A. During the period of January 1, 2005 to January 1, 2010, the permittee is authorized to discharge process wastewater to the Control Authority's sewer system from the outfall(s) listed below.

Description of outfall(s):

Outfall:	Description:
001	The discharge structure located at the permittee's pretreatment facility on the Northeast corner of the property at the 5225 Planters Road facility just prior to discharge into the City's sanitary sewer system.

B. During the period of January 1, 2005 to January 1, 2010, the discharge from outfall # 001 shall not exceed the following effluent limitations.

Effluent Limitations

Parameter	Daily Maximum	Monthly Average
Oil & Grease	150 mg/L	NA
Biochemical Oxygen Demand (BOD)	450 mg/L or 180 ppd	NA
Total Suspended Solids (TSS)	430 mg/L or 180 ppd	NA
pH (Grab)	6.0 - 11.0	NA
Copper (Cu)	Monitor & Report	NA
Lead (Pb)	0.518 ppd*	0.173 ppd*
Nickel (Ni)	Monitor & Report	NA
Silver (Ag)	Monitor & Report	NA
Zinc (Zn)	0.778ppd*	0.259 ppd*

* Iron & Steel Category (40 CFR Part 420) PSES production based standards.

PART 2 - SELF MONITORING REQUIREMENTS

A. From the period beginning on the effective date of the permit until January 1, 2010, the permittee shall monitor outfall # 001 for the following parameters, at the indicated frequency:

Sample Parameter (units)	Measurement Location	Frequency	Sample type
Oil & Grease mg/L	outfall #001	1/month	grab
BOD mg/L	outfall #001	1/month	24 hour composite
TSS mg/L	outfall #001	1/month	24 hour composite
pH SU (Grab)	outfall #001	1/month	grab
Copper mg/L	outfall #001	1/month	24 hour composite
Nickel mg/L	outfall #001	1/month	24 hour composite
Lead mg/L	outfall #001	1/month	24 hour composite
Zinc mg/L	outfall #001	1/month	24 hour composite
Silver mg/L	outfall #001	1/month	24 hour composite

1. The designated sampling point for all parameters shall be at the discharge structure located at the permittee's pretreatment facility on the Northeast corner of the property at the 5225 Planters Road facility just prior to discharge into the City's sanitary sewer system

2. See definitions of sample types.

B. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit. Also, all sampling and analyses conducted for self-monitoring shall be performed by a certified, independent laboratory acceptable to the Control Authority.

C. The permittee shall not discharge wastewater containing any of the following substances from any of the outfalls:

1. Fats, wax, grease, or oils of petroleum origin, whether emulsified or not, in excess of one hundred and fifty (150) mg/l or containing substances which may solidify or become viscous at temperatures between 32 degrees F (O degrees C) and 140 degrees F (60 degrees C);

2. Any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases;

3. Any effluent having a temperature higher than 104 degrees F (40 degrees C);

4. Any ashes, hair, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solid or viscous substances capable of causing obstructions or other interferences with proper operation of the sewer system;

5. Any pollutant, including oxygen demanding pollutants (BOD etc.) at flow rate and/or concentration which will cause the pollutant to pass through to the receiving waters or interfere with the City of Fort Smith's wastewater treatment facility. For the purpose of this section, the terms "pass through" and "interference" have the same definitions as appear in the City Ordinance 69-97.

D. All discharges shall comply with all other applicable laws, regulations, standards, and requirements contained in Ordinance 69-97 and any applicable State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this permit.

PART 3 REPORTING REQUIREMENTS

A. Monitoring Reports

Monitoring results obtained shall be summarized and reported on an Industrial User Monitoring Report once per month. The reports are due on the 15th day of each month. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed during the calendar month preceding the submission of each report including measured maximum and average daily flows. Copies of all analytical reports used for compliance demonstration, from internal as well as contract laboratories, shall be included with all pertinent reports.

B. If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and results shall be reported in the monthly report submitted to the Control Authority. Such increased monitoring frequency shall also be indicated in the monthly report.

C. Automatic Resampling

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the Control Authority of the violation within 24 hours; and

2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days of the first violation.

D. Accidental Discharge Report

1. The permittee shall notify the Control Authority immediately upon the occurrence of an accidental discharge of substances prohibited by Ordinance 69-97 or any slug loads or spills that may enter the public sewer. During normal business hours the Control Authority should be notified by telephone at 784-2330. At all other times, the Control Authority should be notified by fax at 784-2404 after 5 p.m. Monday - Friday or weekends and holidays.

This notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.

Within seven days following an accidental discharge, the permittee shall submit to the Control Authority a detailed written report containing the following:

a. Description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include the location of discharge, type, concentration and volume of waste.

b. Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.

c. All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

E. All reports required by this permit shall be submitted to the Control Authority at the following address:

Paul R. Easley
City of Fort Smith
3900 Kelley Hwy.
Fort Smith, AR 72904

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The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

5. Permit Termination

This permit may be terminated for the following reasons: (But not limited to)

a. Falsifying self-monitoring reports
b. Tampering with monitoring equipment
c. Refusing to allow timely access to the facility premises and records
d. Failure to meet effluent limitations
e. Failure to pay fines
f. Failure to pay sewer charges
g. Failure to meet compliance schedules.

6. Permit Appeals

The permittee may petition to appeal the terms of this permit within thirty (30) days of the receipt of this permit.

This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of the appeal. In its petition, the permittee must indicate the permit provisions objected to, the reasons for this objection, and the alternative condition, if any, it seeks to be placed in the permit.

The effectiveness of this permit shall not be stayed pending a reconsideration by the Control Authority. If, after considering the petition and any arguments put forth by the Pretreatment Program Supervisor, the Control Authority determines that reconsideration is proper, the Control Authority shall remand the permit back to the Pretreatment Program Supervisor for re-issuance. Those permit provisions being reconsidered by the Pretreatment Program Supervisor shall be stayed pending re-issuance.

7. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of Federal, State, or local laws or regulations.

8. Limitation on Permit Transfer

Permits may be assigned or transferred to a new owner and/or operator with prior approval of the Pretreatment Program Supervisor:

a. The permittee must give at least thirty (30) days advance notice to the Pretreatment Program Supervisor

b. The notice must include a written certification by the new owner which:

(i) States that the new owner has no immediate intent to change the facility's operations and processes,

(ii) Identifies the specific date on which the transfer is to occur,

(iii) Acknowledges full responsibility for complying with the existing permit.

9. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must submit an application for a new permit at least ninety (90) days before the expiration date of this permit.

10. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

a. The permittee has submitted a complete permit application at least ninety (90) days prior to the expiration date of the users existing permit.

b. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

11. Dilution

The permittee shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute of adequate treatment to achieve compliance with the limitations contained in this permit.

12. Definitions

a. Daily Maximum - The maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharge over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.

b. Composite Sample - A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a time composite sample: composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or as a flow proportional composite sample: collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquots.

c. Grab Sample - An individual sample collected in less that fifteen (15) minutes, without regard for flow or time.

SECTION A. GENERAL CONDITIONS AND DEFINITIONS

1. Severability
The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

2. Duty to Comply
The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

3. Duty to Mitigate
The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

4. Permit Modification
This permit may be modified for good causes including, but not limited to, the following:

a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements

b. Material or substantial alterations or additions to the discharger's operation processes, or discharge volume or character which were not considered in drafting the effective permit

c. A change in any condition in either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge

d. Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel or the receiving waters

e. Violation of any terms or conditions of this permit

f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting

g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR 403.13; or

h. To correct typographical or other errors in the permit

i. To reflect transfer of the facility ownership and/or operation to a new owner/operator

j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

PART 4 - SPECIAL CONDITIONS

SECTION 1 - ADDITIONAL/SPECIAL MONITORING/REPORTING REQUIREMENTS

A. Categorical Industrial User Requirements.

Within 90 days after the compliance date for the Iron & Steel Manufacturing Standards, or in the case of a New Source, following commencement of the introduction of wastewater into the POTW, all users subject to the above standards must submit to the Control Authority a report on compliance that states whether or not applicable pretreatment standards are being met on a consistent basis. The report must indicate the nature and concentration of all regulated pollutants in the facility's regulated streams and a statement of whether compliance is consistently being achieved, and if not, what additional operation, maintenance and/or pretreatment is necessary to achieve compliance. The Iron & Steel Manufacturing compliance date is July 10, 1985.

In June and December of each year a periodic compliance report must be submitted to the office of the Pretreatment Program Supervisor indicating the precise nature and concentration of the pertinent regulated parameters in the users discharge to the POTW, the average and maximum daily flow rates of the facility, the methods used by the discharger to sample and analyze the data, and a certification that these methods conform to the methods outlined in 40 CFR Part 136. Therefore, at least twice a year, the user must sample and analyze (outside the City's sampling program) the parameters listed on the previous pages.

Categorical Industries with production based limits must submit the previous six months data in their Bi-Annual reports. TTO's known to be on the premises must be also be tested twice per year. A Toxic Organic Management Plan (TOMP) may be submitted in lieu of testing, however, a certification stating the plan is being carried out must also accompany each Bi-Annual report. If the user is under a compliance schedule with the City, quarterly reports must be submitted to this office for the purpose of evaluating compliance status.

SECTION 2 - REOPENER CLAUSE

Describe any causes for modifying the permit arising out of facts that are not common to all industrial users which will or are likely to occur during its effective period.

Not currently applicable to this Industrial User.

SECTION 3 - COMPLIANCE SCHEDULE

Not currently applicable to this Industrial User.

d. Instantaneous Maximum Concentration - The maximum concentration allowed in any single grab sample.

e. Cooling Water -
(1) Uncontaminated: Water used for cooling purposes only which has no direct contact with any raw material, intermediate, or final product and which does not contain a level of contaminants detectably higher than that of the intake water.

(2) Contaminated: Water used for cooling purposes only which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides, or by direct contact with process materials and/or wastewater.

f. Monthly Average - The arithmetic mean of the values for effluent samples collected during a calendar month or specified thirty (30) day period (as opposed to a rolling 30 day window).

g. Weekly Average - The arithmetic mean of the values for effluent samples collected over a period of seven consecutive days.

h. Bi-Weekly - Once every other week.

i. Bi-Monthly - Once every other month.

j. Upset - Means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee, excluding such factors as operational error, improperly designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.

k. Bypass - Means the intentional diversion of wastes from any portion of a treatment facility.

13. General Prohibitive Standards

The permittee shall comply with all the general prohibitive discharge standards in city Ordinance 69-97. Namely, the industrial user shall not discharge wastewater to the sewer system:

a. Having a temperature higher than 104 degrees F (40 degrees C);

b. Containing more than 150 ppm by weight of fats, oils, and grease;

c. Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases; and in no case pollutants with a closed cup flash-point of less than one hundred forty (140) degrees Fahrenheit (60) degrees C), or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the POTW.

d. Containing any garbage that has not been ground by house hold type or other suitable garbage grinders;

e. Containing any ashes, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solid or viscous substances capable of causing obstructions or other interference's with proper operation of the sewer system;

f. Having a pH lower than 6.0 or higher than 11.0, or having any other corrosive property capable of causing damage or hazards to structures, equipment or personnel of the sewer system;

g. Containing toxic or poisonous substances in sufficient quantity to injure or interfere with any wastewater treatment process, or which would constitute hazards to humans or animals, or to create any hazard in waters which receive treated effluent from the sewer system treatment plant(s). Toxic wastes shall include, but are not limited to wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions;

h. Containing noxious or malodorous gases or substances capable of creating a public nuisance; including pollutants which result in the presence of toxic gases, vapors, or fumes;

i. Containing solids of such character and quantity that special and unusual attention are required for their handling;

j. Containing any substance which may affect the treatment plant's effluent and cause violation of NPDES permit requirements;

k. Containing any substance which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines or regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substance Control Act or other regulations or criteria for sludge management and disposal as required by the State;

l. Containing color which is not removed in the treatment process;

m. Containing any medical or infectious wastes;

n. Containing any radioactive wastes or isotopes; or

o. Containing any pollutant, including BOD pollutants, released at a flow rate and/or concentration which would cause interference with the treatment plant(s).

14. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this permit does not relieve the permittee from it's obligations regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may be come effective during the term of this permit.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance

includes, but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance and procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment Facilities

a. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist.

b. The permittee may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure efficient operation.

c. Notification of bypass:

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the City of Fort Smith.

(2) Unanticipated bypass. The permittee shall immediately notify the Control Authority and submit a written notice to the POTW within five (5) days. This report shall specify:

(i) A description of the bypass, and its cause, including its duration;

(ii) Whether the bypass has been corrected; and

(iii) The steps being taken or to be taken to reduce, eliminate and prevent a reoccurrence of the bypass.

4. Removed substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act. The permittee must also comply with any additional local and State standards including such standards or requirements that may become effective during the term of this permit.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected and maintained to ensure their accuracy. Monitoring points shall not be changed without notification to and the approval of the Control Authority.

2. Flow Measurements

If flow measurement is required by this permit, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

3. Analytical Methods to Demonstrate Continued Compliance

All sampling and analysis required by this permit shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA, or as specified in this permit.

4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures identified in Section C. 3, the results of this monitoring shall be included in the permittee's self-monitoring reports.

5. Inspection and Entry

The permittee shall allow the Control Authority, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and

e. Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under this permit, could originate, be stored, or be discharged to the sewer system.

6. Retention of Records

a. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application.

This period may be extended by request of the Control Authority at any time.

b. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Control Authority shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

7. Record Contents

Records of sampling and analyses shall include:

a. The date, exact place, time, and methods of sampling or measurement, and sample preservation techniques or procedures;

b. Who performed the sampling or measurements;

c. The date(s) analyses were performed;

d. Who performed the analyses;

e. The analytical techniques or methods used; and

f. The results of such analyses.

8. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions and/or civil penalties.

SECTION D. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

The permittee shall give notice to the Control Authority ninety (90) days prior to any facility expansion, production increase, or process modifications which results in new or substantially increase discharges or a change in the nature of the discharge.

2. Anticipated Noncompliance

The permittee shall give advance notice to the Control Authority of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

3. Automatic Re-sampling

If the results of the permittee's wastewater analysis indicates a violation has occurred, the permittee must notify the Control Authority within 24 hours of becoming aware of the violation and repeat the sampling and pollutant analysis and submit, in writing, the results of this repeat analysis within 30 days after becoming aware of the violation.

4. Duty to Provide Information

The permittee shall furnish to the Control Authority within 14 days any information which the Control Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also, upon request, furnish to the Control Authority within 14 days, copies of any records required to be kept by this permit.

5. Signatory Requirements

All applications, reports, or information submitted to the Control Authority must contain the following certification statement and be signed as required in Sections (a), (b), (c), or (d) below:

"I certify under penalty of law that this document and all attachments were prepared under by 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."

a. By 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 operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

b. By 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.

d. By 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 a 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 a 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 Control Authority.

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 the environmental matters for the company, a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the Control Authority prior to or together with any reports to be signed by the newly authorized representative.

6. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or with Ordinance 69-97 shall inform the Control Authority within 24 hours of becoming aware of the upset at 784-2330, or by fax at 784-2404.

A written follow-up report of the upset shall be filed by the permittee with the Control Authority within five (5) days. The report shall specify:

a. Description of the upset, the cause(s) thereof and the upset's impact on the permittee's compliance status;

b. Duration of noncompliance, including exact dates and times of noncompliance, and if not corrected, the anticipated time the noncompliance is expected to continue; and

c. All steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner.
A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations attributable to the upset event.

7. Annual Publication

A list of all industrial users which were subject to enforcement proceedings during the twelve (12) previous months shall be annually published by the Control Authority in the largest daily newspaper within its service area. Accordingly, the permittee is apprised that noncompliance with this permit may lead to an enforcement action and may result in publication of its name in an appropriate newspaper in accordance with this section.

8. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under Ordinance 69-97 or other local, State or Federal laws or regulations.

9. Penalties for Violations of Permit Conditions

Ordinance 69-97 provides that any person who violates a permit condition is subject to a civil penalty of at least $1,000.00 dollars per day of such violation. Any person who willfully or negligently violates permit conditions is subject to criminal penalties or a fine of up to $1,000.00 dollars per day of violation, or by imprisonment, or both. The permittee may also be subject to sanctions under State and/or Federal law.

10. Recovery of Costs Incurred

In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or Ordinance 69-97 or causing damage to or otherwise inhibiting the Control Authority's wastewater disposal system shall be liable to the Control Authority for any expense, loss, or damage caused by such violation or discharge. The Control Authority shall bill the permittee for the costs incurred for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation of Ordinance 69-97.

SECTION A. GENERAL CONDITIONS AND DEFINITIONS

1. Severability
The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

2. Duty to Comply
The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

3. Duty to Mitigate
The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

4. Permit Modification
This permit may be modified for good causes including, but not limited to, the following:

a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements

b. Material or substantial alterations or additions to the discharger's operation processes, or discharge volume or character which were not considered in drafting the effective permit

c. A change in any condition in either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge

d. Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel or the receiving waters

e. Violation of any terms or conditions of this permit

f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting

g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR 403.13; or

h. To correct typographical or other errors in the permit

i. To reflect transfer of the facility ownership and/or operation to a new owner/operator

j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

5. Permit Termination

This permit may be terminated for the following reasons: (But not limited to)

a. Falsifying self-monitoring reports
b. Tampering with monitoring equipment
c. Refusing to allow timely access to the facility premises and records
d. Failure to meet effluent limitations
e. Failure to pay fines
f. Failure to pay sewer charges
g. Failure to meet compliance schedules.

6. Permit Appeals

The permittee may petition to appeal the terms of this permit within thirty (30) days of the receipt of this permit.

This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of the appeal. In its petition, the permittee must indicate the permit provisions objected to, the reasons for this objection, and the alternative condition, if any, it seeks to be placed in the permit.

The effectiveness of this permit shall not be stayed pending a reconsideration by the Control Authority. If, after considering the petition and any arguments put forth by the Pretreatment Program Supervisor, the Control Authority determines that reconsideration is proper, the Control Authority shall remand the permit back to the Pretreatment Program Supervisor for re-issuance. Those permit provisions being reconsidered by the Pretreatment Program Supervisor shall be stayed pending re-issuance.

7. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of Federal, State, or local laws or regulations.

8. Limitation on Permit Transfer

Permits may be assigned or transferred to a new owner and/or operator with prior approval of the Pretreatment Program Supervisor:

a. The permittee must give at least thirty (30) days advance notice to the Pretreatment Program Supervisor

b. The notice must include a written certification by the new owner which:

(i) States that the new owner has no immediate intent to change the facility's operations and processes,

(ii) Identifies the specific date on which the transfer is to occur,

(iii) Acknowledges full responsibility for complying with the existing permit.

9. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must submit an application for a new permit at least ninety (90) days before the expiration date of this permit.

10. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

a. The permittee has submitted a complete permit application at least ninety (90) days prior to the expiration date of the users existing permit.

b. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

11. Dilution

The permittee shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute of adequate treatment to achieve compliance with the limitations contained in this permit.

12. Definitions

a. Daily Maximum - The maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharge over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.

b. Composite Sample - A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a time composite sample: composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or as a flow proportional composite sample: collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquots.

c. Grab Sample - An individual sample collected in less that fifteen (15) minutes, without regard for flow or time.

d. Instantaneous Maximum Concentration - The maximum concentration allowed in any single grab sample.

e. Cooling Water -

(1) Uncontaminated: Water used for cooling purposes only which has no direct contact with any raw material, intermediate, or final product and which does not contain a level of contaminants detectably higher than that of the intake water.

(2) Contaminated: Water used for cooling purposes only which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides, or by direct contact with process materials and/or wastewater.

f. Monthly Average - The arithmetic mean of the values for effluent samples collected during a calendar month or specified thirty (30) day period (as opposed to a rolling 30 day window).

g. Weekly Average - The arithmetic mean of the values for effluent samples collected over a period of seven consecutive days.

h. Bi-Weekly - Once every other week.

i. Bi-Monthly - Once every other month.

j. Upset - Means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee, excluding such factors as operational error, improperly designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.

k. Bypass - Means the intentional diversion of wastes from any portion of a treatment facility.

13. General Prohibitive Standards

The permittee shall comply with all the general prohibitive discharge standards in city Ordinance 69-97. Namely, the industrial user shall not discharge wastewater to the sewer system:

a. Having a temperature higher than 104 degrees F (40 degrees C);

b. Containing more than 150 ppm by weight of fats, oils, and grease;

c. Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases; and in no case pollutants with a closed cup flash-point of less than one hundred forty (140) degrees Fahrenheit (60) degrees C), or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the POTW.

d. Containing any garbage that has not been ground by house hold type or other suitable garbage grinders;

e. Containing any ashes, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solid or viscous substances capable of causing obstructions or other interference's with proper operation of the sewer system;

f. Having a pH lower than 6.0 or higher than 11.0, or having any other corrosive property capable of causing damage or hazards to structures, equipment or personnel of the sewer system;

g. Containing toxic or poisonous substances in sufficient quantity to injure or interfere with any wastewater treatment process, or which would constitute hazards to humans or animals, or to create any hazard in waters which receive treated effluent from the sewer system treatment plant(s). Toxic wastes shall include, but are not limited to wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions;

h. Containing noxious or malodorous gases or substances capable of creating a public nuisance; including pollutants which result in the presence of toxic gases, vapors, or fumes;

i. Containing solids of such character and quantity that special and unusual attention are required for their handling;

j. Containing any substance which may affect the treatment plant's effluent and cause violation of NPDES permit requirements;

k. Containing any substance which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines or regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substance Control Act or other regulations or criteria for sludge management and disposal as required by the State;

l. Containing color which is not removed in the treatment process;

m. Containing any medical or infectious wastes;

n. Containing any radioactive wastes or isotopes; or

o. Containing any pollutant, including BOD pollutants, released at a flow rate and/or concentration which would cause interference with the treatment plant(s).

14. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this permit does not relieve the permittee from it's obligations regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may be come effective during the term of this permit.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes, but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance and procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment Facilities

a. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist.

b. The permittee may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure efficient operation.

c. Notification of bypass:

(1) Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the City of Fort Smith.

(2) Unanticipated bypass. The permittee shall immediately notify the Control Authority and submit a written notice to the POTW within five (5) days. This report shall specify:

(i) A description of the bypass, and its cause, including its duration;

(ii) Whether the bypass has been corrected; and

(iii) The steps being taken or to be taken to reduce, eliminate and prevent a reoccurrence of the bypass.

4. Removed substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act. The permittee must also comply with any additional local and State standards including such standards or requirements that may become effective during the term of this permit.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected and

maintained to ensure their accuracy. Monitoring points shall not be changed without notification to and the approval of the Control Authority.

2. Flow Measurements

If flow measurement is required by this permit, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

3. Analytical Methods to Demonstrate Continued Compliance

All sampling and analysis required by this permit shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA, or as specified in this permit.

4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures identified in Section C. 3, the results of this monitoring shall be included in the permittee's self-monitoring reports.

5. Inspection and Entry

The permittee shall allow the Control Authority, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and

e. Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under this permit, could originate, be stored, or be discharged to the sewer system.

6. Retention of Records

a. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation,

copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application.

This period may be extended by request of the Control Authority at any time.

b. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Control Authority shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

7. Record Contents

Records of sampling and analyses shall include:

a. The date, exact place, time, and methods of sampling or measurement, and sample preservation techniques or procedures;

b. Who performed the sampling or measurements;

c. The date(s) analyses were performed;

d. Who performed the analyses;

e. The analytical techniques or methods used; and

f. The results of such analyses.

8. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions and/or civil penalties.

SECTION D. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

The permittee shall give notice to the Control Authority ninety (90) days prior to any facility expansion, production increase, or process modifications which results in new or substantially increase discharges or a change in the nature of the discharge.

2. Anticipated Noncompliance

The permittee shall give advance notice to the Control Authority of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

3. Automatic Re-sampling

If the results of the permittee's wastewater analysis indicates a violation has occurred, the permittee must notify the Control Authority within 24 hours of becoming aware of the violation and repeat the sampling and pollutant analysis and submit, in writing, the results of this repeat analysis within 30 days after becoming aware of the violation.

4. Duty to Provide Information

The permittee shall furnish to the Control Authority within 14 days any information which the Control Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also, upon request, furnish to the Control Authority within 14 days, copies of any records required to be kept by this permit.

5. Signatory Requirements

All applications, reports, or information submitted to the Control Authority must contain the following certification statement and be signed as required in Sections (a), (b), (c), or (d) below:

"I certify under penalty of law that this document and all attachments were prepared under by 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."

a. By 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 operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding $25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

b. By 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.

d. By 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 a 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 a 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 Control Authority.

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 the environmental matters for the company, a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the Control Authority prior to or together with any reports to be signed by the newly authorized representative.

6. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or with Ordinance 69-97 shall inform the Control Authority within 24 hours of becoming aware of the upset at 784-2330, or by fax at 784-2404.

A written follow-up report of the upset shall be filed by the permittee with the Control Authority within five (5) days. The report shall specify:

a. Description of the upset, the cause(s) thereof and the upset's impact on the permittee's compliance status;

b. Duration of noncompliance, including exact dates and times of noncompliance, and if not corrected, the anticipated time the noncompliance is expected to continue; and

c. All steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner.
A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations attributable to the upset event.

7. Annual Publication

A list of all industrial users which were subject to enforcement proceedings during the twelve (12) previous months shall be annually published by the Control Authority in the largest daily newspaper within its service area. Accordingly, the permittee is apprised that noncompliance with this permit may lead to an enforcement action and may result in publication of its name in an appropriate newspaper in accordance with this section.

8. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under Ordinance 69-97 or other local, State or Federal laws or regulations.

9. Penalties for Violations of Permit Conditions

Ordinance 69-97 provides that any person who violates a permit condition is subject to a civil penalty of at least $1,000.00 dollars per day of such violation. Any person who willfully or negligently violates permit conditions is subject to criminal penalties or a fine of up to $1,000.00 dollars per day of violation, or by imprisonment, or both. The permittee may also be subject to sanctions under State and/or Federal law.

10. Recovery of Costs Incurred

In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or Ordinance 69-97 or causing damage to or otherwise inhibiting the Control Authority's wastewater disposal system shall be liable to the Control Authority for any expense, loss, or damage caused by such violation or discharge. The Control Authority shall bill the permittee for the costs incurred for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation of Ordinance 69-97.

Gerdau MacSteel

City of Fort Smith
Industrial Pretreatment Program
IU Fact Sheet

Permit:	**SIU109304**	Industrial User Number:	281
Permittee:	Gerdau MacSteel	Permitted Outfalls:	1
Address:	5225 Planters Road	Working Hours:	7:00 AM - 7:00 AM
	PO Box 1592	Number of Shifts:	3
City:	Fort Smith	Number of Employees:	450
State:	AR 72902		
Classification:	Signifcant Industrial User	Categorical Classification:	Categorical-Iron & Steel Manufacturing
Water Account:	001213-029937-002 001213-043498-004 025796-029771-001 001213-026374-001	Avg. Daily Flow (gal):	78583
Sewer Account:	001213-029938-003	Receiving WWTP:	Massard
		Batch Discharge	No
Permitted:	Yes	Control Authority Sampling Frequency:	Monthly
Active Permit:	Yes		
Slug Control Plan:	No	Industrial User Sampling Frequency:	Monthly
Spill Prevention Plan:	Yes		
Effective Date of Permit:	1/1/2005	Industrial User Reporting Frequency:	Monthly
		Inspection Frequency:	Annual
Expiration Date of Permit:	1/1/2010	Date of Last Inspection:	1/10/2008

SIC Codes: 3312 Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills

NAICS Code: 331111 Iron and Steel Mills

B-30/31

Iron and Steel Category (40 CFR Part 420)
Pretreatment Standards for Existing Sources (PSES)
Pollutant limits (in kg/Kkg of product unless otherwise noted)

Subpart		Lead	Average Daily Prod.	Allowed (Kg)	Allowed (lbs)
Vacuum degassing	Mo Av	0.0000313	1252	0.0391876	
Continuous casting	Mo Av	0.0000313	1252	0.0391876	
				0.0783752	0.173
Vacuum degassing	D Max	0.0000939	1252	0.1175628	
Continuous casting	D Max	0.0000939	1252	0.1175628	
				0.2351256	0.518

Subpart		Zinc	Average Daily Prod.	Allowed (Kg)	Allowed (lbs)
Vacuum degassing	Mo Av	0.0000469	1252	0.0587188	
Continuous casting	Mo Av	0.0000469	1252	0.0587188	
				0.1174376	0.259
Vacuum degassing	D Max	0.000141	1252	0.176532	
Continuous casting	D Max	0.000141	1252	0.176532	
				0.353064	0.778

To calculate, mutiliply the allowable loading by the current production rate for each pollutant & criteria in table and add together for the total allowable loading per day.

Exide Technologies

City of Fort Smith
Industrial Pretreatment Program
IU Fact Sheet

Permit:	**SIU036304**	Industrial User Number:	161
Permittee:	Exide Technologies	Permitted Outfalls:	2
Address:	4115 South Zero	Working Hours:	7:00 AM - 7:00 AM
		Number of Shifts:	3
City:	Fort Smith	Number of Employees:	257
State:	AR 72903		
Classification:	Significant Industrial User	Categorical Classification:	Categorical- Battery Manufactoring
Water Account:	037-9050-00-00-0 022731-026095-001	Avg. Daily Flow (gal):	Outfall #001 23541 Outfall #002 19950
Sewer Account:	048-0102-00-00-0	Receiving WWTP:	Massard
		Batch Discharge	Yes
Permitted:	Yes	Control Authority Sampling Frequency:	Monthly
Active Permit:	Yes		
Slug Control Plan:	No	Industrial User Sampling Frequency:	Monthly
Spill Prevention Plan:	Yes		
Effective Date of Permit:	12/15/2004	Industrial User Reporting Frequency:	Monthly
		Inspection Frequency:	Annual
Expiration Date of Permit:	12/15/2009	Date of Last Inspection:	4/24/2008

SIC Codes: 3691 Storage Batteries

NAICS Code: 335911 Storage Battery Manufacturing

C - 1/2

GNB Production Based Standards

Average Monthly Lead Used (lb/day)	2,484,446
Average Daily Lead Used (lb/day)	112,929

	Pretreatment Standard (lb/1,000,000 lb Pb used) (from 40 CFR 461.34)					Allowance (lb/1,000,000 lb Pb used) (Pretreatment Standard)			
	Daily Max		Monthly Avg		%	Daily Max		Monthly Avg.	
	Copper	Lead	Copper	Lead	Process	Copper	Lead	Copper	Lead
Open Formation - Dehydrated	3.19	0.71	1.68	0.34	0	0	0	0	0
Open Formation - Wet	0.1	0.022	0.053	0.01	0.1	0.01	0.0022	0.0053	0.001
Plate Soak	0.039	0.008	0.021	0.004	0.1	0.0039	0.0008	0.0021	0.0004
Closed Formation	0	0	0	0	1	0	0	0	0
Battery Wash - Detergent	1.71	0.38	0.9	0.18	1	1.71	0.38	0.9	0.18
Direct Chill Lead Casting	0.0004	0.00008	0.0002	0.00004	0	0	0	0	0
Mold Release Formulation	0.011	0.002	0.006	0.001	1	0.011	0.002	0.006	0.001
Truck Wash	0.026	0.005	0.014	0.002	1	0.026	0.005	0.014	0.002
Laundry	0.21	0.05	0.11	0.02	0	0	0	0	0
Miscellaneous	0.58	0.13	0.31	0.06	1	0.58	0.13	0.31	0.06
				Total Allowance		2.3409	0.520	1.237	0.2444
				Limit Allowance		0.264355	0.05872	0.13974	0.02760

C-2/2

Copper	**Daily Maximum**	**0.264**	**lbs/day**
	Monthly Average	**0.140**	**lbs/day**
Lead	**Daily Maximum**	**0.059**	**lbs/day**
	Monthly Average	**0.028**	**lbs/day**

Limits derived from Pretreatment Standards for Existing Sources for the Battery Manufacturing Category (40 CFR 461) Subpart C: Lead

RECEIVED
SEP 16 2004
BY:

CITY OF FORT SMITH

WASTEWATER CONTRIBUTION

PERMIT APPLICATION FORM

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

SECTION A - GENERAL INFORMATION

1. Facility Name: QUANEX CORP. MACSTEEL DIVISION

   a. Operator Name: QUANEX CORP. MACSTEEL DIVISION

   b. Is the operator identified in 1.a., the owner of the facility?
   Yes [X] 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: 5225 Planters Road
City: Fort Smith State: AR Zip: 72916

3. Business Mailing Address:

Street or P.O.Box: 1592
City: Fort Smith State: AR Zip: 72916

4. Designated signatory authority of the facility:
   [Attach similar information for each authorized representative]

Name: Warren Taff
Title: Environmental Engineer
Address: P.O. Box 1592
City: Fort Smith State: AR Zip: 72916
Phone#: (479)648-5544 Email: wtaff@macark.com

5. Designated facility contact:
Name: Warren Taff
Title: Environmental Engineer
Phone#: (479)648-5544 Email: wtaff@macark.com

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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
[ ] Carbon Black
[ ] Coal Mining
[ ] Coil Coating
[ ] Copper Forming
[ ] Electric and Electronic Components Manufacturing
[ ] Electroplating
[ ] Feedlots
[ ] Fertilizer Manufacturing
[ ] Foundries (Metal and Casting)
[ ] Glass Manufacturing
[ ] Grain Mills
[ ] Inorganic Chemicals
[X] Iron and Steel
[ ] Leather Tanning and Finishing
[ ] Metal Finishing
[ ] Nonferrous Metals Forming
[ ] Nonferrous Metals Manufacturing
[ ] Organic Chemicals Manufacturing
[ ] Paint and Ink Formulating
[ ] Paving and Roofing Manufacturing
[ ] Pesticides Manufacturing
[ ] Petroleum Refining
[ ] Pharmaceutical
[ ] Plastic and Synthetic Materials Manufacturing
[ ] Plastics Processing Manufacturing
[ ] Porcelain Enamel
[ ] Pulp, Paper, and Fiberboard Manufacturing
[ ] Rubber
[ ] Soap and Detergent Manufacturing
[ ] Steam Electric
[ ] Sugar Processing
[ ] Textile Mills
[ ] Timber Products

A facility with processes inclusive in these business areas may be covered by the Environmental Protection Agency's (EPA) categorical pretreatment standards. These facilities are termed " categorical users".

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

See Attachment A

3. Indicate applicable Standard Industrial Classification (SIC) Code for all processes (If more than one applies, list in descending order of importance.) :

a. 3312
b. 3398
c.
d.
e.

4. PRODUCT VOLUME:

PRODUCT (Brand name) (levels with others) (and no u.l)	PAST CALENDAR YEAR Amounts Per Day (Daily Units) (Tons Per Day)		ESTIMATE THIS CALENDAR YEAR Amounts Per Day (Daily Units) (Tons Per Day)	
	Average	Maximum	Average	Maximum
STEEL BARS (Finished Product)	1653	2260	1700	2270
Vacuum Degassing	1744	2384	1820	2390
Hot Forming	1653	2260	1700	2270
Continuous Casting	1744	2384	1820	2390

SECTION C - WATER SUPPLY

1. Water Sources: (Check as many as are applicable)
   [ ] Private Well
   [ ] Surface Water
   [X] Municipal Water Utility (Specify City) Fort Smith
   [ ] Other (specify): _____

2. Name on the water bill: MacSteel

Name: MacSteel
Address: P.O. Box 1592
City: Fort Smith State: AR Zip: 72902-1592

3. Water service account number(s): 025796-029771-001
   001213-026374-001
   001213-029937-002

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	153,353	E
b. Non-contact cooling water	153,353	E
c. Boiler feed	35,800	M
d. Process	0	E
e. Sanitary	28,800	E
f. Air pollution control	0	E
g. Contained in product	0	E
h. Plant & equipment washdown	14,400	E
i. Irrigation & lawn watering	1,440	E
j. Other	0	E
k. Total of A-J	372,746	M

SECTION D - SEWER INFORMATION

1. a. For an existing business:

Is the building presently connected to the public sanitary sewer system?

[X] Yes: Sanitary sewer account number(s) 001213-029938-003

[ ] 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 facility sewer which connects to the City's sewer system. (If more than four, attach additional information on another sheet.)

SEWER SIZE	DESCRIPTIVE LOCATION OF SEWER CONNECTION OR DISCHARGE POINT	AVERAGE FLOW (GPD)
6"	outfall 001, manhole on S.E. Corner of property at 5225 Planters Road	131,704
6"	SOUTH OF PLANTERS ROAD	15,840

SECTION E - WASTEWATER DISCHARGE INFORMATION

1. Does (or will) this facility discharge any wastewater other than from restrooms to the City's sewer?

   [X] Yes If the answer to this question is "yes", complete the remainder of this 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 24 T 24 W 24 T 24 F 24 Sat 24 Sun 24

   b. Hours of Discharge (e.g. 9 a.m. to 5 p.m.) :
   M 12A-12A T 12A-12A W 12A-12A T 12A-12A F 12A-12A Sat 12A-12A Sun 12A-12A

   c. Peak hourly flow rate (GPD) 302,000

   d. Maximum daily flow rate (GPD) 302,000

   e. Annual daily average (GPD) 131,704

3. If batch discharge occurs or will occur, indicate:
   [New facilities may estimate]

   a. Number of batch discharges N/A per day

   b. Average discharge per batch _____ (GPD)

   c. Time of batch discharges _____ at _____
   (days of week) (hours of day)

   d. Flow rate _____ gallons/ minute

   e. Percent of total discharge _____

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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 process in the building layout in Section H. This drawing must be certified by a State Registered Professional Engineer.

Attached

DWG - City Flow 2004

Facilities that checked activities in question 1 of Section B are considered Categorical Industrial Users and should skip to question 6.

5. For Non-Categorical Users Only: 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 facilities should provide estimates for each discharge] .

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

ANSWER QUESTIONS 6 & 7 ONLY IF YOU ARE SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS.

6. For Categorical Users: Provide the wastewater discharge flows for each of your processes or proposed processes. Include the reference number from the process schematic that corresponds to each process. [New facilities should provide estimates for each discharge] .

No.	Regulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, cont., none)
1	Continuous Casting	37,256	71,608	Batch
2	Hot Forming	37,447	72,035	Batch
3	Vacuum Degassing	36,146	69,477	Batch

Combined Wastewater

No.	Unregulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, cont., none)
10	Etch Room	2,880	2,880	Continuous
16	Nitrogen Plant Condensate	1,440	1,440	Continuous
6	Boiler	4,320	4,320	Continuous

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No.	Dilution	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, cont., none)
5	Softeners Blowdown	1,440	1,440	Batch
9	Sanitary Waste	20,160	20,160	Continuous
18	Ultrasonic Testing #2	1,440	1,440	Continuous
20	Ultrasonic Testing #3	1,440	1,440	Continuous
21	Sanitary Waste Annex	14,400	14,400	Continuous

7. For Categorical Users Subject to Total Toxic Organic (TTO) Requirements:

   Provide the following (TTO) information.

   a. Does (or will) this facility use any of the toxic organics that are listed under the TTO standard of the applicable categorical pretreatment standards published by EPA?
   [X] Yes [ ] No

   b. Has a baseline monitoring report (BMR) been submitted which contains TTO information?
   [X] Yes [ ] No

   c. Has a toxic organics management plan (TOMP) been developed?
   [X] Yes (please attach a copy) [ ] No

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

Current:	Flow Metering	[X] Yes	[ ] No	[ ] N/A
	Sampling Equipment	[ ] Yes	[X] No	[ ] N/A
Planned:	Flow Metering	[ ] Yes	[ ] No	[X] N/A
	Sampling Equipment	[ ] Yes	[ ] No	[X] N/A

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

Badger 2100 (#19 Total Discharge)

Clarifier Discharge Meter (Niagara Flow Meter 3") For regulated discharge

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9. 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 [X] No, (skip question 10)

10. Briefly describe these changes and their effects on the wastewater volume and characteristics: (Attach additional sheets if needed.)

11. Are any materials or water reclamation systems in use or planned?

    [ ] Yes [X] No (skip question 12)

12. 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).

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	Maximum Daily Value		Average Analysis		Detection Level Used	Units		Number of Analyses
	Conc.	Mass	Conc.	Mass		Conc.	Mass	
Acenaphthene			0					
Acrolein			0					
Acrylonitrile			0					
Benzene			0					
Carbon Tetrachloride			0					
Chlorobenzene			0					
1,2,4- Trichloroethane			0					
Hexachlorobenzene			0					
1,2-Dichloroethane			0					
1,1,1-Trichloroethane			0					
Hexachloroethane			0					
1,1-Dichloroethane			0					
1,1,2-Trichloroethane			0					
1,1,2,2-Tetrachloroethane			0					
Chloroethane			0					
Bis(2-chloroethyl) ether			0					
17 bis (chloro methyl) ether			0					
2-Chloroethyl vinyl ether			0					
2-Chloronaphthalene			0					
2,4,6-Trichlorophenol			0					
Parachlororometa cresol			0					
Chloroform			0					
2-Chlorophenol			0					
1,2-Dichlorobenzene			0					
1,3-Dichlorobenzene			0					
1,4-Dichlorobenzene			0					
3,3-Dichlorobenzene			0					
1,1-Dichloroethylene			0					
1,2-Trans-dichloroethylene			0					
2,4-Dichlorophenol			0					
1,2-Dichloropropane			0					
1,2-Dichloropropylene			0					
1,3-Dichloropropylene			0					

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Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used	Units		Number of Analyses
	Conc.	Mass	Conc.	Mass		Conc.	Mass	
2,4-Dimethylphenol			0					
2,4-Dinitrtotoluene			0					
2,6-Dinitrotoluene			0					
1,2-Diphenylhydrazine			0					
Ethylbenzene			0					
Fluoranthene			0					
4 - Chlorophenyl phenyl ether			0					
4 - Bromophenyl phenyl ether			0					
Bis (2-chloroisopropyl) ether			0					
Bis (2-chloroethoxy) methane			0					
Methylene Chloride			0					
Methyl Chloride			0					
Methyl Bromide			0					
Bromoform			0					
Dichlorobromomethane			0					
Chlorodibromomethane			0					
Hexachlorobutadiene			0					
Hexachlorocyclopentadiene			0					
Isophorone			0					
Naphthalene			0					
Nitrobenzene			0					
Nitrophenol			0					
2- Nitrophenol			0					
4-Nitrophenol			0					
2,4-Dinitrophenol			0					
4,6-Dini-o-cresol			0					
N-nitrosodimethylamine			0					
N-nitrosodiphenylamine			0					
N-Nitrosodi-n-propylamine			0					
Pentachlorophenol			0					
Phenol			0					
Bis (2-ethyl hexyl) phthalate			0					
Butyl Benzyl phthalate			0					

D - 12/34

Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used	Units		Number of Analyses
	Conc.	Mass	Conc.	Mass		Conc.	Mass	
Di-n-butyl phthalate			0					
Di-n-octyl phthalate			0					
Diethyl phthalate			0					
Dimethyl phthalate			0					
Benzo (a) anthracene			0					
Benzo(a) pyrene			0					
3,4-Benzofluoranthene			0					
Chrysene			0					
Acenaphthylene			0					
Anthracene			0					
Benzo (ghi) perylene			0					
Fluorene			0					
Phenanthrene			0					
Dibenzo (a,h) anthracene			0					
Indeno (1,2,3-cd) pyrene			0					
Pyrene			0					
Tetrachloroethylene			0					
Toluene			0					
Trichloroethylene			0					
Vinyl chloride			0					
Aldrin			0					
Dieldrin			0					
Chlordane			0					
4,4'- DDT			0					
4,4'- DDE			0					
4,4'- DDD			0					
Alpha-Endosulfan			0					
Beta-Endosulfan			0					
Endosulfan sulfate			0					
Endrin			0					
Endrin Aldehyde			0					
Heptachlor			0					
Heptachlor Epoxide			0					

D-13/34

Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used	Units		Number of Analyses
	Conc.	Mass	Conc.	Mass		Conc.	Mass	
Alpha BHC			0					
Beta-BHC			0					
Gamma-BHC			0					
Delta-BHC			0					
PCB-1242			0					
PCB-1254			0					
PCB-1221			0					
PCB-1232			0					
PCB-1248			0					
PCB-1260			0					
PCB-1260			0					
Toxaphene			0					
(TCDD)			0					
Asbestos			0					
Acidity 40 CFR 136 4500 H	7.69		8.06		0.01 pH	pH		12
Alkalinity			S					
Bacteria			S					
BOD (5) 40 CFR 136 5210	25	20	12.5	8	2 mg/l	mg/l	PPD	12
COD			S					
Chloride			S					
Chlorine			S					
Fluoride			S					
Hardness			S					
Magnesium			S					
NH(3)-N			S					
Oil & Grease 40 CFR 136 1664	9		5		2 mg/l	mg/l	PPD	12
TSS 40 CFR 136 2540-D	8	10	6	4	1 mg/l	mg/l	PPD	12
TOC			S					
Kjeldahl N			S					
Nitrate N			S					
Nitrite N			S					
Organic N			S					
Orthophosphate P			S					

D - 14/34

Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used	Units		Number of Analyses
	Conc.	Mass	Conc.	Mass		Conc.	Mass	
Phosphorous			S					
Sodium			S					
Specific Conductivity			S					
Sulfate (SO(4))			S					
Sulfide (S)			S					
Sulfite (SO(3))			S					
Antimony			0					
Arsenic			0					
Barium			0					
Beryllium			0					
Cadimium CFR 40 136 3111-B	0.375		0.041		0.001 mg/1	mg/1		12
Chromium CFR 40 136 3111-B	0.110		0.018		0.01 mg/1	mg/1		12
Copper CFR 40 136 3111-B	0.16		0.07		0.01 mg/1	mg/1		12
Cyanide			0					
Lead CFR 40 136 3111-N	0.072	0.054	0.024	0.017	0.04 mg/1	mg/1		12
Mercury			0					
Nickel CFR 40 136 3111-B	0.280		0.122		0.01 mg/1	mg/1		12
Selenium			0					
Silver CFR 40 136 3111-B	0.046		0.011		0.01 mg/1	mg/1		12
Thallium			0					
Zinc CFR 40 136 3111-B	1.81	1.49	0.474	0.345	0.001 mg/1	mg/1		13

D-15/34

SECTION G - TREATMENT

1. Is any form of wastewater treatment (see list below) practiced at this facility?
   [X] 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: _____

   [X] No

3. Treatment devices or processes used or proposed for treating wastewater or sludge (check all that apply).

   [ ] Air flotation
   [ ] Centrifuge
   [ ] Chemical Precipitation
   [ ] Chlorination
   [ ] Cyclone
   [ ] Filtration
   [ ] Flow equalization
   [ ] Grease or oil separation, type: _____
   [ ] Grit removal
   [ ] Ion Exchange
   [ ] Neutralization, pH correction
   [ ] Ozonation
   [ ] Reverse osmosis
   [ ] Screen
   [X] Sedimentation
   [ ] Septic Tank
   [ ] Solvent separation
   [ ] Spill protection
   [ ] Sump
   [ ] Biological treatment, type: _____
   [ ] Rainwater diversion or storage
   [ ] Other chemical treatment, type: _____
   [ ] Other chemical treatment, type: _____
   [ ] Other physical treatment, type: _____
   [ ] Other, type: _____

4. Description

Describe the pollutant loadings, flow rates, design capacity, physical size, and operating procedures of each treatment facility checked above.

85' Diameter Clarifier used for treatment of in House Water Systems.

Discharge of process waste water from clean side of clarifier.

Designated flow rates 3,200 GPM

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. Attachment B

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 date(s).

N/A

7. Do you have a treatment operator? [ ] Yes [ ] No

(if yes,) Name: N/A

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 [X] No

9. Do you have a written maintenance schedule for your maintenance equipment?
[ ] Yes [X] No

SECTION H - FACILITY OPERATIONAL CHARACTERISTICS

1. Shift information

Work Days		[X] Mon.	[X] Tue.	[X] Wed.	[X] Thu.	[X] Fri.	[X] Sat.	[X] Sun.
Shifts per work day:		3	3	3	3	3	3	3
Empl's per Shift:	1st	100	100	100	100	100	100	25
	2nd	170	170	170	170	170	50	50
	3rd	100	100	100	100	100	25	100
Shift start and end times:	1st	11P-7A	11P-7P	11P-7P	11P-7P	11P-7P	11P-7P	11P-7P
	2nd	7A-3P	7A-3P	7A-3P	7A-3P	7A-3P	7A-3P	7A-3P
	3rd	3P-11P	3P-11P	3P-11P	3P-11P	3P-11P	3P-11P	3P-11P

2. Indicate whether the business activity is:

[X] Continuous through the year, or
[ ] Seasonal - Circle the months of the year during which the business activity occurs:

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

COMMENTS: _____

_____

3. Indicate whether the facility discharge is:

[X] Continuous through the year, or
[ ] Seasonal - Circle the months of the year during which the business activity 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?
[X] Yes, indicate reasons and period when shutdown occurs:
Last week of December - Holidays - Maintenance
First week of July - Maintenance
[ ] No

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

See Attachement C

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

Chemical	Quantity
See Attachment D	
MSDS on file with City	

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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. This drawing must be certified by a State Registered Professional Engineer.

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

See Drawing City Permit Phase 6 2004 & PSL 4403 R

SECTION I - SPILL PREVENTION

1. Do you have chemical storage containers, bins, or ponds at your facility?
   [X] Yes [ ] No

If yes, (on another sheet), please give a description of their location, contents, size, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to sewer or storm drains. Indicate if buried metal containers have cathodic protection.
See Drawing PST-1004

2. Do you have floor drains in your manufacturing or chemical storage area(s)?
   [ ] Yes [X] 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).

   [X] an onsite disposal system
   [ ] public sanitary sewer system (e.g. through a floor drain)
   [ ] storm drain
   [X] 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 Approving Authority's collection system?

   [X] 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.

See attachments E, F, & G

SECTION J - NON-DISCHARGED WASTES

1. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?
   [X] Yes, please describe below
   [ ] No, skip the remainder of Section J.

Waste Generated	Quantity (per year)	Disposal Method
Waste Paint	55-110 gal/year	Hazmert - off site
Waste Oil	30,000 gal/year	Hazmert - off site
Cleaning solvents	6,000 gal/year	Hazmert - off site
Filter Cake Sludge	270 ton/year	City Landfill - off site

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 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. Hazmert
2633 Laurel Circle
Rogers, AR 72758
Permit No. (if appl.) _____

b. _____
_____
_____
Permit No. (if appl.) _____

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

   [X] Yes
   [ ] No

If yes, please list the permit(s):
PDS Air Permit - 693-AOP-R6
NPDES - AR0039730
No Discharge Pond - 4422-W

SECTION K - AUTHORIZED SIGNATURES

Compliance certification:

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

   [X] Yes
   [ ] No
   [ ] Not yet discharging

2. **If No:**

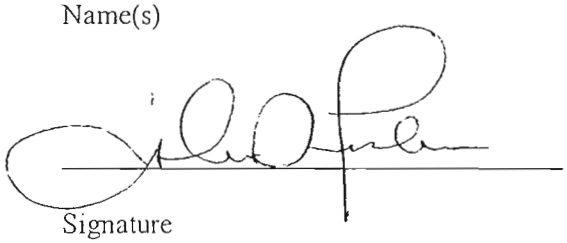
   a. What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.

   b. Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note that if the Approving 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

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, 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.

John D. Fisher	General Manager, MacSteel Div. of Quanex	
Name(s)	Title	
	9/15/04	(479)646-0223
Signature	Date	Phone

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Attachment A

Process Description

Macsteel, a division of Quanex Corporation, operates a scrap steel recycling mill near Fort Smith, in Sebastian County, Arkansas. Macsteel produces approximately 250 grades of steel including alloy, carbon, and resulfurized steels primarily from steel scrap using the electric arc furnace (EAF) process.

In general, raw materials, including scrap, fluxes, iron carbide, direct reduced iron, hot briquetted iron, pig iron, and other materials, are brought to the facility by rail or truck. Scrap and flux are charged to EAFs and melted by application of electric current through the mixture. Molten metal is poured into a ladle and transferred by an overhead crane to a ladle refining station. Once the molten steel is transferred to the ladle refining station, additional alloys and reagents are added to adjust the chemistry.

From the ladle refining station, the steel is transferred to the stir station and vacuum arc degasser. At the stir station, the steel is stirred by the introduction of argon gas into the bottom of the ladle. Additional alloys also may be added to adjust the chemistry. The steel is then transferred to the vacuum arc degasser. At the degasser, dissolved gases are removed by subjecting the steel to a vacuum. Heat also may be added to the steel with the use of electric arcs.

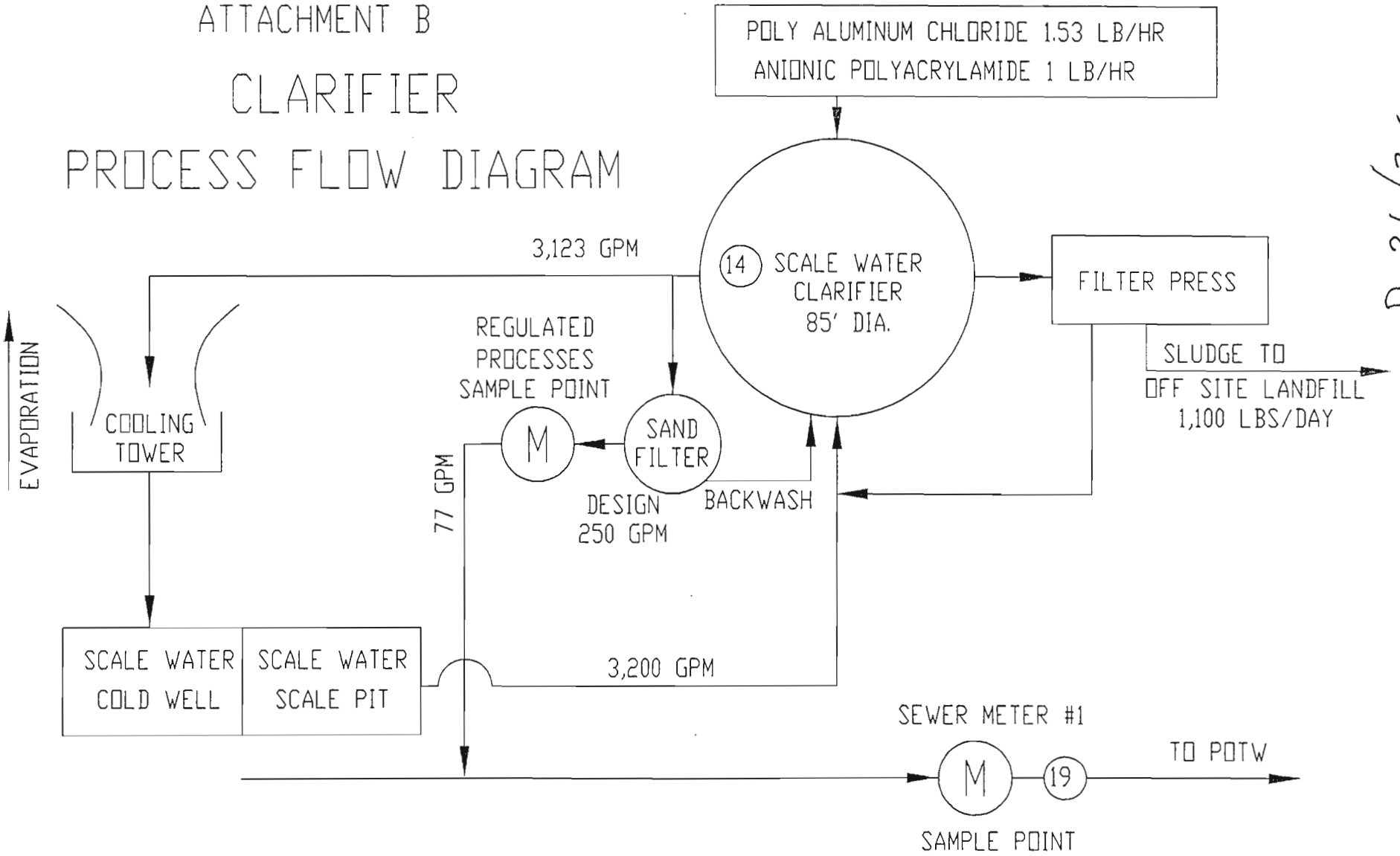
After leaving the degasser, the steel is transferred to a caster where it is drained from the ladle into a tundish and then into the molds. At the caster, the steel solidifies to a round bar. The bars are cut to length and transferred to either the "as cast" cooling bed or directly to the reheat furnace. Bars transferred to the "as cast" cooling bed are sold or stored for future processing.

In the reheat furnace, the steel bars are heated to the temperature required for rolling. The bars are then rolled to a smaller diameter. Bars exiting the rolling mill are cut to length and transferred to the "rolled product" cooling bed. The bars are then deburred and bundled for shipment or for further processing in the heat treat furnaces, straighteners, and/or bar turners.

ATTACHMENT B

CLARIFIER

PROCESS FLOW DIAGRAM



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Attachment C
Raw Materials

Material	Quantity Used (lb./day)
Steel Scrap	3,331,000
Ferro Manganese	8,200
Silicon Manganese	31,000
Ferro Silicon	1,900
Ferro Chromium	13,600
Aluminum	1,330
Molybdenum Trioxide	1,600
Ferro Molybdenum	400
Nickel	3,600
Ferro Columbium	20
Ferro Vanadium	112
Calcium Silicon	200
Sulfur	360
Ferro Boron	22
Carbon	13,000
Iron Pyrite	1,200
Ferro Titanium	75
Lime	500,000
Florospar	5,000
Silicon Carbide	3,000

Attachment D
Chemical and Materials

Material	Quantity Used/Produced (lb./day)
Basic Slag (produced)	189,000
Baghouse Dust (produced)	41,000
Phosphate Polymer	200
Sodium Hypohlorite (12% sol.)	1,330
Citric Acid	50
Anionic Polymer	24
Poly Aluminum Chloride	75
Hydrochloric Acid	10
Sulfite	1
Diesel Fuel	2,000
Sodium Chloride	180
Hydrogen peroxide	410
Petroleum Oil/Grease	300
Di-Ethylene Glycol	200
Gasoline	22
Kerosene	12
Petroleum Naphtha	102
Carbon Electrodes	10,600
Carbon, Alumina, Lime, and Chromium Refractory	45,000
Scale, Iron Oxide (produced)	43,000
Steel Bars (produced)	3,090,000
Filter Press Cake (produced)	1,500
Spray Paint	30
Paint, other	41

Attachment E

Spill Report 3/27/03

Time of Spill:	Spill occurred at approximately 8:15 a.m. on 3/27/03 and was reported to Warren Taff by Mike Schmiser, Yard Supervisor, on 3/27/03 at 8:25 a.m. Spill was investigated by Warren Taff at 8:35 to 8:45 a.m.
Material:	Hazardous waste K061, baghouse dust from the electric arc production of steel.
Location:	MacSteel, 5225 Planters Rd., Fort Smith, AR 72916. Dust from hole in loaded rail car at baghouse #2 silo, spilled into secondary containment and onto ground beside rail road track for about 300 feet to the south and east of the silo.
Danger:	The spill posed no immediate danger to plant personal or persons off site. No injuries occurred nor any evacuation required.
Cause:	A hole in the rail car due to damage to a vibrator bracket. Half of the bracket was missing leaving an open bolt hole. The hole was welded shut.
Amount:	Estimated 300 lbs. was spilled onto ground.
Clean Up:	Clean up was performed by Environmental Remediation Specialist, Tulsa, OK, 918-832-8888. Clean up began at approximately 1:45 p.m. A vacuum truck was utilized to remove the dust and contaminated ballast from alone side of the track and placed in the secondary containment area at about 6:00 p.m. The material is covered by a tarp, awaiting placement into hoppers. The dust and contaminated ballast will be disposed of at Clean Harbors, Lone Mountain facility in Wynoka, OK.
Contacts:	Local Emergency Coordinator, Jerry Roberts, office was contacted at 8:56 a.m. on 3/27/03. Arkansas Office of Emergency Management was contacted at 8:58 a.m., on 3/27/03, report #4488. National Response Center was contacted at 9:02 a.m., on 3/27/03, report #640650. Environmental Remediation Specialist was contacted at 8:50 a.m. Clean Harbors was contacted at 9:10 a.m.
Update:	Material removed from secondary containment and placed in covered hoppers. Completed before 12:00 p.m. on 3/28/03. Truck scheduled for 8 a.m. on Monday, 3/31/03.

Attachment F

Spill Report

Time of Spill:	Spill occurred at approximately 8:00 a.m. on 1/17/03 and was reported to Warren Taff by Mike Schmiser, Yard Supervisor, on 1/17/03 at 8:30 a.m.
Material:	Hazardous waste K061, baghouse dust from the electric arc production of steel.
Location:	MacSteel, 5225 Planters Rd., Fort Smith, AR 72916. Dust from over loaded rail car at baghouse #2 silo, spilled into secondary containment and onto ground around secondary containment.
Danger:	The spill posed no immediate danger to plant personal or persons off site. No injuries occurred nor any evacuation required.
Cause:	Slide gate on bottom of silo did not shut off while loading rail car. Air valve to slide gate was found to be frozen. System was repaired.
Amount:	Estimated 800 lbs. was spilled onto ground.
Clean Up:	Clean up was performed by Environmental Remediation Specialist, Tulsa, OK, 918-832-8888. A vacuum truck was utilized to remove the material form the outside of the rail car and secondary containment area. Dust removed with the vacuum truck was returned to the baghouse. The material on the ground and contaminated soil was removed with fount end loaders and loaded to a tuck for disposal at Clean Harbors, Lone Mountain facility in Wynoka, OK. Approximately 43,600 lbs. of soil was removed alone with the 800 lbs. of dust. Clean up is complete.
Contacts:	Local Emergency Coordinator, Jerry Roberts, office was contacted at 8:45 a.m. on 1/17/03. Arkansas Office of Emergency Management was contacted at 8:47 a.m., on 1/17/03, report #4142. National Response Center was contacted at 8:50 a.m., on 1/17/03, report #634324.

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Attachment G

Jerry Roberts – 784.1541
Fort Smith Fire Department – 783.5338
Arkansas Department of Emergency Management – 501.730.9754

Notice of Release
Written Report

Facility:
Quanex MacSteel Division
5225 Planters Road
P.O. Box 1592
Fort Smith, AR 72901

Contact:
Warren Taff Jr.
501.648.5544

Source: Spill of baghouse dust (H.W. K061) from truck.

Quantity: Approximately 4,000 lbs.

Time of Release: 8/29/2001 at approximately 8:10 a.m.

Cause of Release: Driver was attempting to sift load by lifting trailer. Material sifted excessively and spilled over back of trailer.

Location of Release: 5225 Planter Rd., Fort Smith, AR, MacSteel facility at gate #1 onto paved road.

Corrective Action: Contacted Environmental Remediation Specialists at 8:15. Material was transferred back to the truck using a fount end loader, shovels, brooms, and floor sweep. Cleanup was completed at approximately 2:00 p.m.

pc: J. Fisher, R. A. Lewis

TOXIC ORGANIC MANAGEMENT PLAN
SOLVENT MANAGEMENT PLAN

MACSTEEL Division of Quanex
5225 Planters Road
P.O. Box 1592
Fort Smith, AR 72903

Contact: Warren Taff (479) 648-5544

Description of Operations

MacSteel, a division of Quanex Corporation, operates a scrap steel-recycling mill near Fort Smith, in Sebastian County, Arkansas. MacSteel produces approximately 250 grades of steel including alloy, carbon, and resulfurized steels primarily from steel scrap using the electric arc furnace (EAF) process.

In general, raw materials, including scrap, fluxes, iron carbide, direct reduced iron, hot briquetted iron, pig iron, and other materials, are brought to the facility by rail or truck. Scrap and flux are charged to EAFs and melted by application of electric current through the mixture. Molten metal is poured into a ladle and transferred by an overhead crane to a ladle refining station. Once the molten steel is transferred to the ladle refining station, additional alloys and reagents are added to adjust the chemistry.

From the ladle refining station, the steel is transferred to the stir station and vacuum arc degasser. At the stir station, the steel is stirred by the introduction of argon gas into the bottom of the ladle. Additional alloys also may be added to adjust the chemistry. The steel is then transferred to the vacuum arc degasser. At the degasser, dissolved gases are removed by subjecting the steel to a vacuum. Heat also may be added to the steel with the use of electric arcs.

After leaving the degasser, the steel is transferred to a caster where it is drained from the ladle into a tundish and then into the molds. At the caster, the steel solidifies to a round bar. The bars are cut to length and transferred to either the "as cast" cooling bed or directly to the reheat furnace. Bars transferred to the "as cast" cooling bed are sold or stored for future processing.

In the reheat furnace, the steel bars are heated to the temperature required for rolling. The bars are then rolled to a smaller diameter. Bars exiting the rolling mill are cut to length and transferred to the "rolled product" cooling bed. The bars are then deburred and bundled for shipment, for further processing in the heat treat furnaces and/or bar turner.

Identification of Organic Toxics

Product	Toxic Organic	Percent	Product Usage LB/Yr.	Toxic Organic Usage LB/Yr.	Use and Disposal of Toxic Organics
Flexmaster	Tetrachlorethylene	UK	<50*	50	Gasket material, evaporation.
SS-25 Plus Aero	Dichloromethane	40.0%	<50*	20	Aerosol cleaner, evaporation.
	Tetrachlorethylene	60.0%	<50*	30	
Detco Areo Solvent	Trichloroethylene	UK	<50*	50	Aerosol cleaner, evaporation.
	Dichloromethane	UK	<50*	50	
	Tetrachlorethylene	UK	<50*	50	
Detco All-safe	Dichloromethane	UK	<50*	50	Aerosol cleaner, evaporation.
	Tetrachlorethylene	UK	<50*	50	
	Trichloroethylene	UK	<50*	50	
Tecmark Cleaner	Dibuthly phthalate	80.0%	<500*	400	Paint nozzle cleaner, evaporation, collected in waste paint drum, offsite disposal.
	Tetrachlorethylene	54.0%	<500*	270	
	Dichloromethane	38.0%	<500*	190	
All-Safe Aerosol	Trichloroethylene	44.0%	<100*	44	Aerosol cleaner, evaporation.
	Methylene Chloride	10.0%	<100*	10	
	Tertachloroethlylene	47.0%	<100*	47	
Rapid Tap	1,1,1 trichlorethane	80.0%	<100*	80	Tapping fluid, evaporation.
Lectra Clean	1,1,1 trichlorethane	91.0%	<100*	91	Aerosol cleaner, evaporation.
Nonflammable Solvent	1,1,1 Trichloroethane	95.0%	<100*	95	Aerosol cleaner, evaporation.
Metal Prep II	Trichloroethylene	99.0%	<100*	99	Aerosol cleaner, evaporation.
Krylon Spray Paint	Ethyl benzene	5.0%	8,584	429	Aerosol spray paint, evaporation.
	Toluene	26.0%	8,584	2,232	
Industrial Enamel Paint	Ethyl Benzene	1.0%	15,000	150	Building and equipment maintenance, evaporation, waste paint stored in waste paint drum and shipped offsite for disposal.
	Benzene	1.0%	15,000	150	
	1,2,4 Triethlybenzene	1.0%	15,000	150	
Purple Lube 5311	Methylene Chloride	1.0%	<100*	1	Aerosol lubricant, evaporation.
Loctite Water Proofing	Methyl Ethyl Ketone	27.5%	<100*	28	Aerosol water proofing, evaporation.
	Toluene	42.5%	<100*	43	
Loctite Clean Up Solvent	Toluene	95.0%	<50*	48	Solvent cleaner, evaporation.
Layout Fluid Remover	Toluene	47.0%	<50*	24	Solvent cleaner, evaporation.

* Product usage is estimated based on knowledge of product application.

Empty and waste aerosol containers are collected and shipped offsite product removal and metal recycling.

All products containing toxic organics are used and stored in a manner that prevents discharge to the POTW.

Training

Maintenance and Store Room personnel are trained annually on the proper handling and disposal of spent materials and clean up procedures.

New Material Evaluation

The Environment Engineer reviews all new materials brought into the facility. Control procedures will be issued for all new materials containing TTO's to prevent releases to any water system. The "Toxic Organic Management Plan" will be revised to include any changes and resubmitted to the city for their review.

Personnel Responsible for Plan Implementation

John D. Fisher, General Manager and Warren Taff, Jr., Environmental Engineer, are designated to be responsible for the implementation and perpetuation of this plan.

Certification

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

Warren Taff, Jr.
Environmental Engineer
MACSTEEL Division of Quanex

pc: J. Fisher
R. A. Lewis

D-34/34

CITY OF FORT SMITH • ENVIRONMENTAL SERVICES
INDUSTRIAL MONITORING FIELD REPORT

Sample Location and/or Industrial User: Gerdau MacSteel 8Ft-hose | Sample Event No.: 281 070 8081

I. SAMPLER AND SAMPLE SET UP INFORMATION

Date: 7/8/08	Time: 0956	Sample I.D. No.: 0730270
Composite Sample Pacing: ☐ Flow ☒ Time	Sample Interval: 30	☒ Minutes ☐ Pulses
Vol. Selected (mls): 100	Sample Type: ☒ Composite ☐ Discrete	Sampler Installation: ☐ Manhole ☒ Above Ground
Sample Preservation: ☒ Ice Packs ☐ Refrigeration ☐ N/A (Ambient Temp. Below 39° F) ☐ Other (List):		
Security Measures (Sampler Locked): ☒ Yes ☐ No		Technician(s) Initials: GJB

II. SAMPLER AND SAMPLE TAKE OFF INFORMATION

Date: 7/9/08	Time: 1025	No. of Samples Collected: 30	Technician(s) Initials: GJB
Composite Sample Description: Clear liquid w/ small particulates; Foamy			
Metals: ☒ Full Metals (Ag, Ni, Cd, Cr, Zn, Cu, Pb) ☐ Other (List):			

☐ Check if Composite was Split with Industrial User

III. FLOW CALCULATION INFORMATION

Measurement Device Type: ☐ Water meter(s) ☒ Wastewater Flow Meter(s)

	Meter Readings				
Stop	155905				
Start	155801				
Difference	104				

Multiplication Factor:	X 1000	Flow In Gallons:	104,000

IV. GRAB SAMPLE INFORMATION

Sample I.D. No.: 0730266 | Grab Sample Description: Foamy clear liquid; No particulates

Sample Type	Date	Time Collected	Time Analyzed	Analyst	Temp. ° C	pH (Grab)
Grab	7/8/08	0956	0957	GJB	32.9	8.05

pH - EPA Method 150.1 Temp. - EPA Method 170.1

Other Grab Samples	Sample Collected	Date & Time Collected	Preservative Used
	☒ Oil & Grease	7/8/08/0956	☒ HCl to < 2 pH
	☐ Cyanide (Total)		☐ NaOH to > 12 pH & Ascorbic Acid
	☐ Flash Point		N/A

Technician(s) Initials: GJB ☐ Check if Grab was Split with Industrial User

V. COMMENTS

vision #4

E-1/4

Approved: 07/23/02

City of Fort Smith
Environmental Services
P.O. Box 10080
Fort Smith, Arkansas 72917 - 0080
Fax (501) 784-2404

Department: Pretreatment Program (5609)

Sampling Site/Project: **Industrial Monitoring Program**

Sampling Personnel Signature(s):

Job Number: 5609080854

Notes:

Sample ID	Date(s) Collected	Time(s) Collected	No. Bottles	Pres. Used	Matrix	Sample Type GRAB	Sample Type COMP.	Requested Analysis: TSS, BOD, COD	Control Number (For Lab Use Only)
0730270	7/8-9/08	1025	1	A	WW		X	X	08047 21
0730271	7/8-9/08	1059	1	A	WW		X	X	08-04722

Relinquished By:	Date:	Time:	Received By:	Date:	Time:
	7/9/08	1202			
Relinquished By:	Date	Time:	Received in Laboratory By:	Date:	Time:
			Rachel L. Mapp	07/09/08	1202

Comments:

Preservative Used: A = Ice; B = Sulfuric Acid; C = Nitric Acid; D = Hydrochloric Acid; E = Sodium Hydroxide; F = None; G = E + Ascorbic acid

Matrix: W = Water; WW = Wastewater; SL = Sludge; ML = Mixed Liquor; S = Soil; O = Other

E - 2/4

AMERICAN INTERPLEX CORPORATION LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE 1 OF 1

Client: City of Ft Smith

Project Reference: Industrial Monitoring

Project Manager: Randy Easley

Sampled By: [signature]

PO No.:

AIC CONTROL NO:

AIC PROPOSAL NO:

Carrier:

Received Temperature C

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL		NO OF BOTTLES	Ag, Cd, Cr, Cu, Pb, Zn, Ni	Remarks
	0730259	7/1-2/08/0950		X	X			1	X	
	0730260	7/1-2/08/1020		X	X			1	X	
	0730268	7/7-8/08/1026		X	X			1	X	
	0730269	7/7-8/08/1044		X	X			1	X	
	0730270	7/8-9/08/1025		X	X			1	X	
										Field pH calibration
		Container Type							P	on ____ @ ____
		Preservative							N	Buffer:

G = Glass; P = Plastic; V = VOA vials; H = HCl to pH2; 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 ____ DAYS

Expedited results requested by: ____

Who should AIC contact with questions: Randy Easley

Phone: 479-784-2337 Fax: ____

Report Attention to: Randy Easley

Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	7/10/08/1506		

Relinquished By:	Date/Time	Received in Lab By:	Date/Time

Comments: Analyze using EPA Method 200.8

5/01 WS 5981 8/02 FORM 0060

E-3/4

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: City of Ft Smith
Project Reference: Industrial Monitoring
Project Manager: Randy Easley
Sampled By: [signature]

PO No.

SAMPLE MATRIX

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL	NO OF BOTTLES	Oil + Grease										
	0730266	7/8/08/0956	X		X		1	X										
	0730267	7/8/08/1013	X		X		1	X										
	0720409	7/8/08/1040	X		X		1	X										
	0730272	7/10/08/1012	X		X		1	X										
		Container Type						G										
		Preservative						S										

ANALYSES REQUESTED

AIC CONTROL NO:
AIC PROPOSAL NO:
Carrier:
Received Temperature
Remarks
Field pH calibration on ____ @ ____ Buffer:

G = Glass P = Plastic V = VOA vials H = HCl to pH2 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 ____ DAYS
Expedited results requested by: ____
Who should AIC contact with questions: Randy Easley
Phone: 479-784-2337 Fax: ____
Report Attention to: Randy Easley
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	7/10/08/1506		
Relinquished By:	Date/Time	Received in Lab By:	Date/Time

Comments:

5/01 WS 5981 8/02 FORM 0060

E - 4/4

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division
Inspection Date: 1/10/08
Fact Sheet
Permitted Outfall(s)
1. *Attach a copy of the pertinent page from the current Industrial User's permit listing and describing the permitted outfall(s) to the City's sewer system.*
See attached.
Effluent Limitations
2. *Attach a copy of the pertinent page of the current Industrial User's permit listing the effluent limitations for the permitted outfall(s) to the City's sewer system.*
See attached.
Self Monitoring Requirements
1. *Attach a copy of the pertinent page from the current Industrial User's permit listing the self monitoring requirements for the permitted outfall(s) to the City's sewer system*
See attached.

F-1/54

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

General Conditions

1. Has the Industrial User's permit been terminated? ☐ Yes, ☒ No

   If yes, list date and reason.

2. Has the Permittee submitted an application for a new permit at least 90 (ninety) days before the expiration date of the current permit? ☐ Yes, ☐ No,

   Applicable only if nearing expiration date of current permit. If yes, list date received and any comments. ☒ Not Applicable

Information Requirements

1. Has the Permittee furnished to the Control Authority within 10 workdays any information which the Control Authority has requested to determine whether cause exits for modifying, revoking and reissuing, or terminating the Industrial User's permit, or to determine compliance with the Industrial User's permit? ☐ Yes, ☐ No, ☒ Not Applicable

2. Has the Permittee furnished to the Control Authority within 10 workdays any requested copies of any records required to be kept by the Industrial User's permit? ☐ Yes, ☐ No, ☒ Not Applicable

PART 2 - SELF MONITORING REQUIREMENTS

A. From the period beginning on the effective date of the permit until January 1, 2010, the permittee shall monitor outfall # 001 for the following parameters, at the indicated frequency:

Sample Parameter (units)	Measurement Location	Frequency	Sample type
Oil & Grease mg/L	outfall #001	1/month	grab
BOD mg/L	outfall #001	1/month	24 hour composite
TSS mg/L	outfall #001	1/month	24 hour composite
pH SU (Grab)	outfall #001	1/month	grab
Copper mg/L	outfall #001	1/month	24 hour composite
Nickel mg/L	outfall #001	1/month	24 hour composite
Lead mg/L	outfall #001	1/month	24 hour composite
Zinc mg/L	outfall #001	1/month	24 hour composite
Silver mg/L	outfall #001	1/month	24 hour composite

1. The designated sampling point for all parameters shall be at the discharge structure located at the permittee's pretreatment facility on the Northeast corner of the property at the 5225 Planters Road facility just prior to discharge into the City's sanitary sewer system

2. See definitions of sample types.

B. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit. Also, all sampling and analyses conducted for self-monitoring shall be performed by a certified, independent laboratory acceptable to the Control Authority.

PART 1 - EFFLUENT LIMITATIONS

A. During the period of January 1, 2005 to January 1, 2010, the permittee is authorized to discharge process wastewater to the Control Authority's sewer system from the outfall(s) listed below.

Description of outfall(s):

Outfall:	Description:
001	The discharge structure located at the permittee's pretreatment facility on the Northeast corner of the property at the 5225 Planters Road facility just prior to discharge into the City's sanitary sewer system.

B. During the period of January 1, 2005 to January 1, 2010, the discharge from outfall # 001 shall not exceed the following effluent limitations.

Effluent Limitations

Parameter	Daily Maximum	Monthly Average
Oil & Grease	150 mg/L	NA
Biochemical Oxygen Demand (BOD)	450 mg/L or 180 ppd	NA
Total Suspended Solids (TSS)	430 mg/L or 180 ppd	NA
pH (Grab)	6.0 - 11.0	NA
Copper (Cu)	Monitor & Report	NA
Lead (Pb)	0.518 ppd*	0.173 ppd*
Nickel (Ni)	Monitor & Report	NA
Silver (Ag)	Monitor & Report	NA
Zinc (Zn)	0.778ppd*	0.259 ppd*

* Iron & Steel Category (40 CFR Part 420) PSES production based standards.

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

Annual Publication

1. Was the Permittee included on the list of all industrial users that were subject to enforcement action during the (12) previous months in the most recent annual newspaper publication by the Control Authority? ☒ Yes, ☐ No

   If yes, list date and publication(s) or other media.

The SIU was in significant violation of pollutant limitations during the period of August 1, 2006 through July 31, 2007 published in the Times Record.

Violation Penalties

1. Has the Permittee been subject to any civil penalties for violating any permit condition? ☐ Yes, ☒ No

   If yes, list.

1. Has the Permittee been subject to any criminal penalties for willfully or negligently violating permit conditions? ☐ Yes, ☒ No

   If yes, list

F - 5/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08
Facility Inspection	
General Information	
Arrival Time:	9:30 AM
Inspector(s):	Mr. John Beard
Contact(s):	Mr. Warren Taff, Jr.
Permit Number:	SIU109304
Site Address:	5525 Planters Road Fort Smith, Arkansas
Mailing Address:	P.O. Box 1592 Fort Smith, AR 72902-1592
Primary Contact:	Mr. Warren Taff, Jr.
Title:	Senior Project Engineer - Environmental
Telephone:	(479) 648-5544
Fax:	(479) 648-5588
Additional Contact:	Mr. John Kelleher
Title:	General Plant Manager
Telephone:	(479) 648-5500
Additional Contact:	
Title:	
Telephone:	
Comments: Email address; Warren Taff, Jr.; wtaff@macark.com	

F-6/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Process Information

SIC Code(s):	3312				

Raw Materials:

Scrap steel, synthetic slag and various alloys (see attached listing of all raw materials).

Process Description:

Two electric arc furnaces for the production of alloy steels, ladle furnace for refining steel, twin tank vacuum arc degasser, three strand cast steel and re-heat furnace to a 15 stand rolling mill, 3 bar turners and 3 bar straightening. (See attached process description.)

Products:

Steel bars.

F-7/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Operations Information

	1st Shift	2nd Shift	3rd Shift
Number Of Employees: (Avg.)	184	133	133
Working Hours:	7:00 AM - 3:00 PM	3:00 PM - 11:00 PM	11:00 PM - 7:00 AM
Hours/Day:	8	8	8
Days/Week:	6	6	6

Notes: 450 total number of employees working Monday through Saturday.

Water Source & Usage

Source:	Volume (GPD):	Usage:	Volume (GPD):
City:	326,000	Process:	52,000
Landlord:		Sanitary:	9,000
Other:		Consumed in Product:	
Other:		Evaporation:	
Other:		Other:	
Total:	326,000	Total:	326,000
List all water account number(s):	001213-029937-002	001213-043498-004	025796-029771-001
	001213-026374-001		
List wastewater account number(s):	001213-029938-003		
If applicable.			

Notes: Total water usage; 326,000 GPD based on previous year's meter readings read weekly by SIU. Process wastewater; 52,000 GPD based on SIU's measurements during the same time period. Total of four city water meters, three process and one non-process. Sanitary sewer separated from process water and reconnected before final outfall to the city's sewer system. Sanitary estimate: 20 GPD x 450 (number of employees) = 9,000 GPD. Water accounts: 001213-029937-002 (Original meter supplies main process and administration building), 001213-043498-004 (Meter supplies caster system west of gate #1), 025796-029771-001 (Meter supplies bar straightener east end of property), and 001213-026374-001 (Meter supplies as needed ornamental pond located on Hwy. 45 frontage).

F-8/54

Attachment C
Raw Materials

Material	Quantity Used (lb./day)
Steel Scrap	3,331,000
Ferro Manganese	8,200
Silicon Manganese	31,000
Ferro Silicon	1,900
Ferro Chromium	13,600
Aluminum	1,330
Molybdenum Trioxide	1,600
Ferro Molybdenum	400
Nickel	3,600
Ferro Columbium	20
Ferro Vanadium	112
Calcium Silicon	200
Sulfur	360
Ferro Boron	22
Carbon	13,000
Iron Pyrite	1,200
Ferro Titanium	75
Lime	500,000
Florospar	5,000
Silicon Carbide	3,000

F-9/54

Attachment A

Quanex MacSteel Division
Permit SIU109304

Process Description (modified February 2007)

Macsteel, a division of Quanex Corporation, operates a scrap steel recycling mill near Fort Smith, in Sebastian County, Arkansas. Macsteel produces approximately 250 grades of steel including alloy, carbon, and resulfurized steels primarily from steel scrap using the electric arc furnace (EAF) process.

In general, raw materials, including scrap, fluxes, iron carbide, direct reduced iron, hot briquetted iron, pig iron, and other materials, are brought to the facility by rail or truck. Scrap and flux are charged to EAFs and melted by application of electric current through the mixture. Molten metal is poured into a ladle and transferred by an overhead crane to a ladle metallurgical furnace (LMF). Once the molten steel is transferred to the LMF, additional alloys and reagents are added to adjust the chemistry. Electric arcs are used to maintain the molting steels temperature.

From the LMF, the steel is transferred to one of the two vacuum tank degassers (VTD). At the VTD, the steel is stirred by the introduction of argon gas into the bottom of the ladle. Additional alloys also may be added to adjust the chemistry. The steel is then vacuumed degassed to remove dissolved gasses. After degassing, additional heat may be added to the steel with the use of electric arcs at the ladle reheat station (LRS).

After leaving the VTD and LRS, the milting steel is transferred to a caster where it is drained from the ladle into a tundish and then into the molds. At the caster, the steel solidifies to a round bar. The bars are cut to length and transferred to either the "as cast" cooling bed or directly to the reheat furnace. Bars transferred to the "as cast" cooling bed are sold or stored for future processing.

In the reheat furnace, the steel bars are heated to the temperature required for rolling. The bars are then rolled to a smaller diameter through two roughing stands, ten reducing stands, and three finishing stands. Bars exiting the rolling mill are cut to length and transferred to the "rolled product" cooling bed. The bars are then deburred and bundled for shipment or for further processing in the heat treat furnaces, straighteners, and/or bar turners.

F-11/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Process Waste-Streams		
Source Description:	Volume (GPD):	Code Type: *
Continuous casting (17.5%)	9,100	RCW, CD
Vacuum degassing (40.3%)	20,956	RCW, CD
Hot forming (rolling mill) (42.2%)	21,944	RCW, CD
Estimated based on re-circulation rates, amount of water used in each process.		

*** Code Types:**

CD: Continuous Discharge	OD: Other Disposal (Not sewer.)	BD: Batch Discharge	ND: Not Discharged

*** Additional Categorical Waste-Stream Types:**

RCW: Regulated Categorical Waste-Stream	NRCW: Non-Categorical Waste-Stream
ARCW: Ancillary Regulated Categorical Waste-Stream	DCW: Diluted Categorical Waste-Stream

F - 13/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Additional Process Waste-Streams		
Source Description:	Volume (GPD):	Code Type: *

*** Code Types:**			
CD: Continuous Discharge	OD: Other Disposal (Not sewer.)	BD: Batch Discharge	ND: Not Discharged

*** Additional Categorical Waste-Stream Types:**	
RCW: Regulated Categorical Waste-Stream	NRCW: Non-Categorical Waste-Stream
ARCW: Ancillary Regulated Categorical Waste-Stream	DCW: Diluted Categorical Waste-Stream

F - 14/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Additional Process Waste-Streams		
Source Description:	Volume (GPD):	Code Type: *

*** Code Types:**

CD: Continuous Discharge	OD: Other Disposal (Not sewer.)	BD: Batch Discharge	ND: Not Discharged

*** Additional Categorical Waste-Stream Types:**

RCW: Regulated Categorical Waste-Stream	NRCW: Non-Categorical Waste-Stream
ARCW: Ancillary Regulated Categorical Waste-Stream	DCW: Diluted Categorical Waste-Stream

E-15/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Sketch process waste-stream(s) connections to the City's sewer system or attach copies of drawing(s) to report.

F-16/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Permit Compliance Appendix

Industrial User Permit

1. Does the facility have a copy of it's current Industrial User permit on file and available for inspection? ☒ Yes, ☐ No

Comments:

General Conditions

1. Is the Permittee in compliance with all conditions of its' permit? ☒ Yes, ☐ No

   If no, list any administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, or summary abatement resulting from noncompliance with the Industrial User's permit.

   If yes, skip next question.

2. If the Permittee is in noncompliance of its' permit, is the Permittee taking all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance including accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge? ☐ Yes, ☐ No

   If yes, detail the steps taken or if no, explain inaction.

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division	
Inspection Date: 1/10/08	
1. Has the Industrial User's permit been modified for good causes since the permit was granted? *If yes, list causes and modifications.*	☐ Yes, ☒ No
2. Has the Industrial User's permit been assigned or transferred to a new owner and/or operator since the permit was issued? *If yes, list new owner and/or operator and give date assigned or transferred.*	☐ Yes, ☒ No
3. Has the Permittee increased or decreased the use of potable or process water? *If yes, explain.* ☐ Increased water use. ☐ Decreased water use.	☐ Yes, ☒ No, ☐ Not Applicable

F-19/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

General Permit Standards

1. Is the Industrial User discharging wastewater to the sewer system;

a)	Having a temperature higher than 104 degrees F (40 degrees C),	☐ Yes, ☒ No
b)	Containing more than 150 PPM by weight of fats, oils, and grease,	☐ Yes, ☒ No
c)	Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases; or pollutants with a closed cup flash-point of less than one hundred forty (140) degrees Fahrenheit (60 degrees C), or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the POTW,	☐ Yes, ☒ No
d)	Containing any garbage that has not been ground by house hold type or other suitable garbage grinders,	☐ Yes, ☒ No
e)	Containing any ashes, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or other solids or viscous substances capable of causing obstructions or other interference's with proper operation of the sewer system,	☐ Yes, ☒ No
f)	Having a pH lower than 6.0 or higher than 11.0, or having any other corrosive property capable of causing damage or hazards to structures, equipment or personnel of the sewer system,	☐ Yes, ☒ No
g)	Containing toxic or poisonous substances, such as wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions, in sufficient quantity to injure or interfere with any wastewater treatment process, to constitute hazards to human or animals, or to create any hazard in waters which receive treated effluent from the sewer system treatment plant,	☐ Yes, ☒ No
h)	Containing noxious or malodorous gases or substances capable of creating a public nuisance; including pollutants which may result in the presence of toxic gases, vapors, or fumes;	☐ Yes, ☒ No
i)	Containing solids of such character and quantity that special and unusual attention is required for their handling,	☐ Yes, ☒ No
j)	Containing any substance which may affect the treatment plant's effluent and cause violation of the NPDES permit requirements,	☐ Yes, ☒ No
k)	Containing any substances which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines of regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act or other regulations or criteria for sludge management and disposal as required by the State,	☐ Yes, ☒ No
l)	Containing color which is not removed in the treatment process,	☐ Yes, ☒ No
m)	Containing any medical or infectious wastes,	☐ Yes, ☒ No
n)	Containing any radioactive wastes or isotopes, or	☐ Yes, ☒ No
o)	Containing any pollutant, including BOD pollutants, released at a flow rate and/or concentration, which would cause interference with the treatment plant?	☐ Yes, ☒ No

F - 19/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Pollution Controls

1. Does the Industrial User operate a pretreatment plant, equipment, or otherwise pre-treat its' wastewater prior to discharge to the City's sewer system? ☒ Yes, ☐ No

   If yes, list equipment utilized and/or describe treatment process. Attach copies of any available system drawings or schematics.

   If no, skip section.

An 85 ft. clarifier, with polymer chemical addition and a filter press. The system is primarily for the treatment of water for re-use in the process. Wastewater from the hot water well of the scale pit is discharged to the clarifier. Water discharged when conductivity levels are high in water used in other systems. Effluent from the clarifier is returned to the cooling tower and then to the cold well. A portion of treated effluent is discharged to the City's sewer system during system blow down. Blow down is treated, ten foot diameter mixing tank, pH adjusted prior to filtration in sand filter. Sand filter before final discharge. A 5, 000 gallon mixing tank; coagulant and polymers (flocculant) and pH adjustment to 10 to drop out heavy metals. A charged line with an inline flow measurement device installed discharges wastewater to a sampling well. The discharge then gravity flows to a sewer manhole.

1. Number of pretreatment operators on staff: 1

2. Do operators hold State of Arkansas Waste Water Treatment Operator Licenses? ☐ Yes, ☒ No

3. If so, list number of employees having each classification of license:

   Class I: Class II: Class III: Class IV:

Comments:

4. If the facility's pretreatment plant has been evaluated and rated by the State, list the plant's classification (Class I, Class II, Class III, etc.):

F-20/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Bypass Of Treatment Facilities

1. Has the Permittee bypassed treatment facilities? *If yes, detail below.* *If no, or not applicable, skip section.*	☐ Yes, ☒ No ☐ Not Applicable
2. Is bypass unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exit?	☐ Yes, ☐ No
3. Is bypass for essential maintenance to assure efficient operation, which does not cause effluent limitations to be exceeded?	☐ Yes, ☐ No
4. Did the Permittee notify the City of Fort Smith of any anticipated bypass by written notice, at least ten days before the date of the bypass?	☐ Yes, ☐ No
5. Did the Permittee immediately notify the Control Authority of any unanticipated bypass and submit a written notice to the POTW within 5 (five) days?	☐ Yes, ☐ No
6. Did written notice of an unanticipated bypass specify;	
a) A description of the bypass, and its cause, including its duration,	☐ Yes, ☐ No
b) Whether the bypass has been corrected,	☐ Yes, ☐ No
c) The steps being taken or to be taken to reduce, eliminate, and prevent a reoccurrence of the bypass?	☐ Yes, ☐ No

Comments:

F-21/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

Facility Activity Reduction Requirements

1. Is the Permittee's treatment facility experiencing any reduction of efficiency of operation, or loss or failure of all or part of the treatment facility? ☐ Yes, ☒ No
   If yes, detail below. If no, or not applicable, skip section. ☐ Not Applicable

2. Is the Permittee attempting to control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided? ☐ Yes, ☐ No

Removed Substances

1. Is the Permittee disposing of solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act? ☒ Yes, ☐ No
   If yes, list wastes, disposal methods, contractor, etc. ☐ Not Applicable
   If no, explain.

Filter press filter cake from the scale water clarifier and a second caster spray water system filter press is disposed of in the City's landfill. Filter cake is non-hazardous and has passed a TCLP. K061 -emission control dust, from the electric are production of steel, off site for recycling (7,800 tons per year) to Zinc National, Monterey, Mexico and to Safety Kleen. Non-hazardous wastes, solvent wastes, waste oils, waste paints, thinners, and ethylene glycol (anti-freeze) to Haz-Mert, Rogers, Arkansas.

2. Is the Permittee complying with any additional local and State standards including such standards or requirements that may be come effective during the term of this permit? ☒ Yes, ☐ No
   If yes, list additional standards. If no, explain. ☐ Not Applicable

Title V Air Permit Number 693-A0P-R8, Stormwater Runoff Water-NPDES Permit Numbers AR0039730 and ARR000298 and Water-SPB Industrial No Discharge Pond Permit Number 4422-WR-1. See attached list of all permits issued to the facility.

F-22/54

Permit Data System
Specific Facility Summary

Close this window Print this page

Note: Click on the *AFIN number* for Facility Details

AFIN	Facility Name	City	County
66-00274	QUANEX CORP-MACSTEEL DIVISION	FORT SMITH	SEBASTIAN

List of All Permits Issued to This Facility

Note: Click underlined *Permit Numbers* for detailed permit information.

Permit Nbr	Media	Status	Permit Type	Issued	Revised	Expires
0693-A	Air	Voided	NSPS-New Source Perf.Standards	10/01/1982		
0693-AOP-R0	Air	Voided	Title V	02/18/1998		
0693-AOP-R1	Air	Voided	Title V	12/11/1998		
0693-AOP-R2	Air	Voided	Title V	12/04/2000		
0693-AOP-R3	Air	Voided	Title V	03/09/2001		
0693-AOP-R4	Air	Voided	Title V	03/27/2002		
0693-AOP-R5	Air	Voided	Title V	08/07/2003		
0693-AOP-R6	Air	Voided	Title V	08/24/2004		
0693-AOP-R7	Air	Voided	Title V	11/09/2005		08/06/2008
0693-AOP-R8	Air	Active	Title V	02/16/2007		08/06/2008
0693-AR-1	Air	Voided	NSPS-New Source Perf.Standards	01/03/1990		
0693-AR-2	Air	Voided	PSD-Prevention of Signif.Det.	10/28/1993		
0693-AR-3	Air	Voided	PSD-Prevention of Signif.Det.	04/05/1994		
0693-AR-4	Air	Voided	PSD-Prevention of Signif.Det.	01/27/1995		
4422-W	Water-SPB	Voided	Industrial	10/10/1995		10/09/2000
4422-WR-1	Water-SPB	Voided	Industrial	05/29/2001		05/28/2006
4422-WR-2	Water-SPB	Active	Industrial	12/19/2007		12/31/2012
66000299	RST					
AR0039730	Water-NPDES	Active	Industrial	11/01/2001		10/31/2006
AR0039730C	Water-NPDES	Voided	Other	06/26/2007		
ARR10B962	Water-NPDES	Voided	Storm Runoff	12/22/2000		

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Permit Data System
Specific Facility Summary

Close this window Print this page

Note: Click on the *AFIN number* for Facility Details

AFIN	Facility Name	City	County
66-01551	QUANEX CORP/MACSTEEL DIVISION	FORT SMITH	SEBASTIAN

List of All Permits Issued to This Facility

Note: Click underlined *Permit Numbers* for detailed permit information.

Permit Nbr	Media	Status	Permit Type	Issued	Revised	Expires
ARR000298	Water-NPDES	Active	Storm Runoff	10/25/2007		03/31/2009

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F-24/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Process Control Laboratory

1. Does the Permittee operate its' own laboratory for pretreatment process controls? *If yes, list parameters analyzed and any additional comments. If no, skip section.*	☐ Yes, ☒ No
2. Is the process control laboratory certified by the State of Arkansas?	☐ Yes, ☐ No
3. Number of pretreatment system laboratory technicians on staff:	
4. Are laboratory technician(s) certified in wastewater analysis?	☐ Yes, ☐ No

Representative Sampling

1. Is all equipment used for sampling and analysis routinely calibrated, inspected and maintained to ensure their accuracy and verified by records of maintenance or calibration? *If yes, list equipment used by the Permittee for sampling and/or analysis and any additional comments.* *If no, detail deficiencies.* *Not applicable, if no Industrial User sampling and analysis equipment is used.*	☐ Yes, ☐ No ☒ Not Applicable
2. Has Control Authority been notified and has Control Authority approved the changing of any sampling points?	☐ Yes, ☐ No ☒ Not Applicable

F-25/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Flow Measurement

1. Does the Permittee utilize a wastewater flow meter(s) or water meter(s) for flow determination? *If wastewater meter, list type(s) used and complete section.* *If water meter used, skip section.*	☒ Wastewater Flow Meter(s) ☐ Water Meter(s)

A 3" Niagara, water type meter. Also a Badger ultrasonic flow meter for the total discharge including sanitary.

2. Are appropriate flow measurement devices installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of the type of device being used, including records of verification of maintenance and calibration?	☒ Yes, ☐ No
3. Has the Permittee submitted a written certification of the flow measurement device(s) calibration by an independent source qualified to install and/or calibrate flow measurement equipment and has been granted permission by the Control Authority to use device(s)?	☒ Yes, ☐ No
4. Are devices selected capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes?	☒ Yes, ☐ No

F-26/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

Self Monitoring Procedures

Not applicable if no discharge and self monitoring requirements suspended; skip section. ☐ Not Applicable

1. Is the Permittee monitoring outfall(s) for the required parameters? ☒ Yes, ☐ No

2. Are all parameters being sampled at the designated sampling point(s)? ☒ Yes, ☐ No

3. Are any pollutants monitored more frequently than required by the Industrial User's permit? ☐ Yes, ☒ No

4. If any pollutants were monitored more frequently than required, were test procedures prescribed in 40 CFR Part 136 and amendments thereto, or as otherwise approved by the EPA or as specified in the Industrial User's permit, used? ☐ Yes, ☐ No ☒ Not Applicable

5. Is all sampling conducted for the purposes of self monitoring being performed by a certified independent laboratory acceptable to the Control Authority, or has a permit variance been granted to the Industrial User to perform its' own sampling? ☒ Yes, ☐ No

   Sampling performed by: ☒ Outside Laboratory ☐ Industrial User

   If independent laboratory or laboratories used, list name(s):

   Data Testing, Inc.

6. Are all laboratory analyses conducted for the purposes of self monitoring being performed by a certified independent laboratory or laboratories acceptable to the Control Authority? ☒ Yes, ☐ No

   Name of independent laboratory or laboratories used:

   Data Testing, Inc. and American Interplex (Chromium and Zinc analysis only).

Review laboratory analysis reports, monthly self monitoring reports, and any chain of custody records or sampling event records.

1. *Do records of sampling and analyses include;*
   - a) *The date, exact place, time, and methods of sampling or measurement, and preservation techniques or procedures,* ☒ *Yes,* ☐ *No*
   - b) *Who performed the sampling or measurements* ☒ *Yes,* ☐ *No*
   - c) *The date(s) analyses were performed,* ☒ *Yes,* ☐ *No*
   - d) *Who performed the analyses,* ☒ *Yes,* ☐ *No*
   - e) *The analytical techniques or methods used,* ☒ *Yes,* ☐ *No*
   - f) *The results of such analyses?* ☒ *Yes,* ☐ *No*

☒ *Correct sample types or methods.* ☒ *Correct handling and preservation techniques.* *

☒ *Correct sample frequency.* ☒ *Correct laboratory analysis methods.* *

* *In accordance with 40 CFR Part 136 and amendments thereto.*

F-27/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Automatic Re-sampling

1. Did the results of the Permittee's self monitoring wastewater analysis indicate a violation of the Industrial User's permit had occurred? ☐ Yes, ☒ No

If yes, list each violation separately. If no or not applicable, skip section. ☐ Not Applicable

(Not applicable if no discharge and self monitoring requirements suspended.)

Date of violation:	Notified the City within 24 hours?	Repeated pollutant sampling and analysis?	Submitted re-sample results?	Results submitted within 30 days?
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Accidental Discharge Report

1.	Did the Permittee have any occurrence of an accidental discharge of substances prohibited by Ordinance 69-97 or any slug loads or spills that may enter the public sewer? *If yes, detail below. If no, skip section.*	☐ Yes, ☒ No
2.	Did the Permittee immediately notify the Control Authority upon the occurrence?	☐ Yes, ☐ No
3.	Did the Permittee's notification include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken?	☐ Yes, ☐ No
4.	Did the Permittee submit to the Control Authority a detailed written report within seven days following the accidental discharge?	☐ Yes, ☐ No
5.	Did the report contain a description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the Permittee's compliance status, including the location of the discharge, type, concentration and volume of the waste?	☐ Yes, ☐ No
6.	Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur?	☐ Yes, ☐ No
7.	Did the report contain all steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance?	☐ Yes, ☐ No

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The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Operating Upset Report

1. Did the Permittee experience any upset in operations that placed the Permittee in a temporary state of noncompliance with the provisions of either the user's permit or with Ordinance 69-97? *If yes, detail below. If no, skip section.*	☐ Yes, ☒ No
2. Did the Permittee inform the Control Authority within 24 hours of becoming aware of the upset?	☐ Yes, ☐ No
3. Did the Permittee file a written follow-up report of the upset to the Control Authority within 5 (five) days?	☐ Yes, ☐ No
4. Did the report contain a description of the upset, the cause(s) thereof, and the upset's impact on the Permittee's compliance status?	☐ Yes, ☐ No
5. Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if not corrected, the anticipated time the noncompliance is expected to continue?	☐ Yes, ☐ No
6. Did the report contain all steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset?	☐ Yes, ☐ No
7. Did the report also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner?	☐ Yes, ☐ No

F-30/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

Special Monitoring And Reporting Requirements

1. Does the Permittee have any additional or special monitoring requirements particular to this Industrial User? ☒ Yes, ☐ No

   If yes, attach copy of pertinent page of the industrial user's permit. If no, skip section.

See attached.

Compliance Schedule Requirements

1. Was the Industrial User under a compliance schedule with the City? ☐ Yes, ☒ No

   If yes, attach copy of the Industrial User's compliance schedule. If no, skip section.

2. Did the Permittee submit quarterly compliance reports the Pretreatment Office?

1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No

F-31/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Records Retention

1. Is the Permittee retaining records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by user's permit, and records of all data used to complete the application for permit, for a period of at least three years from the date of the sample, measurement, report or application?	☒ Yes, ☐ No
2. Are all records that pertain to matters that are the subject of special orders or any other enforcement action or litigation activities brought by the Control Authority being retained and preserved by the Permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired?	☐ Yes, ☐ No ☒ Not Applicable

Planned Facility Changes

1. Has the Permittee had any facility expansion, production increase, or process modifications, which results in new or substantially increased discharges or a change in the nature of the discharge? *If not applicable, skip next question.*	☐ Yes, ☒ No ☐ Not Applicable
2. Did the Permittee give notice to the Control Authority 90 days prior to the above planned changes?	☐ Yes, ☐ No ☒ Not Applicable
3. Has the Permittee given advance notice to the Control Authority of any planned changes in the permitted facility or activity, which may result in noncompliance with the Industrial User's permit requirements?	☐ Yes, ☐ No ☒ Not Applicable

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PART 4 - SPECIAL CONDITIONS

SECTION 1 - ADDITIONAL/SPECIAL MONITORING/REPORTING REQUIREMENTS

A. Categorical Industrial User Requirements.

Within 90 days after the compliance date for the Iron & Steel Manufacturing Standards, or in the case of a New Source, following commencement of the introduction of wastewater into the POTW, all users subject to the above standards must submit to the Control Authority a report on compliance that states whether or not applicable pretreatment standards are being met on a consistent basis. The report must indicate the nature and concentration of all regulated pollutants in the facility's regulated streams and a statement of whether compliance is consistently being achieved, and if not, what additional operation, maintenance and/or pretreatment is necessary to achieve compliance. The Iron & Steel Manufacturing compliance date is July 10, 1985.

In June and December of each year a periodic compliance report must be submitted to the office of the Pretreatment Program Supervisor indicating the precise nature and concentration of the pertinent regulated parameters in the users discharge to the POTW, the average and maximum daily flow rates of the facility, the methods used by the discharger to sample and analyze the data, and a certification that these methods conform to the methods outlined in 40 CFR Part 136. Therefore, at least twice a year, the user must sample and analyze (outside the City's sampling program) the parameters listed on the previous pages.

Categorical Industries with production based limits must submit the previous six months data in their Bi-Annual reports. TTO's known to be on the premises must be also be tested twice per year. A Toxic Organic Management Plan (TOMP) may be submitted in lieu of testing, however, a certification stating the plan is being carried out must also accompany each Bi-Annual report. If the user is under a compliance schedule with the City, quarterly reports must be submitted to this office for the purpose of evaluating compliance status.

SECTION 2 - REOPENER CLAUSE

Describe any causes for modifying the permit arising out of facts that are not common to all industrial users which will or are likely to occur during its effective period.

Not currently applicable to this Industrial User.

SECTION 3 - COMPLIANCE SCHEDULE

Not currently applicable to this Industrial User.

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Signatory Requirements

1.	Do all applications, reports, or information submitted to the Control Authority contain the certification statement from Section D, Article 5 of industrial user's permit and are signed as required in paragraphs (a), (b), (c) or (d)?	☒ Yes, ☐ No
2.	Has the Permittee submitted a request to the Control Authority for permission to change its' authorized representative, if authorization is under paragraph (d)?	☐ Yes, ☒ No

Cost Recoveries And Penalties

1.	Has the Permittee been liable and billed for costs incurred for any cleaning, repair, or replacement work caused by any violation or discharge that caused any expense, loss, or damage to or otherwise inhibited the Control Authority wastewater disposal system?	☐ Yes, ☒ No ☐ Not Applicable

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Facility Site Inspection

Spill Prevention

1. Does the facility have a spill prevention plan? ☒ Yes, ☐ No
   If no, skip next question.

SPCC Plan.

2. Is a copy of the spill prevention plan on file with the Control Authority? ☒ Yes, ☐ No

Slug Control

1. Were the Industrial User's slug control and prevention measures evaluated? ☒ Yes, ☐ No

Discussed slug control and prevention measures with the Permittee. See the attached Slug Control Plan Evaluation Appendix.

2. Are adequate precautions being taken and proper procedures followed to prevent accidental spills and slug loads? ☒ Yes, ☐ No

F-36/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Chemical and Hazardous Waste Storage		
Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)
Pump House (curbed-spill containment)		
Phosphate	(2) 1,500 gallon containers	No floor drains
Cooling tower system (non-contact)		
Polyaluminium (clarifier)	(1) 1,500 gallon container	No floor drains
TTA (copper corrosion inhibitor)	500 gallons	No floor drains
Sodium hypochlorite	(1) 5,500 gallon container	No floor drains
Curbed area drains to scale water system if spilled.		
Rolling Mill:		
Steam cleaner soap, caustic	200 gallons	No floor drains
Bar Turning Area:		
5% oil solution/water	5,000 gallons	No floor drains
Closed loop system, no discharge bar turning process. Water-soluble coolant (cutter fluids).		
Outside Storage Pad:		
Outside non-covered pad drain line connected to scale pit (oil skimmers). Skimmers remove all oil from		

F-37/54

Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Chemical and Hazardous Waste Storage Continued		
Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)
process, no discharge to sewer system.		
Lubricants	(110) 55 gallon drums	No floor drains
Gasoline (containment, no discharge)	(1) 500 gallon container	No floor drains
Kerosene (containment, no discharge)	(1) 500 gallon container	No floor drains
Waste oil	(3) 250 gallon containers	No floor drains
Anti-freeze	(1) 250 gallon container	No floor drains
Laboratory (steel etching):		
Hydrochloric Acid	(1) 30 gallon container	1 foot
Laboratory for steel etching with hydrochloric acid, to inspect grain. Laboratory has a marble chip limestone		
filter for pH adjustment and neutralization for all drains prior to discharge to the sewer system. Acid storage		
limited to one thirty gallon container stored in upright position near wall, non-traffic area.		
Additional Chemical Storage Outside Of Laboratory:		
Muractic acid (31.5% solution)	(3) 30 gallon containers	No floor drains
All containers kept on secondary containment pallet.		

F-38/54

Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Chemical and Hazardous Waste Storage Continued		
Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)
Boiler Room:		
Boiler treatment chemical (phosphate)	500 gallons	Varies to drains
Salt blend tank	100 gallons	Varies to drains
Sulfite tank	500 gallons	Varies to drains
Caster Spray Water System Building:		
No floor drains with direct connection to the sewer system, all drains connect to other treatment systems.		
Phosphate tank	800 gallons	Varies to drains
Surfactant tank	1,500 gallons	Varies to drains
Polymer	(1) 300 gallon tote	Varies to drains
Hydrogen peroxide	(1) 1,500 gallon tank	(1) 1,500 gallon tank
Sodium hypochlorite	(1) 1,500 gallon tank	Varies to drains
(Secondary containment for all chemicals.)		
Polyaluminum chloride (Secondary containment.)	(1) 1,500 gallon tank	No floor drains
Clarifier: Adjacent building housing filter press.		

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Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Chemical and Hazardous Waste Storage Continued		
Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)
Polymer (Secondary containment.)	(1) 300 gallon tote	No floor drains
Stormwater Treatment Building:		
Sulfuring acid	(1) 400 gallon tote	No floor drains
Secondary containment.		
No other significant changes in chemical storage since the last inspection. Varying amounts listed are		
maximum amounts stored.		
See attached list of chemicals and materials.		

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Attachment D
Chemical and Materials

Material	Quantity Used/Produced (lb./day)
Basic Slag (produced)	189,000
Baghouse Dust (produced)	41,000
Phosphate Polymer	200
Sodium Hypohlorite (12% sol.)	1,330
Citric Acid	50
Anionic Polymer	24
Poly Aluminum Chloride	75
Hydrochloric Acid	10
Sulfite	1
Diesel Fuel	2,000
Sodium Chloride	180
Hydrogen peroxide	410
Petroleum Oil/Grease	300
Di-Ethylene Glycol	200
Gasoline	22
Kerosene	12
Petroleum Naphtha	102
Carbon Electrodes	10,600
Carbon, Alumina, Lime, and Chromium Refractory	45,000
Scale, Iron Oxide (produced)	43,000
Steel Bars (produced)	3,090,000
Filter Press Cake (produced)	1,500
Spray Paint	30
Paint, other	41

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name: Quanex, MacSteel Division		
Inspection Date: 1/10/08		
Chemical and Hazardous Waste Storage Continued		
Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)

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The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Pollution Controls

1. Is the Permittee at all times properly operating and maintaining all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with it's permit? *Not applicable if no pretreatment equipment, skip section.*	☒ Yes, ☐ No ☐ Not Applicable
2. Does the Permittee's proper operation and maintenance include;	
a) Effective performance;	☒ Yes, ☐ No
b) Adequate funding;	☒ Yes, ☐ No
c) Adequate operator staffing and training;	☒ Yes, ☐ No
d) Adequate laboratory and process controls?	☒ Yes, ☐ No
3. Does the Permittee have proper records of operation and maintenance of pretreatment equipment?	☒ Yes, ☐ No

F-44/54

The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Manufacturing Facilities

1. Were manufacturing or production facilities inspected? *Not applicable if no manufacturing or production facilities.*	☒ Yes, ☐ No ☐ Not Applicable

Pretreatment Facilities

1. Were pretreatment facilities inspected? *Not applicable if no pretreatment equipment.*	☒ Yes, ☐ No ☐ Not Applicable

Self Monitoring Procedures

1. List any comments regarding observation of the Industrial User's self monitoring procedures:

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The City of Fort Smith
Significant Industrial User Inspection Report

Facility Name:	Quanex, MacSteel Division
Inspection Date:	1/10/08

Entry And Inspection

1. Has the Permittee allowed the Control Authority or an authorized representative upon the presentation of credentials and other documents as may be required by law to;

   a) Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of user's permit, ☒ Yes, ☐ No

   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of user's permit, ☒ Yes, ☐ No

   c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under user's permit, ☒ Yes, ☐ No

   d) Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and ☒ Yes, ☐ No

   e) Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under user's permit, could originate, be stored, or be discharged to the sewer system? ☒ Yes, ☐ No

If answered no to any question, detail all instances of noncompliance.

F-46/54

The City of Fort Smith

Industrial Monitoring Inspection Report

Categorical Compliance Appendix

Facility Name: Quanex, MacSteel Division	
Inspection Date: 1/10/08	
Categorical Requirements	
1. Is the Permittee subject to regulation by categorical standards? Category: Iron & Steel	☒ Yes, ☐ No
2. Did the Permittee submit to the Control Authority a report on compliance to the pretreatment standards of the user's federal category, stating whether or not applicable pretreatment standards are being met on a consistent basis?	☒ Yes, ☐ No
3. Was the report submitted within 90 days after the compliance date, or in the case of a New Source following commencement of the introduction of wastewater into the POTW?	☒ Yes, ☐ No
4. Did the report indicate the nature and concentration of all regulated pollutants in the facility's regulated streams and a statement of whether compliance is consistently being achieved, and if not, what additional operation, maintenance and/or pretreatment is necessary to achieve compliance?	☒ Yes, ☐ No
5. Did the Permittee submit Bi-Annual Compliance Reports to the office of the Pretreatment Program Supervisor during the months of June and December of the previous year?	☒ Yes, ☐ No
6. Did the reports indicate the precise nature and concentration of the pertinent regulated parameters in the user's discharge to the POTW, the average and the maximum daily flow rates of the facility, the methods used by the discharger to sample and analyze the data, and a certification that these methods conform to the methods outlined in 40 CFR Part 136?	☒ Yes, ☐ No

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The City of Fort Smith

Industrial Monitoring Inspection Report

Categorical Compliance Appendix

Facility Name: Quanex, MacSteel Division	
Inspection Date: 1/10/08	
Additional Categorical Requirements	
1. Does the Permittee have additional categorical pretreatment standards particular to the industrial user? *If no, skip section.* Additional Category:	☐ Yes, ☒ No
2. Did the Permittee submit to the Control Authority a report on compliance to the pretreatment standards of the user's federal category, stating whether or not applicable pretreatment standards are being met on a consistent basis?	☐ Yes, ☐ No
3. Was the report submitted within 90 days after the compliance date, or in the case of a New Source following commencement of the introduction of wastewater into the POTW?	☐ Yes, ☐ No
4. Did the report indicate the nature and concentration of all regulated pollutants in the facility's regulated streams and a statement of whether compliance is consistently being achieved, and if not, what additional operation, maintenance and/or pretreatment is necessary to achieve compliance?	☐ Yes, ☐ No
5. Did the Permittee submit Bi-Annual Compliance Reports to the office of the Pretreatment Program Supervisor during the months of June and December of the previous year?	☐ Yes, ☐ No
6. Did the reports indicate the precise nature and concentration of the pertinent regulated parameters in the user's discharge to the POTW, the average and the maximum daily flow rates of the facility, the methods used by the discharger to sample and analyze the data, and a certification that these methods conform to the methods outlined in 40 CFR Part 136?	☐ Yes, ☐ No

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The City of Fort Smith

Industrial Monitoring Inspection Report

Categorical Compliance Appendix

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

Production Based Limits

1. Does the categorical industry have production based limits? ☒ Yes, ☐ No
   If no, skip section

2. Did the Permittee submit to the Control Authority the previous 6 (six) months production based limits data in its' Bi-Annual Compliance reports submitted during the months of June and December of the previous year? ☒ Yes, ☐ No

Reviewed daily production recaps, provided a detailed report of each process production rates. Also, heat sheets used in plant are maintained to provide further verification of daily production rates. On a monthly basis, sheets are totalized automatically for monthly reports. Numbers are weights from built-in overhead crane scales. No estimations, actual production rates totalized on a daily basis. See the attached example provided during a previous inspection.

TTO's (Total Toxic Organics)

1. Are TTO's (Total Toxic Organics) known to be on the premises? ☒ Yes, ☐ No

2. Were TTO's tested twice per year or a previously submitted Toxic Organic Management Plan (TOMP) certification stating the plan is being carried out accompany each Bi-Annual report? ☒ Yes, ☐ No

The only TTO's compounds are contact cleaners in aerosol spray cans. TOMP certification and copy of the plan is submitted with each bi-annual compliance report.

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The City of Fort Smith

Industrial Monitoring Inspection Report

Categorical Compliance Appendix

Facility Name: Quanex, MacSteel Division
Inspection Date: 1/10/08

TOMP

1. Has the Permittee submitted a Toxic Organic Management Plan (TOMP), in lieu of testing, and has the Control Authority accepted the plan? *If no, skip section.* *If yes, a detailed review of the TOMP, including inspection to verify that the plan, must be performed.*	☒ Yes, ☐ No

Annual TOMP Review and Inspection

1. Is the inventory of the facility's process TTO compounds current, including the corresponding vendor or supplier Material Safety Data Sheets (MSDS)?	☒ Yes, ☐ No
2. Has the Categorical Industrial User (CIU) changed or added process chemicals that contain TTO compounds?	☐ Yes, ☒ No
3. If the CIU has changed or added process chemicals that contain TTO compounds, has the Control Authority been notified and has the TOMP been updated to reflect these changes?	☐ Yes, ☐ No ☒ Not Applicable
4. Is the management plan for approved alternate disposal methods for the originally identified TTO compounds being followed?	☒ Yes, ☐ No
5. Are procedures for assuring that TTO compounds located on site do not routinely spill or leak into the waste-stream being adhered to?	☒ Yes, ☐ No
6. Is the TOMP current and are adequate management practices being followed?	☒ Yes, ☐ No
7. Is the TOMP being properly implemented?	☒ Yes, ☐ No

Special Notice: Upon completion of the TOMP review and inspection, evaluate findings and take any appropriate action, as required.

1. If the CIU has changed process chemicals and has failed to notify the Control Authority, but continues to adhere to the intent and procedural aspects of the TOMP, the TTO certification corresponding to the that six month period will be allowed. The CIU has **90** days to update the TOMP. Notify CIU of requirement.
2. If through the inspection the Control Authority finds the TOMP is not being implemented, the Control Authority must disallow the TTO certification statement for that reporting period. Additionally, the CIU must submit TTO analyses for that six-month period. The Control Authority must issue a Notice of Violation and perform TTO compliance monitoring (in accordance with 403.8 (f)(2)(v)) within 5 (five) days of the inspection.

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The City of Fort Smith

Industrial Monitoring Inspection Report

Slug Control Plan Evaluation Appendix

Facility Name: Quanex, MacSteel Division	
Inspection Date: 1/10/08	
Slug Control Plan	
1. Is the Significant Industrial User (SIU) currently required to have a plan to control slug discharges?	☐ Yes, ☒ No
Slug Control Plan Evaluation	
1. Has the Permittee had any accidental discharges (slug loads or spills) that have entered the sewer system during the previous compliance year? *If yes, list date, duration of discharge describe the accidental discharge, the cause(s) thereof, and the impact on the Permittee's compliance status, including the location of discharge, type, concentration and volume of waste. List all steps taken to reduce, eliminate, and/or prevent recurrence of such an accidental discharge.*	☐ Yes, ☒ No

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The City of Fort Smith

Industrial Monitoring Inspection Report

Slug Control Plan Evaluation Appendix

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

2. Does the SIU maintain a spill prevention plan or have other written procedures for control or prevention of accidental discharges (slug loads or spills) to the City's sewer system? ☒ Yes, ☐ No

If yes, provide a brief description of any plan(s) or procedures.

SPCC Plan.

3. Is the SIU a batch discharger? ☐ Yes, ☒ No

If yes, provide a brief description of discharge practices, including non-routine batch discharges.

Permittee is limited to 140 GPM discharge, will overflow sampling well with float to stop discharge. Currently discharge is continuous approximately 52,000 GPD.

4. Does the SIU utilize secondary containment for chemical and/or hazardous waste storage? ☒ Yes, ☐ No

If yes, provide a brief description of type(s) of secondary containment used including number of containment unit(s) and area(s) of use.

The Permittee utilizes secondary containment. Also there are no floor drains in the facility where any chemical storage is present.

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The City of Fort Smith

Industrial Monitoring Inspection Report

Slug Control Plan Evaluation Appendix

Facility Name: Quanex, MacSteel Division

Inspection Date: 1/10/08

5. Does the industrial user operate a pretreatment plant, equipment, or otherwise pre-treat its' wastewater prior to discharge to the City's sewer system? ☒ Yes, ☐ No

If yes, list equipment utilized and/or describe treatment process.

An 85 ft. clarifier, with polymer chemical addition and a filter press. The system is primarily for the treatment of water for re-use in the process. Wastewater from the hot water well of the scale pit is discharged to the clarifier. Water discharged when conductivity levels are high in water used in other systems. Effluent from the clarifier is returned to the cooling tower and then to the cold well. A portion of treated effluent is discharged to the City's sewer system during system blow down. Blow down is treated, ten foot diameter mixing tank, pH adjusted prior to filtration in sand filter. Sand filter before final discharge. A 5, 000 gallon mixing tank; coagulant and polymers (flocculant) and pH adjustment to 10 to drop out heavy metals. A charged line with an inline flow measurement device installed discharges wastewater to a sampling well. The discharge then gravity flows to a sewer manhole.

6. Should the SIU be required to develop a slug control plan? ☐ Yes, ☒ No

If yes, list reason(s) for decision and any other comment(s). Notify SIU of requirement and minimum requirements necessary for approval of the plan by the Control Authority

If no, list reason(s) for decision or any other comment(s).

The Permitte did not have any accidental discharges (Slug loads or spills) during the previous compliance year. The Permittee maintains an SPCC plan. The Permittee has continuous discharge. The Permittee uses secondary containment and has no floor drains where chemicals are stored. The Permittee has extensive water reuse systems and only discharges the blow down from the various systems.

F-53/54

The City of Fort Smith

Industrial Monitoring Inspection Report

Slug Control Plan Evaluation Appendix

Facility Name: Quanex, MacSteel Division
Inspection Date: 1/10/08

Legal Authority & Minimum Slug Control Plan Elements

The Control Authority must in accordance with 40 CFR Part 403.8:

"Evaluate, at least once every two years, whether each such Significant Industrial User needs a plan to control slug discharges. For purposes of this subsection, 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. The results of such activities shall be available to the Approval Authority upon request. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

(A) Description of discharge practices, including non-routine batch discharges;

(B) Description of stored chemicals;

(C) Procedures for immediately notifying the POTW of slug discharges, including any discharge that would violate a prohibition under 40 CFR 403.5(b), with procedures for follow-up written notification within five days;

(D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response;"

F-54/54

TOXIC ORGANIC MANAGEMENT PLAN
SOLVENT MANAGEMENT PLAN

MacSteel Division of Quanex
5225 Planters Rd.
P.O. Box 1592
Fort Smith, AR 72902

Contact: Warren Taff Jr. (501)646-0223 Ext. 218

I. Process Description

Quanex, MacSteel Division, produces carbon and alloy steel bars. Scrap steel is melted, refined, caste, and rolled to produce steel bars. The bars are further processed by heat treating, straightening, and turning.

The process wastewater source is from the clean side of the scale water system settling pond. The scale water system is used for direct cooling of steel bars in the caster, rolling mill and straightener. This system is also used to collect steam and fumes from the degasser. Sources of makeup water to the scale water system include cooling tower blowdown, boiler blowdown, mold cooling blowdown, and city water. (Process water flow diagram, attachment A.)

II. Identification of Toxic Organics

a. Refractory bricks, containing 1% phenol as a binder, are stored in the Production Storage. The Production Storage area does not have drains to any water system. Approximately 20,000 lbs. of the bricks are stored on site. The phenol is bonded within the bricks which prevents release to any water system. The phenol is destroyed upon use of the bricks at temperatures >3000 deg. F. Refer to attachments B and C for the Material Safety Data Sheets.

b. Lectra Clean contract cleaner in aerosol cans are stored in the Store Room which does have drains to any water system. Approximately 48-19 oz. cans are stored on site. Lectra Clean contains 75% 1,1,1,trichloroethane and 25% tetrachloroethylene. All residual product is evaporated during use with none collected for disposal. Refer to attachment D for the Material Safety Data Sheets.

c. Safety-Kleen 105 Parts Washer Solvent contains 0.5% toluene, <0.5% 1,1,1,trichloroethane, and <0.5% tetrachloroethylene. The solvent is used in part washers in the Roll Shop (30 gal), Maintenance Shop (50 gal), and in Bar Turning (30 gal). None of these areas have drains to any water system. The used solvent is recycled by Safety-Kleen. A copy of a recent manifest, attachment E, and the Material Safety Data Sheets, attachment F, have been included.

The site plan, attachment G, shows the location and quantities of the above toxic organics.

III. Training

Maintenance and Store Room personnel are trained annually on the proper handling and disposal of solvent and cleanup material. A copy of the "Contingency and Emergency Plan" is included in attachment H.

IV. New Material Evaluation

All new materials brought into the facility are reviewed by the Environmental Engineer. Control procedures will be issued for all new materials containing TTO's to prevent releases to any water system. The "Toxic Organic Management Plan" will be revised to include any changes and resubmitted to the City for their there review.

V. Personnel Responsible for Plan Implementation

John D. Fisher, General Manager, and Warren Taff Jr., Environmental Engineer, is designated to be responsible for the implementation and perpetuation of this plan.

VI. Certification

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

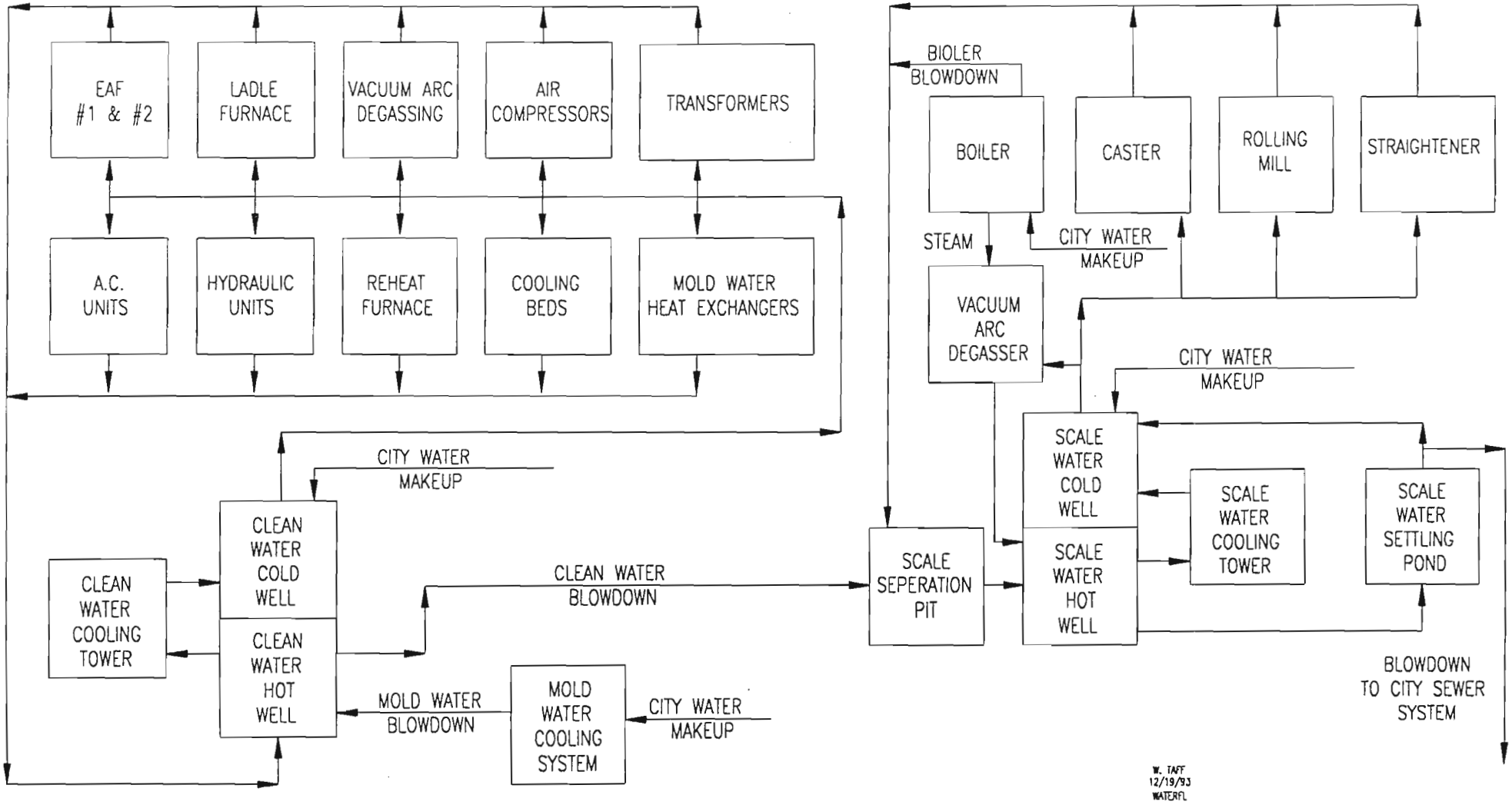
Warren Taff Jr.
Environmental Engineer
MacSteel Division of Quanex

tto1219

pc: J. Fisher
R. A. Lewis

MACSTEEL®
Quanex

PROCESS WATER FLOW



ATTACHMENT B (some sheets not included)

****
* SECTION I *
****

MSDS NUMBER . . . . : 50041
PART NUMBER . . .
MSDS CODE . . . . . : 192
MSDS OTHER CODE . . : 0
SYNONYMS . . . . . : REFRACTORY BRICK SHAPE

MANUFACTURER . . . . NORTH AMERICAN REFRACTORIES CO
DIVISION . . . . .
MFG PART NUMBER . .
VENDOR . . . . NORTH AMERICAN REFRACTORIES CO
EMERGENCY PHONE . . : 415-432-4741
OTHER CALLS . . . . : 814-234-7981
ADDRESS . . . . . . : 500 HALLE BUILDING, 1228 EUCLID AVENUE
CITY . . . . CLEVELAND STATE . . OH ZIP . . 44115
MSDS PREPARED BY . .
DATE PREPARED . . . 1/16/91

****
* SECTION II - HAZARDOUS INGREDIENTS/IDENTITY INFORMATION *
****

TRADE NAME WO-2783

INGREDIENT NAME	CAS	OSHA PEL	ACGIH TLV	OTHER	%
** PHENOL	108-95-2				[illegible]
MAY CONTAIN PETROLEUM PITCH	68187-58-6				[illegible]

****
* SECTION III - CHEMICAL CHARACTERISTICS *
****

BOILING POINT	MELTING POINT	FREEZING POINT	SPECIFIC GRAVITY (H_2O = 1)

PERCENT VOLATILE by VOLUME	THEORETICAL VOC CONTENT (percent of WEIGHT)	WEIGHT PER GALLON

MATERIAL SAFETY DATA SHEET - 01553 12/16/93 PAGE 1
TRADE NAME: LECTRA CLEAN

REC'D

****
* SECTION I *
****

MSDS NUMBER 01553
PART NUMBER .. .
MSDS CODE 192
MSDS OTHER CODE .. AC
SYNONYMS . . . CONTACT CLEANER

MANUFACTURER . . CRC CHEMICALS
DIVISION .. . . .
MFG PART NUMBER
VENDOR .. .. AMER. MACH. & SUP., SUMMERS SOUTH. ELEC.
EMERGENCY PHONE 215-674-4300
OTHER CALLS . ....
ADDRESS ... . 885 LOUIS DRIVE
CITY . . . . . : WARMINSTER STATE ..:PA ZIP ..:18974
MSDS PREPARED BY : A.R. REED
DATE PREPARED . ..: 11-85

****
* SECTION II - HAZARDOUS INGREDIENTS/IDENTITY INFORMATION *
****

TRADE NAME . . . . . : LECTRA CLEAN

INGREDIENT NAME	CAS	OSHA PEL	ACGIH TLV	OTHER	%
1,1,1, TRICHLOROETHANE	71-55-6	350	350		75
PERCHLOROETHYLENE	127-18-4	100	50		25

****
* SECTION III - CHEMICAL CHARACTERISTICS *
****

BOILING POINT	MELTING POINT	FREEZING POINT	SPECIFIC GRAVITY (H_2O = 1)
165-252F			1.335 (77F)

PERCENT VOLATILE by VOLUME	CHLOROFLICAL VOC CONTENT (percent of WEIGHT)	WEIGHT PER GALLON
100		

pH:
Comm:

G-6/15

P. O. Box 8913 Little Ro , Arkansas 72219-8913
Telephone 501-562-7444

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
	ARD 053730701	31138		

GENERATOR

3. Generator's Name and Mailing Address
MAC STEEL
5225 PLANTERS DIV OF QUANEX MAC STEEL
FORT SMITH AR 72902
4. Generator's Phone (501) 646-0223

A. State Manifest Document Number: AR- 651512
B. State Generator's ID:

5. Transporter 1 Company Name: SAFETY-KLEEN CORP.
6. US EPA ID Number: ILD 984908202
C. State Transporter's ID: PC 0855 H 159
D. Transporter's Phone: 501 783-8634

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID: PC - - - - H - - -
F. Transporter's Phone:

9. Designated Facility Name and Site Address
SAFETY-KLEEN CORP. 6-063-01
2511 JOHNSON ST
FORT SMITH, AR 72904
10. US EPA ID Number: ARD 000709733
G. State Facility's ID:
H. Facility's Phone: 501 783-8634

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (D001) (ERG#27) 6.7 LBS/GAL	002	DM	000046	G	D001 D039
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
I (A) D018 (A) 6.7 LBS/GAL

if no alternate TSDF, return to generator

K. Handling Codes for Wastes Listed Above
EMERGENCY RESPONSE INFORMATION:
M. Brant
501-646-0223

15. Special Handling Instructions and Additional Information
9349 62121363 531138 6-063-01-4044 02
FOR RECYCLE
EMERGENCY RESP#708-888-4660 24HR
SKDDT# A: 585 B: C: D:

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volumn and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month Day Year
M Brant	M Brant	1 12 06 93

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
Jim James	Jim James	1 12 06 93

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
Kathy Pittman	Kathy Pittman	1 12 06 93

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

SAFETY-KLEEN CORP.
(DESIGNATED FACILITY)

EPA ID NO. ARD000702733
(DESIGNATED FACILITY)

ADDRESS: 2511 JOHNSON ST FORT SMITH AR 72904

RECEIVED [illegible] '93

Under manifest/sales service number 65512,
the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR Part 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

PLEASE CHECK THE APPROPRIATE BOXES

✓	WASTE NAME	EPA * WASTE CODE	THE WASTE MAY CONTAIN THE FOLLOWING RESTRICTED CONSTITUENTS	TREATMENT STANDARD (mg/l) OR METHOD (FOR NON-WASTE WATER)
☒	Waste Petroleum Naphtha	D001,	Ignitable Liquid (High TOC Subcategory) Halogenated Organic Compounds (HOC's) ≥ 1000 mg/l	Incineration (INCIN), fuel substitution (FSUBS) or recovery (RORGS) (40 CFR 268.42) (non-waste water) INCIN (40 CFR 268.42) (non-waste water)
		D018, D039,	Benzene Tetrachloroethylene	Not Established Not Established
☐	Waste Petroleum Naphtha	D001,	Ignitable Liquid (High TOC Subcategory)	INCIN, FSUBS, or RORGS (40 CFR 268.42) (non-waste water)
☐	Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	D001, D006, D008, D039,	All of the above, plus: Cadmium Lead Tetrachloroethylene	 1.0 (non-waste water) 5.0 (non-waste Water) Not Established
☐	Waste Compound Cleaning Liquid/ Immersion cleaner 699	 D006, D007, D008, D018, D021, D027, D039, D040,	HOC's ≥ 1000 mg/l Cadmium Chromium Lead Benzene Chlorobenzene 1, 4-Dichlorobenzene Tetrachloroethylene Trichloroethylene	INCIN (40 CFR 268.42) (non-waste water) 1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste Water Not Established Not Established Not Established Not Established Not Established
☐	Waste Perchloroethylene	F002,	Tetrachloroethylene	5.6 (non-waste water)
☐	Waste Perc. Filters This hazardous debris is subject to the alternative treatment standards of 40CFR 268.45.	F002,	Tetrachloroethylene	5.6 (non-waste water)
☐	Waste Trichlorotrifluoroethane	F002,	Trichlorotrifluoroethane	28.0 (non-waste water)
☐	Waste 1,1,1 Trichloroethane	F002,	1, 1, 1 Trichloroethane	5.6 (non-waste water)
☐	Waste Petroleum Naphtha (Dry Cleaning)	D001, D039,	Ignitable Liquid (High TOC Subcategory) Tetrachloroethylene	INCIN, FSUBS, or RORGS (40 CFR 268.42) (non-waste water) Not Established
☐	Waste Paint Related Material	F003, F005, F003, F005, F003, F003, D001, D006, D007, D008,	Acetone Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene Methanol Ignitable Liquid (High TOC Subcategory) Cadmium Chromium Lead (TOC Subcategory)	160.0 (non-waste water) 36.0 (non-waste water) 33.0 (non-waste water) 28.0 (non-waste water) 28.0 (non-waste water) 0.75(non-waste water) INCIN, FSUBS, or RORGS (40 CFR 268.42) (non-waste water) 1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste water)
☐	Waste Antifreeze	D008, D039,	Lead Tetrachloroethylene	5.0 (non-waste water) Not Established

The constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created the waste).
*These treatment standards do not preclude reclamation prior to final disposition.

Generator Company: MAC STEEL EPA ID NO.: [illegible]

Generator's Signature X [signature] Date: [illegible]

Printed Name and Title of Generator: [illegible]

Safety-Kleen Corp. manages the above waste through its recycling and fuels programs in accordance with all applicable elements of the land disposal restrictions.

GENERATOR G-8/15

TRADE NAME: SAFETY-KLEEN 105 PARTS WASHING SOLVENT

****
* SECTION I *
****

MSDS NUMBER ..... : 10235
PART NUMBER ..... :
MSDS CODE ..... : 1
MSDS OTHER CODE .. : FAC
SYNONYMS ..... : STODDARD SOLVENT

MANUFACTURER ..... : SAFETY-KLEEN CORP
DIVISION ..... :
MFG PART NUMBER ... :
VENDOR ..... : SAFETY-KLEEN CORP
EMERGENCY PHONE .. : 800 842 3969
OTHER CALLS ..... : 708 697 8460
ADDRESS ..... : 777 BIG TIMBER RD
CITY ..... : ELGIN STATE : IL ZIP : 60124
MSDS PREPARED BY : :
DATE PREPARED .... : MAR 12, 1990

****
* SECTION II - HAZARDOUS INGREDIENTS/IDENTITY INFORMATION *
****

TRADE NAME ..... : SAFETY-KLEEN 105 PARTS WASHING SOLVENT

INGREDIENT NAME	CAS	OSHA PEL	ACGIH TLV	OTHER	%
HYDROCARBON SATURATED	64741-41-9	100	100		85
TOLUENE	108-88-3	100 150ST	100 150ST	150STEL	.5
XYLENE	1330-20-7	100	100	150STEL	1.0
ETHYL BENZENE	100-41-4	100SKIN	100	150STEL	.5
C8+AROMATICS	MIXTURE	N/E	N/E		12.0
CHLORINATED SOLVENTS					
1,1,1 TRICHLOROETHANE	71-55-6	350	350	450STEL	< 5
TETRACHLOROETHYLENE	127-18-4	25	50	200STEL	< 5

G-9/15

MACSTEEL - ARKANSAS

CONTINGENCY AND EMERGENCY PLAN

IMPLEMENTED 1985

June, 1985
December, 1985 Rev. 1
July, 1988 Rev. 2
October, 1992 Rev. 3

G-10/15

I. FACILITY IDENTIFICATION

Quanex Corporation
MacSteel-Arkansas
P.O. Box 1592
5225 Planters Road
Fort Smith, AR 72902-1592
(501) 646-0223

Corporate Address:
1900 West Loop South
Suite 1500
Houston, TX 77027
(713) 961-4600

II. FACILITY DESCRIPTION

MacSteel-Arkansas is a producer of specialty steel round and roundcornered square bars. The process involves charging of scrap into an electric arc furnace, melting, refining, casting, and rolling to customer's specifications.

III. SPILL NOTIFICATION PROCEDURES

A. The following persons are to be contacted in the event of a spill:

1. Your immediate supervisor.
2. General Turn Supervisor
3. Plant Engineering

	Office	Home
Warren Taff Jr.	ext. 218	(501) 928-4168
or		
R. A. Lewis	ext. 210	(501) 646-5677

4. Plant Maintenance

Floyd Zornes	ext. 220	(501) 452-1335
or		
Scott Gleason	ext. 222	(501) 484-5503
	pager	(501) 441-9061

The emergency coordinator is the Chief Engineer, R. A. Lewis.

B. Personnel contacted under section III. A. above, shall notify the following agencies depending on the type and quantity of material spilled or released.

1. Arkansas Office of Emergency Services
   (501) 374-1201

2. Sebastain County Health Department
   (501) 452-8600

3. Fort Smith Fire Department
   (501) 782-9131

4. Arkansas Department of Pollution Control and Ecology
   (501) 562-7444

5. National Emergency Response Center
   (800) 424-8802

III. Spill Notification Procedures, continued

C. Verbal report to the above agencies should include:

1. Location of nearest water source.
2. Type of material spilled.
3. Amount of material released (gallons, pounds, etc.)
4. Time the spill was detected and by whom.
5. Containment and cleanup action taken.
6. A brief assessment of environmental impact.

D. All required written reports should include:

1. All items listed in section III. C.
2. An investigative report detailing events leading to the spill and corrective action taken to eliminate a recurrence.

E. The outside contractor for cleanup, if needed, is:

Spilteck Services, Inc.
6807-A West 12th Street
Little Rock, AR 72204

IV. PREVENTION PLAN

A. Wastewater - All process wastewater is discharged to the Fort Smith sewer system. All contact, non-contact and boiler water systems ultimately discharge or overflow into the scale water system. Wastewater from the scale water system discharges directly to the city system. High water level probes are installed in both the scale water system and the settling pond to prevent overflows.

B. Containerized Chemicals - Receiving of drums and bulk bins of chemicals are supervised by the Storeroom personnel. Any spilled materials will be contained in the unloading areas.

Fifty-five gallon drums, 275 gallon bins, and 1500 gallon bulk tanks of water treatment chemicals are stored in the pump room located west of the scale pit. The building is curbed to contain any spillage.

Fifty-five gallon drums of degreaser, lube oil, hydraulic oil, and a 550 gallon gasoline and kerosene tank are stored on the oil storage pad. This pad is curbed and contains a sump to contain spills. Any spills will be contained and cleaned up in that area.

Up to 6, 150 pound containers of chlorine are placed adjacent to the chemical treatment building. The feed systems are all vacuum systems. Chlorine flow from the tank will stop in the event of a broken or disconnected feed line.

IV. **Prevention Plan, continued**

C. Underground Tanks - Underground tanks include a 5,000 gallon coated steel waste oil tank located north of the scale pit and a 10,000 gallon coated steel diesel fuel tank located adjacent to the scrap yard scale house. Both tanks are equipped with sacrificial cathodes. Fuel oil filling is supervised by the yard department personnel. The fuel oil tank is equipped with a usage meter and an inventory procedure has been established to detect leaks.

D. Waste Oil - All waste oil is stored in a 5,000 gallon underground tank north of the scale pit. This tank for the storage of non-hazardous oils only.

E. Waste Paint and Paint Thinner - Waste paint and paint thinner are collected and stored in a labeled hazardous waste drum located in a fire proof cabinet by the store room window.

F. Baghouse Dust - The baghouse dust is stored in a silo west of the baghouse. It is delivered to the silo via a closed pneumatic conveying line and screw conveyor from the baghouse, from the silo it is fed into a licensed hazardous waste truck. The load is manifested and shipped to a thermal metal recovery unit for treatment.

G. Maintenance Surveillance - The Maintenance Department is responsible for inspecting all storage areas listed in part IV once per eight hour shift.

H. Plant Drainage System - All storm water flows through open ditches and culverts to the southeast corner of the site. All downspouts within the plant are water tight connections to the stormwater system. Chemicals are stored in areas where they cannot impact the stormwater system. All drinking fountains and sanitary facilities are connected to the City sewer system

V. SPILL CONTROL PROCEDURES

A. Storage and Supply of Cleanup Materials - MacSteel will maintain a minimum of the following tools and materials for cleanup. The materials will be stored in the storeroom and chemical treatment building.

1. 10 scoop shovels.
2. 1,000 pounds of absorbent material
3. 6 pairs of knee high slip on rubber boots
4. 25 pounds of rags
5. 12 pairs of rubber gloves
6. 12 empty DOT 17H hazardous waste drums

Additional cleanup equipment is available from:

Spilteck Services, Inc.
6807-A West 12th Street
Little Rock, AR 72204
1-800-950-3304

V. Spill Control Procedures, continued

B. Cleanup Supervision - The following MacSteel personnel should be contacted in the event of a spill:

Environmental Engineer, Warren Taff.....(501) 648-0947 (home)

Chief Engineer, R.A. Lewis.....(501) 646-5677 (home)

Plant Maintenance, F.R. Zornes.....(501) 452-1335 (home)
or
Scott Gleason.....(501) 484-5503 (home)
(501) 441-9061 (pager)

C. Spill Containment and Cleanup - Maintenance Turn Supervisors have been instructed how to recognize a spill by material and area, report the spill, and begin cleanup. This instruction is the responsibility of MacSteel's Personnel Training Supervisor and Environmental Engineer.

1. Baghouse Dust - Spills of baghouse dust shall be swept up and transferred to a hazardous waste container. Care should be taken to avoid dispersal of the dust into the air. Use oil base floor sweep and wear dust respirators. The contents of this container, if any, shall be transferred to the next licensed hazardous waste truck receiving a load from our facility. At no time may the dust remain on site for longer than 90 days. A regularly scheduled clean up shall also be done as needed for good housekeeping in the area. In the event of a spill or release, follow the procedures outlined in this document for reporting and notification.

2. Spills from Containerized Chemicals

   a. Identify substance.

   b. Use recommended personal protection equipment and procedures listed on the container label or MSDS.

   c. Contain spilled material to prevent further contamination.

   d. Contact appropriate personnel listed in section **III. A.**

   e. Transfer spilled and contaminated material to drums.

   f. Submit written report containing information listed in section **III. C. 2.** through **5.**, to your supervisor.

V. **Spill Control Procedures, continued**

3. In the event of extreme high water level in the scale wate: system including the settling pond, immediate action must be taken to prevent an overflow. Contact your supervisor of the actions taken and continue to monitor the levels to insure that an overflow does not occur. In the unlikely event a discharge occurs, contact Warren Taff immediately so that required notifications and monitoring can be performed.

VI. <u>TRAINING</u>

Plant personnel involved in the handling of materials, hazardous waste, and the inspection of storage areas, will be trained in proper spill control, cleanup, and notification procedures once per year. New employees involved in these areas will be trained within the first six months of their employment.

MACSTEEL®

Quanex

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

Revised August 2003

H-1/21

MacSteel
Fort Smith, Arkansas

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN
FOR
MACSTEEL
Fort Smith, ARKANSAS

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PART 1 – GENERAL INFORMATION

A.	NAME OF FACILITY:	MACSTEEL,
B.	TYPE OF FACILITY:	Steel Manufacturing
C.	LOCATION OF FACILITY:	5225 Planters Road Fort Smith, AR 72916
D.	NAME AND ADDRESS OF OWNER:	MACSTEEL 5225 Planters Road Fort Smith, AR 72916

E. DESIGNATED PERSON ACCOUNTABLE FOR OIL SPILL PREVENTION AT FACILITY:

John Fisher, Facility Manager

F. MANAGER APPROVAL {40 CFR 122.7}

This SPCC Plan will be implemented as herein described.

Signature:_____

John Fisher, Facility Manager

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G. PLAN CERTIFICATION {40 CFR 112.3(d)}

I hereby certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices. The good engineering practices include the implementation of additional measures attached to the SPCC plan.

Michael Henderson

Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

Date 8/14/03 Registration No. 5357 State AR.

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PART II – SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

A. POLICY AND OBJECTIVES

It is the policy and objective of MACSTEEL to manage personnel and operations in a manner that will minimize the potential for a release of oil or petroleum products. In the event of a release, it is the objective of the facility to institute appropriate measures that will minimize impact upon the environment. As far as practical, spilled materials will be contained, treated, and/or recovered.

This plan outlines management systems and procedures for facility personnel to adhere to in meeting spill prevention and control objectives. When applicable, these procedures will also apply to non-plant personnel whose assignments require facility personnel supervision.

B. SOURCE IDENTIFICATION

The following table identified the potential oil management areas that are addressed in this SPCC Plan. A brief description of the operation, quantity of oil and type of spill control is listed for each oil management unit. A review of the site drainage, volume of oil, and other sources create a spill potential that must be addressed. A site map, which highlights source location and predominant plant drainage, is also attached in Appendix B.

B. SOURCE IDENTIFICATION

Source Number	Source	Material	Total Quantity (gallons)	Type of Containment Control	Type of operation	Reportable Quantity
A-1	Bulk Gasoline Tank	Gasoline	500	Concrete	Storage	25 Gallons
A-2	Bulk Kerosene Tank	Kerosene	500	Concrete	Storage	25 Gallons
A-3	Waste Oil Tank	Waste Oil	1,500	Concrete	Storage	25 Gallons
A-4	Baghouse Silos	KO61	#1- -27,550 #2 - 66,500	#1 - None #2 - Concrete	Storage	10 LB.
A-5	Chemical Storage	$AlCl_3$, Phosphate Polymer, TTA	(3) 1,500 (1) 500	Concrete	Storage	None
A-6	Drum Storage Area	Oil, Grease, Hydraulic Oils	2,000	Concrete Curbing	Storage	25 Gallons
A-7	Bulk Diesel Tank (IMS)	Diesel	1,500	Concrete	Storage	25 Gallons
A-8	Bulk Gasoline Tank (IMS)	Gasoline	500	Concrete	Storage	25 Gallons
A-9	Waste Oil Tank (IMS)	Waste Oil	350	Steel Catchment Basin	Storage	25 Gallons
A-10	Underground Diesel Tank	Diesel	10,000	Overfill Protection & Monitoring Well	Storage	25 Gallons
A-11	Bulk Bleach	NaOCl	5,000	Concrete	Storage	70 Gallons
A-12	Waste Paint	Waste Paint	55	Steel Cabinet	Storage	10 Gallons
A-13	Bulk Bleach	NaOCl	1,500	Polyethylene Catchment Basin	Storage	70 Gallons
A-14	Bulk Hydrogen Peroxide	H_2O_2	1,500	Concrete	Storage	10 Gallons
A-15	Chemical Storage	$AlCl_3$, Anionic Polymer, Critic Acid, Phosphate Polymer, TTA	(2) 1,500 (1) 800 (2) 55	Polyethylene Catchment Basin, Concrete Curbing, Concrete	Storage	None
A-16	Waste Oil Tank	Waste Oil	5,000	Concrete	Storage	25 Gallons
A-17	Waste Oil Tank	Waste Oil	5,000	Concrete	Storage	25 Gallons
A-18	Chemical Storage Boiler House	Ethylenediaminetretaacedica cid Sodium Bisulfite	(2) 500	Concrete	Storage	None
A-19	Portable Used Oil Totes	Waste Oil	Varies	Steel	Oil Tranfers	25 Gallons
A-20	Hydraulic Oil Storage at Crane Repair Area	Hydraulic Oils	55 gallon drums	Steel	Storage	25 Gallons
A-21	Gasoline Storage South of Planters Road	Above Ground Gasoline	(2) 550	Steel	Storage	25 Gallons
A-22	Gasoline Storage South of Planters Road	Above Ground Gasoline	550	Steel	Storage	25 Gallons

NOTE: 1 55 gallon drums may be located outside a containment area during maintenance and/or repairs; however, employees will be properly instructed on the proper way to handle this situation and prevent a spill from occurring.

2 Contractors when arriving on-site will be instructed on how to prevent a spill from occurring and methods to handle a spill event.

C. SPILL RESPONSE PROCEDURES {40 CFR 112.7(C)}

Spill prevention and control within the Fort Smith steel mill is based on several levels of control. These different levels are:

Prevention

At MacSteel several means are used to prevent spills from occurring. External level sight glasses are used to prevent over-filling of tanks. Also visual inspections of the storage tanks are performed to determine if there are any leaks, corrosion, or breakage.

Control

After practical prevention methods have been implemented, the next level of defense is to control the release should one occur. Control is comprised of containment and diversion systems. Consideration was given to providing bulk oil storage systems with containment areas capable of holding at least 110% of the volume of the largest tank within the containment area.

Response

After all practical prevention and control systems have been installed, the next level of defense is spill response. The facility maintains an Emergency Response Team, composed of individuals who have been trained in response procedures. A list of the emergency response equipment is maintained on-site. This team has been given the responsibility and authority to procure additional response resources as necessary. 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 plugging the release point, valving pipe section off, and off loading tank contents.

2. **Prevent Released Material from Leaving Facility Property**
   This will be accomplished through various means including constructing barricades ahead of or within the body of the released material; absorbent materials; and reducing the mobility of the released material.

3. **Recover the Released Material**
   This will be accomplished after #1 and #2 above, are complete and will consist of using pumping equipment absorbent materials, vacuum equipment, water and/or steam, or excavation to recover released materials.

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D. REPORTING/NOTIFICATION REQUIREMENTS {40 CFR 110 & 112.4}

1. Internal

It is the responsibility of each employee to report releases or threatened releases of oil. When an employee observes an oil release or a condition which the employee believes may result in an oil release, the employee is to immediately notify the environmental coordinator, facility manager or the shift foreman. The coordinator, facility manager, or shift foreman will obtain the information available and determine the appropriate response. The emergency response team will then be notified, if necessary. The emergency response team will notify the appropriate area personnel for assistance.

2. External

All releases that occur at the facility will be evaluated by the environmental coordinator or his foreman to determine if the release must be reported. The environmental coordinator will then report the findings to the facility manager. This evaluation will be conducted according to the requirements of:

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) regulations (40 CFR 302)

The Emergency Planning and Community Right-To-Know Act (ERCRA) regulations (40 CFR 355, 370, 372)

EPA Regulations on Oil Pollution Prevention (40 CFR 112)

Oil Pollution Act of 1990 (OPA 90)

If the release is determined to be reportable by the environmental coordinator, facility manager, or his foreman, the following agencies will be notified **within 15 minutes** as appropriate:

National Response Center		**800/424-8802**
Local Emergency Coordinator (Jerry Roberts)	**Weekdays**	**479/783-3932**
	Evenings Weekends	**479/414-7064**
Fort Smith Fire Department		**479/783-4052**
Arkansas Office of Emergency Management		**800/322-4012**
U.S. Coast Guard (oil spill of 500+ gal. only)		**713/671-5193**

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A record of each incident will be made using Form A. Written follow-up reporting will be provided as required and/or requested. Facility personnel responsible for spill response can be reached at the following phone numbers:

Name	Office Phone	Home Phone	Pager
John Fisher	479-648-5500	479-648-5590 (Plant Security)	479-648-5590 (Plant Security)
Warren Taff	479-648-5544	479-474-2569 479-629-2855 Cell	479-709-1033

3. Plan Submittal {40 CFR 112.4}

The following information will also be provided to the Regional Administrator, USEPA, the State Director, and Corporate Environment if: 1) any spill occurs which involves more than 1000 gallons of oil into navigable waters or, 2) two reportable spill events, occurring within twelve month period, which result in a discharge of oil into navigable waters.

1. Name of facility
2. Names(s) of the owner or operator of the facility
3. Location of the facility
4. Date and year of initial facility operations
5. Maximum storage or handling capacity of the facility and normal daily throughput.
6. Description of the facility, including maps, flow diagrams, and topographical maps.
7. A complete copy of the SPCC Plan with any amendments.
8. The cause(s) of such spill, including a failure analysis of system or subsystem in which the failure occurred.
9. The corrective actions and/or countermeasures taken, including an adequate description of equipment reports and/or replacement.
10. Additional preventive measures taken to minimize the possibility of recurrence.
11. Such other information as the Regional Administrator may reasonably require pertinent to the plan or spill event.

This information should be submitted within 60 days from the time the facility experiences the qualifying spill event.

The environmental manager is responsible for maintaining records of oil spill events, for determining whether an event is reportable, and whether the requirements of 40 CFR 112.4 and 112.7 (a) have been triggered.

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E. SPILL HISTORY {40 CFR 112.7 (a)}

Based upon review of the available records, it is concluded that the MACSTEEL, located in Fort Smith, Arkansas, has not experienced a reportable oil spill event in the last 5 years. For other spills, see attached reports.

F. SPILL RESPONSE CONTRACTOR {40 CFR 112.7(a)(ix) (proposed): & 112.7(d)}

Contracts to provide emergency response services has been established with:

Haz-Mert Inc.
800-501-6213
or
Environmental Remediation Specialists
918-832-8888

PART III – DESIGN AND OPERATING INFORMATION

A. OIL SPILL CONTROL AND CONTAINMENT SYSTEM

The aboveground storage tanks and the oil storage areas at MACSTEEL together with containment and control systems, are defined in this section.

1. 1(one) – 500 Gallon Gasoline Storage Tanks (A-1):

This aboveground tank is fabricated of rolled steel. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin will be inspected for oil before it is pumped or siphoned from the basin. A written record of each release of the rainwater will be made and retained for three years. Evidence of oil is a film or sheen on the water, or discoloration of the water, or an emulsion or sludge deposited beneath the surface of the water. If oil is present, absorbent material will be used to prevent the release of oil with the accumulated rainwater.

2. 1(one) – 500 Gallon Kerosene Tank (A-2):

This aboveground tank is fabricated of rolled steel and shares the secondary containment with the 500-gallon gasoline tank A-1. The tank is also exposed to rainfall. Rainwater that accumulates inside the catchment basin will be handled as stated above for A-1.

3. 1500 Gallon Waste Oil Tank (A-3):

This aboveground tank is a steel tank, which located within the mill scale pit. This storage area is not covered, and therefore is exposed to rainfall. Accumulated rainfall is collected in the mill scale pit and used as process water in the steel mill. The steel mill's process water is a closed loop system and is not discharged.

4. Baghouse Silos (A-4):

These silos contain KO61 dust from the electric arc furnaces. The material currently does not require secondary containment and is not oil as defined under 40 CFR 112. This system is only mentioned for completeness in addressing all potential spill sources that could affect the environment.

5. Chemical Storage Area (A-5):

This area is used to store phosphate polymer, aluminum chloride, and TTA. The area is enclosed in a building and is not exposed to rainfall. There are four- (4) polyethylene tanks, three- (3) 1,500 gallons each and one- (1) 500 gallon. The building is curbed and contains a basement which is the secondary containment for this area

6. Drum Storage Area (A-6):

This area is used to store 55-gallon drums and 300 gallons totes of lubricating oils. The area is not covered and is exposed to rainfall. Rainwater that accumulates inside the catchment basin drains to the mill scale pit and used as makeup process water.

7. 1,500 Gallon Diesel IMS Tank (A-7):

This aboveground tank is fabricated of rolled steel. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin will be inspected for oil before it is pumped or siphoned from the basin. A written record of each release of the rainwater will be made and retained for three years. Evidence of oil is a film or sheen on the water, or discoloration of the water, or an emulsion or sludge deposited beneath the surface of the water. If oil is present, absorbent material will be used to prevent the release of oil with the accumulated rainwater.

8. 500 Gasoline IMS Tank (A-8):

This aboveground tank is located in a concrete catchment basin. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin will be inspected for oil before it is pumped or siphoned from the basin. A written record of each release of the rainwater will be made and retained for three years. Evidence of oil is a film or sheen on the water, or discoloration of the water, or an emulsion or sludge deposited beneath the surface of the water. If oil is present absorbent material will be used to prevent the release of oil with the accumulated rainwater.

9. 350 Gallon Waste Oil Tank IMS (A-9):

This aboveground tank is located in a steel catchment basin. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin will be inspected for oil before it is pumped or siphoned from the basin. A written record of each release of the rainwater will be made and maintained for three years. Evidence of oil is a film or sheen on the water, or discoloration of the water, or an emulsion or sludge deposited beneath the surface of the water. If oil is present, absorbent material will be used to prevent the release of oil with the accumulated rainwater.

10. 10,000 Gallon Underground Diesel Storage Tank (A-10):

This underground tank has overfill protection and a monitoring well. The dispensing pump is equipped with a concrete pad to contain minor spills that may occur during fueling of equipment.

11. 5,000 Gallon Bleach Tank (A-11):

This aboveground tank is used to store Sodium Hyperchloride and is located in a curbed concrete area. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin drains to the mill scale pit and used as makeup process water.

12. 55 Gallon Waste Paint Drum (A-12):

This drum is stored in a safety cabinet located inside of the building. Spills from this drum would be contained within the cabinet or building and is not exposed to rainwater.

13. 1,500 Gallon Bleach Tank (A-13):

This aboveground tank is used to store Sodium Hyperchloride and is located in a polyethylene secondary containment. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin will be inspected for product before being pumped from the basin.

14. 1,500 Gallon Hydrogen Peroxide Tank (A-14):

This aboveground polyethylene tank is used to store Hydrogen Peroxide and is located in a building and is not exposed to rainfall. The building is curbed and contains a basement that is the secondary containment for this area.

15. Chemical Storage Area (A-15):

This area is used to store phosphate polymer, aluminum chloride, anionic polymer, and citric acid. The area is enclosed in a building and is not exposed to rainfall. There are three- (3) polyethylene tanks, two- (2) 1500 gallons each, one- (1) 800-gallon tank, and two-2 55-gallon drums. The building is curbed and contains a basement that is the secondary containment for this area.

16. 5,000 Gallon Waste Oil Tank (A-16):

This aboveground tank is a steel tank, which located within a concrete catchment basin. This storage area is not covered, and therefore is exposed to rainfall. Accumulated rainfall is drained to the backwash pit and pumped to the caster water treatment system. The caster water system is a closed loop system and is not discharged.

17. 5,000 Gallon Waste Oil Tank (A-17):

This aboveground tank is a steel tank, which located within a concrete catchment basin. This storage area is not covered, and therefore is exposed to rainfall. Accumulated rainfall is drained to the clarifier pump pit and pumped to the VAD clarifier. The VAD water system is a closed loop system and is not discharged.

18. Boiler House (A-18):

This area is used to store Ethylenediaminetretaacedicacid and Sodium Bisulfite. The area is enclosed in a building and is not exposed to rainfall. Each are stored in one of two- (2) 500 gallon polyethylene tanks. The building is curbed and contains a sump that is pumped to the caster water system.

19. Portable Waste Oil Totes (A-19):

These waste oil totes are used to contain used oil from maintenance activities on mobile equipment. The totes are mobile and are used wherever required.

20. Hydraulic Oil Storage at the Crane Repair Area (A-20):

This area is used to store hydraulic oils for maintenance activities. This storage area is not covered, and therefore is exposed to rainfall. Rainwater that accumulates inside the secondary containment will be inspected for product before being drained.

21. Gasoline Storage South of Planters Road (A-21):

This area is used to store gasoline. This storage area is not covered, and therefore is exposed to rainfall. Rainwater that accumulates inside the secondary containment will be inspected for product before being drained.

22. Gasoline Storage South of Planters Road (A-22):

This area is used to store gasoline. This storage area is not covered, and therefore is exposed to rainfall. Rainwater that accumulates inside the secondary containment will be inspected for product before being drained.

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PART IV – PREPAREDNESS INFORMATION

A. INSPECTION AND RECORDS {40 CFR 112.7 (e)(8)}

Inspections to detect leaks, corrosion, breakage, etc. of all the oil storage and handling equipment will be performed by operating personnel. Visual inspection will be performed on bi-weekly intervals and the following information will be recorded for each detailed inspection.

- Date of inspection
- Location of oil source (tank, transfer pumps)
- Type, volume, and appearance of the tank
- Condition of the pumps, flanges, and etc. (leaking)
- Condition of containment area/position of control valves
- Other comments (including temporary of other mobile sources previously not identified)
- Inspector's name

Integrity testing will be performed on storage tanks and the appropriate piping. The frequency of inspection of the piping will be determined based on the material of construction, equipment use, and corrosive environment associated with the oil source. Tanks storing oil will be inspected in accordance with industry and company standards.

Inspection records will be reviewed by the supervisor and the appropriate corrective actions initiated as soon as practical based on operational or engineering requirements. Integrity test results will be reviewed by appropriate engineering and operations personnel supervisors. A copy of the records will be filed with the plan and maintained for three years.

B. PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES {40 CFR 112.7 (e)(10)}

Operations and maintenance personnel whose normal duties impact spill prevention equipment will be trained in the appropriate procedures to minimize the potential for a release. Personnel will be trained to identify deficiencies (through thorough visual inspections) of the pollution control equipment. Personnel will also be made aware of the level and type of equipment available and to respond to spills. At a minimum, training will include a brief discussion of the following:

1. Content of the SPCC as it impacts their roles and responsibilities.
2. Summary of oil pollution control rules and reporting requirements.
3. Review of recent reportable spill events and corrective action measures taken.

Individuals responsible for new construction or facility modifications will identify spill prevention requirements prior to the approval of new projects. The environmental coordinator is responsible for the implementation of the training programs and to insure that these provisions meet facility management objectives.

Training will be reviewed on an annual frequency for all personnel identified above. Training records will be maintained in the facility records.

APPENDIX A – CALCULATIONS SHOWING CONTAINMENT VOLUME

A-1 and A-2

This gasoline storage tank (550 gallons) and kerosene storage tank have a shared concrete containment area with the dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
11.08	9	1.88	187	1,402

A-3

The waste oil tank (1,500 gallons) is contained in the scale pit. The concrete containment area has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
150	40	15	90,000	673,200

A-4

The baghouse Silos contains KO61 dust and is not an oil. The area does not have secondary containment. This area is included here for completeness in addressing areas that could impact the environment.

A-5

The chemical storage area contains three (3) 1,500-gallon tanks and one (1) 500-gallon tank that are contained within a concrete catchment building. The dimensions and volume of this area are as follows:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
56	32	26	46,592	348,508

A-6

The drum storage is an uncovered concrete curbed slag. The slab contains a sump that collects any rainwater or spill and gravity drains the liquids to the scale pit where it is used as process make up water. The largest container in the slab area is 350 gallons. The dimensions of the containment slab are as follows:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
99	23	.16	363	2,713

A-7 and A-8

Two diesel storage tanks (1,500 gallons and 350 gallons) and a gasoline storage tank (500 gallons) are used by International Mill Services, Inc. (IMS) and have a concrete containment slab. The tanks and slab are exposed to rainfall. IMS is a subcontractor to MACSTEEL. The containment dimensions are as follows:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
16.25	15.9	1.25	323	2,416

A-9

This steel waste oil tank (350 gallons) is used by IMS and was constructed with a steel secondary containment. The dimensions of the containment are as follows:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
7.5	4	2	60	449

Note: A new secondary containment area was under construction for waste oil tank it has the following dimensions: 20 ft 4 in X 8ft X 2 ft for a gross capacity of 2433 gallons.

A-11

This aboveground tank is used to store Sodium Hyperchloride and is located in a curbed concrete area. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin drains to the mill scale pit. The concrete scale pit containment area has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
150	40	15	90,000	673,200

A-13

This aboveground tank is used to store Sodium Hyperchloride and is located in a polyethylene catchment basin. This storage area is not covered, and therefore exposed to rainfall. Rainwater that accumulates inside the catchment basin is removed by a pump. The catchment basin area has dimensions and volume equal to:

Diameter (ft)	Depth (ft)	Vol. (ft^3)	Gallons
9	4	254	1,900

A-14

This aboveground tank is used to store Hydrogen Peroxide (1500 gallons) and is located in a concrete catchment basin. This storage area is in a building and is not exposed to the rain. The catchment basin area has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
10	20	2.5	500	3,745

A-15

The chemical storage area contains two (2) 1,500-gallon tank and one (1) 800-gallon tank that are located in a concrete catchment basin. This storage area is in a building and is not exposed to the rain. The catchment basin area has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
10	20	2.5	500	3,745

A-16

The waste oil tank (5,000 gallons) is contained in a concrete containment area that drains to the backwash pit which has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
46	27	5	6,210	46,500

A-17

The waste oil tank (5,000 gallons) is contained in a concrete containment area that drains to the pump pit which has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
17	17	8	2,312	17,300

A-18

The boiler chemical storage area has two- (2) 500 gallon tanks that are in a curbed building and are not exposed to rain. The building has drains and sumps to the caster water system which has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
34	19	34	21,964	164,300

A-19

Portable totes are used for servicing mobile equipment and are equipped with dip pans. If the totes are to be used as storage tanks secondary containment should be provided

A-20

The crane repair area has racks for 55-gallon drums. The racks are in a steel secondary containment system which has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
12	4	0.5	24	179

A-21

Two 550 gallon above ground gasoline storage tanks are located south of Planters Road and have a steel secondary containment system which has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
13	10	2	260	1944

A-22

One 550 gallon above ground gasoline storage tanks is located south of Planters Road and has a steel secondary containment system which has dimensions and volume equal to:

Length (ft)	Width (ft)	Depth (ft)	Vol. (ft^3)	Gallons
12.83	8	1	102	767

H-19/21

APPENDIX B – SITE MAP

H-19/21

FORMS

H - 20/21

Spill Report

MACSTEEL
Fort Smith, Arkansas

Warren Taff, Phone # 479-648-5544
John Fisher, Phone # 479-648-5500

Material Spilt:_____

Date:_____ Time of Spill:_____ Time Spill Discovered_____

Quantity of Spill:_____

Person that discovered the Spill:_____

Was the spill on soil, concrete, etc.:_____Did the spill leave the site:_____

Describe measures taken to stop, contain, and clean up the spill:

_____

_____

_____

_____

_____

Notification Record:

Agency	Date	Time	Person Contacted	Report Number (if applicable)
National Response Center	/ /	:		
Local Emer. Coordinator	/ /	:		
Fire Department	/ /	:		
AR Emergency Managment	/ /	:		
U.S. Coast Guard	/ /	:		

H-21/21

Torrence, Rufus

From: Fuller, Kim
Sent: Monday, September 08, 2008 4:32 PM
To: 'Easley, Randy'; Torrence, Rufus
Cc: Gilliam, Allen
Subject: RE: Fort Smith Annual Report Due in August Now

Mr. Easley,

You would just need to submit a letter requesting the change and a justification as to why the change is needed. If it can be handled through a minor modification, we will issue a letter along with revised permit pages. Thanks!

Kimberly A. Fuller, PE, CPESC
NPDES Engineer Supervisor
ADEQ, Water Division
Phone: (501) 682-0643
Fax: (501) 682-0910

-----Original Message-----
From: Easley, Randy [mailto:RandyE@FortSmithAR.gov]
Sent: Monday, September 08, 2008 3:29 PM
To: Torrence, Rufus
Cc: Gilliam, Allen; Fuller, Kim
Subject: RE: Fort Smith Annual Report Due in August Now

Rufus,

No problem with me, what do I need to do?

Paul R. Easley
Environmental Manager
City of Fort Smith

From: Torrence, Rufus [mailto:TORRENCE@adeq.state.ar.us]
Sent: Monday, September 08, 2008 2:57 PM
To: Easley, Randy
Cc: Gilliam, Allen; Fuller, Kim
Subject: Fort Smith Annual Report Due in August Now

Randy,

Allen suggested that you submit a request for a minor modification to move your report month to October. This would give you extra time to complete your report.

What do you think?

Rufus

-----Original Message-----
From: Easley, Randy [mailto:RandyE@FortSmithAR.gov]
Sent: Monday, September 08, 2008 2:34 PM
To: Torrence, Rufus
Subject: RE: August Annual Report Past Due!

Rufus,

I am currently completing my report. Our permit states that the "Notice of Significant Violations" is due to be published in August of each year (no specific date in August). Also, in order to properly complete compliance calculations, I must receive all monitoring results from SIUs. The reports for July from SIUs aren't due until August 15th. Sometimes these reports come in a little late, so I am always pushing the August publication date. Historically, I have the notice published & submit it along with my report when the "Proof of Publication" is received from the newspaper. A copy of the notice is required to be submitted with the report, so obviously, I can't submit an official copy of the notice with the report until it is published. The notice was published on August 31, 2008, and I am completing the report. It should go out in the mail this week.

Do I need to change the way the report is completed? I could in the future submit the report without an official copy of the notice and then follow up with an official copy once the "Proof of Publication" is received. Sometimes this takes a week or more.

Please advise.

Paul R. Easley
Environmental Manager
City of Fort Smith

From: Torrence, Rufus [mailto:TORRENCE@adeq.state.ar.us]
Sent: Monday, September 08, 2008 1:16 PM
To: Easley, Randy; Tom Myers; msims@dequeen-ar.us
Subject: August Annual Report Past Due!

Guys,

Each of you have a report due in August but I have not seen it. Have you mailed the report?

Rufus J. Torrence, Engineer
ARKANSAS DEPT OF ENVIRONMENTAL QUALITY
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317
Phone: (501)682-0626
Fax: (501)682-0910
Email: torrence@adeq.state.ar.us

Enforcement Response Guide

PART I: Sampling, Monitoring, and Reporting

Non-compliance	Circumstances	Range of Response
Failure to sample, monitor or report (routine reports, BMRS).	Isolate or Infrequent.	Phone call or written notice of violation (NOV) requiring a report within 15 days. if no response is received, issue an Administrative Order (AO).
Failure to provide reports for compliance schedules, self-monitoring data or categorical standards or to resubmit incomplete, inaccurate or improper reports returned to user by the City within 30 days from the due date or the date the report was returned to the user for re-submission.	Reports not submitted or properly resubmitted for 30 days or more after their due date. --- SNC.	Standards Meeting, or Show Cause Hearing, depending on circumstances.
Failure to sample, monitor, report or notify.	IU does not respond to letters, does not follow through on verbal or written agreement, or frequent violation --SNC.	AO or judicial action, including penalties if no response is received.
Failure to notify of effluent limit violation or slug discharge.	Isolated or infrequent. No known effects.	Phone call or NOV. If no response within 14 days, call Review Meeting.
Failure to notify of effluent limit violation or slug discharge.	Frequent or continued violation --- SNC.	Show Cause Hearing, AO, or judicial actions, including penalties.
Failure to notify of effluent limit violation or slug discharge.	Known environmental or POTW damage results --- SNC.	Judicial action and penalties. Sewer ban.
Minor sampling, monitoring, or reporting deficiencies (computation or typographical errors).	Isolated or infrequent.	Phone call or NOV. Corrections to be made on the next submittal. AO if continued.
Major or gross sampling, monitoring, or reporting deficiencies (missing information, late reports).	Isolated or infrequent.	NOV or AO. Corrections to be made on the next submittal.
Major or gross reporting deficiencies.	Continued. Remains uncorrected 30 days or more --- SNC.	AO or judicial action.
Reporting false information.	Any instance --- SNC.	Judicial action, penalties, sewer ban.
Missed interim date.	Will not cause late final date or other interim dates.	NOV.
Missed interim date.	Will result in other missed interim dates. Violation for good or valid cause.	NOV or AO.
Missed interim date.	Will result in other missed interim dates. No good or valid cause --- SNC.	NOV, AO, or Show Cause Hearing.

J - 1/3

PART I: Sampling, Monitoring, and Reporting (Cont'd)

Non-compliance	Circumstances	Range of Response
Missed final date.	Violation due to force majeure (strike, act of God, etc.).	Contact permittee and require documentation of good or valid cause; Show Cause Hearing
Missed final date.	90 days or more outstanding. Failure or refusal to comply without good or valid cause.	AO, judicial action (including penalty), Show Cause Hearing.
Failure to install monitoring facilities.	Continued --- SNC.	Standards Meeting, Show Cause Hearing.

PART II: Effluent Limits

Non-compliance	Circumstances	Range of Response
Exceeding final limits (categorical, local or prohibited).	infrequent or isolated minor violations greater than application pretreatment standards or less than TRC.	NOV
Exceeding final limits.	Infrequent or isolated major violations exceed the limits by TRC of a single effluent limit. (SNC if interference or pass through occurs).	NOV, Review Meeting, Show Cause Hearing (if interference or pass-through occurred).
Exceeding final limits.	Violation(s) which place an industrial user in SNC.	Standards Meeting or Show Cause Hearing.
Exceeding Interim Limits (categorical or local).	Without known interference or pass-through.	NOV, Review Meeting or AO.
Exceeding Interim Limits.	Results in know environmental or POTW damage --- SNC.	AO, Show Cause Hearing or judicial action including penalty.
Reported slug load.	Isolated without known damage.	AO or Show Cause Hearing.
Reported slug load.	Isolated with known interference, pass-through, or damage --- SNC.	AO or judicial action including penalty.
Reported slug load.	Recurring --- SNC.	Show Cause Hearing or judicial action including penalty.
Discharge without a permit or approval.	One time without known environmental or POTW damage.	Review Meeting or AO.
Discharge without a permit or approval.	One time that results in environmental or continuing violation --- SNC.	AO, Show Cause Hearing or judicial action.
Discharge without a permit or approval.	Continuing violation with known environmental or POTW damage--SNC.	Judicial action including penalty.

PART III: Non-compliance detected through Inspections or Field Investigations

Non-compliance	**Circumstances**	**Range of Response**
Minor violation of analytical procedures.	Any instance.	NOV.
Major violation of analytical procedures.	No evidence of intent.	NOV or AO.
Major violation of analytical procedures.	Evidence of negligence or intent --- SNC.	AO or judicial action and penalty.
Minor violation of permit condition.	No evidence of negligence or intent.	NOV. Immediate correction required.
Minor violation of permit condition.	Evidence of negligence or intent --- SNC.	Show Cause Hearing, judicial action including penalty, or permit termination.
Refusal of access to City personnel for the purpose of inspection, sampling or monitoring.	Failure or refusal to comply with Ordinance 69-97 or permit conditions -- SNC.	Obtain search warrant, Show Cause Hearing for permit termination.

Note: SNC - Denotes that the circumstances of a particular violation are severe enough to meet the criteria specified for Significant Non-compliance (SNC).