

ADEQ

ARKANSAS
Department of Environmental Quality

July 15, 2011

Randy Bradley, Pretreatment Coordinator
City Corporation-Russellville Water & Sewer System
P. O. Box 3186
Russellville, Arkansas 72811-3186

Re: City Corporation (AFIN: 58-00105 NPDES Permit Number: AR0021768)
Pretreatment Program Audit & Municipal Pollution Prevention (P2) Assessment

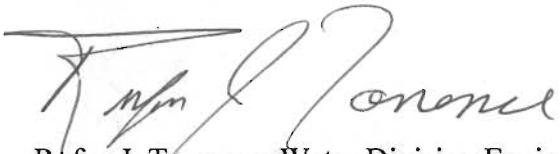
Dear Mr. Bradley:

Please find enclosed the finished report for the audit/assessment conducted by me from June 13 through 16, 2011. The report should be made available for review by appropriate industrial and City officials. City Corporation 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 City Corporation 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.

Sincerely,



Rufus J. Torrence, Water Division Engineer

Encl: Audit/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 CORPORATION – RUSSELLVILLE WATER & SEWER SYSTEM

RUSSELLVILLE, ARKANSAS

NPDES PERMIT #AR0021768

JULY 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

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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—Cover Page of CMOM
B—Cover Page of CAP
C—ConAgra Permit Application
D—ConAgra Permit & Fact Sheet
E—ConAgra Inspection
F—ConAgra Spill/Slug Plan
G—Influent CBOD, TSS & NH3-N
H— International Paper Permit Cover & Limit pages
I— Sugar Creek Permit Cover & Limit pages
J—Cover Page of CAO 09-146

A) INTRODUCTION

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

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

The auditor performed an audit/assessment from June 13 to June 16, 2011 on the Pretreatment Program implemented by City Corporation for the city of Russellville, Arkansas. Participants included:

Rufus Torrence	ADEQ / Pretreatment Engineer & Auditor
Charlotte Petrick	City Corp / Lab Analyst & Pretreatment Inspector
Randy Bradley	City Corp / Pretreatment Coordinator
Larry Collins	City Corp / Water & Wastewater Superintendent
Craig Noble	City Corp / General Manager

The goals of the audit/assessment were:

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

Russellville's Pretreatment Program was originally approved 1/13/84. By resolution in April of 1985, the City of Russellville delegated the control authority status to City Corporation, a nonprofit organization; City Corporation has the control authority status to administer and implement the City's Pretreatment Program. The auditor may use "City Corp, Russellville or the City" synonymously throughout this report.

The City Pretreatment Coordinator conducts an annual “Industry Day” meeting with the City stakeholders in the local pretreatment program. During this meeting the Coordinator updates the SIU representatives on current issues and the representatives may also ask questions on these issues.

On June 13, 2011 the auditor conducted a pre-audit meeting with key personnel involved in the pretreatment program; the auditor met with Randy Bradley, Larry Collins and Craig Noble. The primary topic of the meeting focused on the two Consent Administrative Orders and local limits for conventional pollutants. The City attempted to complete the requirements of CAO LIS No. 06-114 to correct I/I and SSO problems. The City has prepared a Capacity, Management, Operation and Maintenance (CMOM) Program and Corrective Action Plan (CAP) to address the requirements in CAO LIS No. 09-146 [Total Suspended Solids (TSS) and Total Residual Chlorine (TRC) violations]. See attachments A, B and J to find references for more details. Finally, the City plans to update local limits for BOD₅ (CBOD₅), TSS and NH₃-N.

The City’s wastewater treatment plant consists of new equalization basin, primary clarifiers, biotowers (temporarily removed from service), intermediate clarifiers (temporarily removed from service), trickling filters, activated sludge, and final clarification. Treated wastewater is chlorinated and discharged to Whig Creek. There has been no pattern of lethality shown recently from the POTW’s effluent.

The plant’s design flow is 7.3 MGD and has an average flow of approximately 5.9 MGD. Approximately 17.8% of the average flow is from 13 significant industrial contributors (SIUs), 3 of the SIUs are categorical (subject to Federal/State regulations). The city’s one food processor (ConAgra) makes up most of the permitted industry flow.

The City disposes approximately 520 dry tons of sludge per year in a nearby landfill or adjacent land application sites. In reference to paragraph 8 (Page 3 of Part II) in the NPDES permit, the City may continue to land apply biosolids until October 1, 2011 before a separate permit must be obtained. The Department received an application for a separate permit on June 13, 2011.

The audit/assessment consisted of informal discussions with City Corp’s personnel, examination of industrial user files, pretreatment records and site visits to five (5) of the City industrial users. The auditor utilized a checklist to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachments.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City of Russellville (City Corp). Section C includes recommendations to help improve the implementation and enforcement of the City Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City’s approved program, including its adopted legal authorities, are outlined in Section D. The City is currently modifying the program to comply with the most recent changes to 40 CFR 403 (commonly referred to as the “Streamlining Rule Changes” promulgated on October 14, 2005). The City has adopted a new pretreatment ordinance (currently in public notice), is now reviewing the existing approved program narrative and will make all necessary modifications to comply.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

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

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 #AR0021768 on March 10, 1992. In reference to Part II (page 19) in the City's NPDES permit (effective October 1, 2010), find in section 13.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 twelve (12) months of the effective date of this permit.*" The City commenced updating the pretreatment ordinance before the current permit was issued. On December 16, 2008 in an attachment to an email, the City submitted the first draft of the proposed new ordinance. The Department reviewed the draft ordinance. Enclosed with a letter dated July 24, 2009, the Department sent the City a checklist and a revised draft ordinance. On December 30, 2009 in an attachment to an email, the City submitted a second draft ordinance to incorporate the Department's revisions. The Department reviewed the second draft ordinance. On January 11, 2010 in an attachment to an email, the Department sent the City another revised draft ordinance. Enclosed with a letter dated April 23, 2010, the City submitted the third draft ordinance. However on April 28, 2010 the City decided to update the third draft to remove optional streamlining elements. In an email dated April 29, 2010 the Department confirmed the City's intentions to remove the optional elements and in an attachment to this email sent the City another revised draft ordinance. The City Council adopted the draft ordinance on April 21, 2011. In reference to Section D below, the City must update the pretreatment program narrative as soon as possible.

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.”

The current approved pretreatment program narrative (“*Pretreatment Program for the Russellville Sewer System Russellville, Arkansas November 1990 Revised October 1991*”) has local limits for BOD₅ (550 mg/l), TSS (650 mg/l) and NH₃-N (175 mg/l) in Appendix K. At a minimum the City must update these local limits in conjunction with updating the program narrative to comply with the recent Streamlining revisions to 40 CFR 403.

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

I) The City should include Statement of Basis in permits which do not have published federal limits or approved local limits. For example, Taber has production-based limits and International Paper Company has a 3000 mg/l BOD₅ limit. The approved local limit for BOD₅ is 550 mg/l. See Attachment H for more details.

2) Under 40 CFR 403.12(j) & (p)(1) “[City Corp.] shall...Notify IUs of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and Subtitles C and D of the Resource Conservation and Recovery Act.” The City has included the notification in the IWS form circulated to local industries. The auditor recommends that the City include this notification in the permit application.

3) The City may develop local limits for BOD₅, TSS and NH₃-N and may use either a “mass allocation” of the MAHL or performance-based local limits. In either case, the City should determine the current MAHLs for all conventional pollutants. If a pollutant current actual loading from all SIUs exceed the MAHL for that pollutant, the City may either require additional treatment from the SIUs or “debottleneck” the WWTP for that pollutant.

4) In reference to page 4 in the approved program narrative find, “*The City of Dover..has adopted ..[the City of Russellville]...Pretreatment Ordinance and has appointed and empowered City Corporation, Inc. to administer and enforce the Pretreatment Ordinance.*” In reference to section 5.7.2 in the ordinance, find “*Jurisdiction to determine such penalties shall be in the City... [of Dover]... Municipal Court*”. The auditor recommends that the City attorneys (Russellville and Dover) review the ordinances and agree on the proper implementation procedure for permits, inspections, NOV_s, etc.

5) To avoid confusion in each permit surcharge language, the City should change the acronym for “composite BOD₅” from CBOD₅ to ComBOD₅. See Attachment D-2/10 for more details.

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 as soon as possible.

* * * * *

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

PRETREATMENT AUDIT CHECKLIST (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information Pages 1- 4
 Section II: Pretreatment Program Analysis Pages 5-18
 Section III: Industrial User File Evaluation Pages 19-27

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: Russellville City Corporation NPDES # AR0021768

Mailing address: P.O. Box 3186, Russellville, AR 72811-3186

Permit Signatory: Craig Noble Title: General Manager

Telephone: (479) 968-2105 FAX NUMBER: (479) 968-3265

Pretreatment Contact: Randy Bradley Title: Pretreatment Coordinator

Address: same

Telephone: (479) 968-2080 ext. 133 E-Mail: rbradley@citycorporation.com

Pretreatment program approval date: 1/13/84

Dates of approval of any substantial modifications: 3/10/92

Month Annual Pretreatment Report Due: February

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 06/14-16/2011
(ASSESSMENT)

Inspector(s) :

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

Control Authority representative(s) :

NAME	TITLE	PHONE NUMBER
<u>*Randy Bradley</u>	<u>Pretreatment Coordinator</u>	<u>(479) 968-2080 ext. 133</u>
<u>Craig Noble</u>	<u>City Corp. Gen. Mngr.</u>	<u>(479) 968-2080 ext 113</u>
<u>Larry Collins</u>	<u>Operations Manager</u>	<u>(479) 968-2080 ext 132</u>
<u>Charlotte Petrick</u>	<u>Laboratory Analyst</u>	<u>(479) 968-2080 ext 133</u>

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
<u>PCI</u>	<u>04/2009</u>	<u>No Apparent Deficiencies Noted</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: The Control Authority is under a Consent Administrative Order (LIS No. 09-146) to correct permit violations for CBOD5, TSS, DO, TRC, FCB, Zinc, Copper and Nitrates by submitting a Corrective Action Plan (CAP). The CAP was submitted and approved on 6-1-2010. Also the City is developing local limits for CBOD5, TSS and NH3-N. The Zinc and Copper are entering the POTW at domestic levels.

Is the Control Authority currently in SNC or RNC?

.....

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
*AR0021768	City Wastewater	10/01/10	09/30/15

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: City Wastewater Plant
Location Address: 404 Jimmy Lile Road, 72811

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 7.3 MGD; Actual (Average)-5.932 MGD

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

Industrial Contribution to this Treatment Plant

of SIUs : 13 # of CIUs : 3
Industrial Flow (mgd): 1.06* Industrial Flow (%) : 17.8 %
*ConAgra (food processor) makes up .8 MGD of this

Level of Treatment

Type of Process(es):

Primary primary clarifiers; biotowers*;
Secondary intermediate clarifiers*; trickling filters, activated
Tertiary sludge & final clarification

Method of Disinfection: chlorination

Dechlorination YES NO

*biotowers and intermediate clarifiers temporarily removed from service to facilitate nitrate removal.

Effluent Discharge

Receiving Stream Name: Whiq Creek

Receiving Stream Classification: Segment 3F Ark. River Basin

Receiving Stream Use: secondary contact recreation

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 checked="" type="checkbox"/> Land Application	<u>519</u> dry tons/yr.
<input type="checkbox"/> Incineration	_____ dry tons/yr.
<input type="checkbox"/> Monofill	_____ dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	_____ dry tons/yr.
<input type="checkbox"/> Public Distribution	_____ dry tons/yr.
<input type="checkbox"/> Lagoon Storage	_____ dry tons/yr.
<input type="checkbox"/> Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: Copper, Mercury & Zinc

a. (continuation of individual treatment plant information for
City Wastewater 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: same

Issuance Date: same

Expiration Date: same

List pollutants that are specified in current sludge permit:
Page 1 of Part III; paragraph 3 requires 40 CFR 503 & Haz Waste standards.

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?) No but in March 2007 the effluent had a sub-lethal effect on the Pimephales promelas (Fathead Minnows).

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>4</u>	<u> </u>
Priority **	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
Biomonitoring	<u> </u>	<u>4</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u>1</u>	<u> </u>
Other: TKN, etc	<u> </u>	<u> </u>	<u>12</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.
Stayed the same for all pollutants 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)

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>Total Suspended Solids</u>	<u>Rain Events*</u>

*The City has installed an EQ basin.

YES NO

Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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

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

The City is currently updating the program narrative to be compatible with the recently approved SUO.

1. Modifications:

Date Approved by ADPC&E	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
<u>3/10/92</u>	<u>Ord. # 1388; total program modification with headworks loading evaluation, ERP, program narrative and SUO revisions</u>	<u>3/10/92</u>

2. Modifications in Progress: Yes

Date Requested	Nature of Modification
<u>12/16/2008¹</u>	<u>New Streamlining Ordinance and Updated Program Narrative</u>

¹See email from Bradley to Torrence dated "Tuesday, December 16, 2008 3:32 PM"

YES NO

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

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

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

Date of original Pretreatment Program approval: 1/3/84 [ICIS-RIDE]

Date of most recent Ordinance approved by the Control authority: 4/21/2011

Date of most recent Pretreatment Program modification approval: 3/20/92

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

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no: City of Dover is connected & has some small IUs; one is about to become an SIU.

Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions? City of Dover's Ord. adopts Russellville's by reference.

Have provisions been made for the incorporation of Pollution Prevention (P²) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. <u>City of Dover</u>	<u>1</u>	<u>0</u>	<u>their Ord. adopts Russ. by reference</u>
2. _____	_____	_____	_____

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

	Problems
<input type="checkbox"/> Updating industrial waste survey	<u>N/A</u>
<input type="checkbox"/> Notification of IUs	_____
<input type="checkbox"/> Permit issuance	_____
<input type="checkbox"/> Receipt and review of IU reports	_____
<input type="checkbox"/> Inspection and sampling of IUs	_____
<input type="checkbox"/> Assessment of IUs for P ² activity	_____
<input type="checkbox"/> Analysis of samples	_____
<input type="checkbox"/> Enforcement	_____
<input type="checkbox"/> Other: _____	_____

Briefly describe other problems: _____

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

IU Name	Problem	NPDES Permit Violation	
		Yes	No
<u>Premium Protein*</u>	<u>Causing Nitrate Violations</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*This IU is a point source for NH3-N.

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

- YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f) (2) (i)]
-
- If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² activity?
- Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f) (2) (i)]
- If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P² activity and the distribution of P² reference materials to the IUs which qualify?

What methods are used to update the IWS: (program says)

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

How often is the survey to be updated? ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: The CA has not performed a survey within the City of Dover. The City of Dover wants to construct a WWTP near the City of Russellville drinking water source; the CA challenged the proposal.

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?
<u>Aqua Contour Cutting¹</u>	<u>Laser Cutting</u>	<u>In the process</u>

¹Located in Pope County near Russellville city limits but discharges into Dover Collection System.

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

- a. 13 SIUs (As defined by the Control Authority) [ICIS-SIUS]
 - b. 3 Categorical Industrial Users (CIUs) [ICIS-CIUS]
 - c. 10 Noncategorical SIUs
 - d. 2 Other regulated nonsignificant IUs (Describe) septage hauler
- 15 TOTAL of a. + d.

YES NO

- Has the POTW identified any IUs with Pollution Prevention opportunities?
- Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v) (1) (i-ii)]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO
 Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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

What is the maximum term of the control mechanism? 3 yrs

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

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

YES NO
 Does the Control Authority accept trucked septage & grease trap 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> pH </u>	

Describe the discharge point(s) (including security procedures):
 Manhole provides access to 36" line which leads to bar screen at 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?

June 2009 Date Notified IWS Method of Notification

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

<u> </u> Federal Register	<u> </u> Journals, Newsletters
<input checked="" type="checkbox"/> Meetings, Training	<input checked="" type="checkbox"/> Other <u>Internet</u>
<input checked="" type="checkbox"/> Government Agencies	<u> </u> Other <u> </u>

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
<i>The Control Authority is in the process of changing the local limits for conventional (CBOD5, TSS, NH3-N, etc) pollutants.</i>			

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

See Below¹ Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [ICIS-TBLL] [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted?		Ordinance Headworks Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Cadmium (Cd)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Chromium-Total	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Copper (Cu)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Cyanide (CN)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Lead (Pb)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Mercury (Hg)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Molybdenum (Mo) *	_____	_____	_____	_____	_____	_____	_____
Nickel (Ni)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Selenium (Se) *	_____	_____	_____	_____	_____	_____	_____
Silver (Ag)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____
Zinc (Zn)	<u>See Below</u> ¹	_____	_____	_____	_____	_____	_____

* - If necessary for the sludge disposal option chosen.

¹Back in 1990 the control authority evaluated the need for local limits; these 1990 limits were not current with present water quality standards. In 2011 the Control Authority evaluated the local limits for toxic (metals and cyanide) pollutants and demonstrated that local limits are not necessary for these pollutants.

YES NO

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

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

YES NO

 N/A Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)	<u>Local Limits for metals and cyanide are not</u>		
Cadmium (Cd)	<u>necessary at this time.</u>		
Chromium-Total	_____	_____	_____
Copper (Cu)	_____	_____	_____
Cyanide (CN)	_____	_____	_____
Lead (Pb)	_____	_____	_____
Mercury (Hg)	_____	_____	_____
Molybdenum (Mo)	_____	_____	_____
Nickel (Ni)	_____	_____	_____
Selenium (Se)	_____	_____	_____
Silver (Ag)	_____	_____	_____
Zinc (Zn)	_____	_____	_____
BOD5*	550 mg/l*	_____	_____
TSS*	650 mg/l*	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

*The City is currently updating the the local limits to consider switching from Uniform Concentration limits for CBOD₅ and TSS to Mass limits (Refer to Appendix K for more details) based on MAHL or Performance-Based.

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
Inspections:			
CIUs	<u>2/year</u>	1/year	<u>Sect 6.1&2 Includes scheduled and unscheduled</u>
Other SIUs	<u>2/year</u>	1/year	<u>Sect 6.1&2 Includes scheduled and unscheduled</u>
Sampling:			
CIUs	<u>2/year</u>	1/year	<u>Sect 6.1&2 Includes scheduled and</u>
<u>unscheduled*</u>			
Other SIUs	<u>2/year</u>	1/year	<u>Sect 6.1&2 Includes scheduled and</u>
<u>unscheduled*</u>			
Reporting:			
CIUs	<u>2+/yr</u>	2/year	<u>Sect 6.4 shows minimum of 2/yr</u>
Other SIUs	<u>2+/yr</u>	2/year	<u>Sect 6.4 shows minimum of 2/yr</u>
Self-Monitoring:			
CIUs	<u>2-12/year</u>	2/year	<u>Appendix M requires additional monitoring*</u>
Other SIUs	<u>2-52/year</u>	2/year	<u>Appendix M requires additional monitoring*</u>

*Sect I in the ERP also shows monitoring requirement

<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-SNIS]-[403.8(f)(2)(v)]

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected.

Does the Control Authority routinely split samples with industrial personnel:

YES NO
 If requested? (CA splits samples only when 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</u>	<u>Env Enterprise Group</u>
Cyanide <u>Spectro</u>	<u>"</u>
Organics <u>GC/MS</u>	<u>"</u>
Other	

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:
POTW relies on ADEQ Certification

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

5 days Conventionals

3 wks Metals

1 mos Organics

Is there an established protocol clearly detailing sampling location and procedures? (Protocol is located in each IU file with photos)

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: _____

*Sect 1.D in the ERP shows Demand Monitoring

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

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

- | | |
|--|---|
| <input checked="" type="checkbox"/> Notice or letter of violation | <input checked="" type="checkbox"/> Administrative Order |
| <input checked="" type="checkbox"/> Setting of compliance schedule | <input checked="" type="checkbox"/> Revocation of permit |
| <input checked="" type="checkbox"/> Injunctive relief | <input checked="" type="checkbox"/> Fines (maximum amount): |
| civil | \$ <u>1000</u> /day/violation (Ord 5.7.2) |
| criminal | \$ <u>1000</u> /day/violation (Ord 5.8) |
| administrative | \$ <u>1000</u> /day/violation (Ord 5.4.3) |
| <input checked="" type="checkbox"/> Imprisonment (Ord 5.8) | |
| <input type="checkbox"/> Termination of Service (Ord 5.4.2) | |
| <input type="checkbox"/> Other: _____ | |

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: _____

YES NO

- When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f) (5)]
- Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g) (2)].

Comment: In the Permit, Part 2: Paragraph E requires 24 hour notification & resampling; see attachment D.

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO N/A

Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Return to Compliance?	
			Yes (Date)	No
Sugar Creek Foods		NOVs (from Sugar Creek)		<input checked="" type="checkbox"/> *
Taber Extrusion		NOVs only		
Premium Protein		NOVs only		
*Sugar Creek is working with CA; CA plans to revise program to allocate the CBOD ₅ MAIL (lbs/day) to allow Sugar Creek a higher CBOD ₅ concentration limit.				

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

#	%	
3	23	Pretreatment Standards [ICIS-SNCPS] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [ICIS-SNCRR]
0	0	Reporting requirements [ICIS-SNCRR]
0	0	Pretreatment compliance schedule [ICIS-SNCCS]
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [ICIS-NINS]

YES NO

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

Has the Control Authority experienced any of the following:

YES	NO	EXPLAIN and ID Industrial User
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Interference [ICIS].
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pass through [ICIS].
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Fire or explosions? (incl. flash point viol.)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Corrosive structural damage? (incl. pH <5.0).
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Flow obstructions?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Excessive flow or pollutant concentrations?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Heat problems?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Interference due to oil or grease?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Toxic fumes?
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Illicit dumping of hauled wastes?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f) (2) (iv)]

0 How many SIUs are currently on compliance schedules?

Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

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

	<u>Number</u>	<u>Amount</u>	
Civil	<u>0</u>	\$ <u> </u>	
Administrative	<u>0</u>	\$ <u> </u>	
Total	<u>0</u>	\$ <u> </u>	[ICIS-PENALTIES]

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

YES NO

computerized
 hard copy
 OTHER: _____

Are the following files computerized:

YES NO

Control Mechanism Issuance
 Inspection and Sampling schedule
 Monitoring Data
 IU Compliance Status Tracking

Other: _____

Can IU monitoring data can be retrieved by:

Industry name

Pollutant type

Industrial category or type

SIC Code

IU discharge volume

Geographic location

N/A

Receiving treatment plant (i.e. if > one plant in the system)

Other (specify) _____

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?

CA places information in separate file and locks drawer.

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

If yes, please explain: The City council has recently passed the pretreatment ordinance (presently in public notice) and public impact of the CAO for BOD and TSS violations are drawing attention to the pretreatment program streamlining update.

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

(Page 17 in program estimates ~ 2.35 FTEs) CA currently estimates about 1.95 FTE

YES NO

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

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

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

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

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

YES NO

If no, explain

- Legal assistance _____
- Permitting _____
- IU inspections _____
- Sample collection _____
- Sample analyses _____
- Data analysis, review and response _____
- Enforcement _____
- Administration (inc. record keeping /data management) _____

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

- Sampling equipment 2 Isco portable; 3 portable & 2 bench pH meters;
- Safety equipment standard list
- Vehicles 1 Truck
- Analytical equipment CA checks conventionals in RWSS lab; sends metals to contract lab

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.):
CA has not documented any efforts

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

3. Has the POTW implemented any kind of public education program? If yes, describe:
U of A - Morrilton Chemistry Professor brings a class to tour the POTW every semester. Russellville Tech and Russellville High School also have classes tour.

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

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
No

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? Not Yet
If yes, which of the "Guides to Pollution Prevention" were used? _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

FILE #: 1 Industry Name Con Agra File/ID No. WDP2004
Industry Address 3100 East Main 72802
Industry Description Frozen Food Processor/Assembly
Industrial Category Not Applicable 40 CFR N/A SIC Code: 2038
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 718,000 gpd

Industry visited during audit: YES

Comments: Con Agra is the main source of organic loading to the POTW

FILE #: 2 Industry Name Tyson Foods File/ID No. WDP2007
Industry Address 620 Tyler Road 72801
Industry Description Food Processor
Industrial Category Not Applicable 40 CFR N/A SIC Code: 2017
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 144,000 gpd

Industry visited during audit: YES

Comments: Tyson is another source of high organic loading.

FILE #: 3 Industry Name International Paper File/ID No. WDP2001
Industry Address 3019 East 16th 72802
Industry Description Manufacturer of Cardboard Sheets
Industrial Category Not Applicable 40 CFR N/A SIC Code: 2653
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 2400 gpd

Industry visited during audit: YES

Comments: Another Source of organic loading

FILE #: 4 Industry Name International Paper File/ID No. WDP2015
Industry Address 3900 International Drive 72801
Industry Description Manufacturer of Cardboard Boxes
Industrial Category Not Applicable 40 CFR N/A SIC Code: 2653
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 11,000 gpd

Industry visited during audit: YES

Comments: Another Source of organic loading

FILE #: 5 Industry Name Sugar Creek Foods File/ID No. 2000
Industry Address 301 North El Paso Ave
Industry Description Dairy Products for Ice Cream Dispensers
Industrial Category N/A 40 CFR N/A SIC Code: 2024
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 53,000 gpd

Industry visited during audit: YES

Comments: Sugar Creek is currently in SNC for exceeding the allowable organic loading to the POTW

SECTION II: PROGRAM ANALYSIS AND PROFILE

✓ => Yes X => No N/A => Not Applicable "IV-A" => paragraph label

A. Industrial User Characterization

	<u>ConAg</u> <u>FILE 1</u>	<u>Tyson</u> <u>FILE 2</u>	<u>IP16</u> <u>FILE 3</u>	<u>IPIDr</u> <u>FILE 4</u>	<u>SUGAR</u> <u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Is the user subject to categorical pretreatment standards?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
a. New source or existing source (NS or ES)?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. Is this IU one identified as having P ² potential?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
If yes, what is the application date?	<u>3-29-10</u>	<u>8-21-09</u>	<u>11-24-09</u>	<u>8-18-09</u>	<u>8-24-09</u>
Does it ask for Pollution Prevention information?	<u>X¹</u>	<u>X¹</u>	<u>X¹</u>	<u>X¹</u>	<u>X¹</u>
2. Does the file contain a Permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Permit Expiration Date? ²	<u>11-30-15</u>	<u>11-30-15</u>	<u>11-30-15</u>	<u>11-30-15</u>	<u>11-30-15</u>
Is a fact sheet included?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>

Comments:

1. Section A para 7 on page 2 in the application (see Attachment A-2/5) asks the SIU to list P2 information.
2. All permits expire on 11-30-2015.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	ConAg <u>FILE 1</u>	Tyson <u>FILE 2</u>	IP16 <u>FILE 3</u>	IPIDr <u>FILE 4</u>	SUGAR <u>FILE 5</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f) (1) (iii) (A)-(E)]					
a. Legal Authority Cite?	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>
b. Expiration date?	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>
c. Statement of nontransferability?	<u>4-F</u>	<u>4-F</u>	<u>4-F</u>	<u>4-F</u>	<u>4-F</u>
d. Appropriate discharge limitations?	<u>✓⁴</u>	<u>✓⁵</u>	<u>✓⁶</u>	<u>✓⁵</u>	<u>✓⁵</u>
e. Appropriate self-monitoring requirements?	<u>Part 2</u>	<u>Part 2</u>	<u>Part 2</u>	<u>Part 2</u>	<u>Part 2</u>
f. Sampling frequency?	<u>2.C</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>
g. Sampling locations?	<u>2.A</u>	<u>2.A</u>	<u>2.A</u>	<u>2.A</u>	<u>2.A</u>
h. Requirement for flow monitoring?	<u>2.C</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>2.C</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>
j. Applicable IU reporting requirements?	<u>3.A</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>	<u>2.B</u>
k. Standard conditions for:					
Right of Entry?	<u>4-B</u>	<u>4-B</u>	<u>4-B</u>	<u>4-B</u>	<u>4-B</u>
Records retention?	<u>4-C</u>	<u>4-C</u>	<u>4-C</u>	<u>4-C</u>	<u>4-C</u>
Civil and Criminal Penalty provisions?	<u>4-I</u>	<u>4-I</u>	<u>4-I</u>	<u>4-I</u>	<u>4-I</u>
Revocation of permit?	<u>4-H</u>	<u>4-H</u>	<u>4-H</u>	<u>4-H</u>	<u>4-H</u>
l. Compliance schedules/ progress reports	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
m. General/Specific Prohibitions?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>

Comments:

- 3. CP => Cover Page of permit
- 4. ConAgra limits in pounds/day; see Attachment D-8/10 for details.
- 5. BOD and TSS limits based on existing local limits
- 6. IP16 has a 3000 mg/l limit (source unknown).

SECTION II: PROGRAM ANALYSIS AND PROFILE

	<u>ConAg</u> <u>FILE 1</u>	<u>Tyson</u> <u>FILE 2</u>	<u>IP16</u> <u>FILE 3</u>	<u>IPIDr</u> <u>FILE 4</u>	<u>SUGAR</u> <u>FILE 5</u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>

Comments:

- 7. The IUs were notified at the City's annual "Pretreatment/Award Workshop".
- 8. Page 27 is missing in Attachment E.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	ConAg <u>FILE 1</u>	Tyson <u>FILE 2</u>	IP16 <u>FILE 3</u>	IPIDr <u>FILE 4</u>	SUGAR <u>FILE 5</u>
D. <u>Compliance Monitoring</u>					
<u>Sampling</u>					
1. Does the file contain Control Authority sampling results?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
f. Chain-of-custody records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓¹⁵</u>	<u>✓</u>
4. Has the Control Authority appropriately implemented all applicable TFO monitoring/management requirements?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>timed</u>	<u>timed</u>	<u>timed</u>	<u>timed</u>	<u>timed</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>

Comments:

SECTION II: PROGRAM ANALYSIS AND PROFILE

	ConAg FILE 1	Tyson FILE 2	IP16 FILE 3	IPIDr FILE 4	SUGAR FILE 5
<u>Inspections</u>					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
b. Date of last Inspection	<u>1-13-11</u>	<u>11-22-10</u>	<u>12-1-10</u>	<u>3-10-11</u>	<u>3.29-11</u>
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]					
a. Inspector Name(s)	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>
b. Inspection date and time?	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>
c. Name and title of IU official contacted?	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>	<u>Page 4</u>
d. Verification of production rates?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>Page 7</u>	<u>Page 7</u>	<u>Page 7</u>	<u>Page 7</u>	<u>Page 7</u>
f. Evaluation of pretreatment facilities?	<u>Page 33</u>	<u>Page 33</u>	<u>Page 33</u>	<u>Page 33</u>	<u>Page 33</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>Page 33</u>	<u>Page 33</u>	<u>Page 33</u>	<u>Page 33</u>	<u>Page 33</u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	<u>Page26</u>	<u>Page26</u>	<u>Page26</u>	<u>Page26</u>	<u>Page26</u>
i. Manufacturing facilities?	<u>Page 5,33</u>	<u>Page 5,33</u>	<u>Page 5,33</u>	<u>Page 5,33</u>	<u>Page 5,33</u>
j. Chemical handling and storage procedures?	<u>Page 27⁸</u>	<u>Page 27⁸</u>	<u>Page 27⁸</u>	<u>Page 27⁸</u>	<u>Page 27⁸</u>
k. Chemical spill prevention areas?	<u>Page 26</u>	<u>Page 26</u>	<u>Page 26</u>	<u>Page 26</u>	<u>Page 26</u>
l. Hazardous waste storage areas and handling procedures?	<u>Page 27</u>	<u>Page 27</u>	<u>Page 27</u>	<u>Page 27</u>	<u>Page 27</u>
m. Sampling procedures?	<u>Page 17,33</u>	<u>Page 17,33</u>	<u>Page 17,33</u>	<u>Page 17,33</u>	<u>Page 17,33</u>
n. Laboratory procedures?	<u>Page 17</u>	<u>Page 17</u>	<u>Page 17</u>	<u>Page 17</u>	<u>Page 17</u>
o. Monitoring records?	<u>Page 19</u>	<u>Page 19</u>	<u>Page 19</u>	<u>Page 19</u>	<u>Page 19</u>
p. Evaluation of Pollution Prevention opportunities?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
q. Control Authority inspector signature?	<u>Cover Letter</u>	<u>Cover Letter</u>	<u>Cover Letter</u>	<u>Cover Letter</u>	<u>Cover Letter</u>

SECTION II: PROGRAM ANALYSIS AND PROFILE

	ConAg <u>FILE 1</u>	Tyson <u>FILE 2</u>	IP16 <u>FILE 3</u>	IPIDr <u>FILE 4</u>	SUGAR <u>FILE 5</u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
11. Does the file include:					
a. BMR?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. 90-Day Report?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
c. All periodic reports?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
d. Compliance schedule reports?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
12. Did the IU report on all required parameters?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
14. Did the IU report flow?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
b. Did POTW respond to the spill?	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>

Comments:

SECTION II: PROGRAM ANALYSIS AND PROFILE

	<u>ConAg</u> <u>FILE 1</u>	<u>Tyson</u> <u>FILE 2</u>	<u>IP16</u> <u>FILE 3</u>	<u>IPIDr</u> <u>FILE 4</u>	<u>SUGAR</u> <u>FILE 5</u>
E. Enforcement					
1. Were all IU discharge violations identified in: [403.8(f) (2) (vi)]					
a. Control Authority monitoring results?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>✓</u>
b. IU self-monitoring results?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>✓</u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>1</u>	<u>0</u>	<u>7</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>✓</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?					
5. Were all nondischarge violations identified in the file?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
6. Was the IU notified of all violations?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>✓⁹</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>✓¹⁰</u>
8. Did the Control Authority follow its approved ERP?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>✓¹⁰</u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>N/A</u>	<u>N/A</u>	<u>✓</u>	<u>N/A</u>	<u>✓¹⁰</u>
10. Is there a compliance schedule? If yes:	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
11. Were there any compliance schedule violations?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f) (2) (vii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>

SECTION II: PROGRAM ANALYSIS AND PROFILE

	<u>ConAg</u> <u>FILE 1</u>	<u>Tyson</u> <u>FILE 2</u>	<u>IP16</u> <u>FILE 3</u>	<u>IPIDr</u> <u>FILE 4</u>	<u>SUGAR</u> <u>FILE 5</u>
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
b. TRC	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
c. Pass through/Interference	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
d. Spill/slug loads	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>X</u>
e. Reporting	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>X</u>
f. Compliance schedule	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>X</u>
g. others (specify)	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>X</u>
13. Was the SIU published for SNC?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>✓</u>
Date of publication.	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>2-13-11</u>

Comments:

9. At this time, the City does not issue NOVs to Sugar Creek but Sugar Creek notifies the City when a violation occurs.

10. Sugar Creek has no pretreatment system and compliance is depended on BMPs.

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Russellville NPDES #: AR0021768

Date of Audit: 06/14 - 16/11 Date entered into QNCR: 06/23/2011

(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

* Compliance Monitoring Type:

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

Compliance Monitoring Activity Name: City of Russellville

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

Program System Acronym Identifier Facility Site Name Address FRS ID

NPDES AR00 21768 VALIDATE

Compliance Monitoring Dates

Planned Start Date: 06/13/2011

Actual Start Date: 06/13/2011

Planned End Date: 06/16/2011

Actual End Date: 06/16/2011

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?

* Compliance Monitoring Agency Type:

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

Which party had the lead?

Compliance Monitoring Agency Name:

Government Contacts

Affiliation Type First Name Last Name Phone Office Organization

SIC Codes:

4952 Sewerage Systems

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

NAICS Codes:

Regional Priority:

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

Media Monitored

Media Monitored:

Compliance Monitoring Information

Number of Days Physically Conducting Activity:

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

Multimedia Indicator:

Compliance Monitoring Media Indicator

Compliance Monitoring Comments

Compliance Monitoring Comments:

005: Significant Industries Site Visits Conducted

User Defined Fields

1:



Special Programs Pretreatment

Significant Industrial Users (SIUs)

SIUs:

SIUs Without Control Mechanism:

SIUs Not Inspected:

SIUs Not Sampled:

SIUs in SNC with Pretreatment Standards:

SIUs in SNC with Reporting Requirements:

SIUs in SNC with Pretreatment Schedule:

SIUs in SNC Published in Newspaper:

SIUs on Schedules:

Violation Notices Issued to SIUs:

Administrative Orders Issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

Categorical Industrial Users (CIUs)

CIUs:

CIUs in SNC:

Penalties

Dollar Amount of Penalties Collected: \$

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

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures:

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:

Date of Most Recent Removal Credits Approval:

Removal Credits:

Acceptance of Waste

Acceptance of Hazardous Waste:

Acceptance of Non-Hazardous industrial Waste:

Acceptance of Hauled Domestic Wastes:

Deficiencies

Deficiencies Identified During IU File Review:

Control Mechanism Deficiencies:

Legal Authority Deficiencies:

Deficiencies in Data Management and Public Participation:

Deficiencies in Interpretation and Application of Pretreatment Standards:

Inadequacy of Sampling and Inspections:

Adequacy of Pretreatment Resources:

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling:

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

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Russellville NPDES #: AR0021768

Name, address and phone number of industry:
Con Agra 3100 East Main 72802 479-964-8211

Type of industry: Frozen Food Assembler

Date/Time of visit: 06/15/2011 @ 4:00 pm

Industry contacts: Debbie Stanley, Sr Env Specialist EH&S
479-498-7591 debbie.stanley@conagrafoods.com

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

Comments:

1. The City owns and operates the pretreatment system. The system consists of DAFs and O&G removal vats.
2. ConAgra samples after the first stage of BOD/TSS/O&G removal. The City also has a sample point at the final effluent to the main POTW.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

 (signature of auditor conducting visit)

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

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: Con Agra

Additional comments:

This facility imports bulk prepared food items. Workers and robots assemble the food items into individual dinners. In an effort to reduce the BOD loading to the on-site treatment system, the facility has BMPs in place to trap and recover food items that fall on the floor.

With 20 acres under one roof, the facility is the largest building in the area.

For legal reasons, ConAgra deeded the wastewater treatment plant over to the City. In 2015 ConAgra will have the option to own the treatment system again.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Russellville NPDES #: AR0021768

Name, address and phone number of industry:

Tyson Food 620 Tyler Road 479-478-0442

Type of industry: Poultry Processor

Date/Time of visit: 06/15/2011 @ 12:45 pm

Industry contacts: Kemal Beach, Plt Mgr 479-498-0419

Rick Owens, Wastewater Mgr. 479-498-0489

Felecia Harris, EH&S Mgr. 501-945-7131

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

Additional comments:

1. Two DAFs in series with three-polymer polishing
2. Tyson is not only capable of meeting the existing local limits but consistently treats the wastewater below surcharge limits.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

(signature of auditor conducting visit)

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

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: Tyson Foods

Additional comments:

Tyson uses indirect heating to cook chicken parts. Tyson circulates heating oil from external furnaces to the cooking units inside the main facility.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Russellville NPDES #: AR0021768

Name, address and phone number of industry:

International Paper 3019 East 16th 479-890-6634

Type of industry: Card Board Sheets

Date/Time of visit: 06/15/2011 @ 11:00 am

Industry contacts: Paul Turner, Production Manager
479-890-6634 x22 paul.turner@ipaper.com

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

Additional comments:

1. Treatment consist of pH adjustment only. A vucuum truck removes sludge from the tanks.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

 (signature of auditor conducting visit)

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

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: International Paper on 16th Street

Additional comments:

This facility does not make cardboard boxes (only sheets). The sheets are intermediate products and are "feedstock" for other facilities.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Russellville NPDES #: AR0021768

Name, address and phone number of industry:
International Paper 3900 International Drive 479-964-2010

Type of industry: Card Board Box Mfgr

Date/Time of visit: 06/15/2011 @ 9:30 am

Industry contacts: Trina Kleck, Safety Coordinator
479-964-2257 trina.kleck@ipaper.com

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

Additional comments:

1. This facility has two treatment processes (activated sludge for glue and starches and ALAR-Diatomaceous Earth for inks).
2. Stores 55 gallon drums of WD-40.
3. Recycle paper trimmings
4. Weir at top of Activated Sludge plant.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

 (signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: International Paper on International Drive

Additional comments:

This facility manufactures finished cardboard boxes for its customers. The facility receives large rolls of paper and corrugates the center sheet to form the boxes.

Visit conducted by: Torrence/Bradley/Petrick Date:

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Russellville NPDES #: AR0021768

Name, address and phone number of industry:

Sugar Creek Foods 301 North El Paso 800-445-2715

Type of industry: Frozen Desserts / Ice Cream Mixture

Date/Time of visit: 06/15/2011 @ 8:00 am

Industry contacts: Scott Van Horn, President & Owner
scottv@sugarcreekfoodsinc.com

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

Additional comments:

1. This facility discharges about 50,000 gpd of process wastewater with high BOD (1200 to 2000 mg/l). Appendix K in the approved program shows a BOD limit of only 550 mg/l. Therefore, Sugar Creek is in constant violation of the local limit for BOD. Sugar Creek has declared financial hardship and cannot install adequate pretreatment. The CA is in the process of relaxing the BOD limit for Sugar Creek by updating the program to use "mass allocation" instead of a uniform concentration limit.

Visit conducted by: Torrence/Bradley/Petrick Date: _____

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: Sugar Creek Foods

Additional comments:

Sugar Creek manufactures its own one gallon plastic containers at a nearby facility. The containers are loaded into a conveyor system where the robotics automatically fill the containers with a liquid ice cream mixture. The filled containers are moved next door to a freezer to solidify the mixture. The frozen mixture is shipped to various restaurants (Ryan, Western Sizzler, etc.).

Visit conducted by: Torrence/Bradley/Petrick Date: _____

(signature of auditor conducting visit)



Capacity, Management, Operations, and Maintenance Program (CMOM)
MARCH 2011



Prepared By:



NPDES PERMIT No. AR0021768
CAO LIS No 09-146
AFIN 58-00105

A-1/1

CITY CORPORATION
RUSSELLVILLE, ARKANSAS

CITY CORPORATION WASTEWATER TREATMENT PLANT

CAO LIS No. 09-146

AFIN 58-00105

NPDES Permit No. AR0021768

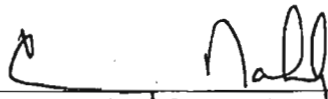
COMPREHENSIVE CORRECTIVE ACTION PLAN

Prepared for: The Arkansas Department of Environmental Quality
21 January 2010

Revision 1 – Incorporating ADEQ Comments
9 April 2010

Revision 2 – Incorporating Additional ADEQ Comments
17 May 2010

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.



CRAIG NOBLE, General Manager
CITY CORPORATION



received
3/31/2010 2B



ConAgra Foods, Inc.
3100 East Main Street
Russellville, AR 72801

March 29, 2010

City Corporation
Attention: Randy Bradley, Pretreatment Coordinator
404 Jimmy Lile Road
Post Office Box 3186
Russellville, AR 72811

Subject: Application for Wastewater Discharge Permit – ConAgra Foods, Inc. – WDP 2004

Dear Mr. Bradley,

Attached is the application for Wastewater Discharge Permit. Our current permit will expire on October 31, 2010.

If you have any questions, please contact Debbie Stanley, Sr. Environmental Specialist at 479-964-8261.

Sincerely,

Paul Siedsma, Plant Manager

cc: file

C-1/6

CITY CORPORATION
 RUSSELLVILLE WATER & SEWER SYSTEM
 WASTEWATER SURVEY FOR NONRESIDENTIAL CUSTOMERS
 (Application for Wastewater Discharge Permit)

SECTION A - General Information

1. Company name, street and mailing address and telephone number: Responsible person name
 2. Parent Company, Street and mailing address and telephone number (if different from 1)

ConAgra Foods, Inc., 3100 East Main Street	ConAgra Foods, Inc., 1 ConAgra Drive
Russellville, AR 72802	Omaha, NE 68102
Paul Siedsma, Plant Manager, 479-964-8204	402-595-4000
Debbie Stanley, Sr. Env./Safety 479-964-8261	

3. Briefly describe the production or service activities of the company:

Frozen food assembly plant. Prepare, package and freeze single and family serve entree's.

4. List the Standard Industrial Classification Number for your company: 2038

5. Check the types of wastewater generated at this facility and indicate volumes:

	Gallons per day	Estimated	Measured
a. <input checked="" type="checkbox"/> Domestic wastes	<u>18,000</u>	<input checked="" type="checkbox"/>	()
b. <input checked="" type="checkbox"/> Boiler blowdown	<u>3,750</u>	<input checked="" type="checkbox"/>	()
c. <input checked="" type="checkbox"/> Cooling water, non-contact	<u>49,000</u>	<input checked="" type="checkbox"/>	()
d. <input checked="" type="checkbox"/> Cooling water, contact	<u>211,000</u>	<input checked="" type="checkbox"/>	()
e. <input checked="" type="checkbox"/> Process	<u>150,000</u>	<input checked="" type="checkbox"/>	()
f. <input checked="" type="checkbox"/> Equipment/facility washdown	<u>430,000</u>	<input checked="" type="checkbox"/>	()
g. <input type="checkbox"/> Air pollution control unit	_____	()	()
h. <input checked="" type="checkbox"/> Storm water runoff	*	()	()
i. <input type="checkbox"/> Other (describe): _____		()	()

* Dependent upon intensity and duration.

If you did not check one or more items listed in A.5.d. through A.5.i., sign and date section E and return Survey; otherwise, please continue to next page.

6. Check the applicable outfalls and indicate volumes:

C-2/6

	Gallons per day	Estimated	Measured
a. <input checked="" type="checkbox"/> Sanitary sewer	<u>18,000</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. <input checked="" type="checkbox"/> Storm sewer	<u>*</u>	<input type="checkbox"/>	<input type="checkbox"/>
c. <input type="checkbox"/> Surface water	<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
d. <input type="checkbox"/> Ground water	<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
e. <input checked="" type="checkbox"/> Trucked waste	<u>15,000</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. <input checked="" type="checkbox"/> Evaporation	<u>84,932</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. <input checked="" type="checkbox"/> Other: Process Sewer	<u>843,750</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
* Dependent upon intensity and duration.			
Total Wastewater Discharged:	<u>861,750</u>		

7. List any pollution prevention, waste minimization, or recycling programs practiced at this facility:
Steam condensation return system, organic waste collection at production lines. Chilled vessel water recycle system and the Pasta cooker cooling water recycle system.

8. Has an accidental spill/slug discharge prevention plan been prepared for this facility?

YES (enclose copy) NO

SECTION B - Facility Operation Characteristics

- Number of shifts per 24hr day: 3 2. Number of employees per shift: 150-625
- Shift starting times: 1st 5:00 am pm 2nd 2:00 am pm 3rd 11:00 am pm
- Principal product produced: Frozen foods, single and family serve entree's.
- Raw materials and process chemicals used: Meat, vegetables, water and food components.
Ammonia and glycol for product cooling applications. Cleaning/sanitation chemicals.
- Production process: Batch Continuous Both: 75 %Batch/ 25 %Continuous
Average number of batches per 24hr work day: 195
- Is production subject to seasonal variations? NO YES (describe) _____
- Are any process changes or expansions planned during the next three years? NO YES
If yes, please attach separate sheet of explanation. See attached notification letter to City Corporation dated August 10, 2009.

SECTION C - Wastewater Information

1. If your company employs processing in any of the following industrial categories subject to National Categorical Pretreatment Standards, and the processes generate wastewater or sludge, place a check next to the category (check all that apply):

- | | |
|---|--|
| <input type="checkbox"/> Aluminum Forming | <input type="checkbox"/> Meat Processing |
| <input type="checkbox"/> Asbestos Manufacturing | <input type="checkbox"/> Metal Finishing |
| <input type="checkbox"/> Battery Manufacturing | <input type="checkbox"/> Metal Molding and Casting |
| <input type="checkbox"/> Builder's Paper | <input type="checkbox"/> Nonferrous Metals Forming |
| <input type="checkbox"/> Carbon Black | <input type="checkbox"/> Nonferrous Metals Manufacturing |
| <input type="checkbox"/> Cement Manufacturing | <input type="checkbox"/> Paint Formulating |
| <input type="checkbox"/> Coil Coating | <input type="checkbox"/> Paving and Roofing (Tars and Asphalt) |
| <input type="checkbox"/> Copper Forming | <input type="checkbox"/> Pesticides |
| <input type="checkbox"/> Dairy Products Processing | <input type="checkbox"/> Petroleum Refining |
| <input type="checkbox"/> Electrical and Electric Components | <input type="checkbox"/> Pharmaceuticals |
| <input type="checkbox"/> Electroplating | <input type="checkbox"/> Phosphate Manufacturing |
| <input type="checkbox"/> Feedlots | <input type="checkbox"/> Porcelain Enameling |
| <input type="checkbox"/> Ferroalloy Manufacturing | <input type="checkbox"/> Pulp and Paper |
| <input type="checkbox"/> Fertilizer Manufacturing | <input type="checkbox"/> Rubber Processing |
| <input type="checkbox"/> Fruits and Vegetables Processing | <input type="checkbox"/> Seafood Processing |
| <input type="checkbox"/> Glass Manufacturing | <input type="checkbox"/> Soaps and Detergents Manufacturing |
| <input type="checkbox"/> Grain Mills Manufacturing | <input type="checkbox"/> Steam Electric |
| <input type="checkbox"/> Ink Formulating | <input type="checkbox"/> Sugar Processing |
| <input type="checkbox"/> Inorganic Chemicals | <input type="checkbox"/> Timber Products Manufacturing |
| <input type="checkbox"/> Iron and Steel Manufacturing | <input type="checkbox"/> Plastics Molding and Forming |
| <input type="checkbox"/> Leather Tanning and Finishing | <input type="checkbox"/> Textile Mills |

2. Pretreatment Equipment or Processes used to treat wastewater or sludge (check all that apply):

- | | | |
|---|--|---|
| <input type="checkbox"/> Biological Treatment | <input checked="" type="checkbox"/> Grit Removal | <input type="checkbox"/> Septic Tank |
| <input type="checkbox"/> Centrifuge | <input type="checkbox"/> Ion Exchange | <input type="checkbox"/> Solvent Recovery |
| <input checked="" type="checkbox"/> Chemical Precipitation | <input checked="" type="checkbox"/> Oil & Grease Separator | <input type="checkbox"/> Spill Protection |
| <input type="checkbox"/> Chlorination | <input type="checkbox"/> Ozonation | <input type="checkbox"/> Stormwater Storage/
Diversion |
| <input checked="" type="checkbox"/> Dissolved Air Flotation | <input checked="" type="checkbox"/> pH Adjustment | <input checked="" type="checkbox"/> Sump |
| <input type="checkbox"/> Filtration | <input type="checkbox"/> Reverse Osmosis | <input type="checkbox"/> Other: _____ |
| <input checked="" type="checkbox"/> Flow Equalization | <input checked="" type="checkbox"/> Screens | <input type="checkbox"/> None |
| <input type="checkbox"/> Grease Trap | <input checked="" type="checkbox"/> Sedimentation | |

3. Toxic Pollutant Information. Check all that are reasonably expected or known present in your manufacturing processes:

- | | | |
|---|--|--|
| <input type="checkbox"/> Acenaphthene | <input type="checkbox"/> Cyanides | <input type="checkbox"/> Mercury & compounds |
| <input type="checkbox"/> Acrolein | <input type="checkbox"/> DDT and metabolites | <input type="checkbox"/> Naphthalene |
| <input type="checkbox"/> Acrylonitrile | <input type="checkbox"/> Dichlorobenzenes | <input type="checkbox"/> Nickel & compounds |
| <input type="checkbox"/> Aldrin/Dieldrin | <input type="checkbox"/> Dichlorobenzidine | <input type="checkbox"/> Nitrobenzene |
| <input type="checkbox"/> Antimony & compounds | <input type="checkbox"/> Dichloroethylenes | <input type="checkbox"/> Nitrophenols |
| <input type="checkbox"/> Arsenic & compounds | <input type="checkbox"/> 2,4-dichlorophenol | <input type="checkbox"/> Nitrosamines |
| <input type="checkbox"/> Asbestos | <input type="checkbox"/> Dichloropropane & ene | <input type="checkbox"/> Pentachlorophenol |
| <input type="checkbox"/> Benzene | <input type="checkbox"/> 2,4-dimethylphenol | <input type="checkbox"/> Phenol |

3. Toxic Pollutant Information (cont.):

- | | | |
|--|--|--|
| <input type="checkbox"/> Benzidine | <input type="checkbox"/> Dinitrotoluene | <input type="checkbox"/> Phthalate esters |
| <input type="checkbox"/> Beryllium & compounds | <input type="checkbox"/> Diphenylhydrazine | <input type="checkbox"/> PCB's |
| <input type="checkbox"/> Cadmium & compounds | <input type="checkbox"/> Endosulfan & metabolites | <input type="checkbox"/> Polynuclear aromatics |
| <input type="checkbox"/> Carbon tetrachloride | <input type="checkbox"/> Endrin & metabolites | <input type="checkbox"/> Selenium & compounds |
| <input type="checkbox"/> Chlordane | <input type="checkbox"/> Ethylbenzene | <input type="checkbox"/> Silver & compounds |
| <input type="checkbox"/> Chlorinated benzenes | <input type="checkbox"/> Flouranthene | <input type="checkbox"/> TCDD |
| <input type="checkbox"/> Chlorinated ethanes | <input type="checkbox"/> Haloethers | <input type="checkbox"/> Tetrachloroethylene |
| <input type="checkbox"/> Chloroalkyl ethers | <input type="checkbox"/> Halomethanes | <input type="checkbox"/> Thallium & compounds |
| <input type="checkbox"/> Chlorinated naphthalene | <input type="checkbox"/> Heptachlor & metabolites | <input type="checkbox"/> Toluene |
| <input type="checkbox"/> Chlorinated phenols | <input type="checkbox"/> Hexachlorobutadiene | <input type="checkbox"/> Toxaphene |
| <input type="checkbox"/> Chloroform | <input type="checkbox"/> Hexachlorocyclohexane | <input type="checkbox"/> Trichloroethylene |
| <input type="checkbox"/> 2-chlorophenol | <input type="checkbox"/> Hexachlorocyclopentadiene | <input type="checkbox"/> Vinyl chloride |
| <input type="checkbox"/> Chromium & compounds | <input type="checkbox"/> Isophorone | <input type="checkbox"/> Zinc & compounds |
| <input type="checkbox"/> Copper & compounds | <input type="checkbox"/> Lead & compounds | |

4. Enclose Material Safety Data Sheets (MSDS) for any compounds or chemicals used in processing for pollutants checked above.
5. If any sampling and analyses has been conducted on your wastewater discharge, enclose a copy of the most recent data with this survey.

SECTION D - Other Wastes

1. Are any liquid wastes or sludges disposed of by means other than the sanitary sewer system?

YES (continue) NO (sign & date Section E & return)

2. Describe the wastes:

	Gals/Lbs/Yr		Gals/Lbs/Yr
<input type="checkbox"/> Acids and/or Alkalis	_____	<input type="checkbox"/> Pesticides	_____
<input type="checkbox"/> Heavy Metal Sludges	_____	<input type="checkbox"/> Plating Wastes	_____
<input type="checkbox"/> Inks/Dyes	_____	<input checked="" type="checkbox"/> Pretreatment Sludges	4.54 mil. gal per yr.
<input checked="" type="checkbox"/> Oil & Grease	751,032 gal/yr	<input type="checkbox"/> Solvents/Thinners	_____
<input type="checkbox"/> Organic Compounds	_____	<input type="checkbox"/> Other Wastes:	_____
<input type="checkbox"/> Paints	_____		_____

3. Check the appropriate practice for items above:

On-site Storage Off-site Storage On-site Disposal Off-site Disposal

Describe: Oil, grease and Pretreatment sludge are disposed of by contract land application for nutrient recovery. Some Oil & Grease is segregated by contractor for recovery by rendering PTP screenings are hauled off by a local waste disposal contractor use as animal feed.

4. Does your company have a hazardous waste generator/storage permit?

() NO

(X) YES:

Permit Number: ARR000009795

SECTION E - Certification

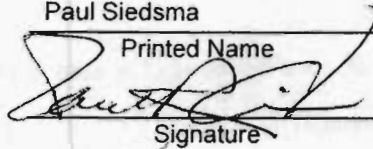
1. In accordance with 40CFR403.14, the information and data provided in this survey which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40CFR, Part 2 (Public Information). Should a wastewater discharge permit be required by your facility, the information supplied by this survey shall be used to issue the permit.

2. The following certification must be signed by the president, vice-president, or by a designee with a signed written authorization:

"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 gathered and evaluate the information submitted. Based upon my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information 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."

Paul Siedsma

Printed Name



Signature

Plant Manager

Title

03/29/2010

Date

Please mail the completed survey/application and any enclosures to:

Pretreatment Coordinator
City Corporation
Post Office Box 3186
Russellville, Arkansas 72811-3186

For any questions concerning this survey/application, call (479) 968-2080 ext 133



CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105
FAX (479) 968-3265

WASTEWATER CONTRIBUTION PERMIT NO. WDP 2004

Company Name: CON AGRA FROZEN FOODS
Mailing Address: 3100 East Main Street, Russellville, Arkansas 72801
Facility Address: 3100 East Main Street, Russellville, Arkansas 72801
Facility Representative: Debbie Stanley, Environmental/Safety Manager

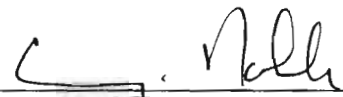
The above industrial user is authorized to discharge industrial wastewater to the City of Russellville Wastewater Pretreatment Plant from the Flow Equalization Tank, in accordance with the provisions of City of Russellville Pretreatment Ordinance, No. 1388, Con Agra and City Corporation pretreatment agreement, and with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its responsibility to comply with U. S. Environmental Protection Agency Regulation 40 CFR 403 (General Pretreatment Regulations) and any or all applicable provisions, standards, or requirements of Federal or State of Arkansas Law, 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 City of Russellville Pretreatment Ordinance, No. 1388, and may subject the permittee to enforcement actions.

This permit is granted in accordance with the application dated March 29, 2010, filed with the Control Authority and in conformity with plans, specifications, and/or other data submitted in support of the application, all of which are filed with and considered as part of this permit, together with the following named conditions and requirements. As of the date of this permit, the Control Authority for the City of Russellville Pretreatment Program is City Corporation.

If the permittee wishes to continue to discharge industrial wastewater after the expiration date of this permit, application must be filed for a permit reissuance in accordance with the requirements of Section 4.2.5. Of City of Russellville Pretreatment Ordinance, No. 1388, a minimum of 180 days prior to the expiration date.

Effective Date: **December 16, 2010**
Expiration Date: **Midnight, November 30, 2015**


Craig Noble, General Manager

December 15, 2010
Date

1
D-1/10

PART 1 – EFFLUENT LIMITATIONS

- A. All wastewater discharge shall conform with all applicable laws, regulations, standards, and requirements contained in City of Russellville Pretreatment Ordinance, No. 1388 and any applicable State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards or requirements that become effective during the term of this permit.
- B. Maximum Limitations: The permittee shall not exceed the effluent limitations stated below for all wastewater discharged to the City of Russellville Wastewater Pretreatment Plant.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
BOD ₅	30,000 lbs/day
TSS	36,000 lbs/day
O&G	8,340 lbs/day

<u>PARAMETER</u>	<u>DAILY MAXIMUM</u>
Flow	1.5 MGD

- C. Surcharge Limitations: All wastewater discharged by the permittee to the City of Russellville Wastewater Pretreatment Plant which exceeds the concentrations stated below are subject surcharge.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
BOD ₅	1700 mg/L
TSS	2000 mg/L

- D. BOD₅ and TSS Surcharge Calculations:

$$S = SBOD_5 + STSS$$

WHERE:

- S = Total monthly surcharge in dollars
 SBOD₅ = Monthly surcharge in dollars due to excessive BOD₅
 STSS = Monthly surcharge in dollars due to excessive TSS

$$SBOD_5 = (CBOD_5 - 1,700)(F)(8.34)(0.0727)$$

$$STSS = (CTSS - 2,000)(F)(8.34)(0.0624)$$

WHERE:

- CBOD₅ = Monthly average concentration of all composite BOD₅ sample results in milligrams/liter, enter 1,700 if average concentration is less than 1,700 milligrams/liter.
 CTSS = Monthly average concentration of all composite TSS sample results in milligrams per liter, enter 2,000 if average concentration is less than 2,000 milligrams per liter.
 F = Total wastewater volume for the month, million gallons
 8.34 = Conversion factor
 0.0727 = Unit charge in dollars per pound for BOD₅
 0.0624 = Unit charge in dollars per pound for TSS

BOD₅, TSS and O&G Compliance with Maximum Mass Loading Limitations Calculations:

BOD₅

- (C) (F) (8.34) ≤ 30,000 pounds/day
 C = Each 24hr composite BOD₅ sample result for the monthly monitoring period in milligrams per liter
 F = Total discharge for the weekday monitored in million gallons

TSS

- (C) (F) (8.34) ≤ 36,000 pounds/day
 C = Each 24hr composite TSS sample result for the monthly monitoring period in milligrams per liter
 F = Total discharge for the weekday monitored in million gallons

O&G

- (C) (F) (8.34) ≤ 8,340 pounds/day
 C = Each grab O&G sample result for the monthly monitoring period in milligrams per liter
 F = Total discharge for the weekday monitored in million gallons

- E. Contingent and Backup Limitations: The effluent from the pretreatment plant as a whole shall not exceed the effluent limitations stated below for all wastewater discharged to the City of Russellville wastewater collection and treatment system.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
BOD ₅	550 mg/L
TSS	650 mg/L
O&G	150 mg/L
<u>PARAMETER</u>	<u>INSPANTANEOUS MINIMUM – MAXIMUM</u>
PH	6.0 – 9.0 S.U.

- F. Surcharge Limitations: All wastewater discharged by the permittee to the City of Russellville Wastewater collection and treatment system which exceeds the concentrations stated below are subject surcharge.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
BOD ₅	350 mg/L
TSS	350 mg/L

- G. Contingent and Backup BOD₅ and TSS Surcharge Calculations:

$$S = SBOD_5 + STSS$$

WHERE:

- S = Total monthly surcharge in dollars
 SBOD₅ = Monthly surcharge in dollars due to excessive BOD₅
 STSS = Monthly surcharge in dollars due to excessive TSS

$$SBOD_5 = (CBOD_5 - 350)(F)(8.34)(0.0727)$$

$$STSS = (CTSS - 350)(F)(8.34)(0.0624)$$

WHERE:

- CBOD₅ = Monthly average concentration of all composite BOD₅ sample results in milligrams/liter, enter 350 if average concentration is less than 350 milligrams/liter.
- CTSS = Monthly average concentration of all composite TSS sample results in milligrams per liter, enter 350 if average concentration is less than 350 milligrams per liter.
- F = Total wastewater volume for the month, million gallons
- 8.34 = Conversion factor
- 0.0727 = Unit charge in dollars per pound for BOD₅
- 0.0624 = Unit charge in dollars per pound for TSS

PART 2 – MONITORING REQUIREMENTS

- A. Samples shall be collected from the eight-inch (8") flow equalization tank discharge line. All sampling shall be done during normal work and discharge cycles. For maximum monthly average limitations and for monthly surcharge all samples collected during a calendar month by the permittee or Control Authority will be averaged to determine compliance and/or surcharge assessment.
- B. Samples for Contingent and backup limits shall be collected from the effluent of the DAF unit discharge line. All sampling shall be done during normal work and discharge cycles. For maximum monthly average limitations and for monthly surcharge all samples collected during a calendar month by the permittee or Control Authority will be averaged to determine compliance and/or surcharge assessment.
- C. The permittee shall collect a sample and have it analyzed by an independent laboratory certified by the Arkansas Department of Pollution Control and Ecology for the parameters and at the frequency listed below.

<u>PARAMETER</u>	<u>MINIMUM FREQUENCY</u>	<u>TYPE</u>
Flow	Daily	Meter ¹
BOD ₅	1/week	24-Hr Composite ²
TSS	1/week	24-Hr Composite ²
O&G	1/week	Grab ³

¹ Daily flows are to be recorded from the flow equalization discharge pump flow-monitoring device.

² Time-proportional composite sampling technique.

³ Grab sample means an individual sample collected in less than 15 minutes in conjunction with an instantaneous flow measurement.

- D. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR 136 and amendments thereto.

- E. If sampling performed by the permittee indicates a violation, the permittee shall notify the Control Authority within 24 hours of becoming aware of the violation. The permittee shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days after becoming aware of the violation.

PART 3 – REPORTING REQUIREMENTS

- A. Monthly Self-Monitoring Reports: The permittee will submit monthly self-monitoring reports for the pollutants monitored during each calendar month. **These reports are due by the last day of the month for all samples collected during the previous month.** The report must contain the results of all samples collected during the month, the daily maximum and monthly average discharge volume, and a signed certification statement that all sampling and analysis was performed according to EPA regulations.
- B. If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR 136 or amendments thereto, 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 be indicated in the monthly report. All BOD₅ and TSS samples collected during a calendar month will be averaged to determine compliance and/or surcharge assessment
- C. The permittee shall notify the Control Authority prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristic of the wastewater being discharged to the City of Russellville Wastewater Pretreatment Plant, or any new construction or process modifications involving plumbing changes. This notification shall be written and the permittee must receive Control Authority approval before changes can occur.
- D. Slug Discharge Report: The permittee shall develop and implement a Control Authority approved Slug Control Plan. The permittee shall notify the Control Authority immediately of any slug discharges released into the City of Russellville Wastewater Pretreatment Plant. The notification shall include the location of the discharge, type of waste, concentration and volume of the waste, and corrective action taken. The notification shall be made telephonically within 24 hours of the release to 968-4989 or 968-2105, Monday through Friday from 8:00a.m. to 4:00p.m., or to 968-1148 if the notification is made on weekends, holidays or during the evening or night. Within five (5) days of the notification, the permittee must submit a detailed written report describing the cause of the discharge and actions to be taken by the permittee to prevent future occurrences.
- E. A notice shall be permanently posted on the permittee's bulletin board or other prominent place-advising employees of the notification procedure in the event of an accidental spill into the City of Russellville wastewater collection and treatment system. The permittee shall ensure that all employees who may cause or witness such an event are advised of the emergency notification procedures.
- F. All reports required by this permit must be signed by either the owner, general partner, a principal executive officer of at least the level of vice president, or a responsible individual who has received written delegation of this authority from either the owner, general partner, or a principal executive officer of at least the level of vice president.
- G. All written reports required by this permit will be submitted to the following address:

Pretreatment Coordinator
City Corporation
Post Office Box 3186
Russellville, Arkansas 72811

PART 4 – STANDARD CONDITIONS

- A. The permittee shall comply with all the general prohibitive discharge standards in the City of Russellville Pretreatment Ordinance, No. 1388, and provisions of the Con Agra and City Corporation Pretreatment Agreement dated April 1991.
- B. Right of Entry: The permittee shall allow duly authorized representatives of the Control Authority bearing proper credentials and identification to enter the premises at reasonable hours for the purpose of inspecting, sampling, or records inspection. Reasonable hours are considered any time the permittee is operating any process which results in the discharge of wastewater to the City of Russellville Pretreatment Plant and / or wastewater collection and treatment system.
- C. Records Retention: The permittee shall retain all records relative to monitoring, analyses, and operations of any process or treatment system which result in the discharge of wastewater to the City of Russellville Pretreatment Plant and / or wastewater collection and treatment system for a minimum of three (3) years.
- D. Dilution: The permittee shall not increase the use of potable or process waters or in any way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in Part 1 of this permit.
- E. Bypass: The intentional diversion of wastewater from any treatment facility shall be prohibited.
- F. Nontransferability: This permit is issued to a specific permittee for a specific operation and is not assignable to another discharger or transferable to any other location without the prior written approval of the Control Authority.
- G. Permit Modifications: The terms and conditions of this permit are subject to modification by the Control Authority at any time in response to changes in the City of Russellville Pretreatment Ordinance, No. 1388 and amendments, modification or promulgation of any federal regulation including promulgation of Categorical Pretreatment Standards, State of Arkansas Regulations, and/or issuance of special or administrative orders. Any permit modification, which results in new conditions, or limitations will include a reasonable time schedule for compliance, if necessary.
- H. Permit Revocation: This permit may be revoked by the Control Authority if it is determined that the permittee has violated any provision of this permit, City of Russellville Pretreatment Ordinance, No. 1388 and amendments, State of Arkansas regulation, or EPA regulation. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any report required by this permit shall be cause for permit revocation.
- I. Penalties: Failure to resolve any violation of this permit, City of Russellville Pretreatment Ordinance, No. 1388 and amendments, State of Arkansas regulation, or EPA regulation may result in the Control Authority seeking applicable fines and penalties as outlined in the City of Russellville Pretreatment Ordinance, No. 1388 and amendments.
- J. Severability: The provisions of this permit are severable, and if any provision of this permit, or the application of any provisions of this permit to circumstances, is held invalid, the application of such provisions to other circumstances, and the remainder of this permit shall not be affected thereby.
- K. Property Rights: The issuance of this permit does not convey any property rights in either real or personal, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of federal, state or local regulation.

L. Proper Disposal of Pretreatment Sludges and Spent Chemicals: The permittee shall dispose of any sludges or spent chemicals in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

M. Confidentiality: Except for that information that is deemed confidential in accordance with the provisions of the City of Russellville Pretreatment Ordinance, No. 1388, all reports and data related to the requirements of this permit shall be available for public inspection at the following address:

City Corporation
Pretreatment Coordinator
404 Jimmy Lile Road
Russellville, Arkansas 72802

N. Permit Expiration: This permit will expire on **November 30, 2015**. The permittee must reapply for a discharge permit at least **180 days** prior to the expiration date.

CON AGRA DISCHARGE LIMITATIONS AND SURCHARGE METHOD BASED ON MONITORING
FROM FLOW EQUALIZATION BASIN

Significant Users discharging BOD5, TSS and O&G in concentrations in excess of 257 mg/l, 304 mg/l and 100 mg/l respectively will be subject to surcharge; and based on the Significant Users volume of discharge and BOD5, TSS and O&G concentrations of 550 mg/l, 650 mg/l and 150 mg/l respectively a maximum mass based loading limit will be developed. Violation of the Significant User permit maximum mass based loading limit will result in corrective actions and/or administrative and/or judicial action. In order to establish surcharges and discharge limitations for Con Agra limitations are based on the assumption that the pretreatment plant will be at a minimum 85% efficient in the removal of BOD5, TSS and O&G after the flow equalization basin, and a maximum discharge from the equalization basin of 1,000,000 gallons per day.

Based on the above, discharging BOD5, TSS and O&G in concentrations from the flow equalization basin in excess of the following will be subject to surcharge:

$$\text{BOD5} = (257 \text{ mg/l}) / (1 - 0.85) = 1700 \text{ mg/l}$$

$$\text{TSS} = (304 \text{ mg/l}) / (1 - 0.85) = 2000 \text{ mg/l}$$

$$\text{O\&G} = (100 \text{ mg/l}) / (1 - 0.85) = 660 \text{ mg/l}$$

Maximum mass loading of BOD5, TSS and O&G from the equalization basin at 1.0 MGD:

$$\text{BOD5} = ((550 \text{ mg/l}) / (1 - 0.85))(1.0 \text{ MGD})(8.34) = 30,000 \text{ \#/day}$$

$$\text{TSS} = ((650 \text{ mg/l}) / (1 - 0.85))(1.0 \text{ MGD})(8.34) = 36,000 \text{ \#/day}$$

$$\text{O\&G} = ((150 \text{ mg/l}) / (1 - 0.85))(1.0 \text{ MGD})(8.34) = 8,340 \text{ \#/day}$$

Discharging BOD5, TSS and O&G in concentrations in excess of 1,700 mg/l, 2,000 mg/l and 660 mg/l respectively will be subject to surcharge; and discharging BOD5, TSS and O&G in mass loadings in excess of 30,000 #/day, 36,000 #/day and 8,340 #/day respectively will be in violation of Con Agra's permit and will be subject to corrective actions and/or administrative and/or judicial action.

Summary of limitations and method of calculating surcharges and compliance with maximum discharge limitations:

- (1) Maximum flow from the flow equalization basin shall be limited to 1.0 MGD. Any flow in excess of 1.0 MGD and/or by-pass of the equalization tank will be a violation of Con Agra's permit.
- (2) A 24-hr. composite sample will be taken once per week (Monday through Friday) from the discharge of the flow equalization basin.

D-8/10

(3) Surcharge for excessive BOD5, TSS and O&G above 1700 mg/l, 2000 mg/l and 660 mg/l respectively.

(4) Method for calculating BOD5, TSS and O&G surcharges:

BOD5

C = Average all 24-hr. composite BOD5 sample results for the monthly monitoring period in mg/l

F = Total discharge for the monthly monitoring period in MG

$(C - 1,700)(F)(8.34)(0.236) = \text{BOD5 surcharge in dollars per monthly monitoring period}$

TSS

C = Average all 24-hr. composite TSS sample results for the monthly monitoring period in mg/l

F = Total discharge for the monthly monitoring period in MG

$(C - 2,000)(F)(8.34)(0.093) = \text{TSS surcharge in dollars per monthly monitoring period}$

O&G

C = Average all 24-hr. composite O&G sample results for the monthly monitoring period in mg/l

F = Total discharge for the monthly monitoring period in MG

$(C - 660)(F)(8.34)(0.026) = \text{O&G Surcharge in dollars per monthly monitoring period}$

(5) Maximum discharge limitations for BOD5, TSS and O&G are mass loading based and are as follows:

BOD5 = 30,000 #/day

TSS = 36,000 #/day

O&G = 8,340 #/day

D- 9/14

(6) Method for determining BOD5, TSS and O&G compliance with maximum mass loading limitations:

BOD5

C = Each 24-hr. composite BOD5 sample result for the monthly monitoring period in mg/l

F = Total discharge for the weekday monitored in MG

$$(C)(F)(8.34) \leq 30,000 \text{ \#/day}$$

TSS

C = Each 24-hr. composite TSS sample result for the monthly monitoring period in mg/l

F = Total discharge for the weekday monitored in MG

$$(C)(F)(8.34) \leq 36,000 \text{ \#/day}$$

O&G

C = Each 24-hr. composite O&G sample result for the monthly monitoring period in mg/l

F = Total discharge for the weekday monitored in MG

$$(C)(F)(8.34) \leq 8,340 \text{ \#/day}$$

D-10/10



CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105
FAX (479) 968-3265

February 25, 2011

Mr. Paul Siedsma
Plant Manager
ConAgra Frozen Foods
3100 East Main
Russellville, Arkansas 72802

Ref: Inspection / Announced

Mr. Siedsma:

Enclosed you will find, for your files, a copy of the inspection that was completed on January 13, 2011 by Ms. Charlotte Petrick. Ms. Debbie Stanley assisted her during this inspection. The results of the inspection reveal at this time Con Agra Foods is in compliance with all permit limits.

Thank you for your continue efforts and concern for maintaining compliance with permit limitations. If you have any questions, please call me at (479) 968-2080, extension 133.

Respectfully,

A handwritten signature in black ink that reads "Randy Bradley".

Randy Bradley
Pretreatment Coordinator

E-1/26

E-2/26
City Corporation
Significant Industrial User Inspection Report

Facility Name: Con Agra

Inspection Date: January 13, 2011

General Conditions

1. Has the Industrial User's permit been terminated? Yes, No
If yes, list date and reason.

2. Has the Permittee submitted an application for a new permit at least 90 (ninety) days before the expiration date of the current permit? Yes, No,
Applicable only if nearing expiration date of current permit. If yes, list date received and any comments. Not Applicable

Information Requirements

1. Has the Permittee furnished to the Control Authority within 10 workdays any information which the Control Authority has requested to determine whether cause 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,
 Not Applicable

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

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Annual Publication

1. Was the Permittee included on the list of all industrial users that were subject to enforcement action during the (12) previous months in the most recent annual newspaper publication by the Control Authority?
 Yes, No
If yes, list date and publication(s) or other media.

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.

E-2150
City Corporation
Significant Industrial User Inspection Report

Facility Name:	Con Agra
Inspection Date:	January 13, 2011
Facility Inspection	
General Information	
Arrival Time:	0845 / out @ 1010
Inspector(s):	Charlotte Petrick – Lab Tech
Contact(s):	Debbie Stanley
Permit Number:	WDP 2004
Site Address:	3100 East Main Street Russellville, AR 72802
Mailing Address:	Same as above
Primary Contact:	Debbie Stanley
Title:	Environmental / Safety Specialist
Telephone:	747-6588
Fax:	964-8277
Additional Contact:	Rick Maske
Title:	
Telephone:	964-8205
Additional Contact:	Paul Siedsma
Title:	Plant Manager
Telephone:	
Comments:	

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Process Information

SIC Code(s):	2038			

Raw Materials:

Food Products: Beef, pork, and poultry meat, vegetables, cooking oils, flour and meal.

Process Description:

Cooking and processing meats and vegetables for frozen foods

Products:

Frozen food products

E-311P

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Operations Information

	1st Shift	2nd Shift	3rd Shift
Number Of Employees: (Avg.)	600	600	200
Working Hours:	0630 – 1430	1430 – 2300	2300 – 0700
Hours/Day:	8	8	8
Days/Week:	6/7	6/7	6/7

Notes: Some lines are at 10-hour days and working only 5 days. Some lines are temporally down during system Upgrades.

Water Source & Usage

Source:	Volume (GPD):	Usage:	Volume (GPD):
City:	919000	Process:	200,000
Landlord:		Sanitary:	4,000
Other:		Consumed in Product:	150000
Other:		Evaporation:	65,000
Other:		Other:	500,000
Total:		Total:	919000
List all water account number(s):			
List wastewater account number(s):			
If applicable.			

Notes:

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Process Waste-Streams

Source Description: Volume (GPD): Code Type: *

All process streams go to the pretreatment plant

732,633

CD

*** Code Types:**

CD: Continuous Discharge	OD: Other Disposal (Not sewer.)	BD: Batch Discharge	ND: Not Discharged
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*** Additional Categorical Waste-Stream Types:**

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

E-7/26

E-8/26

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Permit Compliance Appendix

Industrial User Permit

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

General Conditions

1. Is the Permittee in compliance with all conditions of its' permit? Yes, No
If no, list any administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, or summary abatement resulting from noncompliance with the Industrial User's permit.
If yes, skip next question.

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

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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.

3. Has the Permittee increased or decreased the use of potable or process water? Yes, No, Not Applicable

If yes, explain.

Increased water use. Decreased water use.

Note: Con Agra is installing weir in the Hughes Cooler, on the pasta line. This will slow the over flow from 80GPM to 20GPM.

E-3759

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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 9.0, 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

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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.*

Pretreatment plant is owned by City of Russellville, with City Corporation employees running the plant. Con Agra is responsible up to the discharge from the EQ basin. TRS is haul the sweco.

1. Number of pretreatment operators on staff:

4

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: 1 Class II: 1 Class III: 2 Class IV: 4

Comments:

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

E-11/26

E-12/26

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Bypass Of Treatment Facilities

1. Has the Permittee bypassed treatment facilities? Yes, No
If yes, detail below. Not Applicable
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
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:

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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?
 If yes, detail below. If no, or not applicable, skip section.

Yes, No Not Applicable

2. Is the Permittee attempting to control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided?

Yes, No

Removed Substances

1. Is the Permittee disposing of solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act?
 If yes, list wastes, disposal methods, contractor, etc.
 If no, explain.

Yes, No Not Applicable

TRS removes grease and solids to their site in Yell County.
 Sauces and some pasta are collected in the process plant and disposed of by TRS. - This has helped reduce the BOD loading on the pretreatment plant. Bins are strategically placed under machines to catch over flows. The water from these bins goes down the drain and the solid into trash bins.
 TRS also removes waste vegetables and meat, as well as the sweco.

2. Is the Permittee complying with any additional local and State standards including such standards or requirements that may be come effective during the term of this permit?
 If yes, list additional standards. If no, explain.

Yes, No Not Applicable

E-12/50

City Corporation
Significant Industrial User Inspection Report

Facility Name: Con Agra

Inspection Date: January 13, 2011

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

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
If yes, list equipment used by the Permittee for sampling and/or analysis and any additional comments. Not Applicable
If no, detail deficiencies.
Not applicable, if no Industrial User sampling and analysis equipment is used.

Sampling equipment owned by City Corporation.

2. Has Control Authority been notified and has Control Authority approved the changing of any sampling points? Yes, No
 Not Applicable

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Flow Measurement

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

Sparling Tiger mag meter – last calibration date was 11/18/2010

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

E-13/59

City Corporation
Significant Industrial User Inspection Report

Facility Name: Con Agra

Inspection Date: January 13, 2011

Self Monitoring Procedures

Not applicable if no discharge and self monitoring requirements suspended; skip section.

Not Applicable

1. Is the Permittee monitoring outfall(s) for the required parameters? Yes, No
2. Are all parameters being sampled at the designated sampling point(s)? Yes, No
3. Are any pollutants monitored more frequently than required by the Industrial User's permit? Yes, No
4. If any pollutants were monitored more frequently than required, were test procedures prescribed in 40 CFR Part 136 and amendments thereto, or as otherwise approved by the EPA or as specified in the Industrial User's permit, used? Yes, No
 Not Applicable
5. Is all sampling conducted for the purposes of self monitoring being performed by a certified independent laboratory acceptable to the Control Authority, or has a permit variance been granted to the Industrial User to perform its' own sampling? Yes, No
- Sampling performed by: Outside Laboratory Industrial User
- If independent laboratory or laboratories used, list name(s):
- Sampling by City Corporation employees with Isco sampler.

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:
- EEG, 220 North Knoxville Ave., Russellville

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.

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Automatic Re-sampling

1: Did the results of the Permittee's self monitoring wastewater analysis indicate a violation of the Industrial User's permit had occurred?
 Yes, No

If yes, list each violation separately. If no or not applicable, skip section

Not Applicable

(Not applicable if no discharge and self monitoring requirements suspended)

Date of violation:	Notified the City within 24 hours?	Repeated pollutant sampling and analysis?	Submitted re-sample results?	Results submitted within 30 days?
	<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
	<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

Sampling is completed each week, any violations are noted and weekly sampling will meet the requirements of this section.

E-18/26

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Accidental Discharge Report

1. Did the Permittee have any occurrence of an accidental discharge of substances prohibited by Ordinance 1388 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

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

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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 13887? 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

E-20/26

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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.

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

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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?
- Not Applicable Yes, No

All records are retained by City Corporation and Con Agra.

Planned Facility Changes

1. Has the Permittee had any facility expansion, production increase, or process modifications, which results in new or substantially increased discharges or a change in the nature of the discharge?
If not applicable, skip next question
- Yes, No Not Applicable

2. Did the Permittee give notice to the Control Authority 90 days prior to the above planned changes?
- Yes, No Not Applicable

3. Has the Permittee given advance notice to the Control Authority of any planned changes in the permitted facility or activity, which may result in noncompliance with the Industrial User's permit requirements?
- Yes, No Not Applicable

The new red meat line is completed. This should not change flow to treatment plant, may lower loading rate to treatment plant. Note: that one drain had a slow trickle of meat juice running into a drain, which goes to the treatment plant. The new pasta room is complete and the cookers have weirs in them that control the water level. This control contains the starchy water, for proper disposal.

E-22/26
City Corporation
Significant Industrial User Inspection Report

Facility Name: Con Agra

Inspection Date: January 13, 2011

Signatory Requirements

1. Do all applications, reports, or information submitted to the Control Authority contain the appropriate signature as required in the Wastewater Contribution Permit, Part 3, paragraph F. 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

All reports will be signed by plant manager, Mr. Paul Siedsma.

Cost Recoveries And Penalties

1. Has the Permittee been liable and billed for costs incurred for any cleaning, repair, or replacement work caused by any violation or discharge that caused any expense, loss, or damage to or otherwise inhibited the Control Authority wastewater disposal system? Yes, No
 Not Applicable

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Facility Site Inspection

Spill Prevention

1. Does the facility have a spill prevention plan?

Yes, No

If no, skip next question

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

Slug Control plan received and approved.

2. Are adequate precautions being taken and proper procedures followed to prevent accidental spills and slug loads?

Yes, No

E-24/26

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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 Not Applicable

Not applicable if no pretreatment equipment, skip section.

Pretreatment plant owned and operated by City Corporation. Permittee not responsible for effluent from pretreatment plant, only permitted for loading to plant.

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

Pretreatment equipment operated and maintained by City Corporation.

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

Manufacturing Facilities

1. Were manufacturing or production facilities inspected?

Yes, No
 Not Applicable

Not applicable if no manufacturing or production facilities.

Production facilities were in good condition. One line had a minor gray leak that they were trying to control until a part arrived.

Pretreatment Facilities

1. Were pretreatment facilities inspected?

Yes, No
 Not Applicable

Not applicable if no pretreatment equipment.

Self Monitoring Procedures

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

**City Corporation
Significant Industrial User Inspection Report**

Facility Name: Con Agra

Inspection Date: January 13, 2011

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.



CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105
FAX (479) 968-3265

August 20, 2009

Mr. Paul Siedsma
Plant Manager
ConAgra Foods Packaged Foods, LLC
3100 East Main
Russellville, Arkansas 72802

RE: Slug Control Plan Approval

Mr. Siedsma:

A review of the revised Slug Control Plan for your facility as submitted by Debbie Stanley on August 19, 2009 found this plan to meet the minimum requirements and is hereby approved.

Pursuant to City of Russellville Ordinance No. 1388, this Plan approval shall not relieve ConAgra Foods from its responsibility to comply with all requirements of the Pretreatment Program and any permit or order issued thereto.

Thank you for your diligent effort and concern for maintaining compliance with permit limitations. If you have any questions please call me at (479) 968-2080 Ext 133.

Respectfully,

Randy Bradley
Pretreatment Coordinator

F-2/15

received
6/7/2011

Slug Control Plan



CONAGRA FOODS PACKAGED FOODS, LLC
3100 East Main Street
Russellville, AR 72802

(479) 498-7500

Revised: June 6, 2011

F-2/14

PURPOSE:

The purpose of this plan is to provide guidance and instructions for the slug prevention and control plan for the ConAgra Foods Packaged Foods, LLC, Russellville, Arkansas facility.

SCOPE:

The following guidance outlines the requirements for compliance with the slug control and prevention program for this facility. The plan is written in accordance with federal, state and local regulatory agencies, but is not limited to the Pretreatment Plant (PTP), City Corporation, Russellville Water & Sewer System (RW&SS) discharge requirements. Stricter compliance limits may be adhered to as necessary.

This plan establishes the necessary contingency measures to be followed in the event of an emergency situation resulting from a chemical spill or uncontrolled release to the Pretreatment Plant (PTP). The contingency measures outlined herein are established to protect ConAgra Foods' employees, the Russellville Water & Sewer System, and the general public to the greatest extent possible.

GENERAL/FACILITY INFORMATION:

ConAgra Foods Packaged Foods, LLC is located at 3100 East Main Street, Russellville, AR. The facility manufactures frozen food products, such a single and family serve entrée's which are distributed to stores for public sale. The facility operates twenty-four hours per day, six and seven days per week.

- 1.1 Security Previsions: Chemicals are locked and under the control of the 3rd Shift Superintendent.
- 1.2 Description of Wastewater sources: Most of the wastewater discharged to the PTP is generated from cleaning of equipment, boiler blowdown, and process waste. Cleaning activities are normally conducted from 10:30 pm to 7:00 am.
- 1.3 Personnel on site: ConAgra Foods employs approximately 1300 people (\pm 3%).

KEY PERSONNEL:

- Plant Manager Paul Siedsma
- EHS Manager Jamie Vaughn
- Sr. Environmental/Safety Specialist Debbie Stanley
- Chief Emergency Coordinators Debbie Stanley & Rick Maske

F -3/14

- Alternate Emergency Coordinators Jamie Vaughn, Scott Strange, Jack Wilburn
- 3rd Shift Superintendent Jason Pitts

These personnel share responsibilities for all facets of this plan and have full authority to make necessary decisions to ensure success of the program. The Sr. Environmental & Safety Specialist will be consulted prior to implementation of any amendments to these instructions.

The EHS Manager, Plant Manager, and Plant Engineer are the personnel authorized to amend these instructions and are authorized to halt any operation of the company where there is the potential for a release.

PLAN MANAGEMENT

The plan will be reviewed annually, and amended, when necessary:

1. Applicable regulations are revised.
2. The plan fails in an emergency
3. The facility changes - in its design, construction, operation, maintenance, or other circumstances - in a way that materially increases the potential for releases of waste or hazardous waste constituents, or changes the response necessary in an emergency.

A complete copy of this slug plan is maintained at the following locations:

1. Plant Environmental Files

CONTINGENCY REQUIREMENTS

EMERGENCY CONTACT LIST



ASSUMPTIONS

This plan will be implemented in the event of an emergency situation such as a fire, explosion, tornado, severe weather, unplanned release, spill of hazardous waste/constituents, or any hazardous chemical. Should a release occur to the city wastewater treatment plant, indoor environment, air, soil, surface water, or storm drains at this facility, which threatens human health or the environment; this occurrence will be immediately reported to the following personnel:

In the event of a spill or release of a hazardous chemical, fire or other emergency at this facility, immediately notify the following:

CHIEF EMERGENCY COORDINATOR

Debbie Stanley	Home:	479-747-6588
	Off. Ph:	479-498-7561
	Cell Ph:	479-747-6588
Rick Maske	Home:	479-964-0101
	Off. Ph:	479-498-7505
	Cell Ph:	479-970-7691

ALTERNATE EMERGENCY COORDINATOR

IF YOU ARE UNABLE TO CONTACT THESE INDIVIDUALS, CALL EMERGENCY PERSONNEL IN THE FOLLOWING ORDER:

<u>Title:</u>	<u>Name:</u>	<u>Cell Phone</u>
EHS Manager	Jamie Vaughn	479-747-7189
Operations Manager	Scott Strange	479-970-7662
1 st Shift Authority	Jack Wilburn	479-747-8690

NIGHT SHIFT KEY DESIGNEES:

<u>Title:</u>	<u>Name:</u>	<u>Cell Phone</u>
2 nd Shift Authority	Matt Taff	479-692-9184
3 rd Shift Authority	Jason Pitts	479-970-5442

OTHER KEY EMERGENCY RESPONDERS:

<u>Title:</u>	<u>Name:</u>	<u>Cell Phone</u>
Utilities Engineer	Wayne Russell	479-970-6414
Human Resources Mgr.	Terry Steen	479-498-7507 (office)

In the event of a fire, explosion, bomb threat, etc, call local Emergency Services at 911.

REPORTABLE MATERIAL DATA:

ConAgra Foods' maintains material safety data sheets (MSDS) for materials used at this facility. MSDS's are available to all employees and are located in the Medical Department.

ConAgra Foods encourages PTP to review and become familiar with the locations and content of the material safety data sheets used by this facility.

EMERGENCY RESPONSE PROCEDURES:

In the event that spill prevention and control measures fail, containment measures will be taken to prevent or mitigate contamination of the affected outfall. The Chief Emergency Coordinator is responsible for the implementation of the slug control plan. This person will delegate applicable portions of the facility's emergency response procedures to the shift managers or supervisors in charge at the time of the release. These individuals will assist the Chief and Alternate Emergency Coordinator's by directing the overall emergency response actions at the site, which includes the following:

1. Evacuation of buildings or areas, as needed;
2. Shutdown of equipment;
3. Accountability of personnel;
4. Direction of containment and spill cleanup actions.

In the event of an emergency situation or release of potentially toxic or hazardous materials which necessitates an evacuation, the Chief Emergency Coordinator will be notified first; subsequently, all affected facility personnel, corporate representatives, appropriate PTP personnel, and local emergency responders will be notified.

The control and containment of any spill of hazardous materials will be succeeded by the use of abatement materials available on-site.

Detailed notification procedures are provided in this plan (See **EMERGENCY CONTACT LIST**). All releases will be reported to the PTP and Sr. Environmental & Safety Specialist. This report will be filed telephonically within 1 hour of initial containment of the release after all threats to human health and the environment have been contained.

SECURITY OFFICE NOTIFICATION:

The facility security office is located at the north-east entrance to the main building, and is staffed 24 hours a day. The person responsible for operating the security office will perform the following tasks:

1. Receive all emergency calls;
2. Write down description and location of emergency and any reported injuries;
3. Announce emergency over the intercom system and require that the proper alarm be sounded; and
4. Call the City of Russellville dispatch for fire and ambulance service, if necessary.

SLUG REPORTING PROCEDURES:

1. The PTP operations will notify City Corporation, within 1-hour, of any large slug-load, spill, bypass, or upset.
2. ConAgra will follow up with City Corporation via a written report which will be submitted within 5-days of an incident (slug-load, spill, bypass, or upset)
3. ConAgra will report to the POTW within 24 hours, initially a phone call and then a follow up letter in writing of any substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261.

**Call PTP @ (479) 968-4997 or
Danny Teeter's Pager 479-858-0868**

SLUG RELEASE PREVENTION:

1.1 MATERIALS:

Materials can be divided into three major categories: 1) waste material; 2) raw material; and 3) products produced. Raw materials are generally received in fifty-five (55) gallon drums and bulk loads. Small amounts of materials are received in small quantities, such as five (5) and thirty (30) gallon drums and one hundred (100) pound bags. Bulk raw liquids/gases are stored in above ground storage tanks. All raw material drums are stored in a chemical storage area.

The waste materials of concern in this plan are liquid and hazardous wastes. All of these wastes are accumulated and stored on-site in Department of Transportation (DOT) specification drums. The storage facilities for the wastes and raw materials are arranged and managed to prevent and/or minimize releases of hazardous materials or oil to the environment.

1.2 CONTAINER MANAGEMENT:

All drums and containers shall be clearly marked to identify their containing product. Additionally, hazardous materials/chemical drums and containers shall be affixed with the manufactures/shipping labels.

Drums placed in dispensing racks shall be fitted with approved faucets and pressure relief devices. Drip pans shall be placed under the faucets at all times so to contain any and all residuals.

The Sanitation Manager or his designee will perform a visual inspection of the hazardous material storage area on a daily basis checking for any signs of leakage or potential for chemical leakage. Inspection to include, but not limited to the following:

- Associates are instructed to maintain materials in an organized manner.
- All toxic/hazardous materials on-site must be clearly marked.
- Proper and safe handling procedures are discussed with all associates who are required and responsible for handling the toxic/hazardous materials.
- Visual inspections will be stressed to identify signs of wear on drums, containers, hoses, pumps, and containment devices or other indicators of potential spills.
- Material transfer procedures will be implemented to reduce the chance of leaks or spills.

1.3 APPROVED CONTAINERS:

The EPA and DOT require that all hazardous materials be contained in DOT approved containers/packages. All chemical, hazardous materials and wastes will be contained in the proper approved DOT containers/packages for the hazard class of the material at all times.

Drums/containers not meeting the above requirements is to remain in the generating department until the deficiencies are resolved.

SPILL CONTAINMENT:

The highest priority in this plan is the prevention of a potential spill. The next highest priority is to contain the source of the spill. Leaking containers must have their contents transferred to another approved container (note: the new container must be DOT approved and must be compatible with material to be contained; i.e. sulfuric acid will be placed in a DOT approved plastic drum). The residual and/or spilled material will be contained by means of floor dry, diking, drain covers etc., to prevent it from entering the floor drain.

If it is not possible to transfer materials to another container, the entire leaking container may also be placed into a larger recovery drum, such as an over pack.

In the event of a major spill (i.e., 55-gallons or less), the discoverer will notify his/her immediate supervisor, Emergency & Alternate Coordinators, Plant Manager, Maintenance Supervisor, Production Manager or direct others to do so, as to ensure that response actions are initiated to cause and contain the spill (if the materials are not hazardous). For example, if a drum was accidentally upended, it will be righted to limit the spill quantity, or if the spill is a leak from a damaged drum, the contents will be immediately transferred to a drum in good condition. Once the cause and source have been remedied, steps will be taken to restrict and contain the material using bulk absorbent material and/or the initiation of diking techniques using absorbent-filled bags and other appropriate measures.

Large spills (greater than 55-gallons) of hazardous waste materials within the building should not be remediated by the discoverer. The Emergency & Alternate Coordinator should contact the emergency response team to respond to the spill. The Emergency Coordinator will direct all contaminant and spill clean up procedures for large spills.

The following list comprises the potential spill threats at this facility:

1. Raw Materials.
2. Bulk oil storage containment.
3. Drummed/bulk raw materials.
4. Process tanks.
5. Ammonia storage tanks.

In the event a large spill involves a hazardous waste or hazardous substance in a non-contained area:

- a. The Emergency Coordinator shall secure the spill and identify the hazards.
- b. The Emergency Coordinator shall be notified and then the local or state emergency response team shall be notified, **if required**.
- c. Emergency personnel shall construct temporary dikes (i.e., absorbent, sand, earth, etc.) in low areas to halt the flow to drainage ditches and sewers.
- d. The Emergency Coordinator shall use any method deemed necessary to prevent a spill from reaching the floor drain or any area off-site or entering bodies of water.
- e. Emergency Personnel shall begin cleanup.
- f. All cleanup materials shall be placed in empty DOT approved drums. This shall include hazardous material, contaminated materials and disposable tools (i.e., gloves, rags, clothing, etc.). The filled drums shall be sealed, labeled in accordance with EPA and DOT requirements, and placed in the storage area.

POST EMERGENCY ACTIONS

1.1 STORAGE AND HANDLING OF RELEASED MATERIAL

Hazardous waste spilled hazardous materials, granular absorbent materials, and any other contaminated liquid or solid materials used or recovered in the cleanup and decontamination process will be placed in properly-labeled 55-gallon drums or approved over-pack drums and temporarily stored on site in the designated storage area pending an evaluation of disposal options and arrangements for off-site disposal. The Emergency Coordinator will ensure that waste that is incompatible with the released material is not treated, stored, or disposed of until cleanup procedures are completed.

1.2 EQUIPMENT RESTORATION

Restoration of all emergency equipment used during the incident shall begin immediately following the emergency incident.

The Emergency Coordinator or designee shall take an inventory of all emergency equipment and materials used. Shovels, rakes, and reusable equipment and materials will be cleaned and stored to ensure availability before operations are resumed. Any cleaning solvents shall be consolidated into the least number of drums possible, labeled, and placed in the storage area. All process equipment exposed to hazardous waste shall be cleaned.

The Emergency Coordinator or designee shall contact an approved contractor to conduct complete remedial activities when plant personal are unable to complete the task.

The Emergency Coordinator or designee shall remain on-site to direct all remedial activities being conducted by associates and contractors. All equipment used by an outside contractor shall be removed from the site by the contractor.

EMPLOYEE TRAINING:

All personnel involved in response activities will receive training. Employee training programs will be instituted at the plant to inform employees of the components and goals of the plan. Pollution prevention will be discussed during the monthly Safety Meetings, when appropriate. The training program will address three areas:

1. spill prevention;
2. good housekeeping; and
3. material management practices.

Brief descriptions of such topics covered in this training program are outlined below:

Spill Prevention and Response:

1. Employee involvement in the pollution prevention program are shown the potential spill areas and drainage routes at the plant;
2. Employees are given instructions on how to report a spill and the appropriate individuals to contact; and
3. Material handling procedures and storage requirements will be discussed.

Good Housekeeping:

1. Employees will be instructed to perform regular cleaning of the facility;
2. Employees will be instructed to promptly clean up small spills.

3. Locations for good housekeeping and spill response equipment and supplies; and where appropriate, employees are instructed on the proper methods to secure drums and other containers.
4. Those responsible for drum/container storage integrity are instructed to keep a log of inspections.

Material management Practices:

1. Employees are instructed to maintain materials in an organized manner;
2. All toxic/hazardous materials on-site are clearly marked;
3. Visual inspections will be stressed in identify signs or wear on drums, containers, hoses, pumps, and containment devices; and
4. Material transfer procedures will be discussed to reduce the chance of leaks and spills.

BEST MANAGEMENT PRACTICES & PREVENTIVE MAINTENANCE:

1.1 Best Management Practices:


Best management practices (BMP's) are measures currently taken at the facility, or to be implemented, to prevent or mitigate water pollution from sources throughout the plant. BMP's are aimed at preventing spills and similar environmental incidents by stressing the importance of management and employee awareness of potential situations.

Good housekeeping - practices are designed to maintain a clean and orderly work environment. At this facility, housekeeping is stressed on a daily bases.

Preventive Maintenance - All areas of the plant are inspected periodically for leaking valves, seals, and gaskets. Leaks are repaired as they are discovered.

CERTIFICATION:

Based on my inquiry of the person or persons directly responsible for managing compliance with the slug control measures in the slug control plan, I certify that, to the best of my knowledge and belief, this facility is implementing the slug control plan submitted to the City of Russellville, AR.


Name/Title of Authorized Representative
Paul Siedsma, Plant Manager

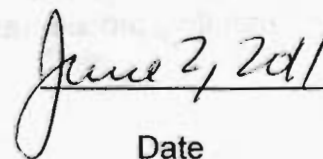

Date

EXHIBIT A

SPILL INCIDENT REPORT FORM

F-12/14

SPILL REPORT FORM

TODAY'S DATE: _____ EMPLOYEE NAME: _____

1. Date and time spill was found:

2. Name of employee finding spill:

3. Name of supervisor initially informed of the spill:

4. Specify exact location of spill:

5. What material was spilled?

6. Estimate duration of spill (i.e., if a leak is discovered, how long has it been leaking):

7. Estimate of volume of material spilled:

8. Did the spill occur on a concrete floor? Yes ___ No ___
9. Was the spill contained?

10. If the answer to Question #9 is Yes, was all of the spilled material accounted for? Yes ___ No ___
11. If the answer to Question # 10 is No, how much of the spilled material is not accounted for?

12. If the answer to Question #9 is No, was the spilled material allowed to reach a storm water run-off structure?
Yes ___ No ___
13. If the answer to Question # 12 was yes, how much of the spilled material was lost to the storm water discharge?

14. Outcome of the recovered spilled material:
___ Recovered spilled material was used in the industrial process.
___ Recovered spilled material was returned to the supplier or another firm to be recycled.
___ Recovered spilled material was disposed of in a regulated landfill.
Name of Landfill:

Quantity of material sent to landfill:

Other: Explain: _____

F-13/14

SPILL REPORT FORM

TODAY'S DATE: _____ EMPLOYEE NAME: _____

15. The supervisor responsible for the spill cleanup must write a narrative of the spill incident and attach it to this form.

The report should include:

- a) Date(s) of the spill.
- b) Who was notified/time?
- c) How the spill was contained.
- d) How much material was lost?
- e) The outcome of the lost material.
- f) The outcome of the recovered material.
- g) Steps taken to assure that a similar spill does not occur in the future.
- h) Recommendation.

Influent CBOD

CBOD, INFLUENT Summary Report

Date	2006	2007	2008	2009	2010
Jan	499.3	180.6	266.8	225.9	162.8
Feb	366.7	212.8	173.7	180.9	87.9
Mar	333.0	255.1	135.6	167.3	160.8
Apr	542.7	249.8	188.8	174.6	176.8
May	357.1	231.5	229.5	111.7	169.2
Jun	440.5	278.7	209.2	294.4	301.3
Jul	408.8	266.3	285.1	272.5	275.6
Aug	385.5	304.5	339.2	249.0	303.9
Sep	351.9	267.7	237.6	198.0	258.1
Oct	251.5	279.0	333.0	194.0	318.9
Nov	203.8	377.5	371.5	164.6	320.5
Dec	168.9	254.4	214.1	171.2	318.3
Minimum	168.9	180.6	135.6	111.7	87.9
Maximum	542.7	377.5	371.5	294.4	320.5
Total	4,309.5	3,157.9	2,984.2	2,404.1	2,854.0
Average	359.1	263.2	248.7	200.3	237.8

Influent TSS

TSS, INFLUENT Summary Report

Date	2006	2007	2008	2009	2010
Jan	350.5	109.2	317.4	172.6	114.5
Feb	214.4	188.9	208.1	172.6	93.2
Mar	230.3	249.9	155.7	236.3	156.5
Apr	235.7	239.7	258.7	201.8	221.3
May	256.5	261.0	249.4	130.1	196.0
Jun	263.1	217.5	208.0	210.8	251.1
Jul	358.5	278.2	256.3	251.8	183.0
Aug	348.9	350.3	327.1	234.0	244.5
Sep	272.5	316.5	313.4	217.3	258.1
Oct	278.5	289.2	339.6	189.7	365.3
Nov	217.5	428.9	421.1	143.9	414.1
Dec	171.5	432.1	235.9	159.3	299.7
Minimum	171.5	109.2	155.7	130.1	93.2
Maximum	358.5	432.1	421.1	251.8	414.1
Total	3,179.8	3,361.5	3,290.7	2,314.3	2,797.4
Average	265.0	280.1	274.2	192.9	233.1

Influent NH3-N

NH3-N, INFLUENT Summary Report

Date	2006	2007	2008	2009	2010
Jan	28.21	4.40	16.43	14.45	23.61
Feb	21.35	6.26	10.08	12.78	10.09
Mar	24.83	6.37	6.81	10.14	14.07
Apr	15.56	11.35	12.28	9.63	13.28
May	51.93	13.14	10.72	7.97	10.73
Jun	15.24	14.35	9.00	14.05	16.92
Jul	19.46	11.48	11.25	14.87	15.74
Aug	16.90	16.42	13.42	14.30	17.75
Sep	14.94	14.74	9.44	10.90	14.04
Oct	15.27	12.81	13.07	8.57	14.54
Nov	13.00	17.70	14.36	11.50	17.12
Dec	10.83	13.41	13.88	12.87	21.62
Minimum	10.83	4.40	6.81	7.97	10.09
Maximum	51.93	17.70	16.43	14.87	23.61
Total	247.52	142.43	140.72	142.04	189.50

G-1/1



CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105
FAX (479) 968-3265

WASTEWATER CONTRIBUTION PERMIT NO. WDP 2001

Company Name: International Paper Company

Mailing Address: Post Office Box 130, Russellville, Arkansas 72811

Facility Address: 3019 East 16th Street, Russellville, Arkansas 72802

Facility Representative: Mr. Jamie Bullock, Site Manager

The above industrial user is authorized to discharge industrial wastewater to the City of Russellville wastewater collection and treatment system at the cleanout located 70 feet east and 36 feet south of the front entrance, in accordance with the provisions of City of Russellville Pretreatment Ordinance, No. 1388 and with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its responsibility to comply with U. S. Environmental Protection Agency Regulation 40 CFR 403 (General Pretreatment Regulations) and any or all applicable provisions, standards, or requirements of Federal or State of Arkansas Law, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

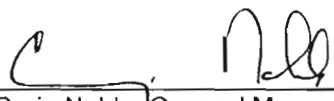
Noncompliance with any term or condition of this permit shall constitute a violation of the City of Russellville Pretreatment Ordinance, No. 1388, and may subject the permittee to enforcement actions.

This permit is granted in accordance with the application dated November 24, 2009 and filed with the Control Authority and in conformity with plans, specifications, and/or other data submitted in support of the application, all of which are filed with and considered as part of this permit, together with the following named conditions and requirements. As of the date of this permit, the Control Authority for the City of Russellville Pretreatment Program is City Corporation.

If the permittee wishes to continue to discharge industrial wastewater after the expiration date of this permit, application must be filed for a permit reissuance in accordance with the requirements of Section 4.2.5. Of City of Russellville Pretreatment Ordinance, No. 1388, a minimum of 180 days prior to the expiration date.

Effective Date: **December 16, 2010**

Expiration Date: **Midnight, November 30, 2015**


 Craig Noble, General Manager

December 15, 2010
 Date

1
 H-2/2

PART 1 – EFFLUENT LIMITATIONS

- A. All wastewater discharge shall conform with all applicable laws, regulations, standards, and requirements contained in City of Russellville Pretreatment Ordinance, No. 1388 and any applicable State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards or requirements that become effective during the term of this permit.
- B. Maximum Limitations: The permittee shall not exceed the effluent limitations stated below for all wastewater discharged to the City of Russellville wastewater collection and treatment system.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
BOD ₅	3000 mg/L
TSS	650 mg/L
O&G	150 mg/L

<u>PARAMETER</u>	<u>INSTANTANEOUS MINIMUM-MAXIMUM</u>
pH	6.0 – 9.0 S. U.

- C. Surcharge Limitations: All wastewater discharged by the permittee to the City of Russellville wastewater treatment and collection system which exceeds the concentrations stated below are subject surcharge.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
BOD ₅	350 mg/L
TSS	350 mg/L

- D. BOD₅ and TSS Surcharge Calculations:

$$S = SBOD_5 + STSS$$

WHERE:

- S = Total monthly surcharge in dollars
 SBOD₅ = Monthly surcharge in dollars due to excessive BOD₅
 STSS = Monthly surcharge in dollars due to excessive TSS

$$SBOD_5 = (CBOD_5 - 350)(F)(8.34)(0.0727) \quad STSS = (CTSS - 350)(F)(8.34)(0.0624)$$

WHERE:

- CBOD₅ = Monthly average concentration of all composite BOD₅ sample results in milligrams/liter, enter 350 if average concentration is less than 350 milligrams/liter.
 CTSS = Monthly average concentration of all composite TSS sample results in milligrams per liter, enter 350 if average concentration is less than 350 milligrams per liter.
 350 = Surcharge limitation for TSS in milligrams per liter
 F = Total wastewater volume for the month, million gallons
 8.34 = Conversion factor
 0.0727 = Unit charge in dollars per pound for BOD₅
 0.0624 = Unit charge in dollars per pound for TSS



CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105
FAX (479) 968-3265

WASTEWATER CONTRIBUTION PERMIT NO. WDP 2000

Company Name: Sugar Creek Foods International Inc.
Mailing Address: Post Office Box 747, Russellville, Arkansas 72811
Facility Address: 301 North El Paso Street, Russellville, Arkansas 72801
Facility Representative: Mr. Scott Van Horn, President


The above industrial user is authorized to discharge industrial wastewater to the City of Russellville wastewater collection and treatment system at the municipal manhole located adjacent to the base of the loading dock ramp at the northwest corner of the facility, in accordance with the provisions of City of Russellville Pretreatment Ordinance, No. 1388 and with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its responsibility to comply with U. S. Environmental Protection Agency Regulation 40 CFR 403 (General Pretreatment Regulations) and any or all applicable provisions, standards, or requirements of Federal or State of Arkansas Law, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

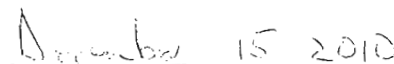
Noncompliance with any term or condition of this permit shall constitute a violation of the City of Russellville Pretreatment Ordinance, No. 1388, and may subject the permittee to enforcement actions.

This permit is granted in accordance with the application dated August 26, 2010 filed with the Control Authority and in conformity with plans, specifications, and/or other data submitted in support of the application, all of which are filed with and considered as part of this permit, together with the following named conditions and requirements. As of the date of this permit, the Control Authority for the City of Russellville Pretreatment Program is City Corporation.

If the permittee wishes to continue to discharge industrial wastewater after the expiration date of this permit, application must be filed for a permit reissuance in accordance with the requirements of Section 4.2.5. Of City of Russellville Pretreatment Ordinance, No. 1388, a minimum of 180 days prior to the expiration date.

Effective Date: **December 16, 2010**
Expiration Date: **Midnight, November 30, 2015**


Craig Noble, General Manager


Date

I-1/2

PART 1 – EFFLUENT LIMITATIONS

- A. All wastewater discharge shall conform with all applicable laws, regulations, standards, and requirements contained in City of Russellville Pretreatment Ordinance, No. 1388 and any applicable State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards or requirements that become effective during the term of this permit.
- B. Maximum Limitations: The permittee shall not exceed the effluent limitations stated below for all wastewater discharged to the City of Russellville wastewater collection and treatment system.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
TSS	650 mg/L
BOD ₅	550 mg/L
Oil & Grease	150 mg/L
<u>PARAMETER</u>	<u>INSTANTANEOUS MINIMUM-MAXIMUM</u>
pH	6.0 – 9.0 S. U.

- C. Surcharge Limitations: All wastewater discharged by the permittee to the City of Russellville wastewater treatment and collection system which exceeds the concentrations stated below are subject surcharge.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u>
BOD ₅	350 mg/L
TSS	350 mg/L

- D. BOD₅ and TSS Surcharge Calculations:

$$S = SBOD_5 + STSS$$

WHERE:

- S = Total monthly surcharge in dollars
- SBOD₅ = Monthly surcharge in dollars due to excessive BOD₅
- STSS = Monthly surcharge in dollars due to excessive TSS

$$SBOD_5 = (CBOD_5 - 350)(F)(8.34)(0.0727)$$

$$STSS = (CTSS - 350)(F)(8.34)(0.0624)$$

WHERE:

- CBOD₅ = Monthly average concentration of all composite BOD₅ sample results in milligrams/liter, enter 350 if average concentration is less than 350 milligrams/liter.
- CTSS = Monthly average concentration of all composite TSS sample results in milligrams per liter, enter 350 if average concentration is less than 350 milligrams per liter.
- 350 = Surcharge limitation for TSS in milligrams per liter
- F = Total wastewater volume for the month, million gallons
- 8.34 = Conversion factor
- 0.0727 = Unit charge in dollars per pound for BOD₅
- 0.0624 = Unit charge in dollars per pound for TSS

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

**Russellville City Corporation
P. O. Box 3186
Russellville AR 72811**

**LIS No. 09-
AFIN 58-00105
NPDES Permit No. AR0021768**

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order (hereinafter "CAO") is issued pursuant to Ark. Code Ann. §8-1-202(b)(2)(B), which authorizes the Director of the Arkansas Department of Environmental Quality (hereinafter "ADEQ" or "Department") to initiate and settle administrative enforcement actions to compel compliance with laws, orders, and regulations charged to the responsibility of the Department, including but not limited to the Federal Water Pollution Control Act, 33 U.S.C §1311 et seq., and the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. §8-4-101 et seq., and all regulations issued thereunder. The Director may also propose the assessment of civil penalties as provided by Ark. Code Ann. §8-4-103(c) and Arkansas Pollution Control and Ecology Commission (hereinafter "APC&EC") Regulation No. 7, Civil Penalties, and take all actions necessary to collect such penalties.

The issues herein having been settled by the agreement of the Russellville City Corporation and ADEQ, it is hereby agreed and stipulated that the following **FINDINGS OF FACT** and **ORDER AND AGREEMENT** be entered herein.

