

# ADEQ

ARKANSAS  
Department of Environmental Quality

November 15, 2011

Paul R. Easley  
City of Fort Smith  
Utility Department  
3900 Kelley Hwy  
Fort Smith, Arkansas 72904

Re: City of Fort Smith (AFIN: 66-00226 NPDES Permit Number: AR0021750)  
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 17<sup>th</sup> through 21<sup>st</sup>, 2011. The report should be made available for review by appropriate industrial and City officials. The Fort Smith staff should discuss and evaluate the findings in this report. Please respond to my required actions and recommendations in writing within thirty (30) days.

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

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

Sincerely,



Rufus J. Torrence, Water Division Engineer

Encl: Audit Report/Assessment Checklist

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

**PRETREATMENT PROGRAM AUDIT/  
POLLUTION PREVENTION ASSESSMENT  
CITY OF FORT SMITH, ARKANSAS  
NPDES PERMIT #AR0021750 & #AR0033278**

**NOVEMBER 15, 2011**

**PREPARED BY: Rufus Torrence  
ADEQ Water Division Engineer and Auditor**

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
5301 Northshore Drive  
NORTH LITTLE ROCK, ARKANSAS 72118-5317**

- A) Introduction**
  
- B) Summary of Findings with Required Actions**
  
- C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs**
  
- 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**

### **LIST OF ATTACHMENTS**

#### **Pretreatment Program Audit/Assessment Checklist:**

**Section I: General Information**

**Section II: Program Analysis and Profile**

**Section III: Industrial User File Review**

**Reportable Noncompliance (RNC) Worksheet**

**SIU Site Visit Summaries**

**Attachments: A—Exide Permit Application**

**B—Exide Permit**

**C—Exide Inspection**

**D—Exide Monitoring Results**

**E—SIU Permit Cover & Limitation Pages**

**F—TOMPs: Fort Smith Plating and Hickory Springs**

**G—NOV: Hiland Dairy**

**H—Exide Spill Plan: Table of Contents Only**

**I—Ordinance #80-11: Cover and Signature Pages**

## 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 17 through 21, 2011 on the Pretreatment Program implemented by City of Fort Smith, Arkansas. Participants included:

Rufus Torrence	ADEQ / Water Division Engineer
Steve Parke	City / Director of Utilities
Paul Easley	City / Environmental Manager
Jay Lor	City / Environmental Coordinator

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; and
- \* 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 reevaluated the headworks loading with the assistance of ADEQ pretreatment staff and software. The City concluded that local limits were not necessary for metals and Cyanide. Nonetheless, the City is currently enforcing local limits for BOD<sub>5</sub>, TSS and O&G. The City is currently modifying the program to comply with the recent Streamlining revisions to 40 CFR 403 and to update the local limits for conventional pollutants.

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 the 2008 audit report; 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 filter 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 8.4 MGD. The POTW receives approximately 0.59 MGD from nine (9) Significant Industrial Users (SIUs). Five (5) of these SIUs are regulated by categorical (federal) standards. Sludge is thickened, vacuum dewatered and sent to the local landfill (as cover). The sludge rate averages about 1876 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 12.94 MGD. This POTW receives approximately 0.65 MGD from nine (9) SIUs. Three (3) are also categorical industrial users (CIUs). 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 3110 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 403.4** The City cannot have any local regulations (ordinance/code) that are "*less stringent than any set forth in National Pretreatment Standards, or any other requirements or prohibitions established under the Act...*".

On October 14, 2005 EPA promulgated revisions to 40 CFR 403. These revisions are commonly referred to as the "Streamlining" revisions. Each POTW with an approved pretreatment program must review the local legal authority to ensure that local ordinances/codes are not less stringent than the Streamlining revisions. For national consistency, the Department decided to wait for EPA to develop guidance before reviewing ordinances and approving modifications to Arkansas approved pretreatment programs. In January 2007 EPA published a "Model Pretreatment Ordinance" with the recent Streamlining Revisions.

The City's last revision to the legal authority and pretreatment program were incorporated into NPDES permit #AR0021750 on December 5, 1997. In reference to Part III (page 2) in the City's other NPDES permit #AR0033278 (effective January 1, 2007), find in section 8.a, "*The Sewer Use Ordinance and the Pretreatment Program have not been modified to come into compliance with the current 40 CFR 403 regulations [Streamlining Revisions]. The permittee shall submit all necessary proposed modifications to ADEQ within six (6) months of the effective date of this permit.*" The City submitted to Allen Gilliam the first draft ordinance (an attachment) in an email [Z000173IR.xml] dated December 31, 2007. The City continued work on the ordinance along with the Department until July 15, 2011 when the Department requested the City to confirm that adoption procedures have commenced. In a letter dated August 22, 2011, the City confirmed "*that the adoption of the proposed pretreatment ordinance is scheduled for the city's September 20, 2011, Board of Director's meeting*". The Board of Directors adopted the ordinance on October 4, 2011. In reference to Section D below, the City must update the pretreatment program narrative and the complete program modification must be submitted to the Department within 90 days of receipt of the codified ordinance or by **May 1, 2012** whichever occurs first.

2) Under **40 CFR 403.5(c)(1)**, “Each POTW developing a POTW Pretreatment Program...shall develop and enforce specific limits...Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits.” Furthermore, under **40 CFR 403.8(f)(4)**, “The POTW shall develop local limits as required in §403.5(c)(1), or demonstrate that they are not necessary.”

The current approved pretreatment program includes a local limit development (“*Technically Based Local Limits Development Submittal City of Fort Smith, AR. May 8, 1995*”). The City adopted these local limits (Maximum Allowable Headworks Loadings-MAHLs) in Ordinance #69-97; Section 6.D. Even though in November 2004 the City demonstrated that local limits (SIU permit limits) are not necessary for metals and cyanide, the City’s 2010 annual report indicated that the MAHLs were exceeded. Furthermore, the City has issued SIU permits with limits for BOD<sub>5</sub>, TSS and O&G and is currently enforcing these limits. In conclusion, the City should consider permit limit for metals and cyanide. In the meantime, all the current MAHLs in Ordinance #69-97 are effective and enforceable until the new ordinance is codified and approved by ADEQ.

In conjunction with updating the program narrative to comply with the recent Streamlining revisions to 40 CFR 403, at a minimum the City must update the current local limits for conventional pollutants or demonstrate that local limits for conventional pollutants are not necessary.

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

- 1) The auditor recommends that the City employ equivalent concentration limits in Gerdau and Exide permits. These permits currently have equivalent mass limits. If the permit had equivalent concentration limits, the City and these CIUs could verify compliance by inspecting the lab results only and without performing any calculations.
- 2) For CIUs not regulated by 40 CFR 433 and which have historically demonstrated that their processes do not add TTOs to the regulated discharge, the City should consider allowing voluntary only testing to TTOs or TOMP submittals.
- 3) Provide a mechanism for free exchange of ideas and information on local pollution prevention success stories (for example, LEED, EPA Performance Track, etc) and current issues. The mechanism can be the “Award Day”.
- 4) 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].
- 5) For uniformity, the City should include a Part 5 in each permit. Referring to page 10 in Exide permit, “Part 5” begins without notation.
- 6) The City should place the requirement to submit flow in the Effluent Limitation chart in each SIU permit.

- 7) The City should add the "Reopen" clause to Gerdau's permit to require this CIU to have new limits when the production rate increases by over twenty percent (20%).
- 8) Hickory Springs Toxic Organic Management Plan (TOMP) is incomplete and inadequate (See Attachment F2-1/5). Hickory Springs did not include a Solvent Management Plan (SMP) in the TOMP. Fort Smith Plating TOMP includes the SMP. The SMP is shown in Section B (Attachment F1-3/4). The City should require Hickory Springs to submit a complete TOMP or test for the regulated Total Toxic Organics. Fort Smith Plating's TOMP is a good model.
- 9) Page 4 in the Gerdau January 2008 inspection report (Attachment F-6/54 in the 2008 Audit Report) had the Arrival Time and the Inspector's name. The Exide June 2011 inspection report (Attachment C-4/26) is missing this information. The City should modify the existing inspection form format to include the Arrival Time and Inspector's name.
- 10) Exide Spill Plan (February 1992) is almost twenty years old and needs to be updated. See Attachment H-1/2. In particular, the emergency contacts numbers may no longer be applicable. For example, Arkansas Department of Control and Ecology at 501-562-7444 is currently Arkansas Department of Environmental Quality at 501-683-6700 (24 hour number is 800-322-4012).



**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 update the pretreatment program narrative and submit the narrative to ADEQ within 90 days of receipt of the codified ordinance or by **May 1, 2012** whichever occurs first.

\* \* \* \* \*

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 in the future, whether in response to the recommendations or otherwise, must be submitted to ADEQ for review and approval.

# PRETREATMENT AUDIT CHECKLIST (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I:           General Information . . . . . Pages 1- 6  
 Section II:         Pretreatment Program Analysis . . . . . Pages 7-19  
 Section III:        Industrial User File Evaluation . . . . . Pages 20-28

## 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: October

Pretreatment Year Dates: 8/1 - 7/31                                  Date(s) of Audit: 10/17 - 21/11  
 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Randy Easley</u>	<u>Environmental Manager</u>	<u>(479) 784-2337</u>
<u>Jay Lor</u>	<u>Environmental Coordinator</u>	<u>(479) 784-2335</u>
<u>Steve Parke</u>	<u>Director of Utilities</u>	<u>(479) 784-2231</u>

\* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>12/2/10</u>	<u>None</u>

YES NO

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

If yes, describe the required corrective action: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

      Is the Control Authority currently in SNC or RNC?

.....

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

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	2-1-2009	1-31-2014
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 9<sup>th</sup> Street

Expiration Date of NPDES Permit: N/A

Treatment Plant Wastewater Flow: Design- 10 MGD; Actual (Average)- 8.4 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 9 # of CIUs : 5  
 Industrial Flow (mgd) : 0.60 Industrial Flow (%) : 7 %

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:

<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill*	<u>1876</u> dry tons/yr.??
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

\*Solid Waste Permit #0267-S1-R1

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?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>	
Metals *	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<i>Upstream &amp; downstream</i>
Priority **	<u>1</u>	<u>1</u>	<u>1</u>	<u>4</u>	
Biomonitoring	<u>  </u>	<u>4</u>	<u>  </u>	<u>  </u>	
TCLP	<u>  </u>	<u>  </u>	<u>6</u>	<u>  </u>	
Other: <u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	<u>  </u>	

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

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

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 (03/11)  
NH3-N (05/10,05/11,08/11)  
pH (08/10,07/11)

Algae coated fouled UV system  
A.S. not conditioned for NH3-N removal  
Unknown by the City

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
<u>AR0033278</u>	<u>"P" Street</u>	<u>01/01/07</u>	<u>12/31/11</u>

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)- 12.94 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 9 # of CIUs : 3  
Industrial Flow (mgd): 0.65 Industrial Flow (%) : 8 %

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.
<input checked="" type="checkbox"/> Mun. Solid Waste Landfill*	<u>3110</u> dry tons/yr.??
_____ Public Distribution	_____ dry tons/yr.
_____ Lagoon Storage	_____ dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.

\*Solid Waste Permit #0267-S1-R1

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?

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>	
Metals *	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<i>Upstream &amp; downstream</i>
Priority **	<u>1</u>	<u>1</u>	<u>1</u>	<u>4</u>	
Biomonitoring	<u>      </u>	<u>4</u>	<u>      </u>	<u>      </u>	
TCLP	<u>      </u>	<u>      </u>	<u>6</u>	<u>      </u>	
Other: _____	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	

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

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

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 (06/11,07/11)

Algae coated fouled UV system

pH (05/10-07/11)

Unknown by City

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 TBLs; this evaluation is a permit requirement.

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>None</u>	<u>*see above</u>

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: 10/04/11  
 Date of most recent Pretreatment Program modification approval: 12/05/97

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**

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? [ICIS-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
<u>Narrative prohibitions</u>	

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
<u>N/A</u>	

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

G. Application of Pretreatment Standards and Requirements

YES NO

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

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

YES NO

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

If yes, complete the information below:

City is presently re-evaluating each of their POTW's MAHLs for assessment of the need for new TBLs; the current TBL 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 for metals and cyanide.

YES NO

& \*\* Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [ICIS-LL] [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	
BOD	_____	_____	_____	_____	_____	_____	_____
TSS	_____	_____	_____	_____	_____	_____	_____
Oil & Grease	_____	_____	_____	_____	_____	_____	_____
Arsenic (As)	_____	_____	_____	_____	_____	_____	_____
Cadmium (Cd)	_____	_____	_____	_____	_____	_____	_____
Chromium-Total	_____	_____	_____	_____	_____	_____	_____
Copper (Cu)	_____	_____	_____	_____	_____	_____	_____
Cyanide (CN)	_____	_____	_____	_____	_____	_____	_____
Lead (Pb)	_____	_____	_____	_____	_____	_____	_____
Mercury (Hg)	_____	_____	_____	_____	_____	_____	_____
Molybdenum (Mo) *	_____	_____	_____	_____	_____	_____	_____
Nickel (Ni)	_____	_____	_____	_____	_____	_____	_____
Selenium (Se) *	_____	_____	_____	_____	_____	_____	_____
Silver (Ag)	_____	_____	_____	_____	_____	_____	_____
Zinc (Zn)	_____	_____	_____	_____	_____	_____	_____

\* - If necessary for the sludge disposal option chosen.  
 \*\* - On October 4, 2011 the City adopted a new ordinance which pre-empted the limits shown in Ordinance #69-97. The City is currently performing an Headworks analysis to determine new MAHLs.

**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:

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

YES   NO

     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 for metals and CN.

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

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

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants?

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference**</u>
<b>Inspections:</b>			
CIUs	<u>1</u>	1/year	<u>Page 66 in program</u>
Other SIUs	<u>1</u>	1/year	<u>Page 66 in program</u>
<b>Sampling:</b>			
CIUs	<u>12</u>	1/year	<u>Page 66 in program</u>
Other SIUs	<u>12</u>	1/year	<u>Page 66 in program</u>
<b>Reporting:</b>			
CIUs	<u>2</u>	2/year	<u>Page 64 in program</u>
Other SIUs	<u>2</u>	2/year	<u>Page 64 in program</u>
<b>Self-Monitoring:</b>			
CIUs	<u>2</u>	2/year	<u>Page 64 in program</u>
Other SIUs	<u>2</u>	2/year	<u>Page 64 in program</u>

\* Fed Req located at 40CFR403.8(f)(2)(v) \*\*Cites from approved program.

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

\* NOIN- this is a count of SIUs that are either not inspected OR not sampled in the past months. This is NOT a count of SIUs that were both not sampled and not inspected. Do not 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:

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals	<u>ICP (Hg)</u>	<u>In-house (AI)</u>
Cyanide	<u>Spectrophotometric</u>	<u>American Interplex</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>Biomonitoring</u>	<u>Bio-analytical</u>

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

✓     Identify by Title the Official(s) responsible for implementing each type of enforcement response.

✓     Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

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

✓ Notice or letter of violation  
✓ Setting of compliance schedule  
✓ Injunctive relief

✓ Administrative Order  
✓ Revocation of permit  
✓ Fines (maximum amount):

civil	\$ 1000	/day/violation
criminal	\$ "	/day/violation
administrative	\$ "	/day/violation

✓ Imprisonment  
✓ Termination of Service  
    Other: \_\_\_\_\_

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

YES NO

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

<u>SIU Name</u>	<u>Date First Identified in SNC</u>	<u>Enforcement Action Type</u>	<u>Date</u>	<u>Return to Compliance?</u>	
				<u>Yes (Date)</u>	<u>No</u>
Southern Steel	<i>(This facility is closed)</i>				
Hiland Dairy	Sept 2008	Compliance Sch	?		<input checked="" type="checkbox"/>
Twin River	<i>(This facility is closed)</i>				
Gerdau MacSteel	?	AO Pending	?		<input checked="" type="checkbox"/>

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

<u>#</u>	<u>%</u>	
<u>4</u>	<u>22.2</u>	Pretreatment Standards [ICIS-PSNC] (Local Limits/Categorical Standards)
<u>4</u>	<u>22.2</u>	Self-monitoring requirements [ICIS-MSNC]
<u>0</u>	<u>0</u>	Reporting requirements [ICIS-PSNC]
<u>0</u>	<u>0</u>	Pretreatment compliance schedule [ICIS-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 \_\_\_\_\_  
hailed 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)]
- 1 How many SIUs are currently on compliance schedules?
- Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

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

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ <u>          </u>
Administrative	<u>0</u>	\$ <u>          </u>
Total	<u>0</u>	\$ <u>          </u> [WENDB-IUPN]

**J. DATA MANAGEMENT/PUBLIC PARTICIPATION**

YES NO

- Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:
  - 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 & 1/2 FTE

YES NO

Have any problems in program implementation been observed which appear to be related to inadequate funding?

If yes, describe and show below the source(s) of funding for the program:

\_\_\_\_\_

\_\_\_\_\_

Percent of Total Funding

<input checked="" type="checkbox"/> POTW general operating fund (G.O.F.)	<u>100</u>
<input checked="" type="checkbox"/> IU permit fees	_____
<input checked="" type="checkbox"/> monitoring charges	_____
<input checked="" type="checkbox"/> industry surcharges	_____
_____ other (describe) _____	_____
*These go back into the G.O.F.	Total <u>100%</u>

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

\_\_\_\_\_

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

YES NO

If no, explain

<input checked="" type="checkbox"/> Legal assistance	_____
<input checked="" type="checkbox"/> Permitting	_____
<input checked="" type="checkbox"/> IU inspections	_____
<input checked="" type="checkbox"/> Sample collection	_____
<input checked="" type="checkbox"/> Sample analyses	_____
<input checked="" type="checkbox"/> Data analysis, review and response	_____
<input checked="" type="checkbox"/> Enforcement	_____
<input checked="" type="checkbox"/> Administration (inc. record keeping /data management)	_____
_____ <input checked="" type="checkbox"/> Pollution Prevention	_____

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

<input checked="" type="checkbox"/> Sampling equipment	<u>Standard list</u>
<input checked="" type="checkbox"/> Safety equipment	<u>"</u>
<input checked="" type="checkbox"/> Vehicles	<u>"</u>
<input checked="" type="checkbox"/> Analytical equipment	<u>POTW has an impressive lab with qualified personnel</u>

## 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' & Adult 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**

FILE #: 1 Industry Name Trane File/ID No. M00105

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) 28,000

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name Southern Steel & Wire File/ID No. P084102  
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: 3496  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) 6,400

Industry visited during audit: YES

Comments: This facility is closed; the auditor verified an "orderly" shutdown.

FILE #: 3 Industry Name Gerdau MacSteel Div. File/ID No. M109304  
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) 112,000

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. M036304  
Industry Address 4115 South Zero 72908  
Industry Description Mfg. batteries from lead ingots and plastic castings  
Industrial Category Battery Mfr 40 CFR 461 SIC Code: 3691  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) 14,500

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 B-21/21).

FILE #: 5 Industry Name Hiland Dairy File/ID No. P00302  
Industry Address 415 South 10<sup>th</sup> 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) 67,500

Industry visited during audit: YES

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

**SECTION III: INDUSTRIAL USER FILE REVIEW**

FILE #: 6 Industry Name Fort Smith Plating File/ID No. P028102

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) 27,500

Industry visited during audit: YES

Comments: Sole proprietorship

FILE #: 7 Industry Name Whirlpool File/ID No. M102313

Industry Address 6400 Jenny Lind Road  
Industry Description Manufacturer of Refrigerators  
Industrial Category N/A 40 CFR N/A SIC Code: 3632.3639  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) 32,000

Industry visited during audit: YES

Comments: This facility is currently downsizing with the intent to close.

FILE #: 8 Industry Name Hickory Springs File/ID No. P040102

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) 4,000

Industry visited during audit: YES

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

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization		✓ => Yes	X => No	N/A => Not Applicable				
	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	Whirlpl	HicSpqg
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	ES	ES	N/A	ES	N/A	ES
b.	Is this IU one identified as having P <sup>2</sup> potential?	X	X	X	X	X	X	X
B. Control Mechanism								
1.	Does the file contain an application for a control mechanism?	✓	✓	✓ <sup>1</sup>	✓	✓	✓	✓
	If yes, what is the application date?	3-22-11	10-26-10	11-19-09	10-14-09	2-2-07	5-26-10	6-3-10
	Does it ask for Pollution Prevention information?	X	X	X	X	X	X	X
2.	Does the file contain a Permit?	✓	✓	✓ <sup>2</sup>	✓	✓	✓	✓
	Permit Expiration Date?	11-1-15	11-1-15	1-1-15	12-14-14	6-30-12	8-30-15	9-1-15
	Is a fact sheet included?	✓	✓	✓ <sup>3</sup>	✓ <sup>4</sup>	✓	✓	✓

Comments: (1). See Attachment A-1/26 for example of Exide application.  
 (2). See Attachment B-1/21 for example of Exide permit; CP is the Cover Page.  
 (3). See Attachment B-30/31 (2008 Audit Report) for Gerdau fact sheet.  
 (4). See Attachment B-21/21 for Exide fact sheet.  
 (5). See page 63 of approved program for language on nontransferability; see also attachment B-11/21 Part 5 Sect A para 8.  
 (6). Flow paragraph is missing in Gerdau MacSteel permit.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	Whirlpl	HicSpqs
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]							
a.	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>
b.	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>	CP <sup>2</sup>
c.	5-A-8 <sup>5</sup>	5-A-8 <sup>5</sup>	5-A-8 <sup>5</sup>	5-A-8 <sup>5</sup>	5-A-8 <sup>5</sup>	5-A-8 <sup>5</sup>	5-A-8 <sup>5</sup>	5-A-8 <sup>5</sup>
d.	1-B	1-B	✓ <sup>3</sup>	✓ <sup>4</sup>	1-B	1-B	1-B	1-B
e.	2-A	2-A	2-A	2-A	2-A	2-A	2-A	2-A
f.	2-A	2-A	2-A	2-A	2-A	2-A	2-A	2-A
g.	2-A-1	2-A-1	2-A-1	2-A-1	2-A-1	2-A-1	2-A-1	2-A-1
h.	2-A-3	2-A-3	X <sup>6</sup>	2-A-3	2-A-3	2-A-3	2-A-3	2-A-3
i.	2-A	2-A	2-A	2-A	2-A	2-A	2-A	2-A
j.	Part 2	Part 2	Part 2	Part 2	Part 2	Part 2	Part 2	Part 2
k.	C-5 <sup>8</sup>	C-5 <sup>8</sup>	C-5 <sup>8</sup>	C-5 <sup>8</sup>	C-5 <sup>8</sup>	C-5 <sup>8</sup>	C-5 <sup>8</sup>	C-5 <sup>8</sup>
	C-6 <sup>8</sup>	C-6 <sup>8</sup>	C-6 <sup>8</sup>	C-6 <sup>8</sup>	C-6 <sup>8</sup>	C-6 <sup>8</sup>	C-6 <sup>8</sup>	C-6 <sup>8</sup>
	D-8 <sup>8</sup>	D-8 <sup>8</sup>	D-8 <sup>8</sup>	D-8 <sup>8</sup>	D-8 <sup>8</sup>	D-8 <sup>8</sup>	D-8 <sup>8</sup>	D-8 <sup>8</sup>
	5-A-5 <sup>9</sup>	5-A-5 <sup>9</sup>	5-A-5 <sup>9</sup>	5-A-5 <sup>9</sup>	5-A-5 <sup>9</sup>	5-A-5 <sup>9</sup>	5-A-5 <sup>9</sup>	5-A-5 <sup>9</sup>
l.	N/A <sup>7</sup>	N/A <sup>7</sup>	N/A <sup>7</sup>	N/A <sup>7</sup>	N/A <sup>7</sup>	N/A <sup>7</sup>	N/A <sup>7</sup>	N/A <sup>7</sup>
m.	5-A-13	5-A-13	5-A-13	5-A-13	5-A-13	5-A-13	5-A-13	5-A-13
n.	X	X	X	X	X	X	X	X

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Trane    SoSteel    GerSteel    Exide    HiDairy    FSPltg    Whirlpl    HicSpqs

1. Has the IU been properly categorized?	✓	✓	✓	✓	✓	✓	✓
2. Were both Categorical Standards and Local Limits properly applied?	✓ <sup>10</sup>	✓ <sup>10</sup>	✓ <sup>10</sup>	✓ <sup>10</sup>	✓	✓	✓
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	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	✓ <sup>3</sup>	✓ <sup>4</sup>	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
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
7. Is the Control Authority applying a bypass provision to this IU?	N/A <sup>11</sup>	N/A <sup>11</sup>	N/A <sup>11</sup>	N/A <sup>11</sup>	N/A <sup>11</sup>	N/A <sup>11</sup>	N/A <sup>11</sup>

Comments: (7). N/A implies Not Applicable to this industry.  
 (8). Standard Conditions are in an attachment (General Permit Conditions) to the permits; see Attachment B-10/21.  
 (9). They use "reopen" & "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    N/A => Not Applicable

Trane    SoSteel    GerSteel    Exide    HiDairy    FSPltg    Whirlpl    HicSpqs

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?	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>
b. Sample date and time?	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>
c. Sample type?	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>
d. Wastewater flow at the time of sampling?	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>
e. Sample preservation procedures?	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>	✓ <sup>12</sup>
f. Chain-of-custody records?	✓	✓	✓	✓ <sup>13</sup>	✓ <sup>14</sup>	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g) (1) - CIUs]	✓	✓	✓	✓	✓	✓	✓

Comments: (12). Recorded on Chain-of-Custody form.  
 (13). See Attachment D1-3/7 for an example of Chain-of-Custody record for an Exide sampling event.  
 (14). See Attachment D4-4/7 for an example of the CA Chain-of-Custody record.



**SECTION III: INDUSTRIAL USER FILE REVIEW**

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

Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	Whirlpl	HicSpqg
✓	✓	✓ <sup>15</sup>	✓	N/A	✓ <sup>16</sup>	N/A	✓ <sup>17</sup>

\*All CIUs are required to have a TOMP or test for the TTOs.

- 4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?\*
- 5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?
- 6. Were 40 CFR 136 analytical methods used? [403.8(f) (2) (vi)]

Timed	Timed	Flow	Timed	Timed	Timed	Timed
✓	✓	✓	✓	✓	✓	✓

**Inspections**

- 7. Does the IU file contain inspection reports?
- 8.
  - a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]
  - b. Date of last inspection

✓	✓	✓ <sup>18</sup>	✓	✓	✓	✓
4-5-11	4-27-11	6-30-11	6-28-11	4-12-11	5-17-11	6-15-11
						5-24-11

**Comments:**

- (15) . See Attachment G-1/15 (2008 Audit Report) for Gerdau MacSteel TOMP.
- (16) . Fort Smith Plating submitted a model TOMP; see Attachment F1-1/4.
- (17) . Hickory Springs TOMP is incomplete as it is missing the SMP; see Attachment F2-1/5.
- (18) . See Attachment C-1/26 for a copy of Exide Inspection Report.
- (19) . Page 4 in Gerdau's last inspection report had the inspector's name and Arrival Time; see Attachment F-6/54 (2008 Audit Report). The Inspector's name and Arrival Time is missing in the current inspections; see Attachment C-4/26.
- (20) . See Attachment C-4/26 for Name and Title on Page 2 of Exide Inspection Report.
- (21) . Pretreatment Facilities description shown on Page 8 and Page 17; see Attachment C-10/26 & C-19/26.
- (22) . Only techniques are shown; all SIUS use a contract lab (See Attachment C-13/26).
- (23) . Referring to Attachment F-51/54, see Slug Control Plan Evaluation Appendix.
- (24) . Storage only no handling procedures; see Attachment C-17/26.
- (25) . For Spill Prevention see Page 15; Attachment C-17/26.
- (26) . No inspector signature on report but CA should consider including it.

SECTION III: INDUSTRIAL USER FILE REVIEW

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	Whirlpl	HicSpqs
	√ => Yes	X => No	N/A => Not Applicable					
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]								
a. Inspector Name(s)	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>
b. Inspection date and time?	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>	X <sup>19</sup>
c. Name and title of IU official contacted?	Pg 2 <sup>20</sup>	Pg 2 <sup>20</sup>	Pg 2 <sup>20</sup>	Pg 2 <sup>20</sup>	Pg 2 <sup>20</sup>	Pg 2 <sup>20</sup>	Pg 2 <sup>20</sup>	Pg 2 <sup>20</sup>
d. Verification of production rates?	N/A	Pg 2/3	Pg 2/3	N/A	N/A	N/A	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	Pg 5	Pg 5	Pg 5	Pg 5	Pg 5	Pg 5	Pg 5	Pg 5
f. Evaluation of pretreatment facilities?	Pg 17 <sup>21</sup>	Pg 17 <sup>21</sup>	Pg 17 <sup>21</sup>	Pg 18 <sup>21</sup>	Pg 17 <sup>21</sup>	Pg 17 <sup>21</sup>	Pg 17 <sup>21</sup>	Pg 17 <sup>21</sup>
g. Evaluation of self-monitoring equipment and techniques?	Pg 11 <sup>22</sup>	Pg 11 <sup>22</sup>	Pg 11 <sup>22</sup>	Pg 11 <sup>22</sup>	Pg 11 <sup>22</sup>	Pg 11 <sup>22</sup>	Pg 11 <sup>22</sup>	Pg 11 <sup>22</sup>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	Pg 15 <sup>23</sup>	Pg 15 <sup>23</sup>	Pg 15 <sup>23</sup>	Pg 15 <sup>23</sup>	Pg 15 <sup>23</sup>	Pg 15 <sup>23</sup>	Pg 15 <sup>23</sup>	Pg 15 <sup>23</sup>
i. Manufacturing facilities?	Pg 17	Pg 17	Pg 17	Pg 17	Pg 17	Pg 17	Pg 17	Pg 17
j. Chemical handling and storage procedures?	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>
k. Chemical spill prevention areas?	Pg15 <sup>25</sup>	Pg15 <sup>25</sup>	Pg15 <sup>25</sup>	Pg15 <sup>25</sup>	Pg15 <sup>25</sup>	Pg15 <sup>25</sup>	Pg15 <sup>25</sup>	Pg15 <sup>25</sup>
l. Hazardous waste storage areas and handling procedures?	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>	X <sup>24</sup>
m. Sampling procedures?	Pg 10	Pg 10	Pg 10	Pg 10	Pg 10	Pg 10	Pg 10	Pg 10
n. Laboratory procedures?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
o. Monitoring records?	Pg 14	Pg 14	Pg 14	Pg 14	Pg 14	Pg 14	Pg 14	Pg 14
p. Evaluation of Pollution Prevention opportunities?	X	X	X	X	X	X	X	X
q. Control Authority inspector signature?	√ <sup>26</sup>	√ <sup>26</sup>	√ <sup>26</sup>	√ <sup>26</sup>	√ <sup>26</sup>	√ <sup>26</sup>	√ <sup>26</sup>	√ <sup>26</sup>

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	Trane	SoSteel	GerSteel	X => No	Exide	HiDairy	FSPltg	Whirlpl	HicSpgs	
	✓ => Yes			N/A => Not Applicable						
<u>IU Self-Monitoring and Reporting</u>										
10. Does the file contain self-monitoring reports?	✓	✓	✓	✓	✓ <sup>27</sup>	✓	✓	✓	✓	
11. Does the file include:	✓	✓	✓	✓	✓	N/A	✓	N/A	✓	
a. BMR?	✓	✓	✓	✓	✓	N/A	✓	N/A	✓	
b. 90-Day Report?	✓	✓	✓	✓	✓	N/A	✓	N/A	✓	
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	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	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	N/A	

SECTION III: INDUSTRIAL USER FILE REVIEW

	Trane	SoSteel	GerSteel	Exide	HiDairy	FSPltg	Whirlpl	HicSpqg
	✓ => Yes	X => No	N/A => Not Applicable					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]	✓			✓	✓	N/A	N/A	✓
a. Control Authority monitoring results?	✓			✓	✓	N/A	N/A	✓
b. IU self-monitoring results?	✓			✓	✓	N/A	N/A	✓
c. If NS CIU was it compliant within 90 days from commencement of discharge?	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2. How many reports submitted during the past reporting year indicated discharge violations?	1	21	4	1	23	0	0	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. See Attachment D1-1/7 for a copy of Exide Self-Monitoring Report and Attachment D2-1/5 for copy of Control Authority monitoring results.
- 28. See Attachment G-1/1 for Hiland Dairy Nondischarge NOV.
- 29. Hiland Dairy is currently on a Compliance Schedule to achieve compliance.

SECTION III: INDUSTRIAL USER FILE REVIEW

	Trane	SoSteel	GerSteel	X => No	N/A => Not Applicable	HiDairy	FSPltg	Whirlpl	HicSpqg
5. Were all nondischarge violations identified in the file?	N/A	N/A	N/A	N/A	N/A	√ <sup>28</sup>	N/A	N/A	N/A
6. Was the IU notified of all violations?	√	√	√	√	N/A	√	N/A	N/A	√
7. Was follow-up enforcement action taken by the Control Authority?	√	√	√	√	N/A	√	N/A	N/A	√
8. Did the Control Authority follow its approved ERP?	√	√	√	√	N/A	√	N/A	N/A	√
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	√	√	√	√	N/A	X <sup>29</sup>	N/A	√	√
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	X	N/A	N/A	N/A
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	√	√	√	√	√	√	N/A	N/A	√
During such evaluation for SNC, did the CA consider each of the following criteria?									
a. Chronic violations	√	√	√	√	√	√	N/A	N/A	√
b. TRC	√	√	√	√	√	√	N/A	N/A	√
c. Pass through/Interference	√	√	√	√	√	√	N/A	N/A	√
d. Spill/slugs loads	√	√	√	√	√	√	N/A	N/A	√
e. Reporting	√	√	√	√	√	√	N/A	N/A	√
f. Compliance schedule	√	√	√	√	√	√	N/A	N/A	√
g. others (specify)	√	√	√	√	√	√	N/A	N/A	√
13. Was the SIU published for SNC?	√	√	√	√	√	√	N/A	N/A	√
Date of publication.	N/A	10-27-10	10-27-10	10-27-10	N/A	10-27-10	N/A	N/A	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: 10/17-21/2011 Date entered into ICIS: 10/27/2011

### (ASSESSMENT)

		Level
NO	Failure to enforce against pass through and/or interference	I
NO	Failure to submit required reports within 30 days <sup>29</sup>	I
NO	Failure to meet compliance schedule milestone date within 90 days	I
NO	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
NO	Failure to inspect or sample 80% of SIUs within the last reporting year	II
NO	Failure to enforce pretreatment standards and reporting requirements	II
NO	Other violations of concern	II

### SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

Compliance Monitoring Type:

\* State: AR

- AFO Defined
- AFO Designation
- Aerial Photography
- Audit
- Audit (IU)

Compliance Monitoring Activity Name: City of Fort Smith

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

Linked Facility

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	490021750			

Compliance Monitoring Dates

Planned Start Date: 10/17/2011

Actual Start Date: 10/17/2011

Planned End Date: 10/21/2011

Actual End Date: 10/21/2011

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

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?

\* Compliance Monitoring Agency Type:

- State Contractor
- State - Using Federal Credential
- State
- Regional
- Other Federal

Compliance Monitoring Agency Name:

Government Contacts

Affiliation Type	First Name	Last Name	Phone	Office	Organization
------------------	------------	-----------	-------	--------	--------------

SIC Codes:

4952 Sewerage Systems

NAICS Codes:

OECA National Priority:

- 2009 - (CA Only) - Air Toxics - Flares
- 2009 - (CA Only) - Air Toxics - LDAR
- 2009 - (CA Only) - Air Toxics - Surface Coating
- 2009 - (CA Only) - Financial Assurance
- 2009 - (CA Only) - MP - Mining

Regional Priority:

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

Media Monitored

Media Monitored:

Compliance Monitoring Media Indicator

Multimedia Indicator:

Compliance Monitoring Information

Number of Days Physically Conducting Activity:

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

Compliance Monitoring Comments:

008: Significant Industries Site Visits Conducted

User Defined Fields

1:



Special Programs  
Pretreatment

Significant Industrial Users (SIUs)

SIUs : 18

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 : 1

Violation Notices issued to SIUs : 86

Administrative Orders issued to SIUs : 0

Civil Suits Filed Against SIUs : 0

Criminal Suits Filed Against SIUs : 0

Categorical Industrial Users (CIUs)

CIUs : 8

CIUs in SNC : 2

Penalties

Dollar Amount of Penalties Collected : \$ 0

Industrial Users (IUs) from which Penalties have been collected : 0

Other Information

SUO Reference :

SUO Date :

Annual Pretreatment Budget : \$

Pass-Through/Interference Indicator :

Violation of IU Schedule for Remedial Measures : No

Formal Response to Violation of IU Schedule for Remedial Measures :

Local Limits

Date of Most Recent Technical Evaluation for Local Limits :

Date of Most Recent Adoption of Technically Based Local Limits :

Local Limit Pollutants :

Removal Credits

Removal Credits Application Status : Not Applicable

Date of Most Recent Removal Credits Approval :

Removal Credits :

Acceptance of Waste

Acceptance of Hazardous Waste : No

Acceptance of Non-Hazardous Industrial Waste : No

Acceptance of Hauled Domestic Wastes : No

Deficiencies

Deficiencies Identified During IU File Review : No

Control Mechanism Deficiencies : No

Legal Authority Deficiencies : No

Deficiencies in Data Management and Public Participation : No

Deficiencies in Interpretation and Application of Pretreatment Standards : No

Inadequacy of Sampling and Inspections : No

Adequacy of Pretreatment Resources : Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling :

Annual Frequency of Effluent Toxicant Sampling :

Annual Frequency of Sludge Toxicant Sampling :



**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: 10/19/2011 from 8:30 a.m. to 11:10 a.m.

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

Industry contacts: Mike Cash, Environmental Engineer

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

Comments: 1. See 2008 Audit Report Attachment G-1/15 for a copy of TOMP.

Visit conducted by: Torrence/Lor Date:                     

\_\_\_\_\_  
 (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 to the treatment system but Gerdau was in SNC for zinc violations during the 2010 pretreatment year.*

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Visit conducted by: Torrence/Lor Date: \_\_\_\_\_

---

(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: 10/20/2011 from 8:30 a.m. to 9:10 am

Type of industry: Metal Finisher 40 CFR 433

Industry contacts: James Echols, Cor Director Human Resources  
Kevin Dunn, Sales Manager

	Yes	No	N/A
1. Significant industrial user?	___	<u>1</u>	___
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	___	___	___

Comments: 1. This facility formally closed on October 17, 2011 (date of letter to City). The Auditor visited the facility to verify an "orderly" closure. A skeleton crew is to remain at the site indefinitely.

Visit conducted by: Torrence/Lor Date: \_\_\_\_\_

\_\_\_\_\_  
(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:

*The auditor toured the entire facility. The auditor did not see any drums or other abandoned storage vessels. The floors were all dry. All the manufacturing equipment had been removed. The plant was empty (except for the phosphate wash system) and clean.*

*The facility management appeared to have followed the closure plan effectively.*

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Visit conducted by: Torrence/Lor Date: \_\_\_\_\_

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(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: Trane  
4811 South Zero St  
(479) 648-4302

Date/Time of visit: 10/19/2011 from 1:35 pm to 3:15 pm

Type of industry: 40 CFR Part 433 Metal Finisher

Industry contacts: Robert Hambrick, EHS Site Leader  
Bill Lee, Cor EHS  
Bill Burkett, Maintenance Leader

	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?	✓ <sup>1</sup>	___	___
6. Proper solid waste disposal?	✓	___	___
7. Solvent management/TTO control?	✓ <sup>2</sup>	___	___
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/Lor Date: \_\_\_\_\_

\_\_\_\_\_  
(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/Lor Date: \_\_\_\_\_

\_\_\_\_\_  
(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: 10/19/2011 from 3:30 pm to 5:15 pm

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

Industry contacts: Richard Kaesther, Plant Manager  
David W. Zirbel, Fac Mgr/Plt Eng  
Joel Stiffler, EHS Manager  
Melissa Birt, ESH Technician

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

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Comments: 1. Exide has elected to sample for the 110 Toxic Organics.  
 2. Exide has developed a spill plan; see Attachment H-1/2.

Visit conducted by: Torrence/Lor Date: \_\_\_\_\_

**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 manufactured elsewhere.*

*Exide submerges the completed batteries in a water bath to remove the heat generated while charging the new batteries. Exide has recently installed a cooling unit which circulates the acid to prevent overheating.*

*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/Lor Date: \_\_\_\_\_

\_\_\_\_\_  
(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. 10<sup>th</sup> Street  
479.782.2833

Type of industry: Milk Products

Date/Time of visit: 10/20/11 From 3:30 pm To 5:00 pm

Industry contacts: Jeff Ventimiglia - Quality Control Mngr.  
Danny Spradin, Plant Manager

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

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: Torrence/Lor/Easley Date:

**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. The soaps contain a dilute phosphoric, nitric and sulfuric acids and are further diluted with water for cleaning.*

*Other "soaps" are continually used to lubricate the conveyor system chains.*

*Raw milk is trucked in and tested for pathogens. The raw milk is further processed to meet FDA standards. This 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. The sampling point is just past the weir.*

Visit conducted by: Torrence/Lor/Easley Date: \_\_\_\_\_

# 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 40 CFR 413

Date/Time of visit: 10/20/2011 10:00 am To 12:30 pm

Industry contacts: Bobby Dolan, II - President  
James Cox, Chem Lab, Inc Consultant

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

### Additional comments:

*Facility is a job shop, Electroplater under CFR 413 where copper, nickel, chrome, zinc and very seldomly now, gold is plated. Some anodizing is also done on aluminum.*

Visit conducted by: Torrence/Lor/Easley Date: 10/20/11

(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:

*This 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. Nickel, Zinc, Copper and Chrome wastewater is 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.*

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Visit conducted by: Torrence/Lor/Easley Date: \_\_\_\_\_

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(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: 10/20/2011 1:30 pm To 3:00 pm

Industry contacts: Erin Billings, Env Mgr

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

### Comments:

*Facility makes "sleeper sofas", RV steps and foam for end products. 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: Torrence/Lor/Easley Date: 10/20/11

\_\_\_\_\_  
(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 electrostatic 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. The dip painted pieces are sent through an oven. Pretreatment consists of simple chemical precipitation with flocculants & polymers, clarification with sludge hauled off-site. The building's floor was sloped to allow any spills to flow into sump.*

*The foam production building was not visited as there is no contact wastewater generated and it was not in operation.*

Visit conducted by: Torrence/Lor/Easley Date: \_\_\_\_\_

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

# PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

## INDUSTRIAL SITE VISIT

Control Authority: City of Fort Smith NPDES #: AR0021750

Name, address and phone number of industry: Whirlpool  
6400 Jenny Lind Road  
479-648-7572

Type of industry: Manufacturer of Refrigerators

Date/Time of visit: 10/19/2011 From 11:30 am To 12:30 pm

Industry contacts: Scott Horton, Plt Mgr  
Rick Moore, Env Control Technician

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

Comments: *This facility is scheduled to close in June 2012.*

Visit conducted by: Torrence/Lor Date: \_\_\_\_\_

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

Control Authority: \_\_\_\_\_ NPDES #: \_\_\_\_\_

Industry name: \_\_\_\_\_

Additional comments:

*Whirlpool manufactures side-by-side refrigerators and trash compactors. Because of the poor housing market, the demand for these units are down and the facility will close soon.*

\_\_\_\_\_  
Visit conducted by: Torrence/Lor Date: \_\_\_\_\_

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



RECEIVED  
DEC 23 2009

CITY OF FORT SMITH  
WASTEWATER CONTRIBUTION  
PERMIT APPLICATION FORM

RECEIVED  
DEC 23 2009 *JF*

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

SECTION A - GENERAL INFORMATION

1. Facility Name: GNB Industrial Power, a division of Exide Technologies

a. Operator Name: Exide Technologies

b. Is the operator identified in 1.a., the owner of the facility?  
Yes [] No []

If no, provide the name and address of the operator and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.

2. Facility Address:

Street: 4115 South Zero Street  
City: Fort Smith State: AR Zip: 72908

3. Business Mailing Address:

Street or P.O.Box: 4115 South Zero Street  
City: Fort Smith State: AR Zip: 72908

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

Name: Dave Brugger  
Title: Plant Manager  
Address: 4115 South Zero Street  
City: Fort Smith State: AR Zip: 72908  
Phone#: (479) 649-2127 Email: Dave.Brugger@Exide.com

5. Designated facility contact:

Name: Joel Stiffler  
Title: EHS Manager  
Phone#: (479) 649-2147 Email: Joel.Stiffler@Exide.com

SECTION B - BUSINESS ACTIVITY

A - 2/26

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
- 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".

A - 2/26

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

*Manufacturer of Lead-Acid Industrial Storage Batteries*

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

- a. 3691
- b. \_\_\_\_\_
- c. \_\_\_\_\_
- d. \_\_\_\_\_
- e. \_\_\_\_\_

4. PRODUCT VOLUME:

PRODUCT (Brand name) (levels with others) (and no u.l)	PAST CALENDAR YEAR Amounts Per Day (Daily Units)		ESTIMATE THIS CALENDAR YEAR Amounts Per Day (Daily Units)	
	Average	Maximum	Average	Maximum
<i>Industrial Lead-Acid Storage Battery</i>				

*A - 3/26*

**SECTION C - WATER SUPPLY**

1. Water Sources: (Check as many as are applicable)
- Private Well
  - Surface Water
  - Municipal Water Utility (Specify City) City of Fort Smith
  - Other (specify): \_\_\_\_\_

2. Name on the water bill: Exide Technologies

Name: Exide Technologies / GNB Industrial Power  
 Address: 4115 South Zero Street  
 City: Fort Smith State: AR Zip: 72908

3. Water service account number(s): 022 731 - 026095 - 001

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	5600	
b. Non-contact cooling water	1430	
c. Boiler feed	1300	
d. Process	12,060	
e. Sanitary	6075	
f. Air pollution control	0	
g. Contained in product	6400	
h. Plant & equipment washdown	2500	
i. Irrigation & lawn watering	0	
j. Other	2000	
k. Total of A-J	36,705	

A - 4/26

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].

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

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)
2	Battery Wash	1250	2300	Batch
1	Mold Release formulation	1000	1500	Batch
3	Open Formulation "Wet"	420	500	Batch
4	Plate Soak	420	500	Batch
5	Change + Cycle	5000	7500	Batch
Misc.	Sinks, Lab, Respiration Wash	1000	1500	Batch

A-5/26

No.	Unregulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, cont., none)
6	Showers Employee	6075	8000	Batch

No.	Dilution	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, cont., none)
	Air Compression Condensate	250	500	Batch
	Cooling Tower Blow-down	1430	2500	Batch
	Boiler Blowdown	250	400	Batch
	Potable Sources	300	500	Batch

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?  
 Yes  No
- b. Has a baseline monitoring report (BMR) been submitted which contains TTO information?  
 Yes  No
- c. Has a toxic organics management plan (TOMP) been developed?  
 Yes (please attach a copy)  No

A-6/26

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

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

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

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

Outfall #2 - Flow measured by 6" Leopold Losco Flume +  
Isco 4230 Bubbler Flow Meter + Probe

2" Parshall Flume primary device measured by Mettler's Hydro Ranger Plus  
Level Sensor

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  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 [ ] 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).

Study underway to review water usage in plant. Determination of  
Feasibility to internally re-cycle low-level streams for multiple  
uses.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

A-7/26

**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.

*See Attached B1 - Annual Compliance Reports for 2009 (Jan - Jun) &  
2008 (July - Dec)*

*A-8/26*



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					
Parachlorometacresol			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					

A-9/26

Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used		Units		Number of Analyses
	Conc.	Mass	Conc.	Mass	Conc.	Mass	Conc.	Mass	
2,4-Dimethylphenol			0						
2,4-Dinitrotoluene			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						

A-10/26

Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used		Units		Number of Analyses
	Conc.	Mass	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						

A-11/26

Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used		Units		Number of Analyses
	Conc.	Mass	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			8.96						12
Alkalinity			0						
Bacteria			0						
BOD (5)			5.10 ppd						12
COD			0						
Chloride			0						
Chlorine			0						
Fluoride			0						
Hardness			0						
Magnesium			0						
NH(3)-N			0						
Oil & Grease			0						
TSS			3.46 ppd						12
TOC			0						
Kjeldahl N			0						
Nitrate N			0						
Nitrite N			0						
Organic N			0						
Orthophosphate P			0						

A-12/26

Pollutant	Maximum Daily Value		Average Analysis		Detection Level Used		Units		Number of Analyses
	Conc.	Mass	Conc.	Mass	Conc.	Mass	Conc.	Mass	
Phosphorous									
Sodium									
Specific Conductivity									
Sulfate (SO(4))									
Sulfide (S)									
Sulfite (SO(3))									
Antimony									
Arsenic									
Barium									
Beryllium									
Cadmium									
Chromium									
Copper									
Cyanide									
Lead									
Mercury									
Nickel									
Selenium									
Silver									
Thallium									
Zinc									

A-13/26

**SECTION G - TREATMENT**

1. Is any form of wastewater treatment (see list below) practiced at this facility?  
 Yes  
 No
  
2. Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the next three years?  
 Yes, describe: \_\_\_\_\_  
 No
  
3. Treatment devices or processes used or proposed for treating wastewater or sludge (check 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
  - 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: \_\_\_\_\_

A-14/26

4. Description

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

00 X 60 Separate Building; Cap: TEST 1300 GPH, Design Cap 15,000 Gal,  
Pol. Load (Metals): 200 lbs/Day; Untreated Wastewater is collected; pH adjusted  
(Lowered); Transferred - pH Adj. (Raised) + Add. of Ferric Chloride; Transferred

pH adjusted to 7.5; Transferred + pH Adj. to 8.75; Transferred + Polymer Added  
Transfer to Clarifier, settling Tank, Sand Filter + into holding Tank + tested by 3rd party

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. See Attachment - Fig #2

L26 + combination parameters prior to discharge to POTW.

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).

None

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

(if yes,) Name: Glenn Nordin (Lic # 009990)

Title: System Tender - Maintenance Dept.

Phone: (479) 646-8341 EXT 262

Full Time: 6:30 AM - 3:00 PM (specify hours)

Part Time: \_\_\_\_\_ (specify hours)

8. Do you have a manual on the correct operation of your treatment equipment?  
 Yes [ ] No

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

A-15/26

**SECTION H - FACILITY OPERATIONAL CHARACTERISTICS**

1. Shift information

Work Days	<input checked="" type="checkbox"/> Mon.	<input checked="" type="checkbox"/> Tue.	<input checked="" type="checkbox"/> Wed.	<input checked="" type="checkbox"/> Thu.	<input checked="" type="checkbox"/> Fri.	<input type="checkbox"/> Sat.	<input type="checkbox"/> Sun.
Shifts per work day:	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>		

*As of Dec. 2009*

Shift:	1st	2nd	3rd	Sat.	Sun.
Empl's per Shift:	<u>65</u>			<u>5</u>	<u>5</u>
	<u>36</u>			<u>5</u>	<u>5</u>
	<u>7</u>			<u>3</u>	<u>3</u>

Shift start and end times:	1st	<u>6:30A - 3:00P</u>	→
	2nd	<u>2:30A - 11:00P</u>	→
	3rd	<u>11:00P - 7:00A</u>	→

2. Indicate whether the business activity is:

- 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:

- 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?

- Yes, indicate reasons and period when shutdown occurs: 2 Events per year  
1) 4th of July Holiday Week + 2) Christmas / New Year Holiday

No

A-16/26



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

*Full Capacity Operation, Normal Material Usage -*

*Lead - 81,000 lbs/day*

*Lead Oxide - 42,000 lbs/day*

*H<sub>2</sub>SO<sub>4</sub> - 1000 gal/day*

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
<i>See Attachment "A" <del>ATTN</del></i>	

*A-17/26*

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 Fig #3 Attached.*

*A- 18/26*

**SECTION I - SPILL PREVENTION**

1. Do you have chemical storage containers, bins, or ponds at your facility?  
 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.

2. Do you have floor drains in your manufacturing or chemical storage area(s)?  
 Yes [ ] No

If yes, where do they discharge to? All open Floor Drains go To Waste Water Treatment.

3. If you have chemical storage containers, bins, or ponds in manufacturing area, could an accidental spill lead to a discharge to: (check all that apply).

- an onsite disposal system
- public sanitary sewer system (e.g. through a floor drain)
- storm drain
- to ground
- other, specify
- not applicable, no possible discharge to any of the above routes

4. Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or slug discharges from entering the Approving Authority's collection system?

- Yes - (Please enclose a copy with the application) See Attached Documentation.
- 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.

N/A

---

---

---

---

---

A-19/26

**SECTION J - NON-DISCHARGED WASTES**

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

<u>Waste Generated</u>	<u>Quantity (per year)</u> <sup>(lbs)</sup>	<u>Disposal Method</u>
<i>Wastewater Sludge</i>	<i>350,000 (full prod.)</i>	<i>Recycled</i>
	<i>1,500,000 lbs</i>	<i>Recycled</i>

2. Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site. *Off site shipment to permitted facilities.*
3. If any of your wastes are sent to an off-site centralized waste treatment facility, identify the waste and facility. *Exide Technologies - Frisco TX, (Smelter)*
4. If an outside firm removes any of the above checked wastes, state the name(s) and address(es) of all waste haulers:

a. *N/A* \_\_\_\_\_ b. \_\_\_\_\_

\_\_\_\_\_

Permit No. \_\_\_\_\_ Permit No. \_\_\_\_\_  
 (if appl.) \_\_\_\_\_ (if appl.) \_\_\_\_\_

5. Have you been issued any Federal, State, or local environmental permits?  
 Yes  
 No

If yes, please list the permit(s):  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

*A-20/26*

**SECTION K - AUTHORIZED SIGNATURES**

Compliance certification:

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

- Yes
- No
- Not yet discharging

2. **If No:**

- a. What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.
- b. Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note that if the 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
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
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_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

A-21/26

Authorized Representative Statement:

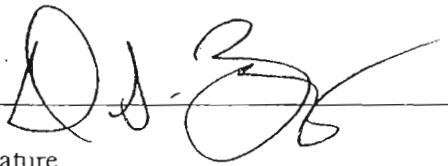
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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.

DAVID S. BRUGGER

PLANT MANAGER

Name(s)

Title



10/14/09

479-649-2127

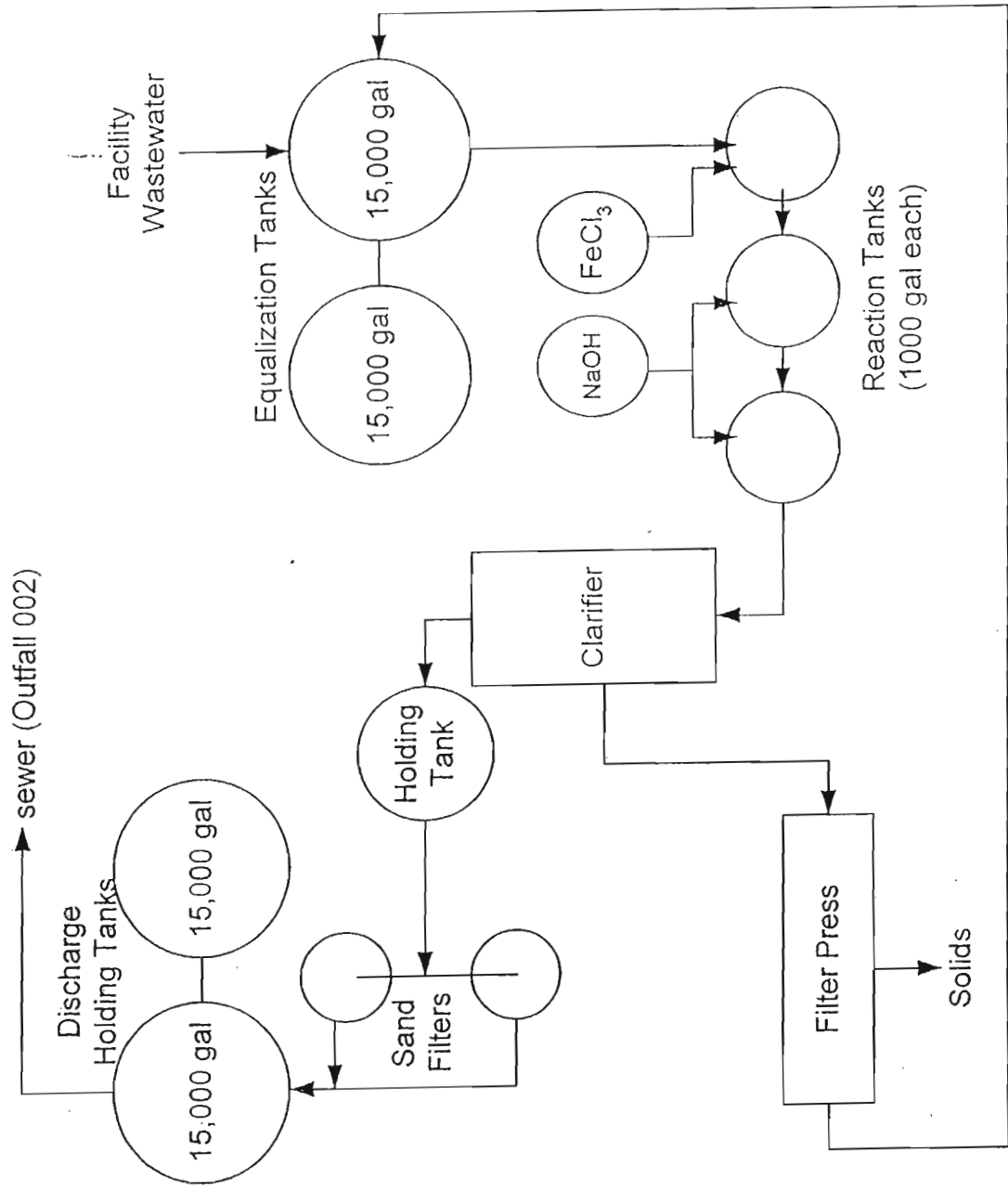
Signature

Date

Phone

---

A-22/26

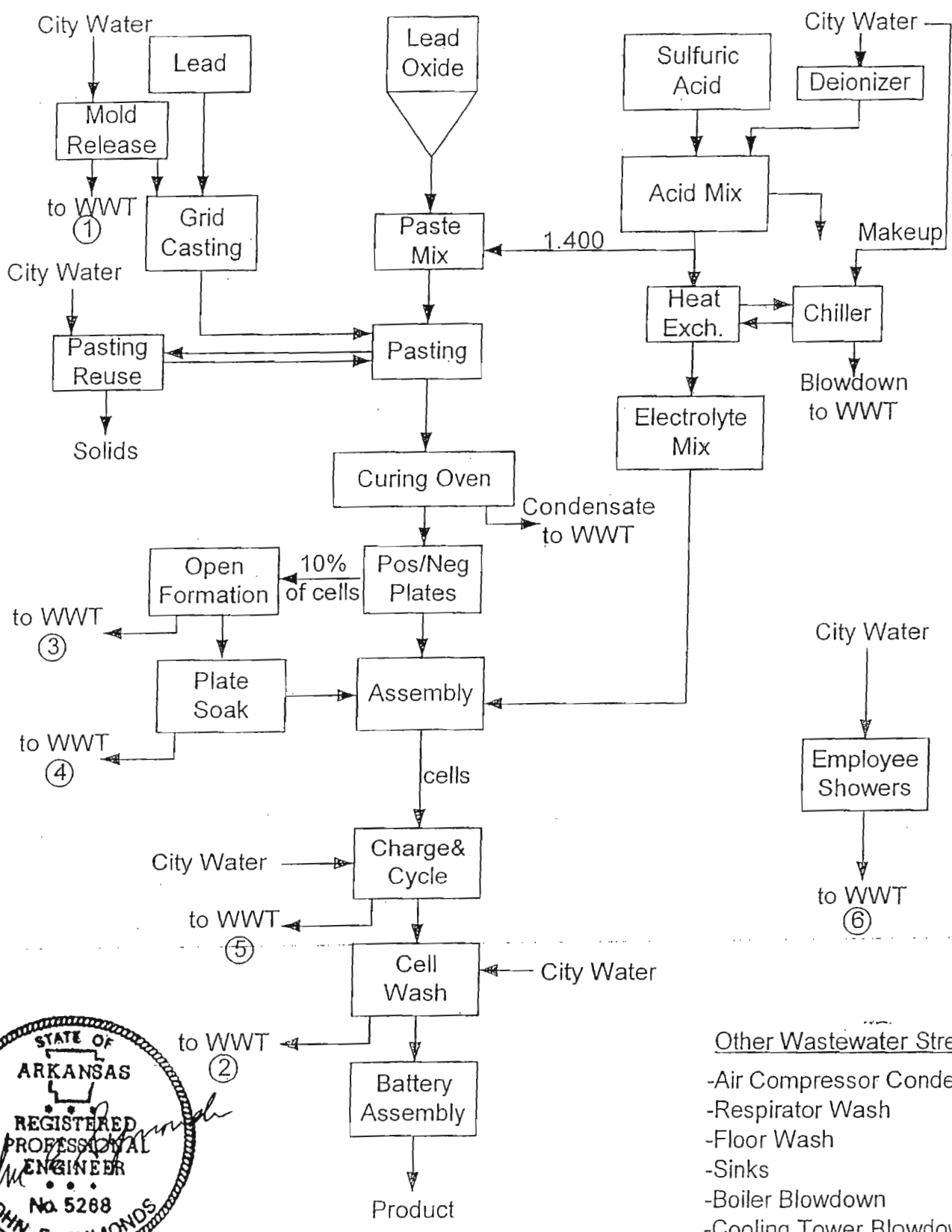


A-23/26

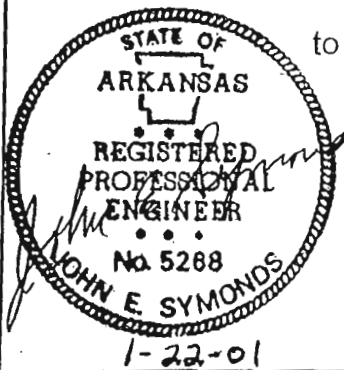
Wastewater Pretreatment System  
Flow Diagram

GNB Industrial Power

FIG 2



- Other Wastewater Streams
- Air Compressor Condensate
  - Respirator Wash
  - Floor Wash
  - Sinks
  - Boiler Blowdown
  - Cooling Tower Blowdown



GNB Industrial Power

Process Flow Diagram

FIG. 1

A-24/26



GNB FURT SMITH



16. 3

A-25/26

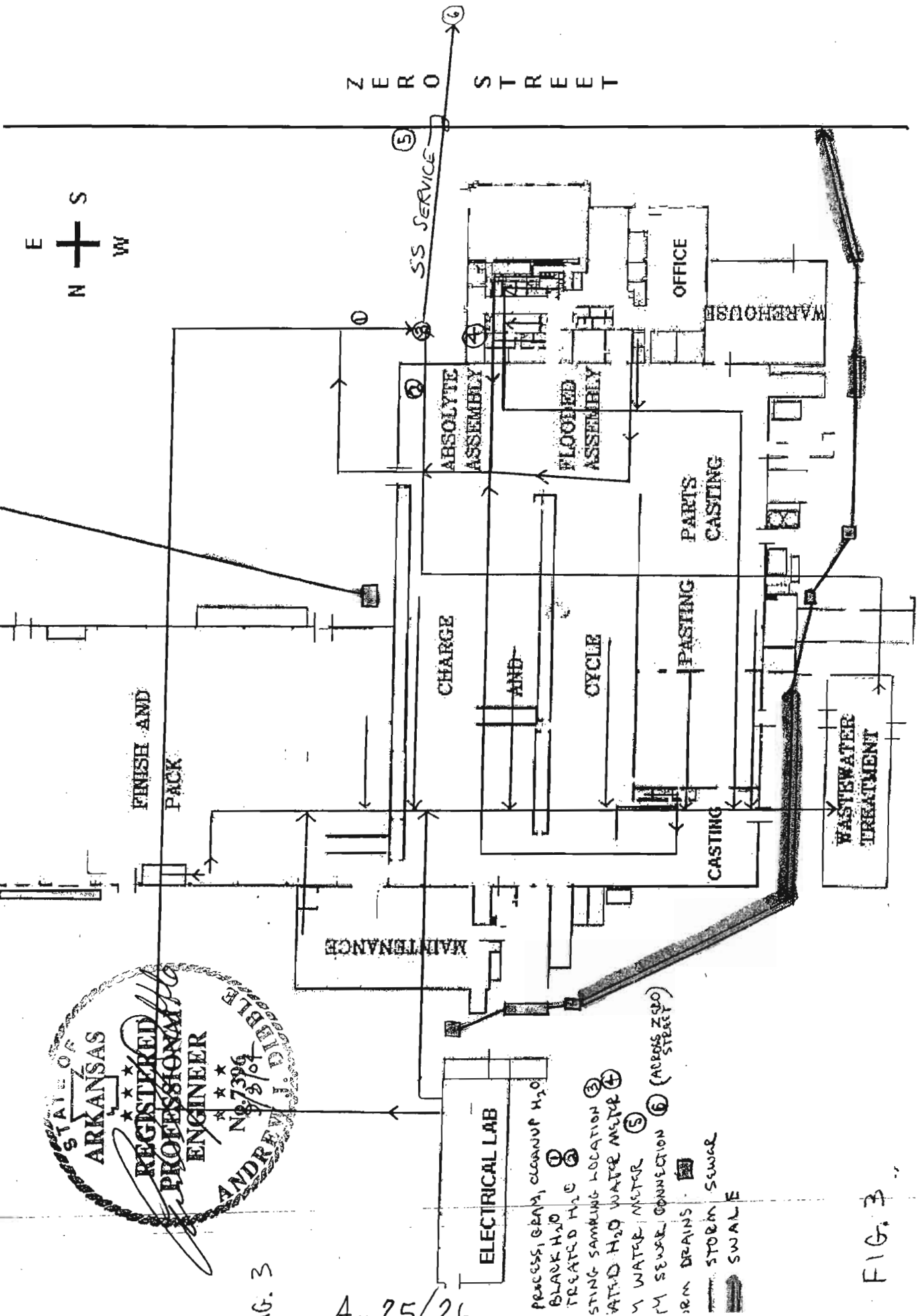


FIG. 3

PERMIT NO: SIU036304

**INDUSTRIAL USER PERMIT**

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

Exide Technologies  
4115 South Zero  
Fort Smith, AR 72903

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 will become effective on December 15, 2004 and shall expire at midnight on December 14, 2009.

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:  \_\_\_\_\_  
Director of Utilities

A-26/26

**PERMIT NO: CIUM036304**

**INDUSTRIAL USER PERMIT**

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

GNB Industrial Power,  
A Division of Exide Technologies  
4115 South Zero  
Fort Smith, AR 72903

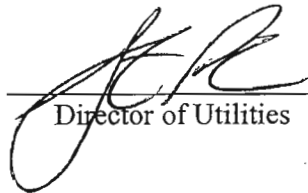
is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfall(s) identified herein into the Control Authority's sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its 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 will become effective on December 15, 2009 and shall expire at midnight on December 14, 2014.

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: \_\_\_\_\_



Director of Utilities

B-1/21

**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of December 15, 2009 to December 14, 2014, 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):

<b>Outfall:</b>	<b>Description:</b>
001	The manhole located on the east side of the 4115 South Zero Street facility, east of Outfall 002 manhole, just prior to discharge into the City's sanitary sewer system.

B. During the period of December 15, 2009 to December 15, 2014, the discharge from outfall # 001 shall not exceed the following effluent limitations.

**Effluent Limitations**

<b>Parameter</b>	<b>Daily Maximum</b>
Oil & Grease	150 mg/L
Biochemical Oxygen Demand (BOD)	450 mg/L or 180 ppd
Total Suspended Solids (TSS)	430 mg/L or 180 ppd
pH (Grab)	6.0 - 11.0
Cadmium (Cd)	Monitor & Report
Copper (Cu)	Monitor & Report
Lead (Pb)	Monitor & Report
Zinc (Zn)	Monitor & Report

*B-2/21*

**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of December 15, 2009 to December 14, 2014, 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):

<b>Outfall:</b>	<b>Description:</b>
002	The manhole located on the east side of the 4115 South Zero Street facility, west of Outfall 001 manhole, just prior to discharge into the City's sanitary sewer system.

B. During the period of December 15, 2009 to December 14, 2014, the discharge from outfall # 002 shall not exceed the following effluent limitations.

**Effluent Limitations**

<b>Parameter</b>	<b>Daily Maximum</b>	<b>Monthly Average</b>
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
Cadmium (Cd)	Monitor & Report	NA
Copper (Cu)	0.264 ppd*	0.140 ppd*
Lead (Pb)	0.059 ppd*	0.028 ppd*
Zinc (Zn)	Monitor & Report	NA

\* Battery Manufacturing Category (40 CFR 461) Subpart C: Lead PSES production based standards.

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 (0 degrees C) and 140 degrees F (60 degrees C);

B-3/21

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 2 - SELF MONITORING REQUIREMENTS**

A. From the period beginning on the effective date of the permit until December 14, 2014, 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
Cadmium mg/L	outfall #001	1/month	24 hour composite
Copper 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

1. The designated sampling point for all parameters shall be at the manhole located on the east side of the 4115 South Zero Street facility, east of Outfall #002 manhole, just prior to discharge into the City's sanitary sewer system.
2. See definitions of sample types.
3. Daily flows are to be recorded from the permittee's wastewater flow meter(s).

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.

B-5/21

**PART 2 - SELF MONITORING REQUIREMENTS**

A. From the period beginning on the effective date of the permit until December 14, 2014, the permittee shall monitor outfall #002 for the following parameters, at the indicated frequency:

Sample Parameter (units)	Measurement Location	Frequency	Sample type
Oil & Grease mg/L	outfall #002	1/month	grab
BOD mg/L	outfall #002	1/month	24 hour composite
TSS mg/L	outfall #002	1/month	24 hour composite
pH SU (Grab)	outfall #002	1/month	grab
Cadmium mg/L	outfall #002	1/month	24 hour composite
Copper mg/L	outfall #002	1/month	24 hour composite
Lead mg/L	outfall #002	1/month	24 hour composite
Zinc mg/L	outfall #002	1/month	24 hour composite

1. The designated sampling point for all parameters shall be at the manhole located on the east side of the 4115 South Zero Street facility, west of Outfall #001 manhole, just prior to discharge into the City's sanitary sewer system.
2. See definitions of sample types.
3. Daily flows are to be recorded from the permittee's wastewater flow meter(s).

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.

B-6/21



### 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. The permittee shall also submit a daily flow report from daily flow measurements recorded from the permittee's wastewater flow meter(s). 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 Re-sampling

If the results of the permittee's wastewater analysis indicate 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. The Control Authority must be notified by fax at (501) 784-2404.

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

## **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 Battery Manufacturing Pretreatment 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 Battery Manufacturing compliance date is March 9, 1987.

In June and December of each year a periodic report (Bi-Annual Compliance) must be submitted to the Control Authority 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 a minimum twice per year, the user must sample and analyze (outside the City's sampling program) the parameters listed on the previous pages. The permittee's self-monitoring may be sufficient to complete this requirement.

Categorical Industries with production-based limits must submit the previous six months data in their Bi-Annual Compliance reports. TTO's known to be on the premises must 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 that will or are likely to occur during its effective period.

Due to market volatility of this business sector, production rate data submitted in the permittee's "Bi-annual Compliance Reports" during the term of this permit shall be monitored for changes in production. If changes of these production rates indicate a minimum 20 percent increase or decrease, the permit limitations for production-based pollutants shall be re-examined by the Control Authority. If this examination indicates a change in a permit limitation is warranted, the Control Authority may issue a permit modification. Permit modifications shall be documented through addendums to this document. Permit modifications based upon production changes shall not exceed once per six-month period and shall not be retroactive.

### **SECTION 3 - COMPLIANCE SCHEDULE**

**Not currently applicable to this Industrial User.**

# Part 5 - Additional Requirements

## 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 abatement.

### 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 its obligations regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may become 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

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 is 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.

# Exide Technologies Production Based Standards

Average Monthly Lead Used (lb/day) 2,484,446.0  
 Average Daily Lead Used (lb/day) 112,929

Pretreatment Standard (lb/1,000,000 lb Pb used) Allowance (lb/1,000,000 lb Pb used)  
 (from 40 CFR 461.34) (Pretreatment Standard)

	Daily Max		Monthly Avg		% Process		Daily Max		Monthly Avg.	
	Copper	Lead	Copper	Lead	Copper	Lead	Copper	Lead	Copper	Lead
Open Formation - Dehydrated	3.19	0.71	1.68	0.34	0	0	0	0	0	0
Open Formation - Wet	0.1	0.022	0.053	0.01	0.1	0.1	0.01	0.0022	0.0053	0.001
Plate Soak	0.039	0.008	0.021	0.004	0.1	0.1	0.0039	0.0008	0.0021	0.0004
Closed Formation	0	0	0	0	1	1	0	0	0	0
Battery Wash - Detergent	1.71	0.38	0.9	0.18	1	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	0
Mold Release Formulation	0.011	0.002	0.006	0.001	1	1	0.011	0.002	0.006	0.001
Truck Wash	0.026	0.005	0.014	0.002	1	1	0.026	0.005	0.014	0.002
Laundry	0.21	0.05	0.11	0.02	0	0	0	0	0	0
Miscellaneous	0.58	0.13	0.31	0.06	1	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

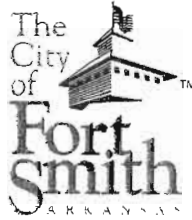
**Copper Daily Maximum** 0.264 lbs/day  
**Monthly Average** 0.140 lbs/day  
**Lead Daily Maximum** 0.059 lbs/day  
**Monthly Average** 0.028 lbs/day

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

B-21/21

CERTIFIED MAIL  
7010 1060 0000 8254 9928

October 14, 2011



Mr. Richard E. Kaestner  
Exide Technologies  
4115 South Zero  
Fort Smith, AR 72903

RE: FOLLOW-UP INSPECTION REPORT  
Permit No.: CIUM036304

Dear Mr. Kaestner:

On June 28, <sup>2011</sup>~~2010~~, representative(s) of the Control Authority conducted an onsite inspection of Exide Technologies. The follow-up inspection report to the audit is composed of this letter and the attached inspection report transcript.

The primary purpose of the inspection is to determine the Permittee's compliance with its Industrial User Permit and/or Ordinance 69-97. In addition, the review gives both parties a chance to explore better methods of ensuring compliance, and serves to further the development of a good working relationship.

The Control Authority shall address facility inspection findings or conclusions by either requirement(s) and/or recommendation(s) for Industrial User action.

Requirements are mandatory and shall be implemented. During the next annual inspection, careful attention will be given to areas where specific requirements were cited. Compliance to these previous audit requirements will be determined and appropriate action taken for noncompliance.

Recommendation(s) are suggestions for improved compliance procedures and are issued to address areas of concern that could affect compliance with pretreatment standards.

**Findings:**

The following issues were noted in the attached inspection report transcript.

1. The Permittee was found to be in compliance with all pretreatment standards at the time of the inspection. However, as noted in the attached inspection report transcript there were several violations found during the 2010-2011 compliance year. These violations included one daily maximum violation for Oil & Grease, three failures to monitor, one late submission, and one failure to provide unrestricted access. The violations were discussed during the inspection. The Permittee previously notified the Control Authority of what efforts were made to correct the violations.
2. Mr. Joel Stiffler, of Exide Technologies (GNB Industrial Power), stated the Spill Prevention Plan was recently updated as of 2011.
3. Records of calibration for the pH meter are not being used in the pretreatment facility.

Utility Department • 3900 Kelley Hwy.  
Fort Smith, Arkansas 72904  
(479) 784-2231 • FAX (479) 784-2358



Mr. Kaestner  
October 14, 2011  
Page 2



Considering the above "Findings", the following Requirements are given.

**Requirements:**

The Permittee will provide the Control Authority with an updated Spill Prevention Plan within 90 days from the date of this letter.

Considering the above "Findings", the following Recommendations are given.

**Recommendations:**

The monitoring of pH is a valuable tool in the treatment of wastewater. It is recommended that the Permittee develop and implement a method of tracking the calibration and daily readings from all pH meters used in treatment process.

Exide Technologies has 30 days from the date of this letter to respond in writing to the above requirement(s) and recommendation(s).

If you have any questions, please call.

Sincerely,

A handwritten signature in cursive script that reads "Jay Lor".

Jay Lor  
Environmental Coordinator

FC

**Fact Sheet**

**Permitted Outfall(s)**

See the pertinent page from the current Industrial User's permit listing and describing the permitted outfall(s) to the City's sewer system. See Attachment #1

**Effluent Limitations**

See 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 Attachment #1

**Self Monitoring Requirements**

See the pertinent page of the current Industrial user's permit listing the self monitoring requirements for the permitted outfall(s) to the City's sewer system. See Attachment #2

**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.*  Not Applicable

Permit expired Dec. 14, 2009. Application submitted in October 2009.

**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 exists for modifying, revoking and reissuing, or terminating the Industrial User's permit, or to determine compliance with the Industrial User's permit?  Yes,  No,  
 N/A

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,  N/A

**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? *If yes, list date and publication(s) or other media.*  Yes,  No

**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*

**Facility Inspection**

**General Information**

Permit Number: CIUM036304

Site Address: 4115 South Zero Street  
Fort Smith, Arkansas

Mailing Address: 4115 South Zero Street  
Fort Smith, AR 72903

Primary Contact: Richard E. Kaestner

Title: Operations Manager & Interim Plant Manager

Telephone: (479) 646-8341

Fax: (479) 649-2143

Additional Contact: Joel Stiffler

Title: EHS Manager

Telephone: (479) 649-2147

Additional Contact:

Title:

Telephone:

Email: Email address;Mr. Joel Stiffler: Joel.Stiffler@exide.com

C-4/26

Process Information

SIC Code(s):	3691				

Raw Materials:

Metallic lead alloys, lead oxide and sulfuric acid.

Process Description:

Manufacture of lead-acid industrial storage batteries.

Products:

Lead-acid industrial storage batteries.

Process Waste-Streams			
Source Description:	Volume (GPD):	Code Type: *	
Battery Manufacturing	18,494	BD, RCW	
<b>* Code Types:</b>			
CD: Continuous Discharge	OD: Other Disposal (Not sewer.)	BD: Batch Discharge	ND: Not Discharged
<b>* Additional Categorical Waste-Stream Types:</b>			
RCW: Regulated Categorical Waste-Stream		NRCW: Non-Categorical Waste-Stream	
ARCW: Ancillary Regulated Categorical Waste-Stream		DCW: Diluted Categorical Waste-Stream	
<i>Sketch process waste-stream(s) connections to the City's sewer system or attach copies of drawing(s) to report.</i>			

C-6/26

**Operations Information**

	1st Shift	2nd Shift	3rd Shift
Number Of Employees: (Avg.)	150	94	13
Working Hours:	6:30 am - 2:30 pm	2:30 pm - 10:30 pm	10:30 pm - 6:30 am
Hours/Day:	8	8	8
Days/Week:	5	5	5

Notes: Total: 257 employees. Occasional Saturday operation. Normally, Monday through Friday operation. Rarely work on Sundays.

**Water Source & Usage**

Source:	Volume (GPD):	Usage:	Volume (GPD):
City:	40,814	Process:	18,494
Landlord:		Sanitary:	4,620
Other:		Consumed in Product:	3,600
Other:		Evaporation:	7,800
Other:		Other:	6,300
Total:	40,814	Total:	40,814
List all water account number(s):	037-9050-00-00-0		
List wastewater account number(s):	048-0102-00-00-0		
If applicable.			

Notes: Other usages; Total 6,300 lawn sprinkler system: 2,000 gpd, acid flume scrubber: 1,300 GPD (closed-loop), assembly and casting: 1,700 gpd, and boiler feed 1,300 gpd. Water baths used for cooling of product. Sanitary; 231 (number of employees) x 20 gpd = 4,620 gpd.

Process usage average of City's Industrial Monitoring from the 2009-2010 Compliance year for Outfall #001, wastewater flow meter measuring flow for Outfall #001.

**Permit Compliance Appendix**

**Industrial User Permit**

1. Does the facility have a copy of its 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.*

Oil & Grease 530 mg/L (Daily Maximum) – City Outfall #001 (4/6/11)

\*Other violations include: three failures to monitor, one late submission, and one failure to provide unrestricted access.

See Attachment #3

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.*

On June 14, 2011 Control Authority Representatives met with Permittee at Permittee's request to discuss violations. Permittee will perform extra analysis of the black line for the next 6 months in an attempt to ascertain if there are any unknown phenomena that need to be investigated further. Additionally, training will be conducted regarding review of plant disposal practices and waste stream segregation.

1. Has the Industrial User's permit been modified for good causes since the permit was granted?  Yes,  No  
*If yes, list causes and modifications.*

2. Has the Industrial User's permit been assigned or transferred to a new owner and/or operator since the permit was issued?  Yes,  No  
*If yes, list new owner and/or operator and give date assigned or transferred.*

Although the plant is still a division of Exide Technology, it is now known as GNB Industrial Batteries; a name change for all industrial battery plants with Exide worldwide.

3. Has the Permittee increased or decreased the use of potable or process water?  Yes,  No,  
*If yes, explain.*  Not Applicable  
 Increased water use.  Decreased water use.

**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



**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.*

Chemical precipitation, filtration, neutralization, pH correction, ferric chloride, sodium hydroxide, and polymer flocculent. Physical treatment; filter press, clarifier, and sand filter.

1. Number of pretreatment operators on staff: 5

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: 2                      Class II:                      Class III: 1                      Class IV:

Comments: Three (3) employees hold Advance Industrial License, 1-Basic Industrial, 2-Class I, and 1-Class 3

Name:	License #:	Class:	Date Issued:	Expires:
Larry King	009988	Industrial (A)	8/12/2011	6/30/2013
Craig E. Morrow	009989	Industrial (A)	8/12/2011	6/30/2013
Joel D. Stiffler-EHS Mgr	009991	Industrial (A)	8/12/2011	6/30/2013
Karl S. Thornell	007376	Municipal (1)	7/1/2011	6/30/2013
Samuel L. McFerran	006165	Municipal (3)	7/1/2011	6/30/2013
Clif L. Sutton	004302	Municipal (1)	7/1/2011	6/30/2013
Melissa Birt-EHS Tech	010626	Industrial (B)	8/12/2011	6/30/2013

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.):  
 N/A

**Bypass Of Treatment Facilities**

1. Has the Permittee bypassed treatment facilities?  Yes,  No  
*If yes, detail below.*  N/A  
*If no, or not applicable, skip section.*

2. Is bypass unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist?  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

C-18/26

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:

**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,  N/A  
*If yes, detail below. If no, or not applicable, skip section.*
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,  N/A  
*If yes, list wastes, disposal methods, contractor, etc.*  
*If no, explain.*

Filter press solids recycled for lead to Frisco, Texas, GNB facility. Trash (boots, coveralls, etc.) to Univar, North Little Rock, Arkansas. Final disposal destination Clean Harbors, Waynoka, Oklahoma. Compressor oil and used oil to Used Service, Bethany, Oklahoma.

2. Is the Permittee complying with any additional local and State standards including such standards or requirements that may become effective during the term of this permit?  Yes,  No,  N/A  
*If yes, list additional standards. If no, explain.*

Air Permit number 0288-AR-14 and stormwater permit number ARR000064.  
See Attachment #4

**Process Control Laboratory**

- 1. Does the Permittee operate its' own laboratory for pretreatment process controls?  Yes,  No  
*If yes, list parameters analyzed and any additional comments. If no, skip section.*
- 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

Monitoring of pH; other process control measurement performed by Chem Lab. Permittee monitor pH at the pretreatment facility to ensure pH is within range of effluent limitations and for the purpose of chemical adjustments to make sure the facility is operating accordingly.

**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?  Yes,  No,  N/A  
*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.*

Sampling at the designated outfalls conducted by Chem Lab 4210 Wheeler Ave. Fort Smith, AR 72901-6654 (479) 646-1586

- 2. Has Control Authority been notified and has Control Authority approved the changing of any sampling points?  Yes,  No,  N/A

**Flow Measurement**

- 1. Does the Permittee utilize a wastewater flow meter(s) or water meter(s) for flow determination?  Wastewater Flow Meter(s)  
*If wastewater meter, list type(s) used and complete section.*  Water Meter(s)  
*If water meter used, skip section.*

Wastewater flow meter used at Outfall #002, ISCO flow meter, bubbler type, with a Parshall flume as the primary measuring device. Wastewater flow meter for Outfall #001 ultrasonic type meter with a Parshall Flume as the primary measuring device. Both meters read in gallons per day with no multiplication factor.

Wastewater meters have been moved to a lockable weatherproof enclosure located outside of the main building.

- 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

**Self Monitoring Procedures**

*Not applicable if no discharge and self monitoring requirements suspended; skip section.*  N/A

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,  N/A

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):

Chem Lab 4210 Wheeler Ave. Fort Smith, AR 72901-6654 (479) 646-1586

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:

Chem Lab 4210 Wheeler Ave. Fort Smith, AR 72901-6654 (479) 646-1586

Environmental Services 1107 Century Street Springdale, AR 72762 (479) 750-1170

*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.

**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.*  N/A  
*(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?
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No
	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No

**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?  Yes,  No

*If yes, detail below. If no, skip section.*

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

Significant Industrial User Report

Inspection Date: 6/28/2011

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

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?  Yes,  No

*If yes, detail below. If no, skip section.*

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

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.*

Categorical requirements: Battery Manufacturing as outlined in 40 CFR part 4611

See Attachment #5

C-15/26

**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
<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No

**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  
 N/A

**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?  Yes,  No  
 N/A

*If not applicable, skip next question.*

2. Did the Permittee give notice to the Control Authority 90 days prior to the above planned changes?  Yes,  No  
 N/A

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  
 N/A

C-16/26

**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,  N/A

**Facility Site Inspection**

**Spill Prevention**

- 1. Does the facility have a spill prevention plan?  Yes,  No

*If no, skip next question.*

Emergency Contingency 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

- 2. Are adequate precautions being taken and proper procedures followed to prevent accidental spills and slug loads?  Yes,  No

C-18/26



Chemical and Hazardous Waste Storage		
Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)
See attachment provided by Permittee. Permittee reviews all MSDS's, updates list and forwards any		
changes to the Control Authority. No floor drains in the facility. Paste department closed loop system, no		
discharge.		
See Attachment #6		
Chemicals not listed in attached list.		
Finishing area (Navy Line)		
Ammonia	(4) 0.5 gallon containers	No floor drains

C-18/26

**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?  Yes,  No,  N/A

*Not applicable if no pretreatment equipment, skip section.*

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

Preventive Maintenance (PM) schedule for equipments

**Manufacturing Facilities**

1. Were manufacturing or production facilities inspected?  Yes,  No,  N/A  
*Not applicable if no manufacturing or production facilities.*

**Pretreatment Facilities**

1. Were pretreatment facilities inspected?  Yes,  No,  N/A  
*Not applicable if no pretreatment equipment.*

**Self Monitoring Procedures**

1. List any comments regarding observation of the Industrial User's self monitoring procedures:

**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.*

C-20/26

Slug Control Plan Evaluation Appendix

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?  Yes,  No

*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.*

- 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 updated 2011

- 3. Is the SIU a batch discharger?  Yes,  No

*If yes, provide a brief description of discharge practices, including non-routine batch discharges.*  
Process control sampling and testing before discharge of wastewater. Required to monitor flow; daily discharge information reported.

- 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.*  
Secondary containment pallets for diesel fuel and acid storage. No floor drains directly connected to sewer system.

- 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.*  
Chemical precipitation, filtration, neutralization, pH correction, ferric chloride, sodium hydroxide, and polymer flocculent. Physical treatment; filter press, clarifier, and sand filter.

C-21/26

Slug Control Plan Evaluation Appendix

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).*

No floor drains directly connected to sewer system; secondary containments are used throughout the facility in chemical storage areas (flammable cabinets).

**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;”

**Categorical Requirements**

1. Is the Permittee subject to regulation by categorical standards?  Yes,  No  
Category: Battery Manufacturing as outlined in 40 CFR part 461
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

**Additional Categorical Requirements**

1. Does the Permittee have additional categorical pretreatment standards particular to the industrial user?  Yes,  No  
*If no, skip section.*  
Additional Category:
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

**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

**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

TTO's tested and submitted with latest compliance report.

**TOMP**

1. Has the Permittee submitted a Toxic Organic Management Plan (TOMP), in lieu of testing, and has the Control Authority accepted the plan?  Yes,  No

*If no, skip section.*

*If yes, a detailed review of the TOMP, including inspection to verify that the plan, must be performed.*

**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.



**Attachments Appendix**

1. Listing and description of permitted outfall and effluent limitations.
2. Permittee's self-monitoring requirements.
3. List of Violations for Exide Technologies during the 2010-2011 compliance years (to date).
4. List of permits from ADEQ issued to Exide Technologies.
5. Special Conditions (Part 4 of Permit # SIU036304) for Exide Technologies.
6. Exide Technologies Chemical Inventory List.

C-26/26

**Facility**  
 Exide Technologies  
 4115 South Zero Street  
 Fort Smith, AR 72903

**Permit no.**  
 SIU 036304

**Flow in Gallons**  
 Min. Avg. Max.  
 28,349 28,349 28,349

Monitoring Period		
Year	Month	Day
11	08	01
	to	
11	08	31

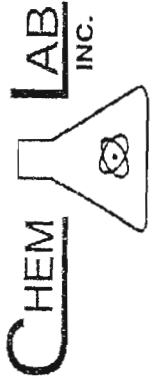
Grab Parameter		Concentration				Quantity or Loading				Number of Exceed	Frequency of Testing	Sample Type
		Min	Avg	Max	Units	Min	Avg	Max	Units			
pH	Sample Measure	8.48	8.48	8.48	SU					0	1/mo.	Grab
pH	Permit Require	6.00		11.0	SU						1/mo.	Grab
Oil & Grease	Sample Measure	16.4	16.4	16.4	mg/L					0	1/mo.	Grab
Oil & Grease	Permit Require			150	mg/L						1/mo.	Grab
<b>Composite Metals</b>												
Cadmium	Sample Measure	0.052	0.052	0.052	mg/L					0	1/mo.	24 hr. Comp.
Cadmium	Permit Require			REPORT	mg/L						1/mo.	24 hr. Comp.
Copper	Sample Measure	0.074	0.074	0.074	mg/L					0	1/mo.	24 hr. Comp.
Copper	Permit Require			REPORT	mg/L						1/mo.	24 hr. Comp.
Lead	Sample Measure	0.038	0.038	0.038	mg/L					0	1/mo.	24 hr. Comp.
Lead	Permit Require			REPORT	mg/L						1/mo.	24 hr. Comp.
Zinc	Sample Measure	1.48	1.48	1.48	mg/L					0	1/mo.	24 hr. Comp.
Zinc	Permit Require			REPORT	mg/L						1/mo.	24 hr. Comp.
<b>Composite Parameter</b>												
BOD	Sample Measure	162	162	162	mg/L	38.3	38.3	38.3	PPD	0	1/mo.	24 hr. Comp.
BOD	Permit Require			450	mg/L			180	PPD		1/mo.	24 hr. Comp.
TSS	Sample Measure	195	195	195	mg/L	46.1	46.1	46.1	PPD	0	1/mo.	24 hr. Comp.
TSS	Permit Require			430	mg/L			180	PPD		1/mo.	24 hr. Comp.

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

Signature: *Richard Haestner* Date: 9-7-11  
 Title: *Plant Manager*

RECEIVED  
 SEP 07 2011  
*JH*

D1-1/7



**ANALYTICAL SERVICES**

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

Phone (479) 646-1595  
FAX (479) 646-9148  
Emergency Numbers

(479) 420-9033  
(918) 658-5127

Site/Facility Location  
Client Sample I.D.  
Date of Sample  
Lab I.D.#

Exide Technology  
Fort Smith,  
Efflu  
8/10  
11-08-08

Client- Exide Technologies


Date/Time Sampler on- 8/9/11 11:24  
Date/Time Sampler off- 8/10/11 10:39  
Date/Time Received in Lab- 8/10/11 11:30  
Collected From- Outfall #001

Control Number-- 11-08-0860  
Meter On Reading-- 6813860  
Meter Off Reading-- 6817650  
Difference-- 3790  
Units-- Cubic Feet

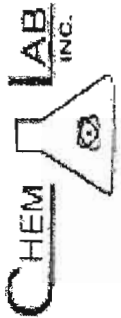
Report issued-- 8/16/11  
PO Number--  
Sample ID-- Effluent  
Sample Phase-- Liquid

Parameter	Concentration	Units	Collected By	Date/Time	Analyzed @	By	Date/Time	Method	Batch #	Blank Value	LFB % Recovery		Spike % Recovery		Spike Dup % Recovery		
											Less than MDL	Acceptable Range	Acceptable Range	Acceptable Range	Acceptable Range	Acceptable Range	
<b>Grab</b>																	
pH	8.48	SU	TD	8/9/11 11:30	TD	8/9/11 11:37	SM 4500-H+B	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Temperature	30.3	°C	TD	8/9/11 11:30	TD	8/9/11 11:36	SM 2550 B	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oil & Grease	16.4	mg/L	TD	8/9/11 11:38	DE	8/12/11 18:30	SM 5520 B	8279	yes	-5.14	97.2	96.1	101	55.8 to 127	55.8 to 127	55.8 to 127	55.8 to 127
<b>24 Hour Composite</b>																	
BOD	162	mg/L	TD	8/10/11 10:39	DE	8/11/11 16:50	SM 5210 B	8276	yes	7.93	98.7	N/A	N/A	N/A	N/A	N/A	2.001
TSS	195	mg/L	TD	8/10/11 10:39	DE	8/12/11 8:05	SM 2540 D	8277	yes	4.72	N/A	N/A	N/A	N/A	N/A	N/A	5.001
Cadmium	0.052	mg/L	TD	8/10/11 10:39	JC	8/11/11 8:28	SM 3120 B	8275	yes	-1.54	117	85.2	86.5	20.0 to 145	20.0 to 145	20.0 to 145	0.001
Copper	0.074	mg/L	TD	8/10/11 10:39	JC	8/11/11 8:28	SM 3120 B	8275	yes	-1.40	114	75.9	77.0	42.3 to 130	42.3 to 130	42.3 to 130	0.006
Lead	<0.038	mg/L	TD	8/10/11 10:39	JC	8/11/11 8:28	SM 3120 B	8275	yes	1.95	85.0	102	100	5.43 to 158	5.43 to 158	5.43 to 158	0.015
Zinc	1.48	mg/L	TD	8/10/11 10:39	DE	8/11/11 8:28	SM 3120 B	8275	yes	-1.36	130	73.5	74.5	26.7 to 131	43.3 to 152	43.3 to 152	0.005

# symbol denotes matrix interference

Approved by   
Date 8/16/11

D1 - 2/7



ANALYTICAL SERVICES

4302 Wheeler Av  
Fort Smith, AR 72801  
Ph: (479) 545-1335  
Fax: (479) 445-8148  
e-mail: [slservice@earthlink.net](mailto:slservice@earthlink.net)

CHAIN OF CUSTODY RECORD

Emergency Numbers  
Air Con: 479 420 8008  
Dist. Eds. 918 658 2127

Sample Series #: 11-8-08-20  
Date Date:

Conditioner Type  
1 HOPE  
2 S02S  
3 VVOA  
4 O-Clear

Sample Type  
1 Water  
2 Ice  
3 Sludge  
4 Oil  
5 Other  
6 TOX Metals  
7, 8, 9, 10, 11, 12

Company: Exide Technologies  
4116 South Zero Street  
Fort Smith, AR 72803  
Phone #: 479 545 8541  
P.O. #:

Client Contact: Josef Bilbrick  
Project: Municipal Wastewater Report  
Site Location: Oufell #001  
e-mail: [jeff.stitt@epa.gov](mailto:jeff.stitt@epa.gov)

Sample #	Client Sample Identification	Sample Type	Container Size	Container Type	Sampling Date/Time	Preservative	ANALYSES REQUESTED											
							pH			Cd, Cu, Pb, Zn			TSS			DOC		
1	Grab	1	200mL	H	8-9-11 11:30	N/A	1	2	3	4	5	6	7	8	9	10	11	12
2	Grab	1	1000mL	G	8-9-11 11:37	H2SO4	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3	Composite	1	1000mL	H	8-10-11 12:39	ICE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	Composite	1	1000mL	H	8-10-11 12:39	ICE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	Composite	1	125mL	H	8-10-11 12:39	HNO3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Composite Duration			24=2		Hours		Time Analyzed		Analyst		
Date/Time Sampler On	8-2-11	11:24								TO	TD
Meter #1 On Reading	6817	640									
Meter #1 Off Reading	6817	650									
Meter #1 Units		Gallons									
Meter #2 On Reading											
Meter #2 Off Reading											
Meter #2 Units											

Sample Condition: 7.6 Sampler: [Signature]

Received By:	
DATE: 8-10-11	TIME: 11:30
DATE: 8-10-11	TIME: 11:50

Special Instructions:  RUSH DATE REQUIRED (Additional costs may apply)  REGULAR (Ten calendar days)

D1877

**Facility**  
 Exide Technologies  
 4115 South Zero Street  
 Fort Smith, AR 72903

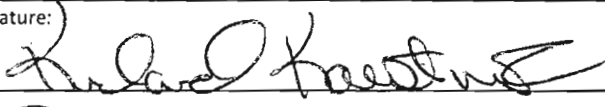
**Permit no.**  
 SIU 036304

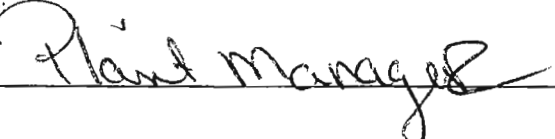
Monitoring Period		
Year	Month	Day
11	07	01
	to	
11	07	31

Flow in Gallons		
Min.	Avg.	Max.
67,749	67,749	67,749

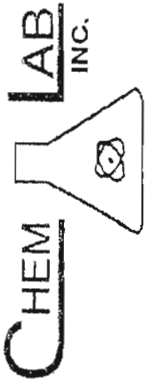
Grab Parameter		Concentration				Quantity or Loading				Number of Exceed	Frequency of Testing	Sample Type
		Min	Avg	Max	Units	Min	Avg	Max	Units			
pH	Sample Measure	7.84	7.84	7.84	SU					0	1/mo.	Grab
pH	Permit Require	6.00		11.0	SU						1/mo.	Grab
Oil & Grease	Sample Measure	2.50	2.50	2.50	mg/L					0	1/mo.	Grab
Oil & Grease	Permit Require			150	mg/L						1/mo.	Grab
<b>Composite</b>												
<b>Metals</b>												
Cadmium	Sample Measure	0.003	0.003	0.003	mg/L					0	1/mo.	24 hr. Comp.
Cadmium	Permit Require			REPORT	mg/L						1/mo.	24 hr. Comp.
Copper	Sample Measure	0.028	0.028	0.028	mg/L	0.016	0.016	0.016	PPD	0	1/mo.	24 hr. Comp.
Copper	Permit Require			REPORT	mg/L		0.140	0.264	PPD		1/mo.	24 hr. Comp.
Lead	Sample Measure	0.038	0.038	0.038	mg/L	0.021	0.021	0.021	PPD	0	1/mo.	24 hr. Comp.
Lead	Permit Require			REPORT	mg/L		0.028	0.058	PPD		1/mo.	24 hr. Comp.
Zinc	Sample Measure	0.025	0.025	0.025	mg/L					0	1/mo.	24 hr. Comp.
Zinc	Permit Require			REPORT	mg/L						1/mo.	24 hr. Comp.
<b>Composite</b>												
<b>Parameter</b>												
BOD	Sample Measure	8.81	8.81	8.81	mg/L	4.98	4.98	4.98	PPD	0	1/mo.	24 hr. Comp.
BOD	Permit Require			450	mg/L			180	PPD		1/mo.	24 hr. Comp.
TSS	Sample Measure	16.4	16.4	16.4	mg/L	9.27	9.27	9.27	PPD	0	1/mo.	24 hr. Comp.
TSS	Permit Require			430	mg/L			180	PPD		1/mo.	24 hr. Comp.

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

Signature:  Date: 9-7-11

Title: 

D1-4/7



ANALYTICAL SERVICES

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

Phone (479) 646-1585  
FAX (479) 646-9148  
Emergency Numbers


(479) 420-9033  
(918) 658-5127

Exide Technolo  
Fort Smith  
Site/Facility Location  
Client Sample I.D.  
Date of Sample  
Lab I.D.#

Client-- Exide Technologies  
Control Number-- 11-08-0861  
Date/Time Sampler on-- 8/9/11 11:30  
Date/Time Sampler off-- 8/9/11 10:45  
Report Issued-- 8/16/11  
PO Number--  
Sample ID-- Effluent  
Sample Phase-- Liquid  
Total Flow= 6774  
Units-- Gall  
Meter On Reading-- 15305979  
Meter Off Reading-- 15373728  
Difference-- 67749  
Units-- Gallons

Parameter	Concentration	Units	Collected By	Collected @ Date/Time	Analyzed By	Analyzed @ Date/Time	Method	Batch #	Blank Value Less than MDL	RPD Value Acceptable Range	LFB % Recovery Acceptable Range	Spike % Recovery Acceptable Range	Spike Dup % Recovery Acceptable Range	#
Grab														
pH	7.84	SU	TD	8/9/11 11:35	TD	8/9/11 11:41	SM 4500-H+ B	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Temperature	33.1	°C	TD	8/9/11 11:35	TD	8/9/11 11:40	SM 2550 B	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Oil & Grease	<2.50	mg/L	TD	8/9/11 11:34	DE	8/12/11 18:30	SM 5520 B	8279	yes	-5.14 -17.1 to 19.5	97.2 55.8 to 127	96.1 55.8 to 127	101 55.8 to 127	101
24 Hour Composite														
BOD	8.81	mg/L	TD	8/10/11 10:45	DE	8/11/11 16:50	SM 5210 B	8276	yes	7.03 -18.1 to 19.6	98.7 87.5 to 112	N/A	N/A	2.00
TSS	16.4	mg/L	TD	8/10/11 10:45	DE	8/12/11 8:05	SM 2540 D	8277	yes	4.72 -25.1 to 20.9	N/A	N/A	N/A	0.80
Cadmium	0.003	mg/L	TD	8/10/11 10:45	JC	8/11/11 8:28	SM 3120 B	8275	yes	-1.54 -23.4 to 19.0	117 20.0 to 145	85.2 20.0 to 145	86.5 20.0 to 145	0.00
Copper	0.028	mg/L	TD	8/10/11 10:45	JC	8/11/11 8:28	SM 3120 B	8275	yes	-1.40 -11.9 to 13.4	114 42.3 to 130	75.9 42.3 to 130	77.0 42.3 to 130	0.00
Lead	<0.038	mg/L	TD	8/10/11 10:45	JC	8/11/11 8:28	SM 3120 B	8275	yes	1.95 -39.4 to 29.0	85.0 6.52 to 147	102 5.43 to 158	100 5.43 to 158	0.01
Zinc	0.025	mg/L	TD	8/10/11 10:45	DE	8/11/11 8:28	SM 3120 B	8275	yes	-1.36 -18.9 to 17.7	130 26.7 to 131	73.5 43.3 to 152	74.5 43.3 to 152	0.03

# symbol denotes matrix interference

Approved by   
Date 8/16/11

01-5/7



ANALYTICAL SERVICES

4302 Whicker Av  
Ft. Smith, AR 72801  
ph: (479) 645-1565  
Fax (479) 645-9148  
email: [chemlabinc@comcast.com](mailto:chemlabinc@comcast.com)

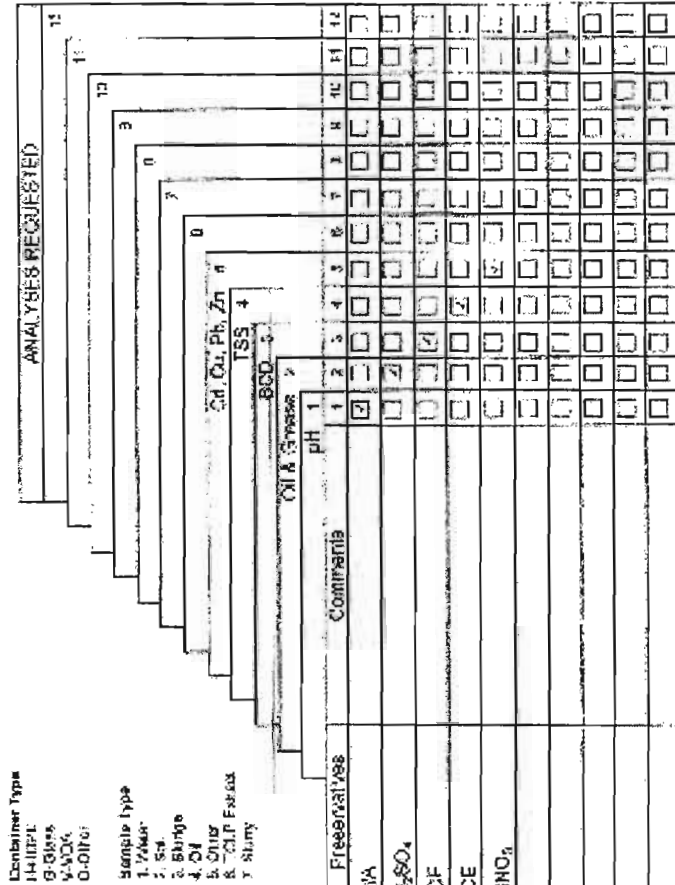
CHAIN OF CUSTODY RECORD

Intercept by N. intake  
Infile: 42942010858  
Den E#s: 915329, 9127

Sample Series #: 11-8-0361  
DUG DRUG:

Container Type  
1-HHPEL  
2-Glass  
3-WDVA  
4-Other

Sample Type  
1-Water  
2-Sol  
3-Sponge  
4-Oil  
5-Other  
6-CLP Fumes  
7-Slurry



Company: **Elite Technologies**  
3-15 South Zero Street  
Ft. Smith, AR 72803  
Phone #: 479-646-9341  
P.O.#:  
Client Contact: **Joni Stuffer**  
Project: **Monthly Wastewater Report**  
Site Location: **Outlet #002**  
e-mail: [cal@elite-tech.com](mailto:cal@elite-tech.com)

Sample #	Client Sample Identification	Sample Type	Container Size	Container Type	Sampling Date/Time	Preservatives	Comments
1	Grab	?	200mL	H	8-9-11 11:35	N/A	
2	Grab	?	1000mL	G	8-9-11 11:34	H <sub>2</sub> O <sub>2</sub>	
3	Composite	?	1000mL	H	8-10-11 10:45	ICE	
4	Composite	?	1000mL	H	8-10-11 10:45	ICE	
5	Composite	?	125mL	H	8-10-11 10:45	HNO <sub>3</sub>	

Time Analyzed	Analyst
pH= 7.84 SU	TD
Temp= 33.1 °C	
Chlorine (as res.)	mg/L
D.O.=	mg/L
Flow=	

Composite Duration	Hours	Sampler
Date/Time Sampler on: 8-9-11 11:30		
Meter #1 On Reading: 913785.979	Date/Time Sampler off: 8-10-11 10:45	
Meter #1 Off Reading: 915377.728	Meter #2 On Reading	
Meter #1 Units: Gallons	Meter #2 Off Reading	
	Meter #2 Units	

Sample Condition: 7c

Refrigorated By: TD DATE: 8-10-11 TIME: 11:30

Refrigorated By: Joni Stuffer DATE: 8-10-11 TIME: 11:30

Special Instructions: Joni Stuffer

RUSH DATE REQUIRED (Additional costs may apply)

REGULAR (Ten calendar days)

D1-6/7

# WATER USAGE REPORT

<b>Aug-11</b>	yellow = daily averages
---------------	-------------------------

**GNB Industrial Power -  
Exide Technologies  
4115 S. Zero  
Ft. Smith, AR 72908**

**Permit  
SIU 036304**

**Monitoring period  
From 8/1/2011 To 8/31/2011**

Date	Meter	Gallons	
August 1	15073907	32240	
2		33579	Tue
3	15141064	33579	Wed
4	15163866	22802	
5	15195962	32096	Fri
6		22784	Sat
7		22784	Sun
8	15264313	22784	Mon
9	15301466	37153	
10	15358853	57387	
11	15392798	33945	
12	15436538	43740	Fri
13	15483142	46604	Sat
14		31369	Sun
15	15545879	31369	
16	15566330	20451	
17	15609070	42740	
18	15649455	40385	
19	15693912	44457	Fri
20	15751062	57150	Sat
21		22735	Sun
22	15796531	22735	
23	15829661	33130	
24	15869262	39601	
25	15915438	46176	
26	15960896	45458	Fri
27	16023756	62860	Sat
28		22385	Sun
29	16068525	22385	
30	16108204	39679	
31	16150839	42635	
31-Jul	15041667		
1-Sep	16190813		

**Min Flow 20451  
Max Flow 62860  
Avg Flow 35779.74**

**8/2 - 8/3 avg = 33578.5 gal/day**

**8/6 - 8/8 avg = 22783.667 gal/day**

**8/14 - 8/15 avg = 31368.5 gal/day**

**8/21 - 8/22 avg = 22734.5 gal/day**

**8/28 - 8/29 avg = 22384.5 gal/day**

**Gallons used  
1109172**

**Avg per day  
35780**

*DAI/7*



C 174/3

## Monthly Violations Report

Company:

Sample Date: Violations:

---

City of Arkoma (Outfall #001)	9/7/2010	TSS 460 mg/l or 474 ppd.
City of Arkoma (Outfall #003)	11/3/2010	Copper (Cu) 2.881 mg/l (Daily Maximum)
Exide Technologies (Outfall #001)	4/6/2011	O&G 530 mg/l
Exide Technologies (Outfall #001)	7/7/2011	TSS 1420 mg/l and 250 ppd.
Gerdau MacSteel	5/3/2011	Zinc 2.443 PPD (Daily Maximum); Zinc 0.672 PPD (Monthly Average)
Gerdau MacSteel	6/2/2011	Zinc 0.573 PPD (Monthly Average)
Gerdau MacSteel	7/21/2011	Zinc 1.316 PPD (Daily Maximum); Zinc 0.483 PPD (Monthly Average)
Hiland Dairy Co.	8/5/2010	BOD 501 mg/l or 353 ppd.
Hiland Dairy Co.	9/9/2010	BOD 800 mg/l or 551 ppd.
Hiland Dairy Co.	9/27/2010	BOD 598 mg/l or 357 ppd.
Hiland Dairy Co.	11/15/2010	BOD 680 mg/l or 268 ppd.
Hiland Dairy Co.	11/22/2010	BOD 501 mg/l or 283 ppd.
Hiland Dairy Co.	12/13/2010	BOD 492 mg/l or 227 ppd.
Hiland Dairy Co.	12/27/2010	BOD 754 mg/l or 312 ppd.
Hiland Dairy Co.	1/4/2011	BOD 1250 mg/l or 820 ppd. TSS 508 mg/l or 333 ppd.
Hiland Dairy Co.	1/5/2011	Oil & Grease 390 mg/l

D2-1/5

Company:

Sample Date: Violations:

---

Hiland Dairy Co.	2/7/2011	BOD 998 mg/l or 947 ppd
Hiland Dairy Co.	2/15/2011	BOD 716 mg/l or 480 ppd
Hiland Dairy Co.	4/19/2011	BOD 635 mg/l or 246 ppd.
Hiland Dairy Co.	4/26/2011	BOD 586 mg/l or 361 ppd.
Hiland Dairy Co.	5/3/2011	TSS 2,225 mg/l or 1,413 ppd & BOD 3,700 mg/l or 2,349 ppd
Hiland Dairy Co.	5/9/2011	BOD 642 mg/l or 449 ppd.
Hiland Dairy Co.	5/17/2011	BOD 1133 mg/l or 484 ppd.
Hiram Walker Pernod Ricard USA	1/6/2011	BOD 686 mg/l or 337 ppd.
Mars Petcare	4/13/2011	TSS 1000 mg/l or 298 ppd
Southern Steel & Wire Co.	11/2/2010	Zinc (Zn) 6.972 mg/l (Daily Max)
Southern Steel & Wire Co.	11/9/2010	Zinc (Zn) 8.375 mg/l (Daily Max.)
Southern Steel & Wire Co.	11/29/2010	Zinc (Zn) 11.187 mg/l (Daily Max); Zinc 7.01 mg/L (Monthly Average)
Southern Steel & Wire Co.	12/1/2010	Zinc (Zn) 3.701 mg/l (Daily Max)
Southern Steel & Wire Co.	1/13/2011	Zinc (Zn) 4.147 mg/l (Daily Max); Zinc (ZN) 3.57 mg/L (Monthly Average)
Sparks Regional Medical Center (Outfall #001)	3/1/2011	Oil & Grease 310 mg/L
St. Edward Mercy Medical Center	8/23/2010	TSS 1,010 mg/l or 1,809 ppd & BOD 462 mg/l or 827 ppd

D2-2/5

Company:	Sample Date:	Violations:
St. Edward Mercy Medical Center	8/25/2010	TSS 900 mg/l or 1,897 ppd
St. Edward Mercy Medical Center	11/23/2010	BOD 460 mg/l or 777 ppd
St. Edward Mercy Medical Center	1/18/2011	TSS 1,280 mg/l or 2,465 ppd & BOD 652 mg/l or 1,256 ppd
St. Edward Mercy Medical Center	3/9/2011	TSS 906 mg/l or 1,347 ppd & BOD 516 mg/l or 767 ppd
St. Edward Mercy Medical Center	3/16/2011	TSS 1,352 mg/l or 3,011 ppd & BOD 576 mg/l or 1,283 ppd
St. Edward Mercy Medical Center	3/21/2011	TSS 940 mg/l or 2,310 ppd & BOD 544 mg/l or 1,337 ppd
St. Edward Mercy Medical Center	3/28/2011	BOD 453 mg/l or 784 ppd
St. Edward Mercy Medical Center	4/5/2011	TSS 500 mg/l and 842 ppd
Trane U.S. Inc.(Outfall #002)	11/4/2010	Copper (Cu) 3.724 mg/l
Twin River Foods (Navy Road)	7/12/2011	TSS 600 mg/l and 265 ppd
Tyson Foods, Inc.	12/15/2010	Oil & Grease 200 mg/L
William Works, LLC dba Fort Smith Industrial	9/21/2010	BOD 4794mg/l or 456 ppd
William Works, LLC dba Fort Smith Industrial	9/27/2010	BOD 4073 mg/l or 228 ppd.
William Works, LLC dba Fort Smith Industrial	10/13/2010	Oil & Grease 230 mg/L
William Works, LLC dba Fort Smith Industrial	10/19/2010	Oil & Grease 980 mg/L
William Works, LLC dba Fort Smith Industrial	10/26/2010	Oil & Grease 240 mg/L

D2-3/5

Company:

Sample Date: Violations:

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William Works, LLC dba Fort Smith  
Industrial

11/18/2010 Oil & Grease 410 mg/L

William Works, LLC dba Fort Smith  
Industrial

12/15/2010 Oil & Grease 740 mg/L

William Works, LLC dba Fort Smith  
Industrial

1/27/2011 Oil & Grease 1300 mg/l

02-4/5

## Monthly Violations Summary

August 1, 2011 through July 31, 2012

Industrial User	Date of Violation	Violation
Twin River Foods (Navy Rd)	8/23/2011	BOD 532 mg/L or 413 PPD
City of Arkoma (Outfall #001)	9/6/2011	BOD 756 mg/L or 545 PPD (City)
Gerdau	8/11/2011	Zinc 1.424 PPD (Daily Max)- City
Gerdau	8/23/2011	Zinc 0.953 PPD (Daily Max)- City
Twin River (Navy)	8/23/2011	BOD 532 mg/L or 413 PPD (Daily Max) - SIU
Hiland Dairy	9/1/2011	BOD 461 mg/L or 333 PPD (Daily Max) - City
Gerdau	9/6/2011	Zinc 0.788 PPD (Daily Max) - City
Hiland Dairy	9/8/2011	BOD 1618 mg/L or 943 PPD (Daily Max) - City
Gerdau	9/12/2011	Zinc 0.894 PPD (Daily Max) - City
Gerdau	9/13/2011	Zinc 2.584 PPD (Daily Max) - City
Twin River (Navy)	9/14/2011	pH 5.72 SU (Daily Max) - City
Gerdau	9/15/2011	Zinc 0.539 PPD (Monthly Avg) - City/SIU
Hiland Dairy	9/15/2011	BOD 625 mg/L or 337 PPD (Daily Max) - City
Hiland Dairy	9/16/2011	BOD 860 mg/L or 507 PPD (Daily Max) - SIU
Hiland Dairy	9/20/2011	BOD 570 mg/L or 402 PPD (Daily Max) - SIU
Gerdau	9/22/2011	Zinc 2.472 PPD (Daily Max.) - City
Hiland Dairy	9/26/2011	BOD 501 mg/L or 293 PPD (Daily Max) - City

02-5/5

15 July 2011

Paul R. Easley – Environmental Manager  
City of Fort Smith - Control Authority  
3900 Kelley Highway  
Ft. Smith, AR 72904

GNB Industrial Power  
4115 South Zero Street  
Fort Smith, AR 72908  
USA

479-646-8341 tel  
479-649-2143 fax  
www.exide.com

Re: Permit SIU036304  
Exide Technologies, Ft Smith AR.

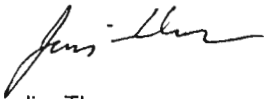
Dear Mr. Easley,

Please accept this Bi-Annual Compliance Report & related documentation for the reporting period of January – June 2011.

Due to our change of name of our division at the beginning of the year, we would like to request that as soon as it is convenient to your office to provide us an updated obtain a copy of our Waste Water permit (#SIU 036304) amended with the plant's new description.

Please contact me at (479) 649-2147 or [Joel.Stiffler@exide.com](mailto:Joel.Stiffler@exide.com) if you require additional information.

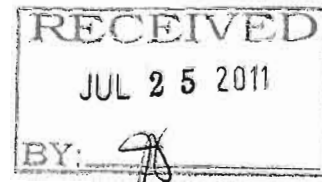
Thank You,



Jim Thomas  
Plant Manager

GNB Industrial Power – Exide Technologies

Fort Smith Manufacturing



Cc: J. Thomas / Exide  
J. Bolea/Exide  
F. Ganster / Exide

D3-1/6







Facility Name: GNB Industrial Power - Exide Technologies	Date: 7/15/11
--	---------------

3. Did the Permittee have any occurrence of an accidental discharge of substances prohibited by Ordinance 46-91 or any slug loads or spills that may enter the public sewer?

*(If answered no to question, skip questions; A through F.)*

Yes,  No

List each occurrence and date of accidental discharge:  
*(Attach additional sheets, if necessary.)*


A. Did the Permittee immediately notify the Control Authority upon the occurrence?  Yes,  No

B. 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

C. Did the Permittee submit to the Control Authority a detailed written report within seven days following the accidental discharge?  Yes,  No

D. 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

E. 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

F. 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

D3 - 4/6

Facility Name: GNB Industrial Power - Exide Technologies	Date: 7/15/11
--	---------------

4. Does the Permittee use wastewater meter(s) or water meter(s) for flow determination?

Wastewater flow meter(s)
  Water meter(s)

*(If no wastewater flow meters are used, skip questions; A through D.)*

List wastewater meter type(s):

6" Leopold-Lagco Flume primary device measured with an ISCO Model 4230 bubbler flow meter

2" Parshall Flume primary device measured with a Milltronics Hydroranger Plus sonic sensor.

A. Are appropriate flow measurement devices installed, calibrated and maintained to ensure that the accuracy of the measurements is consistent with the accepted capability of the type of device being used, including records of verification of maintenance and calibration?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
B. Has the Permittee submitted a written certification of calibration of the flow measurement device(s) 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)?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
C. 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?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
D. Has the Permittee had flow measurement device(s) calibrated by an independent source qualified to install and/or calibrate flow measurement equipment during the current reporting year?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No

**(Attach a copy of written certification of calibration for the current year.)**

5. Is all sampling and analyses conducted for self monitoring being performed by a certified, independent laboratory acceptable to the Control Authority?

Yes,  No

List the name and address of all laboratories conducting self monitoring sampling and/or analysis for the Permittee:  
**(Attach a copy of the current State of Arkansas Laboratory Certification for each laboratory listed.)**

Chem Lab Inc.

4210 Wheeler Ave.

Fort Smith, AR. 72901

Environmental Services Company

1107 Century Ave.

Springdale, AR., 72764

D3-5/6

BI-ANNUAL COMPLIANCE REPORT

Facility Name: GNB Industrial Power - Exide Technologies	Date: 7/15/11
--	---------------

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

Signature: 	Date: 7/19/11
--	---------------

Title: James T. Thomas, Plant Manager

D3 - 6/6



City of Fort Smith  
 Environmental Quality  
 Industrial Monitoring Report

Exide Technologies (Outfall #002)  
 Mr. Richard E. Kaestner  
 4115 South Zero  
 Fort Smith, AR 72903  
 Tel: (479) 646-8341  
 Fax: (479) 649-2143

Permit Number: CIUM036304  
 Industrial Account Number: N-000390  
 Outfall Number: 002  
 Sample Event I.D. Number: 1720901111  
 Sample Date: 9/1/2011  
 Flow (gpd): 37,273

Parameter:	Analysis Result:
pH (Grab):	7.93
Temperature (Degrees Centigrade):	28.5
Oil and Grease (mg/l):	< 5
TSS (mg/l):	10
TSS (ppd):	3

Parameter:	Analysis Result:
BOD (mg/l):	25
BOD (ppd):	8
COD (mg/l):	79
Cyanide (CN), Total (mg/l):	
Flash Point (Degrees Fahrenheit):	

Metal(s) Analysis (mg/l):	
Parameter:	Analysis Result:
Silver (Ag):	< 0.001
Cadmium (Cd):	< 0.001
Chromium (Cr):	< 0.001
Copper (Cu):	0.118
Nickel (Ni):	< 0.001
Lead (Pb):	0.022
Zinc (Zn):	0.005

Other Metal(s) Analysis (mg/l):	
Parameter:	Analysis Result:
Other:	
Other:	
Other:	
Other Metal(s) Analysis (ppd):	
Parameter:	Analysis Result:
Other: Copper	0.037
Other: Lead	0.007

Violations:

Notes:

D4-2/7

City of Fort Smith  
 Environmental Quality  
 Industrial Monitoring Report

Exide Technologies (Outfall #001)  
 Mr. Richard E. Kaestner  
 4115 South Zero  
 Fort Smith, AR 72903  
 Tel: (479) 646-8341  
 Fax: (479) 649-2143

Permit Number: CIUM036304  
 Industrial Account Number: N-000390  
 Outfall Number: 001  
 Sample Event I.D. Number: 1610901111  
 Sample Date: 9/1/2011  
 Flow (gpd): 14,960

Parameter:	Analysis Result:
pH (Grab):	8.22
Temperature (Degrees Centigrade):	28.4
Oil and Grease (mg/l):	56
TSS (mg/l):	491
TSS (ppd):	61

Parameter:	Analysis Result:
BOD (mg/l):	537
BOD (ppd):	67
COD (mg/l):	968
Cyanide (CN), Total (mg/l):	
Flash Point (Degrees Fahrenheit):	

Metal(s) Analysis (mg/l):	
Parameter:	Analysis Result:
Silver (Ag):	< 0.001
Cadmium (Cd):	0.086
Chromium (Cr):	0.002
Copper (Cu):	0.1
Nickel (Ni):	0.02
Lead (Pb):	0.004
Zinc (Zn):	3.334

Other Metal(s) Analysis (mg/l):	
Parameter:	Analysis Result:
Other:	
Other:	
Other:	
Other Metal(s) Analysis (ppd):	
Parameter:	Analysis Result:
Other:	
Other:	

Violations:

Notes:

D4-3/7

**CITY OF FORT SMITH • ENVIRONMENTAL SERVICES  
INDUSTRIAL MONITORING FIELD REPORT**

Sample Location and/or Industrial User: Exide outfall #001 Sample Event No.: 1610901111

**I. SAMPLER AND SAMPLE SET UP INFORMATION**

Date: <u>9/1/11</u>	Time: <u>1109</u>	Sample I.D. No.: <u>1140050</u>
Composite Sample Pacing: <input type="checkbox"/> Flow <input checked="" type="checkbox"/> Time	Sample Interval: <u>60</u>	<input checked="" type="checkbox"/> Minutes <input type="checkbox"/> Pulses
Vol. Selected (mls): <u>100</u>	Sample Type: <input checked="" type="checkbox"/> Composite <input type="checkbox"/> Discrete	Sampler Installation: <input type="checkbox"/> Manhole <input checked="" type="checkbox"/> Above Ground
Sample Preservation: <input checked="" type="checkbox"/> Ice Packs <input type="checkbox"/> Refrigeration <input type="checkbox"/> N/A (Ambient Temp. Below 39° F) <input type="checkbox"/> Other (List):		
Security Measures (Sampler Locked): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Technician(s) Initials: <u>KLL</u>

**II. SAMPLER AND SAMPLE TAKE OFF INFORMATION**

Date: <u>9/2/11</u>	Time: <u>1039</u>	No. of Samples Collected: <u>24</u>	Technician(s) Initials: <u>KLL</u>
Composite Sample Description: <u>Straw colored w/ particulates</u>			
Metals: <input checked="" type="checkbox"/> Full Metals (Ag, Ni, Cd, Cr, Zn, Cu, Pb) <input type="checkbox"/> Other (List):			
<input checked="" type="checkbox"/> Check if Composite was Split with Industrial User			

**III. FLOW CALCULATION INFORMATION**

Measurement Device Type: <input checked="" type="checkbox"/> Water meter(s) <input type="checkbox"/> Wastewater Flow Meter(s)	
Meter Readings	
Stop: <u>6699030</u>	
Start: <u>6697030</u>	
Difference: <u>2000</u>	
Multiplication Factor: <u>7.48</u>	Flow In Gallons: <u>14960</u>

**IV. GRAB SAMPLE INFORMATION**

Sample I.D. No.: <u>1140047</u>	Grab Sample Description: <u>Tan w/ particulates</u>					
Sample Type	Date	Time Collected	Time Analyzed	Analyst	Temp. °C	pH (Grab)
Grab	<u>9/1/11</u>	<u>1108</u>	<u>1109</u>	<u>KLL</u>	<u>28.4</u>	<u>8.22</u>
pH - EPA Method 150.1		Temp. - EPA Method 170.1				

Other Grab Samples	Sample Collected	Date & Time Collected	Preservative Used
	<input checked="" type="checkbox"/> Oil & Grease	<u>9/1/11</u> <u>1108</u>	<input checked="" type="checkbox"/> HCl to <2 pH
	<input type="checkbox"/> Cyanide (Total)		<input type="checkbox"/> NaOH to > 12 pH & Ascorbic Acid
	<input type="checkbox"/> Flash Point		N/A

Technician(s) Initials: <u>KLL</u>	<input type="checkbox"/> Check if Grab was Split with Industrial User
------------------------------------	---

**V. COMMENTS**

--

**CITY OF FORT SMITH • ENVIRONMENTAL SERVICES  
INDUSTRIAL MONITORING FIELD REPORT**

Sample Location and/or Industrial User: Exide outfall #002 Sample Event No.: 1720901111

**I. SAMPLER AND SAMPLE SET UP INFORMATION**

Date: 9/1/11 Time: 1119 Sample I.D. No.: 1140049

Composite Sample Pacing:  Flow  Time Sample Interval: 5  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: KLC

**II. SAMPLER AND SAMPLE TAKE OFF INFORMATION**

Date: 9/2/11 Time: 1027 No. of Samples Collected: 36 Technician(s) Initials: KLC

Composite Sample Description: Clear w/ few small black particulates

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	<u>016231440</u>		
Start	<u>016194167</u>		
Difference	<u>37273</u>		

Multiplication Factor: ~~7.48~~ <sup>1000</sup> N/A Flow In Gallons: 37273

**IV. GRAB SAMPLE INFORMATION**

Sample I.D. No.: 1140048 Grab Sample Description: Clear w/ few small black partic

Sample Type	Date	Time Collected	Time Analyzed	Analyst	Temp. °C	pH (Grab)
Grab	<u>9/1/11</u>	<u>1116</u>	<u>1117</u>	<u>KLC</u>	<u>28.5</u>	<u>7.93</u>

pH - EPA Method 150.1 Temp. - EPA Method 170.1

Other Grab Samples	Sample Collected	Date & Time Collected	Preservative Used
	<input checked="" type="checkbox"/> Oil & Grease	<u>9/1/11 1116</u>	<input checked="" type="checkbox"/> HCl to < 2 pH
	<input type="checkbox"/> Cyanide (Total)		<input type="checkbox"/> NaOH to > 12 pH & Ascorbic Acid
	<input type="checkbox"/> Flash Point		N/A

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

**V. COMMENTS**

DA-5/7



**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

Sampling Personnel Signature(s): *Kathy L. Clark*

Sample ID	Date(s) Collected	Time(s) Collected	No. Bottles	Pres. Used	Matrix	Container Type	Requested Analysis				Control Number (For Lab Use Only)	Job Number:	
							Sample Type	G	C	O			
1140049	9/1-2/11	1027	1	A	WW	P							
1140049	9/1-2/11	1027	1	C	WW	P							
1140050	9/1-2/11	1039	1	A	WW	P							
1140050	9/1-2/11	1039	1	C	WW	P							

Relinquished By: *Kathy L. Clark* Date: 9/2/11 Time: 1112

Relinquished By: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Received in Laboratory By: \_\_\_\_\_ Date: 09/02/11 Time: 1112

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 S = Soil  
Container Type: GI = Glass P = Plastic ML = Mixed Liquor O = Other

DA-617

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: CITY OF FORT SMITH		PO No.		ANALYSES REQUESTED <sup>1</sup>										AIC CONTROL NO:	
Project Reference: Industrial Monitoring		SAMPLE MATRIX												AIC PROPOSAL NO:	
Project Manager: RANDY EASLEY		WATER												Carrier/Tracking No.:	
Sampled By: Kristy Cantu, John Hancock		SOIL												Received Temperature C	
AIC No.		GRA B												Remarks	
Sample Identification		COMP												Field pH calibration on @ Buffer:	
1150010		X		DIL & GRISE											
1140047		X		X											
1140048		X		X											
1150011		X		X											
1150014		X		X											
1150015		X		X											
1140051		X		X											
Container Type		PRESERVATIVE													
G = Glass		P = Plastic													
NO = none		S = Sulfuric acid pH2													
Turnaround Time Requested: (Please circle) NORMAL or EXPEDITED IN ___ DAYS		V = VOA vials													
Expeditied results requested by:		N = Nitric acid pH2													
Who should AIC contact with questions: RANDY EASLEY		H = HCl to pH2													
Phone: 479-784-2337 Fax:		B = NaOH to pH12													
Report Attention to: RANDY EASLEY		Relinquished By: Kristy Cantu													
Report Address to:		Date/Time													
		9/8/11 1430													
		Date/Time													
		Received in Lab													
		By:													
		By:													
		Comments: <sup>1</sup> Required Reporting Limit for Metals must be identified on back of COC.													
		FED Ex TRACKING # 8729 9854 1101													

**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of September 1, 2010 to September 1, 2015, 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 final effluent discharge channel located at the permittee's pretreatment facility inside the manufacturing plant at 4925 State Line Road just prior to discharge into the City's sanitary sewer system.

B. During the period of September 1, 2010 to September 1, 2015, 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
Flow (Instantaneous)	Monitor & Report	Monitor & Report
Cadmium (Cd)	0.69 mg/L*	0.26 mg/L*
Chromium (Cr)	2.77 mg/L*	1.71 mg/L*
Copper (Cu)	3.38 mg/L*	2.07 mg/L*
Lead (Pb)	0.69 mg/L*	0.43 mg/L*
Nickel (Ni)	3.98 mg/L*	2.38 mg/L*
Silver (Ag)	0.43 mg/L*	0.24 mg/L*
Zinc (Zn)	2.61 mg/L*	1.48 mg/L*
Cyanide (Total)	1.2 mg/L*	0.65 mg/L*
Total Toxic Organics (TTO's)	2.13 mg/L*	NA

Note: \* Metal Finishing Category 40 CFR Part 433, Pretreatment Standards for Existing Sources (PSES).

*E7-2/2*

PERMIT NO: CIUP040102

**INDUSTRIAL USER PERMIT**

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


Hickory Springs Mfg. Company  
P.O. Box 1667  
Fort Smith, AR 72902

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls 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 and pretreatment program.

This permit became effective on September 1, 2010 and shall expire at midnight on September 1, 2015.

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:  \_\_\_\_\_  
Director of Utilities

E7-1/2

**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of August 31, 2010 to August 30, 2015 the permittee is authorized to discharge process wastewater to the Control Authority sewer system from the outfall(s) listed below.

Description of outfall(s):

<b>Outfall #:</b>	<b>Description:</b>
001	The final effluent weir located in the pretreatment building on the north side of the property of the 6400 Jenny Lind Road facility just prior to discharge into the city's sanitary sewer system.

B. During the period of August 31, 2010 to August 30, 2015 the discharge from outfall #001 shall not exceed the following effluent limitations.

**EFFLUENT LIMITATIONS**

<b>Parameter</b>	<b>Daily Maximum</b>
Oil & Grease	150 mg/L
Biochemical Oxygen Demand (BOD)	450 mg/L or 180 ppd
Total Suspended Solids (TSS)	430 mg/L or 180 ppd
pH (Grab)	6.0 - 11.0 SU
Copper (Cu)	Monitor & Report
Zinc (Zn)	Monitor & Report
Conductivity	Monitor & Report
Total Dissolved Solids	Monitor & Report
Chlorides	Monitor & Report
Trichloroethylene (TCE)	No detectable levels
Cis-1,2-dichloroethylene (cis-1,2-DCE)	No detectable levels

*E6-2/2*

PERMIT NO: SIUM102313

**INDUSTRIAL USER PERMIT**

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

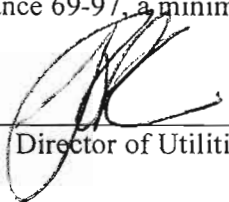
Whirlpool Corporation  
6400 Jenny Lind Road  
Fort Smith, AR 72901

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 will become effective on August 31, 2010 and shall expire at midnight on August 30, 2015.

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:  \_\_\_\_\_  
Director of Utilities

**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of June 30, 2007 to June 30, 2012, 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):

<b>Outfall:</b>	<b>Description:</b>
001	The clean out located on the north side of the plating shop located at 4302 Wheeler Avenue facility just prior to discharge into the City's sanitary sewer system.

B. During the period of June 30, 2007 to June 30, 2012, the discharge from outfall # 001 shall not exceed the following effluent limitations.

**Effluent Limitations**

<b>Parameter</b>	<b>Daily Maximum</b>	<b>4-Day Average</b>
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
Cadmium (Cd)	0.5 mg/L*	0.5 mg/L*
Chromium (Cr)	2.6 mg/L*	2.6 mg/L*
Copper (Cu)	2.4 mg/L*	2.4 mg/L*
Lead (Pb)	0.4 mg/L*	0.4 mg/L*
Nickel (Ni)	2.2 mg/L*	2.2 mg/L*
Silver (Ag)	0.6 mg/L*	0.6 mg/L*
Zinc (Zn)	4.2 mg/L**	2.6 mg/L**
Cyanide (Total)	0.3 mg/L*	0.3 mg/L*
Total Toxic Organics (TTO's)	2.13 mg/L**	NA
Total Metals	10.5 mg/L**	6.8 mg/L**

\* Ordinance 69-97 supercedes categorical standards.

\*\* Electroplating Category PSES (>10,000 gpd) standards. (40 CFR 413)

E5-2/2

**PERMIT NO: CIUP028102**

**INDUSTRIAL USER PERMIT**

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

Fort Smith Plating Co., Inc.  
4302 Wheeler Avenue  
Fort Smith, AR 72901

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 became effective on June 30, 2007 and shall expire at midnight on June 30, 2012.

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:  \_\_\_\_\_  
Director of Utilities



**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of December 31, 2008 to December 31, 2013 the permittee is authorized to discharge process wastewater to the Control Authority sewer system from the outfall(s) listed below.

Description of outfall(s):

**Outfall #: Description:**

001 The clean out located on the northeast corner of the 415 South 10<sup>th</sup> Street facility prior to discharge into the city's sanitary sewer system.

B. During the period of December 31, 2008 to December 31, 2013 the discharge from outfall #001 shall not exceed the following effluent limitations.

**EFFLUENT LIMITATIONS**

Parameter	Daily Maximum
Oil & Grease	150 mg/L
Biochemical Oxygen Demand (BOD)	450 mg/L or 180 ppd
Total Suspended Solids (TSS)	430 mg/L or 180 ppd
pH (Grab)	6.0 - 11.0 SU

EA-2/2

PERMIT NO: SIUP00302

**INDUSTRIAL USER PERMIT**

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

Hiland Dairy Co.  
415 South 10<sup>th</sup> Street  
Fort Smith, AR 72901

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 became effective on December 31, 2008 and shall expire at midnight on December 31, 2013.

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:  \_\_\_\_\_  
Director of Utilities

## PART 1 - EFFLUENT LIMITATIONS

A. During the period of January 1, 2010 to January 1, 2015, 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):

<b>Outfall:</b>	<b>Description:</b>
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, 2010 to January 1, 2015, the discharge from outfall # 001 shall not exceed the following effluent limitations.

### Effluent Limitations

<b>Parameter</b>	<b>Daily Maximum</b>	<b>Monthly Average</b>
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.

PERMIT NO: CIUM109304

**INDUSTRIAL USER PERMIT**

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

Gerdau MacSteel  
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, 2010 and shall expire at midnight on January 1, 2015.

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:  \_\_\_\_\_  
Director of Utilities

**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of November 1, 2010 to November 1, 2015, 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 final effluent channel of the Permittee's pretreatment system plant located on the Southwest corner of the 3501 South Tulsa facility property just prior to discharge into the City's sanitary sewer system.

B. During the period of November 1, 2010 to November 1, 2015, 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
Cadmium (Cd)	0.69 mg/L*	0.26 mg/L*
Chromium (Cr)	2.77 mg/L*	1.71 mg/L*
Copper (Cu)	3.38 mg/L*	2.07 mg/L*
Lead (Pb)	0.69 mg/L*	0.43 mg/L*
Nickel (Ni)	3.98 mg/L*	2.38 mg/L*
Silver (Ag)	0.43 mg/L*	0.24 mg/L*
Zinc (Zn)	2.61 mg/L*	1.48 mg/L*
Cyanide (Total)	1.2 mg/L*	0.65 mg/L*
Total Toxic Organics (TTO's)	2.13 mg/L*	NA

\* Metal Finishing Category 40 CFR Part 433, Pretreatment Standards for Existing Sources (PSES).

*E2-2/2*

PERMIT NO: CIUP084102

**INDUSTRIAL USER PERMIT**

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

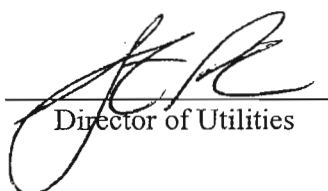
Southern Steel & Wire Co.  
3501 South Tulsa  
Fort Smith, AR 72906

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 became effective on November 1, 2010 and shall expire at midnight on November 1, 2015.

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:  \_\_\_\_\_  
Director of Utilities

**PART 1 - EFFLUENT LIMITATIONS**

A. During the period of November 1, 2010 to November 1, 2015, 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 parshall flume in the manhole closest to the guard building located on the southeast corner of the property in the fenced parking lot of the 4811 South Zero Street facility just prior to discharge into the City's sanitary sewer system.

B. During the period of November 1, 2010 to November 1, 2015, 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
Cadmium (Cd)	0.11 mg/L*	0.07 mg/L*
Chromium (Cr)	2.77 mg/L*	1.71 mg/L*
Copper (Cu)	3.38 mg/L*	2.07 mg/L*
Lead (Pb)	0.69 mg/L*	0.43 mg/L*
Nickel (Ni)	3.98 mg/L*	2.38 mg/L*
Silver (Ag)	0.43 mg/L*	0.24 mg/L*
Zinc (Zn)	2.61 mg/L*	1.48 mg/L*
Cyanide (Total)	1.20 mg/L*	0.65 mg/L*
Total Toxic Organics (TTO's)	2.13 mg/L*	NA

\* Metal Finishing Category 40 CFR Part 433, Pretreatment Standards for New Sources (PSNS).

E1-2/2

PERMIT NO: CIUM00105

INDUSTRIAL USER PERMIT

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

Trane U.S. Inc.  
4811 South Zero Street  
Fort Smith, AR 72903

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 will become effective on November 1, 2010 and shall expire at midnight on November 1, 2015.

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:  \_\_\_\_\_  
Director of Utilities



RECEIVED 70 1 1984

TOXIC ORGANICS MANAGEMENT PLAN

FORT SMITH PLATING COMPANY  
FORT SMITH, ARKANSAS

Fort Smith Plating Company is an industrial and custom electroplater specializing in the application of copper, nickel, chromium, zinc, and gold to base metal parts, as well as, anodizing of aluminum parts.

The cleaning of parts by the solvent 1,1,1,-Trichloroethylene, has been discontinued and replaced by cleaning with alkaline based cleaners. This in effect, eliminates the danger of any toxic organic chemical being discharged into the process water.

After a thorough review of our MSDS, we conclude that none of the 111 chemicals on the TTO list are found in any of the commercial products we use in sufficient enough amounts to pose any danger to the POTW.

For these above stated reasons, Fort Smith Plating will continue to submit the certification form in lieu of the TTO analysis.

F1-1/4

TOXIC ORGANIC SOLVENT MANAGEMENT PLAN

FORT SMITH PLATING COMPANY

FORT SMITH, ARKANSAS

A. DESCRIPTION OF FACILITIES AND TOXICS USED

1. Industrial Process

Fort Smith Plating Company is an independent job shop electroplating company which electroplates copper, nickel, chrome, zinc, and gold and anodizes aluminum.

2. Degreasing

Greasy and oily parts are degreased prior to electroplating. Degreasing consists of suspending the parts in an atmosphere of 1,1,1 Trichloroethane that dissolves the grease. 1,1,1 Trichloroethane is maintained in the bottom of a tank. The tank has a bottom and 4 sides with an open top. The tank is self contained with no openings or drains in the bottom or sides of the tank.

Steam is circulated in pipes in the bottom of the tank to keep 1,1,1 Trichloroethane between 140°F and 180°F. Cold water is circulated in pipes around the outside of the tank about half way between the top and bottom to keep the 1,1,1 Trichloroethane from evaporating.

The parts are lowered into the 1,1,1 Trichloroethane atmosphere and kept there until all grease is dissolved and is removed by gravity. The grease, oil and dirt is collected in the bottom of the tank. The parts are then raised out of the 1,1,1 Trichloroethane atmosphere but still within the tank area where they are air-dried.

3. 1,1,1 Trichloroethane

The 1,1,1 Trichloroethane is used by Fort Smith Plating is purchased from Parker Solvents, Inc. of Fort Smith, Arkansas. In contacting Parker Solvents by phone, they indicated that the 1,1,1 Trichloroethane did not contain any other chemical except for 1,1,1 Trichloroethane.

F1-2/A

B. TOXIC ORGANIC SOLVENT MANAGEMENT PLAN

1. Degreasing Tank

Since the tank is self-contained with no openings or drains in the sides or bottom and since the parts are air-dried within the top part of the tank following degreasing, the 1,1,1 Trichloroethane solvent cannot enter the wastewater stream from the degreasing tank.

2. Storage

The 1,1,1 Trichloroethane is stored in a 55 gallon drum at the location shown on the plot plan. Only one drum of the solvent is kept on the premises at a time.

A concrete block dike will be constructed around the 1,1,1 Trichloroethane storage area for containment of any possible spills. The volume within the concrete block dike will be equal to 55 gallons plus 50% or a total of 82.5 gallons.

3. Spent Solvent Disposal

The degreasing tank is removed and cleaned about twice a year. When the tank is going to be cleaned, no new 1,1,1 Trichloroethane is added to the tank during degreasing. At the time the tank is cleaned, the 1,1,1 Trichloroethane, which is less than one gallon, is allowed to evaporate. The oil and grease residue in the bottom, about 10 gallons a cleaning, is poured on the dirt driveway.

4. Training

All personnel will receive instruction in the proper handling and disposal of solvents and cleanup materials in order to keep regulated organic containing materials out of industrial wastewater. Each employee will be instructed as to the following:

- a. The organic solvents and cleaners known to be in use at the plant and the areas in which they are used.
- b. The Solvent Management Plan and the proper procedures for handling and disposing of the respective solvents.

5. Inspections

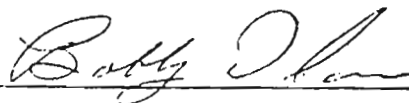
Degreasers and cleaning operations will be inspected routinely by the area supervisor to verify cleaning procedures, proper solvent storage, handling, collection, and adherence to this solvent management plan to insure that TTO does not spill or leak into plant sewers.

6. Implementation

All provisions of this plan will be fully implemented by June 1, 1985.

C. CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standards for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters will occur. I further certify that this facility will implement the toxic organic pollutant management plan by June 1, 1985.



OWNER

• **HS** **Victory Springs Wky.**

*Toxic Organic Management Plan*

**2003**

**( TOMP )**

*F2-1/5*

HICKORY SPRING MFG  
4925 (FOAM/METAL) PLANT  
5001 (TUBE MILL ) PLANT  
STATELINE ROAD, FORT SMITH, AR 72902

REFERENCE: SUBMITTING A TOXIC ORGANIC MANAGEMENT PLAN  
(TOMP) AS AN ALTERNATIVE TO TOTAL TOXIC  
ORGANIC MONITORING PLAN (TTOM).

AS PER 40 CFR, 413 & 433 AND TABLE 2-8 THE FOLLOWING LIST OF TOTAL  
TOXIC ORGANIC (TTO) ARE USED AT THIS MANUFACTURING SITE.

CHEMICAL/COMPONENT	STORED	YEARLY USAGE
1 TOLUENE	110 GAL	750GAL
2 DIOCTYL PHTHALATE	55 GAL	5 GAL

WASTE HAULERS

1- ACTION RESOURCES	PERMIT # ARL000007237
2- U S FILTER RECOVERY	PERMIT # ARD983286485

SPILL/DISCHARGE

METAL PLANT

HICKORY SPRINGS UTILIZES A REMOTE SPECIALLY DESIGNED CONCRETE  
BUILDING FOR ALL SOLVENT STORAGE. THE STRUCTURE CONTAINS A  
CENTRALLY LOCATED SUMP TO CONTAIN ANY ACCIDENTAL SPILLS OR LEAKAGE.  
THE STORAGE BUILDING SUMP IS BELOW FLOOR LEVEL AND WILL CONTAIN THE  
CONTENTS OF ANY ONE CONTAINER RUPTURE, LEAK, OR SPILL. THE SUMP  
WILL NOT ALLOW ANY DISCHARGE TO THE POTW OR TO STORMWATER OUTFALLS.

F2-2/5

THE REGULATED PROCESS IN THE METAL PLANT IS REFERRED TO AS PROCESS ONE (1) ON THIS TOMP AND PREVIOUSLY SUBMITTED "WASTEWATER CONTRIBUTION PERMIT APPLICATION".

ALL FLOOR DRAINS HAVE BEEN SEALED ON THE MANUFACTURING FLOOR AND DRUMS/CONTAINERS CONTAINING ANY CHEMICAL IS STORED INSIDE CONTAINMENT OR OVER PORTABLE CONTAINMENT. THE NEWLY INSTALLED 5-STAGE PARTS WASHER IS OPERATIONAL INSIDE CONTAINMENT COMPRISED OF BELOW FLOOR LEVEL TRENCHES NORMAL CONTROLLED DISCHARGES AND/OR ACCIDENTAL DISCHARGE FROM THE 5 STAGE WASH MACHINE IS PIPED/PLUMBED TO THE SAME RESERVOIR WHICH IS 4 FEET BELOW PLANT FLOOR LEVEL AND INSIDE A 4500 GAL. CONTAINMENT ENCLOSURE. THE LOWER LEVEL DOES NOT CONTAIN ANY DRAINS WHICH WILL ALLOW AN ACCIDENTAL DISCHARGE TO THE POTW OR TO A STORMWATER OUTFALL.

THE WASTESTREAM FROM THE 5 STAGE WASHER IS DIVERTED AS EXPLAINED ABOVE TO THE LOWER LEVEL TO BE CHEMICALLY TREATED AND DISCHARGED/PUMPED TO THE SANITARY FACILITY DISCHARGE LINES LOCATED ON THE HIGHER MANUFACTURING PLANT FLOOR LEVEL. NO ACCIDENTAL DISCHARGE TO THE POTW OR OUTFALL CAN OCCUR FROM THE LOWER LEVEL ACCUMULATIONS AND TREATMENT LEVEL DUE TO DISCHARGE ELEVATION AND SUFFICIENT CONTAINMENT. COMPACTED SOLIDS FROM THE WASTEWATER TREATMENT FILTER PRESS WILL BE TAKEN TO THE CITY LANDFILL.

SPILL/DISCHARGE      TUBE MILL PLANT

THERE IS NO PROCESS WATER STREAM DISCHARGED FROM THE TUBE MILL PLANT. THE AUTOMATED TUBE MILL OPERATES INSIDE APPROVED CONTAINMENT AND ALL NECESSARY VIRGIN CHEMICAL AND/OR SPENT MATERIALS ARE STORED OR TRANSFERRED INSIDE THE CONTAINMENT. THE SANITARY FACILITY WASTE STREAM IS TRANSFERRED BY A LIFT STATION TO THE METAL PLANT LIFT STATION AND DISCHARGED TO THE POTW THRU THE METAL PLANT MAIN DISCHARGE LINE. STRICT OPERATIONAL/TRANSFER PRACTICES AND ENGINEERED SAFE GUARDS DO NOT ALLOW ANY DISCHARGE TO THE POTW OR TO A STORMWATER OUTFALL. SPENT MATERIALS ARE MANAGED BY APPROVED WASTE HAULERS FOR DISPOSAL.

F2-3/5

SPILL/DISCHARGE FOAM PLANT

THERE IS NO PROCESS WASTESTREAM DISCHARGE TO THE POTW FROM THE FOAM PLANT. THERE IS A FLOOR SUMP LOCATED IN THE POURING ROOM. WASTE WATER FROM THIS SUMP IS PUMPED TO AN EVAPORATOR AND EVAPORATED. THE NUMEROUS CHEMICAL HOLDING TANKS ARE LOCATED INSIDE CONTAINMENT. THE NON-HAZARDOUS RESIDUE FROM EVAPORATION IS TRANSPORTED TO THE LANDFILL FOR DISPOSAL. SPENT MATERIALS ARE MANAGED BY APPROVED WASTE HAULERS FOR DISPOSAL.

REFERENCE ANY STATED FEATURE IN THIS TOMP PLAN TO THE ENCLOSED DRAWING DESIGNATED AS "UPDATED TOMP-2003".

REFERENCE ANY MSDS NOT INCLOSED IN THIS TOMP PLAN TO THE PREVIOUSLY SUBMITTED MSDS REQUIRED FOR THE "WASTEWATER DISCHARGE APPLICATION PERMIT." THIS WILL REDUCE DUPLICATION OF THE SAME MSDS DOCUMENTS.

HICKORY SPRINGS CONTINUES TO BE VERY CONSCIOUS OF WASTESTREAM DISCHARGE AND WILL RESPOND UPON SELF-DETECTION AND/OR NOTIFICATION FROM THE CONTROLLING AUTHORITY.

WITHOUT FURTHER NOTIFICATION FROM THE CONTROLLING AUTHORITY, HICKORY SPRINGS WILL ASSUME THE TOMP HAS BEEN ACCEPTED AND NO FUTURE CHANGES WILL BE REQUIRED.

THE SUPPLIED CERTIFICATION DESIGNATES RESPONSIBILITY FOR THE PLAN.

INCL- 1-SWPPP (CURRENT) UPDATE TO BE SUPPLIED UPON COMPLETION  
1-SPCC (CURRENT) UPDATE TO BE SUPPLIED UPON COMPLETION  
1- DWG DESIGNATED AS "UPDATED TOMP PLAN".  
1- DWG DESIGNATED AS PROCESS #1 (DETAIL PROCESS #1).

F3- 4/5



A/REG. VI-5/#5

"Based on my inquiry of the person or persons directly responsible for managing compliance with the T10 limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last report. I further certify that this facility is implementing the toxic organic pollutant management plan submitted to the Control Authority on

6-13-03

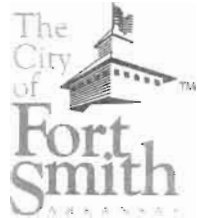
(date)

  
(Officer)

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

F3-5/5<sup>6</sup>

Certified Mail  
7001 1940 0006 8878 8164



Date: 3/22/2011

Mr. Jeff Ventimiglia  
Hiland Dairy Co.  
415 South 10th Street  
Fort Smith, AR 72901

RE: NOTIFICATION OF VIOLATION

Permit Number: SIUP00302

Dear Mr. Jeff Ventimiglia

On the date(s) listed below, the following parameters were found to be in violation.

Date	Sampled By	Parameter	Reported Value	Limit
1/4/2011		Reporting		See Below
1/5/2011		Reporting		See Below

The Permittee failed to respond to a Notice of Violation regarding TSS and BOD exceedance submitted on January 21, 2011 from the Control Authority. The 10 workdays, as stated below, expired on March 07, 2011. As of this notice, the Control Authority has not received any correspondence.

You have **10** workdays from the date of this letter in which to correct the violation(s) stated above and to notify the City of what efforts were made to correct the violation(s). If the user is in disagreement with the violation(s) above or with the time period that such violations must cease, he has the opportunity to request in writing within five (5) workdays of receipt of this notice a hearing at which time he will be given an opportunity to show cause why this notice should be rescinded or modified.

Sincerely,

Paul R. Easley  
Environmental Manager

PC: Director of Utilities

Utility Department • 3900 Kelley Hwy.  
Fort Smith, Arkansas 72904  
(479) 784-2231 • FAX (479) 784-2358

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G - 1/1



ENVIRONMENTAL DEVELOPMENT  
DEPARTMENT

Exide

**EMERGENCY**

**CONTINGENCY**

**PLAN**

1. National Response Center 1-800-424-8802  
Ensign John Cromwell Control Number 131583
2. Office of Emergency Services 1-800-322-4012  
Mr. David Bellew
3. Arkansas Department Control and Ecology 501-562-7444  
Mr. Richard McDuffy
4. Sebastian County Arkansas  
Office of Emergency Services 501-783-3932  
Mr. Clifford Bell

FEBRUARY 1992

H-1/2

EMERGENCY CONTINGENCY PLAN

- I. .1 SCOPE
- .2 RESPONSIBILITY FOR COMPLIANCE
- .3 POSTING
- .4 NOTIFICATION
- .5 DISTRIBUTION OF PLAN
- .6 AMENDMENT TO PLAN
  
- II. .1 PLAN IMPLEMENTATION
- .2 PERSONNEL TRAINING
- .3 DEFINITION OF EMERGENCY
- .4 EMERGENCY RESPONSE COORDINATOR
- .5 EMERGENCY RESPONSE PROCEDURES FOR SITE PERSONNEL
- .6 EMERGENCY RESPONSE PROCEDURES FOR EMERGENCY RESPONSE COORDINATORS
- .7 EVACUATION PLAN
- .8 EMERGENCY EQUIPMENT

Sub-APPENDIX

- A. AGENCIES AND CONTACTS
- B. SITE MAPS
- C. LIST OF AUTHORIZED EMERGENCY RESPONSE COORDINATORS AND SHIFT SUPERVISORS
- D. EMERGENCY EQUIPMENT
- E. SUGGESTED PROCEDURAL GUIDELINES FOR RESPONDING TO SPECIFIC SITUATIONS
- F. SPECIAL RESPONSE ARRANGEMENTS WITH STATE AND LOCAL AGENCIES
- G. FORM LETTERS FOR MAINTAINING PROGRAM
- H. CORRESPONDENCE LOGS

H-2/2

AN ORDINANCE AMENDING PORTIONS OF CHAPTER 25 OF THE FORT SMITH MUNICIPAL CODE, ARTICLE VI SEWERS AND SEWAGE DISPOSAL, DIVISION 1 GENERALLY; ESTABLISHING DIVISION 2 PRETREATMENT REGULATIONS AND PERMITS; REPEALING ORDINANCES IN CONFLICT HEREWITH: AND. FOR OTHER PURPOSES

BE IT ORDAINED AND ENACTED BY THE BOARD OF DIRECTORS OF THE CITY OF FORT SMITH, ARKANSAS, that:

SECTION 1: Chapter 25, Article VI, Section 25-181 of the Fort Smith Municipal Code is hereby repealed as stated and is renamed Abbreviations and Definitions and replaced with the following language:

- (a) The following abbreviations, when used in this division, shall have the designated meanings:

BOD - Biochemical Oxygen Demand  
 BMP - Best Management Practice  
 CFR - Code of Federal Regulations  
 CIU - Categorical Industrial User  
 COD - Chemical Oxygen Demand  
 EPA - U.S. Environmental Protection Agency  
 gpd - gallons per day  
 mg/l - milligrams per liter  
 NPDES - National Pollutant Discharge Elimination System  
 POTW - Publicly Owned Treatment Works  
 RCRA - Resource Conservation and Recovery Act  
 SIU - Significant Industrial User  
 SIC - Standard Industrial Classification  
 TSS - Total Suspended Solids  
 U.S.C - United States Code

- (b) Unless a provision explicitly states otherwise, the following terms and phrases, as used in this division, shall have the meanings hereinafter designated.

*Act or "The Act"*. The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended; 33 U.S.C. 1251, et seq.

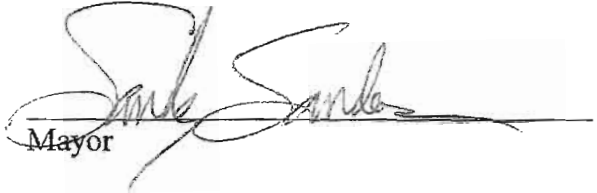
*Approval Authority*. Refers to the Director of Arkansas Department of Environmental Quality (ADEQ) or a delegated representative.

*Authorized Representative of the User*.

- (1) If the User is a corporation:

PASSED AND APPROVED this 4<sup>th</sup> day of October 2011.

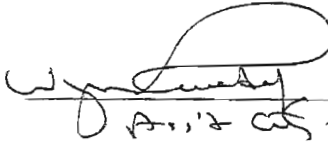
APPROVED:

  
Mayor

ATTEST:

  
City Clerk

APPROVED AS TO FORM:

  
Publish 1 Time  
D. A. Sweeney