

# ADEQ

ARKANSAS  
Department of Environmental Quality

**MAR 16 2015**

Steve Mallet, Jr., P.E.  
General Manager  
City Corporation - Russellville  
P.O. Box 3186  
Russellville, Arkansas 72811-3186

Re: City of Russellville (NPDES #AR0021768) Pretreatment Program Audit /  
Municipal Pollution Prevention (P2) Assessment

Dear Mr. Mallet:

Please find enclosed the finished report for the Audit/Assessment conducted January 13<sup>th</sup> through the 15<sup>th</sup>, 2015. The report with required actions and recommendations should be made available for review and discussion by appropriate City representatives. Please respond in writing within 30 days with proposed corrective actions to deficiencies and recommendations found during the Audit.

Several administrative deficiencies were discovered and need your Pretreatment staff's attention. Pollution Prevention (P2) activities, although voluntary, were found to be almost non-existent. P2 activities are meant to compliment City Corporation's Pretreatment Program and be a win-win situation for both the City and its industries.

It was a pleasure and learning experience working with the City's Pretreatment personnel during this event and becoming more familiar with Russellville, its Pretreatment, Pollution Prevention Programs and industries.

Feel free to contact this office with any questions or concerns at (501) 682-0625.

Sincerely,



Allen Gilliam  
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist/Attachments

ec: Rudy Molina/EPA 6WQ-PO  
Jason Bolenbaugh, Field Services Branch Manager

E/NPDES/NPDES/Pretreatment/Reports

**PRETREATMENT PROGRAM AUDIT/  
POLLUTION PREVENTION ASSESSMENT  
CITY CORPORATION – RUSSELLVILLE  
NPDES PERMIT #AR0021768**

**February 10, 2015**

**Prepared by Allen Gilliam  
ADEQ State Pretreatment Coordinator**

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C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs

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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

Attachment(s) A: Supporting Documentation

## 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.

An audit/assessment was performed January 13<sup>th</sup> through the 15<sup>th</sup>, 2015 of the Pretreatment and Pollution Prevention Programs implemented by City Corporation for the City of Russellville, Arkansas. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator
Randy Bradley	City Corp / Pretreatment Coordinator
Charlotte Petrick	City Corp / Lab Analyst

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 on 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. City Corp, Russellville or the City may be used synonymously throughout this report.

The City submitted Pretreatment Program modifications to be current with the "Streamlining Rule". It was reviewed and approved by ADEQ on 7/29/12. The Program is current with the Streamlining revisions to the Pretreatment Regulations in 40 CFR 403.

The City's wastewater treatment plant is currently undergoing construction for various upgrades and currently consists of primary clarification, anoxic zones for denitrification, activated sludge,

fine bubbler diffusers and 3 final clarifiers. 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 had a 2013 average flow of approximately 5.7 MGD. Approximately 16.4% of the average flow is from 13 significant industrial contributors (SIUs), 3 of which are categorical.

The City land applies approximately 311 dry tons of sludge per year.

The audit/assessment consisted of informal discussions with City Corp's personnel, examination of industrial user files, pretreatment records and site visits to three (3) of the City industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Supporting information obtained during the audit is included as Attachments A-1 through A-8.

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.

## **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 403.8(f)(2)(i), “[the City will] Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to [ADEQ] upon request;”*

During the checklist review a compilation or index of IU surveys could not be produced. The City must develop such a digested version of all their IU surveys to help determine which businesses may or may not be subject to the City's Pretreatment Program.

With this practice, “sanitary wastewater” dischargers could be stricken from further surveys in the future. Chemicals on hand at non-permitted industries/businesses may also be an important note to have on hand. Is there a potential for these chemicals to be toxic or incompatible with the City's treatment works if accidentally discharged into the sewage collection system?

*2) Under 40 CFR 403.8(f)(1)(B), “[I]ndividual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: (3) Effluent limits...based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law;”*

*2a) It was discovered during the file review that Taber's production based limits converted to*

concentration limits were not based on current production or flow. See Atch. A-5d for the old production and flow basis as opposed to Taber's current production and flows (Atch. A-7d, A-7f and A-7g).

**2b)** Taber's production based limits must be based on four (4) Aluminum Extrusion subprocesses under Subpart C of the Aluminum Forming Category located in 40 CFR 467.35: the Core process, Extrusion Press Leakage, Press Heat Treatment Contact Cooling Water (discovered this process was added in 2011 during its site visit) and the Solution Heat Treatment Contact Cooling Water subprocess.

**2c)** Taber's permit limits will more than likely have to be placed on two (2) pages for two (2) different scenarios. It was discovered their Solution Heat Treatment Contact Cooling Water was batch (volume not discussed during its site visit) discharged approximately once/month. This will result in a separate limits' page which includes that subprocess' lbs/million off-lbs of aluminum quenched.

**2d)** Taber's permit reporting requirements must include lbs Aluminum extruded/day for two (2) of its subprocesses and lbs of Aluminum quenched/day for the other two (2) subprocesses.

**3)** Under **40 CFR 403.8(f)(2)(v)**, "[the City will] Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards."

**3a)** During the file review it was not evident the City was verifying production at Taber during inspections (see Atch. A-8). With the addition of the "Press Heat Treatment Contact Cooling Water" equipment in 2011, as mentioned above, four (4) separate subprocesses under 40 CFR 467, Subpart C – Extrusions, must have their production both verified by the City and reported by Taber.

**3b)** It was discovered during Grace's site visit the facility had vibratory tumblers' wastewater discharging directly to the City. This wastestream had not previously been identified as a regulated stream by the City during previous inspections. Neither the City nor Grace had been monitoring it for compliance with its Metal Finishing limits located in 40 CFR 433. The core operations of etching and passivation exists at Grace; therefore, making vibratory tumbling a regulated ancillary process under 40 CFR 433.10.

The City must sample this stream separately or require Grace to re-plumb this wastestream through its pretreatment system to the final sampling point.

**4)** Under **40 CFR 403.8(f)(g)**, "Monitoring and analysis to demonstrate continued compliance. (1) ...the reports required in paragraphs (b), (d), (e), and (h) of this section shall contain the results of sampling and analysis of the Discharge, including the flow and the nature and concentration, or production and mass where requested by the Control Authority, of pollutants contained therein which are limited by the applicable Pretreatment Standards."

Taber has been reporting its production and flow although it is not broken down into their four (4)

separate subprocesses in 40 CFR 467.35 (Attch. A-7b). The City must revise Taber's permit to require production and flow measurements to reflect their separate production based subprocesses.

This same requirement must also be followed for the flow monitoring and verification from each of their four (4) subprocesses. One (1) total flow meter will not be representative of the process discharges as it was discovered during the site visit the "Solution Heat Treatment Contact Cooling Water" was being batch discharged about once/month.

**5) Under 40 CFR 403.8(f)(1)(B)**, "[I]ndividual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: (3) Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter..."

The City's Metal Finishers who had submitted an approvable Toxic Organic Management Plan (TOMP) did not have the "TOMP" specifically listed as a standard to meet in its permit. The City must list any BMPs, and in Russellville's case, their Metal Finisher's TOMP's on the limits page with the rest of their numeric limits.

Compliance with the TOMP should also be included in the "Reporting Section" of these permits. In the case of the City's Metal Finishers with approved TOMP's, the required certification statement in 40 CFR 433.12(a) should be included.

**6) Under 40 CFR 403.12(b)(3)**, "The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes."

During the file reviews, neither comprehensive/understandable wastewater flow schematics nor process descriptions could be produced. The City must require its categorical industries to supply them with comprehensive process descriptions and schematics of their wastewater flows with directional arrows from its generation through pretreatment to the final sampling point. These documents should be dated.

**7) Under 40 CFR 403.12(g)**, "Monitoring and analysis to demonstrate continued compliance. (2) If sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation. The User 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. Where the Control Authority has performed the sampling and analysis in lieu of the Industrial User, the Control Authority must perform the repeat sampling and analysis unless it notifies the User of the violation and requires the User to perform the repeat analysis."

During the file review it was not apparent two (2) industries that violated their permit limits notified the City of their excursions and/or the City did not notify the industries of their violation(s) within 24 hours of becoming aware of those violations.

P.O.M's violations were recognized by the City, but the notice of violation was dated prior to the violations (see Attch. A-3 & A-3c). It appears P.O.M. did resample within thirty (30) days of

becoming aware of its violation (see Attch. A-3h).

There was no documentation from the City to Grace regarding its violations. Even though the City did resample Grace within thirty (30) days (see Attch. A-2b & A-2d), Chrome was still in violation of its monthly average standard in 40 CFR 433.15. No further sampling documentation or correspondence from the City could be located regarding Grace and its recurring violations.

The City must have some form of enforcement action documented in its files. This could even be in the form of a record of communication (dated phone call note to file, e.g.) depending on the egregiousness of the violation.

The City must require its permitted industries to notify the City within 24 hours of first becoming aware of a violation and require re-sampling/re-submittal of results within 30 days. Although not specifically required by the regulations, as a professional courtesy, when the City conducts compliance sampling, it should notify its industries within 24 hours of first becoming aware of a violation and re-sample within 30 days “unless it notifies the User of the violation and requires the User to perform the repeat analysis.”

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

1) STRONG recommendation to “beef up” inspection forms with more narrative regarding each industry’s processes, manufacturing operations, chemical (including haz waste) handling procedures, appearance of equipment (rusting, leaking, loose fittings, etc.), good or poor O&M, sampling point conditions, observations of how the industry representative takes samples, etc.

Pollution Prevention (P2) and Best Management Practices (BMPs) should also be asked during the inspections. Specific questions should be targeted at the facility representative regarding source reduction, lean manufacturing, inventory control, in-situ recycling (acid/caustic regeneration) and/or bath filtration, countercurrent rinses, air knives/curtains, etc.

Grace had an area of concrete in one of their process areas that had apparently been etched away to the point its smooth surface was gone and its aggregate of rocks and gravel was the surface showing. The facility representative explained this was from an operation long ago and that part of the process floor had not been coated with a sealant, but was not noted on the latest inspection report. The etching of the concrete would have been an indicator that continuous spills/overflows of tanks or storage vessels of caustics in the area were ongoing if this auditor hadn’t asked.

If requirement #6 above had already been accomplished, much of this narrative could have already been placed in each industry’s inspection form and used for subsequent inspections only to be updated as processes/chemicals at the IU changes throughout the years.

2) Recommend including the City inspector’s, the industry representative’s signature and date on at least one sheet of the inspection form. Ideally it should be placed on the first page where the rest of the basic facility’s information is already typed in.

3) Recommend notifying hazardous waste generators of their reporting requirements in 40 CFR



403.12(p). It is recognized this a one-time reporting requirement, but it is also recognized hazardous waste generating industries/businesses move around from municipality to municipality frequently. This notification requirement will let these industries/businesses know that the City has them “targeted” as a hazardous waste generator and might deter them from illegally discharging it to the City’s collection system. The latest ADEQ haz waste generators’ list of IUs with Russellville addresses was provided during the audit.

4) STRONG recommendation to develop a more comprehensive fact sheet for each of City Corp’s industrial users (see Attch. A-6 for City’s current example). More pertinent information should be included such as when the facility began its operations and/or started discharging to the City, its permit limits statement of basis, a comprehensive wastewater flow schematic, a comprehensive process narrative matching up to the wastewater flow schematic, toxic/incompatible chemicals stored on-site, slug control plan, any BMPs, etc.

5) Recommend sending each permitted facility what the City has on file for its narrative process/manufacturing operations and wastewater flow schematics and require them to update/revise them to be most comprehensive, date and re-submit.

6) Recommend continuing IU surveys based on business sector (machine shops, auto body repair shops, pharmacies, grocery/hardware stores, screen printers, etc.) tailoring the surveys to “fit” questions appropriate for each sector. Questions asked should be specific to each sector’s operations/processes and chemical disposal practices.

These IU surveys should also ask what pollution prevention (P2) or best management practices (BMP) they employ optimizing their processes with source reduction, inventory control, in-situ recycling (solvent distillation, e.g.), water and energy conservation.

7) Recommend including the \$1,000 penalty per violation per day in all IU permits enforcement options’ section.

8) Recommend including the general and specific prohibitions located in 40 CFR 403.5(a) & (b) in all IU permits.

9) Recommend recycling duplicate draft or expired IU permits and non-current IU permit applications, but retain baseline monitoring reports, current IU applications, TOMPs, Slug Control Plans and Slug Discharge Evaluations.

10) Recommend continuing to send out fliers keeping the general public aware of proper grease, pharmaceuticals and non-dispersible disposal.

#### 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

No further modifications are deemed necessary to the City’s Pretreatment Program at this time.

\* \* \* \* \*

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 5-17  
 Section III: Industrial User File Evaluation . . . . . Pages 18-26

## SECTION I: GENERAL INFORMATION

### A. GENERAL INFORMATION

Control Authority Name: City Corporation, Russellville NPDES # AR0021768  
 Mailing address: P.O. Box 3186, Russellville, AR 72811-3186  
(404 Jimmy Lile Road)  
 Permit Signatory: Steve Mallett, Jr., P.E. Title: General Manager  
 Telephone: 479.968.2105 x-113 FAX NUMBER: 479.968.3265  
 Pretreatment Contact: Randy Bradley Title: Pretreatment Coordinator  
 Address: same  
 Telephone: 479.968.2080 x-224 e-mail: rbradley@citycorporation.com  
 Pretreatment program approval date: 1/13/84  
 Dates of approval of any substantial modifications: 3/10/92, 7/29/12  
 Month Annual Pretreatment Report Due: February  
 Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 1/13-15/2015  
 (ASSESSMENT)  
 Inspector(s):

<u>NAME</u>	<u>TITLE/AFFILIATION</u>	<u>PHONE NUMBER</u>
<u>Allen Gilliam</u>	<u>Pretreatment Coord/ ADEQ</u>	<u>(501) 682-0625</u>

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>*Randy Bradley</u>	<u>Pretreatment Coordinator</u>	<u>479.968.2080 x-224</u>
<u>Charlotte Petrick</u>	<u>Laboratory Analyst</u>	<u>479.968.2080 x-226</u>

\* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>Audit</u>	<u>6/13/11</u>	<u>"Update local limits"</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: n/a

       ✓   Is the Control Authority currently in SNC or RNC?

.....  
The facility is under a CAO (09-146) for numerous monthly permit limit violations, mainly conventionals, but occasionally Cu and Hg too.

**SECTION I: GENERAL INFORMATION**

**B. TREATMENT PLANT INFORMATION**

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0021768	City Wastewater	10/01/10	09/30/15

2. Individual Treatment Plant Information

a. Name of Treatment Plant: City Wastewater Plant  
Location Address: 404 Jimmy Lile Road, 72802

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 7.3 MGD; Actual (Avg)- 5.734 MGD

Sewer System: 100 % # of SSOs due to grease blockages: 5

Industrial Contribution to this Treatment Plant

# of SIUs: 13 # of CIUs: 3  
Industrial Flow (mgd): 0.94 Industrial Flow (%): 16.4 % (2013 data)

Level of Treatment

Type of Process(es):

Primary  primary clarifiers; anoxic zones for denitrification  
Secondary  activated sludge; fine bubble diffusers; 3 final  
Tertiary  clarifiers and de-chlorination

(City Corp is under a construction permit so the above may not accurate)

Method of Disinfection: chlorination

Dechlorination  YES  NO

Effluent Discharge

Receiving Stream Name: Whig Creek then to the AR River

Receiving Stream Classification: Segment 3F Ark. River Basin

Receiving Stream Use: secondary contact recreation, raw water source for domestic, industrial and AG water supplies, propagation of desirable species of fish and other aquatic life.

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>311</u> dry tons/yr.
<input type="checkbox"/> Incineration	<u>      </u> dry tons/yr.
<input type="checkbox"/> Monofill	<u>      </u> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<u>      </u> dry tons/yr.
<input type="checkbox"/> Public Distribution	<u>      </u> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<u>      </u> dry tons/yr.
<input type="checkbox"/> Other (specify)	<u>      </u> dry tons/yr.

List of toxic pollutant limits in NPDES permit: Cu, Hq, Zn & conventionals

**SECTION I: GENERAL INFORMATION**

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: ADEQ (5126-W)  
 Effective Date: 11/1/12  
 Expiration Date: 10/31/17  
 List pollutants that are specified in current sludge permit:  
All requirements and limits per 40 CFR 503

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

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There has been no failures to either species over the last five (5) yrs of quarterly WET tests.

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: <u>TKN, etc</u>	<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 its 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>TSS, NH3-N, TRC, FC (11/14)</u>	<u>Treatment compromised because</u>
<u>DO, TSS, NH3-N, FC, CBOD (9 &amp; 8/14),</u>	<u>of plant upgrades.</u>
<u>DO, TSS, NH3-N, FC (7/14),</u>	<u>      </u>
<u>TSS, FC, CBOD (6/14), DO, TSS,</u>	<u>      </u>
<u>TRC, FC, CBOD (5/14), TSS, NH3-N,</u>	<u>      </u>
<u>FC (4/14), DO, TSS, NH3-N, FC,</u>	<u>      </u>
<u>CBOD (3/14), TSS, NH3-N, Cu, Hg,</u>	<u>      </u>
<u>FC, CBOD (2/14), TSS, NH3-N, TRC, Hg (1/14)</u>	<u>      </u>

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

- Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
- Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.  
City Corp has submitted an approvable revised Pretreatment Program to be current with the Streamlining revisions in 40 CFR 403.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
<u>7/29/12</u>	<u>Ord. # 2105; see above for description of modifications</u>	<u>7/29/12</u>

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>n/a</u>	<u>Russellville City Corp is planning to re-evaluate their maximum allowable industrial loadings</u>

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]  
 Date of most recent Ordinance approved by the Control authority: 4/21/11  
 Date of most recent Pretreatment Program modification approval: 7/29/12

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; Aqua Contour may be 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 (P<sup>2</sup>) policies by contributing jurisdictions?

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

<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1. <u>City of Dover</u>	_____	_____	<u>Their Ord. adopts Russellville's by reference.</u>
2. _____	<u>?</u>	<u>?</u>	_____

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 <sup>2</sup> 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:

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
_____	_____	_____	_____



**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)] \*Last partial survey done in '14.

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

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

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

What methods are used to update the IWS: (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 (not specific in Program)

Are there any problems that the Control Authority has in identifying and categorizing SIUs: A recent IU survey was sent to the City of Dover to help identify any SIUs.

YES NO

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

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

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. 0 Other regulated nonsignificant IUs (Describe): \_\_\_\_\_
- 13 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? 5 yrs

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [ICIS] 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 (within City limits), but not grease trap wastes? \*See Attch. A-1 for example.

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                                  |  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does Control Mechanism designate a discharge point? [403.5(b)(8)]                    |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | 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 (septage) waste haulers:

Pollutant	Limit
<u>Basically, the specific prohibitions in 403.6(b) (see Attch. A-1 for example.)</u>	

Describe the discharge point(s) (including security procedures):

Manhole provides access to 36" line which leads to bar screen at headworks and "wait for a plant operator for assistance".

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?

Feb/March '09 Date Notified Letter 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
<u>The City is in the process of re-evaluating their Max. Allowable IU Loading. for validity purposes. New numbers have not been generated yet.</u>			

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?		MAILs in new Program?		7/29/12 Program's Maximum Allowable Industrial Loading/Concentrations lbs/d / mg/l
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>not determined</u>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.26 / 0.0073</u>
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.20 / 0.0056</u>
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>6.50 / 0.1765</u>
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.44 / 0.0494</u>
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.49 / 0.0187</u>
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.82 / 0.0237</u>
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.0046 / 0.0004</u>
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.11 / 0.0072</u>
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>1.25 / 0.0382</u>
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.25 / 0.0096</u>
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>0.33 / 0.0102</u>
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>6.16 / 0.4052</u>

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

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

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>No determination is made regarding TBLLs or their allocation in their currently "approved" Pretreatment Program at this time.</u>		
Cadmium (Cd)	<u>    </u>	<u>    </u>	<u>    </u>
Chromium-Total	<u>    </u>	<u>    </u>	<u>    </u>
Copper (Cu)	<u>    </u>	<u>    </u>	<u>    </u>
Cyanide (CN)	<u>    </u>	<u>    </u>	<u>    </u>
Lead (Pb)	<u>    </u>	<u>    </u>	<u>    </u>
Mercury (Hg)	<u>    </u>	<u>    </u>	<u>    </u>
Molybdenum (Mo)	<u>    </u>	<u>    </u>	<u>    </u>
Nickel (Ni)	<u>    </u>	<u>    </u>	<u>    </u>
Selenium (Se)	<u>    </u>	<u>    </u>	<u>    </u>
Silver (Ag)	<u>    </u>	<u>    </u>	<u>    </u>
Zinc (Zn)	<u>    </u>	<u>    </u>	<u>    </u>
BOD5*	<u>550 mg/l*</u>	<u>    </u>	<u>    </u>
TSS*	<u>650 mg/l*</u>	<u>    </u>	<u>    </u>
<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>

\*These "TBLLs" were developed back in Oct of '91.

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	_____
Other SIUs	<u>2/year</u>	1/year	_____
Sampling:			
CIUs	<u>2/year</u>	1/year	_____
Other SIUs	<u>2/year</u>	1/year	_____
Reporting:			
	12/yr for flow	for all SIUs	
CIUs	<u>2+/yr</u>	2/year	_____
Other SIUs	<u>2+/yr</u>	2/year	_____
Self-Monitoring:			
CIUs	<u>2/year</u>	2/year	_____
Other SIUs	<u>2-12/year</u>	2/year	_____

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

Does the Control Authority routinely split samples with industrial personnel:

YES    NO  
        If requested? *\*Usually requested by International Paper*  
        To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW or contract lab:

	<u>Analytical Method *</u>	<u>Name of Laboratory</u>
Metals	<u>ICP/MS</u>	<u>Env Enterprise Group</u>
Cyanide	<u>Spectro</u>	<u>"</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>WET</u>	<u>Huther &amp; Assoc.</u>

Were all wastewater samples analyzed by 40 CFR 136 methods? Yes  
 \* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.)

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
City relies on ADEQ Certification & EPA's DMR QA test annually for in-house  
conventionals

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

5 days Conventionals  
2 wks Metals  
2-3 wks Organics

Is there an established protocol clearly detailing sampling location and procedures? *\*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: \_\_\_\_\_

Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

I. ENFORCEMENT

YES NO

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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):  |       |                        |          |                        |                |                        |
|  | <table border="0"> <tr> <td style="padding-left: 100px;">civil</td> <td>\$ 1000 /day/violation</td> </tr> <tr> <td style="padding-left: 100px;">criminal</td> <td>\$ 1000 /day/violation</td> </tr> <tr> <td style="padding-left: 100px;">administrative</td> <td>\$ 1000 /day/violation</td> </tr> </table> | civil | \$ 1000 /day/violation | criminal | \$ 1000 /day/violation | administrative | \$ 1000 /day/violation |
| civil  | \$ 1000 /day/violation   |       |                        |          |                        |                |                        |
| criminal   | \$ 1000 /day/violation   |       |                        |          |                        |                |                        |
| administrative   | \$ 1000 /day/violation   |       |                        |          |                        |                |                        |
| <input type="checkbox"/> Imprisonment                              |  |       |                        |          |                        |                |                        |
| <input type="checkbox"/> Termination of Service                    |  |       |                        |          |                        |                |                        |
| <input type="checkbox"/> Other: _____                              |  |       |                        |          |                        |                |                        |

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

YES NO

- &  When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]  
\*No enforcement action could be produced in the files reviewed for Grace's 6/4/14 Cr violation. Repeat sampling within 30 days was found still showing non-compliance with the Cr CFR 433 monthly avq limit (see Attch. A-2).
- 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: +POM's semi-annual report showed violations. No 24 hr notification could be located from the IU. It appears the City responded to the violation before they occurred. Repeat sampling was conducted within the 30 day mandatory period showing return to compliance (See Attch. A-3). Confusing date on City's paperwork when actual enforcement action took place.

n/a If no, does the Control Authority conduct all of the monitoring?

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	Enforcement Action		Return to Compliance?	
	in SNC	Type	Date	Yes (Date)	No

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period (2014):

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

Has the Control Authority experienced any of the following:

EXPLAIN and ID Industrial User

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

     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>	\$ _____
Administrative	<u>0</u>	\$ _____
Total	<u>0</u>	\$ _____ [ICIS]



## 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: \_\_\_\_\_  
     \_\_\_\_\_  
  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

Pretreatment personnel currently estimates about 2 FTEs

YES NO

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

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

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

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

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	<u>2 Isco portables; 2 portable &amp; 2 bench pH meters;</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	<u>standard list</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	<u>1 Truck &amp; other vehicles as necessary</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	<u>conventionals analyzed in-house. City sends metals and organics to contract lab</u>

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

**L. POLLUTION PREVENTION**

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

No pollution prevention efforts seem to be ongoing.

---

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---

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

No

---

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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.

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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

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

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

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**SECTION III: INDUSTRIAL USER FILE EVALUATION**

FILE #: 1 Industry Name: Taber Extrusions File/ID No. WDP2005  
Industry Address: 415 S. Elmira Ave.  
Industry Description: Aluminum Extrusion of numerous shapes  
Industrial Category: Aluminum Forming 40 CFR 467 SIC/NAICS codes: 3353/331316  
Avg. Total Flow (gpd): ??? Avg. Process Flow (gpd): 11-13,000

Industry visited during audit: YES

Comments: Heat treat cooling water batch discharged; limits may have to be revised

FILE #: 2 Industry Name: Bridgestone Tube File/ID No. WDP202  
Industry Address: 2700 E. Main Street  
Industry Description: Inner Tube Mfr.  
Industrial Category: n/a 40 CFR: n/a SIC/NAICS Codes: 3011/326211  
Avg. Total Flow (gpd): ???? Avg. Process Flow (gpd): 4,000

Industry visited during audit: NO

Comments: \_\_\_\_\_

FILE #: 3 Industry Name: Grace Mfg. File/ID No. WDP2016  
Industry Address: 614 State Route 247  
Industry Description: Mgr. of precision thin metal parts; SS mainly  
Industrial Category: Metal Finisher 40 CFR 433 SIC/NAICS Code(s): 3499, 3479/332216  
Avg. Total Flow (gpd): ???? Avg. Process Flow (gpd): ~42,000

Industry visited during audit: YES

Comments: \_\_\_\_\_

FILE #: 4 Industry Name: Park-O-Meter (POM) File/ID No. WDP2013  
Industry Address: 200 South Elmira  
Industry Description: Refurbishing parking meters & Zn Casting (dry process)  
Industrial Category: Metal Finishing 40 CFR 433 SIC/NAICS Code(s): 3824, 2381, 3363,  
3089/33514  
Avg. Total Flow (gpd): ???? Avg. Process Flow (gpd): 4,000 to 20,000

Industry visited during audit: YES

Comments: seemed to be more Zn casting then phosphatizing and powder coat painting

FILE #: 5 Industry Name \_\_\_\_\_ File/ID No. \_\_\_\_\_  
Industry Address: \_\_\_\_\_  
Industry Description \_\_\_\_\_  
Industrial Category \_\_\_\_\_ 40 CFR \_\_\_\_\_ SIC Code: \_\_\_\_\_  
Ave. Total Flow (gpd) \_\_\_\_\_ Ave. Process Flow (gpd) \_\_\_\_\_

Industry visited during audit:

Comments: \_\_\_\_\_

## SECTION III: INDUSTRIAL USER FILE EVALUATION

### A. Industrial User Characterization

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	_____
2. Is the user subject to categorical pretreatment standards?	✓	✓	✓	✓	_____
a. New source or existing source (NS or ES)?	<u>ES</u>	<u>n/a</u>	<u>ES</u>	<u>ES</u>	_____
b. Is this IU one identified as having P <sup>2</sup> potential?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	_____

### B. Control Mechanism

1. Does the file contain an application for a control mechanism? (See Atatch. A-4 for example) If yes, what is the application date?	✓ <u>10/09</u>	✓ <u>9/09</u>	✓ <u>9/09</u>	✓ <u>12/09</u>	_____
Does it ask for Pollution Prevention information?	<u>1</u>	✓	✓	✓	_____
2. Does the file contain a Permit? (See Atatch. A-5 for example) Permit Expiration Date? <sup>2</sup>	✓ <u>11/15</u>	✓ <u>11/15</u>	✓ <u>11/15</u>	✓ <u>11/15</u>	_____
Is a fact sheet included?	<u>2</u>	✓	✓	✓	_____
3. Has the SIU been issued a control mechanism containing: [403.8(f) (1) (iii) (A) - (E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	_____
b. Expiration date?	✓	✓	✓	✓	_____
c. Statement of nontransferability?	✓	✓	✓	✓	_____
d. Appropriate discharge limitations?	<u>3</u>	✓	✓	✓	_____
e. Appropriate self-monitoring requirements?	<u>4</u>	✓	✓	✓	_____
f. Sampling frequency?	✓	✓	✓	✓	_____
g. Sampling locations?	✓	✓	✓	✓	_____

Comments: 1) IU only mentions recycling; 2) Very basic, see Atatch. A-6 for example; 3) Appears limits will have to be revised because of lower flows reported (compare old A-5d flows to recent A-7b, 7f & 7g flows) and separate batch discharge of one of its subprocesses; 4) No requirement for reporting production (lbs/extruded or lbs/quenched).

## SECTION III: INDUSTRIAL USER FILE EVALUATION

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
h. Requirement for flow monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
j. Applicable IU reporting requirements?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
Civil and Criminal Penalty provisions?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>      </u>
Revocation of permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
m. General/Specific Prohibitions?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>      </u>
n. Where technologically and economically achievable, are P <sup>2</sup> aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>      </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>3</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>3</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>

Comments: 1) No production reporting requirements although IU does (see Attach. A-7b); 2) Very general w/no mention of \$1000 fine; 3) Appears this prod. based CIU needs to have its permit limits revised because of most recent reported flow information. Batch discharge of solution heat treatment contact cooling water may further complicate IU's permit limits, possibly resulting in two separate permit limits' pages.

**SECTION III: INDUSTRIAL USER FILE EVALUATION**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </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>      </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </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>✓</u>	<u>      </u>

### SECTION III: INDUSTRIAL USER FILE EVALUATION

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>      </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>      </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f) (2) (vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
<u>Inspections</u> (see Attech. A-8 for example)					
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>10/14</u>	<u>8/14</u>	<u>10/14</u>	<u>9/14</u>	<u>      </u>
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
d. Verification of production rates?	<u>no</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>
f. Evaluation of pretreatment facilities?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>
g. Evaluation of self-monitoring equipment and techniques?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>      </u>
h. Evaluation of slug discharge control plan [403.8(f) (2) (v)]	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u>      </u>
i. Manufacturing facilities?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>

Comments: 1) General in nature without detailed description nor schematic (could have this info in IUs' files so it can just be referenced in inspection). Any rusting/leaking lines, pumps, tanks; etc?; 2) Sampling equip is asked about, but nothing about the IU's sampling techniques; 3) All IUs are required to have a slug control plan regardless of "low" potential).



**SECTION III: INDUSTRIAL USER FILE EVALUATION**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
j. Chemical handling and storage procedures?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>          </u>
k. Chemical spill prevention areas?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>          </u>
l. Hazardous waste storage areas and handling procedures?	<u>3</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
m. Sampling procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>          </u>
o. Monitoring records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
p. Evaluation of Pollution Prevention opportunities?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>          </u>
q. Control Authority inspector signature?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>          </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>archive</u>	<u>n/a</u>	<u>archive</u>	<u>archive</u>	<u>          </u>
b. 90-Day Report?	<u>archive</u>	<u>n/a</u>	<u>archive</u>	<u>archive</u>	<u>          </u>
c. All periodic reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>          </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>

Comments: 1) Questions about chem. storage, but not handling; 2) Somewhat with questions about "Spill Prevention"; 3) Haz Waste "Removed substances" question on bottom of Atch. A-8f answered incorrectly. Facility IS a haz waste generator.

## SECTION III: INDUSTRIAL USER FILE EVALUATION

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</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>      </u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>      </u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
b. Did POTW respond to the spill?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </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>2</u>	<u>✓</u>	<u>      </u>
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>1</u>	<u>1</u>	<u>      </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>3</u>	<u>4</u>	<u>      </u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>N/A</u>	<u>N/A</u>	<u>5</u>	<u>✓</u>	<u>      </u>

Comments: 1) Slug discharge potential evals show "low" potential; 2) No documentation a violation had occurred; 3) No documentation indicating the City notified Grace of a permit limit violation; 4) Notification of violation from the City to the IU was dated prior to the violations (see Atatch. A-3); 5) Repeated analysis within 30 days, but still non-compliant.

## SECTION III: INDUSTRIAL USER FILE EVALUATION

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>no</u>	<u>see#4 above</u>	<u>          </u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>n/a</u>	<u>no</u>	<u>see#4 above</u>	<u>          </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/a</u>	<u>n/a</u>	<u>no</u>	<u>see#4 above</u>	<u>          </u>
8. Did the Control Authority follow its approved ERP?	<u>n/a</u>	<u>n/a</u>	<u>no</u>	<u>no</u>	<u>          </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>?</u>	<u>          </u>
10. Is there a compliance schedule? If yes:	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>          </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>          </u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
b. TRC	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
c. Pass through/Interference	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
d. Spill/slug loads	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
e. Reporting	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
f. Compliance schedule	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
g. others (specify)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>          </u>
13. Was the SIU published for SNC?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>          </u>
Date of publication.	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>          </u>

Comments:

# REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Russellville NPDES #: AR0021768

Date of Audit: 1/13 - 15/15 Date entered into QNCR: 3/10/15  
(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
YES	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.

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

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: P.O.M. (Park-0-Meter)

Additional comments: After a few seconds for casting, the operator releases the casting and sets it out to air cool. He occasionally hand sprays an anti-seize/coolant solution onto the open mold faces. He also hand "dabs" hot spots to keep any castings from discoloring. The casting operations are dry with catch trays beneath them to catch any hydraulic leakage. This "waste" is sent off-site for treatment. Very clean casting ops as facility keeps up with a vigorous preventive maintenance progeam. They've removed most of the vibratory tumblers in lieu of steel bead blasting to remove any rough edges. What few vib. tumblers they have left generate very small volumes of w.w. Parts are then sent thru a typical 5-stage Fe phosphatizing process with a final chrome sealant. The phosphatizing and chrome sealant are a closed loop system with only the caustic cleaning stage and 2 rinses being discharged to the City. After a drying process, these castings are powder coat painted with "every color in the rainbow". Any machining coolant is ~80% water/~20% coolant. They've not had to change out the coolant in over a yr and a half. Current production is estimated at 40/60% P.O.M./outside customer. Simple "pretreatment" includes the addition of sodium metabisulfite and air to help "drop out" the Zn from the w.w. This is accomplished in 1 tank inside the bldg and 2 pits outside near the sampling station. Addition of soda ash is necessary for final pH adjustment before discharge to the City. Adequate sampling site.

Visit conducted by: Gilliam/Bradley/Petrick Date: 1/14/15



(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:

P.O.M. (Park-O-Meter), 200 S. Elmira, 479.968.2880

Type of industry: Refurbishing of Parking meters and zinc castings for outside customers

Date/Time of visit: 1/14/15 @1:45 p.m.

Industry contacts: Brent Huneycutt, Quality Mngr.

	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>	___	___
2. Classified correctly?	<u>✓</u>	___	___
3. Pretreatment equipment or procedures?	___	___	___
4. Pretreatment equipment maintained and operational?	___	___	___
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>✓</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>✓</u>	___	___

Additional comments: Facility brings in used parking meters of different brands to refurbish them with new internal castings/electronics. The company has branched out into zinc and aluminum casting for various customer needs. The operator of the casting machine hand ladles the approximate amount of molten Zn/Al into the "ram" and steps back to hydraulically close the ram contents into the mold.

Visit conducted by: Gilliam/Bradley/Petrick Date: 1/14/15

*Allen Gilliam*

(signature of auditor conducting visit)

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

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: Grace Manufacturing

Additional comments: All haz waste is received on the dock of the chem storage area and immediately placed in the storage room. Etching includes a mix of hydrochloric acid, sodium chlorate & ferric chloride (kept in two 4,000 gal tanks) Numerous rinses, both by hand wand and dip rinse baths are in use. "Resist" & screen print stripping is accomplished by the same above mix. Each of these chems have secondary containment. The "resist" process consists of cleaning, laminating, exposure and developing metal parts. The "developer" and the clean line are self-contained. W.W. from the developer is pumped to a 500 gallon tank which is plumbed to the WTP. Caustic from the developer is used to neutralize the pH at the WTP as necessary. The soap/rinse w.w. from the clean line are sent to the WTP. Passivation consists of degreasing (potassium hydroxide which is shipped off-site for treatment); acid brite dip (pickle?), passivation (citric acid or "citri-surf") and final rinse. W.W. from passivation flows to the WTP. Five vibratory tumblers are in use for certain parts. Soapy water and ceramic cones make up the media. W.w. from this are flows directly to the City (after some retention in "sedimentation boxes". This w.w. needs to be plumbed to the WTP or sampled separately for compliance with CFR 433. W.W. treatment is typical chemical precip although the facility's equipment did not seem traditional. W.W. is sent to the WTP via an 8" pipe and enters a 4,000 gallon vertical tank which is divided into 4 quadrants. W.W. enters the 1<sup>st</sup> quadrant and is pH adjusted with NaOH. This water is kept above 9 s.u. After pH adjustment the w.w. flows to the 2<sup>nd</sup> quadrant where continuous mixing occurs to ensure homogeneous pH then flows to quadrants 3 and 4 and on to a 500 gallon tank. Once that tank's float reaches a certain level it pumps the w.w. over to the clarifier "flash mix" box where cationic and anionic polymers and coagulants are added/mixed to facilitate solids floc/precipitation while flowing through a series of overflow/underflow baffles for good mixing. The w.w. flows upwards thru the conical bottom inclined plate clarifier with the solids thickening and sent to a sludge holding tank when measured/deemed ready. Sludge is sent thru a filter press and sent to the local landfill. Clarifier supernatant is discharged to the City after last pH check. During this site visit, the floc did not appear to be settling correctly and some was possibly overflowing to the City. Adequate sampling point.

Visit conducted by: Gilliam/Bradley/Petrick Date: 1/14/15



(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:

Grace Manufacturing, 614 State Route, 479.968.5455 x-1020

Type of industry: Mfr of metal components

Date/Time of visit: 1/14/15 @ 10:10 a.m.

Industry contacts: Rachel Wade, EHS Supervisor

	Yes	No	N/A
1. Significant industrial user?	<u>✓</u>	___	___
2. Classified correctly?	<u>✓</u>	___	___
3. Pretreatment equipment or procedures?	<u>✓</u>	___	___
4. Pretreatment equipment maintained and operational?	<u>✓</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>✓</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>✓</u>	___	___

Additional comments: This facility's main raw stock (~95-98%) is stainless steel which comes in very thin sheets or coils. End products (mostly intermediate for customer finish) include precision parts for mainly medical, then automotive, oil and gas industry, aerospace, military, house wares (cheese graters, e.g.), wood working and personal care products. The facility sends out 100,000 to 200,000 "products"/day. Various manufacturing ops include photo chemical machining, electric discharge machining (EDM) or spark machining/eroding with Zn coated brass wire, stamping, punching, laser welding/cutting/marking. Any oils used for machining has to meet the FDA "food grade" standard. These ops are either dry or are self contained with no w.w. discharged to the City. Chemical storage area houses all acids, caustics and flammables which are separated by containment walls and have secondary containment. No floor drains present in this area. There are spill kits and absorbents kept in this area. The NaOH is kept in the "waste treatment plant" building (WTP). Sodium chlorate (oxidizer) for etching is also stored in the WTP.

Visit conducted by: Gilliam/Bradley/Petrick Date: 1/14/15

*Allen Gilliam*

(signature of auditor conducting visit)



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

Control Authority: City of Russellville NPDES #: AR0021768  
Industry name: Taber Extrusions

Additional comments: There is water pumped out periodically to a container and when full will be pumped to their "pretreatment". Other customers prefer their product to be quenched after the solution heat treatment process. The greater portion of the extrusions are left out for air cooling. IU has a non-destruct testing tank of fresh water that uses a ultra-sonic transducer that "scopes" across the top of the products looking any non-conformities. This tank is continually filtered and vacuumed like a swimming pool and is very infrequently discharged to the City. The press heat treatment contact cooling water is self contained and sprays city water from top and bottom "headers" on the products after they are solution heat treated. Again, not all customers require heat treatment. Its self contained pit is occasionally pumped out to "pretreatment" for cleaning and replacing with fresh water. The volume of this monthly batch discharge was not ascertained. Their "pretreatment" consists of several O/W separators. There's one below grade pit (which is the first pit to receive the plant's w.w.), two above grade containment tanks and one ~20,000 vertical tank which is baffled for most effective gravity separation of oil from water. All containment equipment has rope skimmers. The open topped tanks have a wire grated tray that sits on top of the fluid level. Absorbent mats lying on top of this tray are also used to sop up as much floating oil as possible and trashed when saturated. Actual flow of wastewater was explained, but without a schematic with directional arrows it was difficult to visualize. There is an in-line flow meter from which the IU reports flow to the city. The die cleaning tank (highly alkaline) is sent off-site for treatment once spent. The facility is in fairly clean shape for the type of operations it conducts. Permit limits will have to be revised to include the additional press heat treatment contact cooling water and to take into account the frequency of batch discharge of water (unknown volume) from the solution heat treatment subprocess.

Visit conducted by: Gilliam/Bradley/Petrick Date: 1/15/15



(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:  
Taber Extrusions, 915 S. Elmira, 479.968.1021  
Type of industry: Aluminum Extrusions

Date/Time of visit: 1/15/15 @ 9:30 a.m.

Industry contacts: Robert Taylor, EH&S Mngr/Mark Wilcox,  
Maintenance Mngr/Randy Johnson, Plant Mngr

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

Comments: Facility extrudes numerous (~14,000) shapes and forms of Aluminum. Any oils or non-contact cooling water from the press pit connects to the covered/below grade troughs to the waste treatment. A water quench was added in 2011 and is self-contained in a pit, but on a schedule for being pumped out. This w.w. will be covered under the Press Heat Treatment Contact Cooling Water subprocess. This quench is used only per customer specs for tempering and not used all the time.

Visit conducted by: Gilliam/Bradley/Petrick Date: 1/15/15

*Alta A. L. L.*

(signature of auditor conducting visit)

Attachment A-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) 968-3255

June 21, 2013

Lee's Onsite Portable Toilets  
Tony Lee, Owner  
5495 N Arkansas  
Post Office Box 1005  
Russellville, Arkansas 72811

Permit No.: WHDP 0006

Dear Mr. Lee:

This letter will serve as your permit to discharge wastes pumped from septic tanks and portable toilets from within Russellville city limits into the City Corporation Wastewater Treatment Plant located on 404 Jimmy Lile Road, Russellville, Arkansas.

All loads will be dumped at the manhole located at the plant headworks, Monday through Friday between the hours of 8:00 a.m. and 3:00 p.m. No tank trucks or hauled discharges will be accepted under any circumstances before 8:00 a.m. or after 3:00 p.m., as well as no deliveries during times of increased flow as determined by the Treatment Plant Lead Operator, or any time on Saturdays, Sundays or Holidays.

The cost to discharge will be 1.5 cents per gallon, when paid within thirty (30) days from billing. Delinquent accounts will result in suspension of this permit.

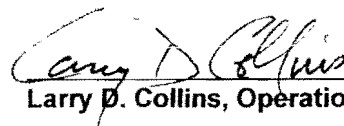
When entering the plant grounds with a load of waste for discharge, you must stop at the Administrative building and wait for a plant operator for assistance. The operator will require waste source information, and may perform one or more tests on the waste. You will be permitted to discharge your waste only after authorization by the plant operator.

Prohibited discharges are:

1. Pollutants that will create a fire or explosion hazard.
2. Pollutants containing oils or grease, including those from grease traps.
3. Pollutants that will cause corrosive structural damage, and in no case discharges with a pH lower than 6.0. or higher than 9.0
4. Solid or viscous pollutants that will obstruct flow.
5. Oxygen demanding pollutants that will cause interference.
6. Any other types of waste that may be untreatable or will cause interference, upset, or pass-through of the treatment plant, (i.e., radioactive, toxic or hazardous wastes).

Effective Date: July 1, 2013

Expiration Date: June 30, 2014

  
Larry D. Collins, Operations Manager

received  
 June 6/17/14

June 12, 2014  
 Control No. 179479  
 Page 3 of 5

City Corporation  
 Post Office Box 3186  
 Russellville, AR 72811-3186

**ANALYTICAL RESULTS**

AIC No. 179479-1

Sample Identification: L246-048520 0614026 Grace Permitted Outfall 6/4/2014 940 6/5/2014 940

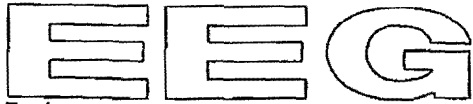
Analyte	Result	RL	Units	Qualifier
<b>Cadmium</b> EPA 200.7	< 0.004	0.004	mg/l	
Prep: 10-Jun-2014 1341 by 285	Analyzed: 11-Jun-2014 1741 by 311		Batch: S36921	
<b>Chromium</b> EPA 200.7	3.4	0.007	mg/l	
Prep: 10-Jun-2014 1341 by 285	Analyzed: 11-Jun-2014 1741 by 311		Batch: S36921	
<b>Copper</b> EPA 200.7	0.13	0.006	mg/l	
Prep: 10-Jun-2014 1341 by 285	Analyzed: 11-Jun-2014 1741 by 311		Batch: S36921	
<b>Lead</b> EPA 200.7	< 0.04	0.04	mg/l	
Prep: 10-Jun-2014 1341 by 285	Analyzed: 11-Jun-2014 1741 by 311		Batch: S36921	
<b>Nickel</b> EPA 200.7	1.2	0.01	mg/l	
Prep: 10-Jun-2014 1341 by 285	Analyzed: 11-Jun-2014 1741 by 311		Batch: S36921	
<b>Silver</b> EPA 200.7	< 0.007	0.007	mg/l	
Prep: 10-Jun-2014 1341 by 285	Analyzed: 12-Jun-2014 1210 by 305		Batch: S36921	
<b>Zinc</b> EPA 200.7	0.030	0.002	mg/l	
Prep: 10-Jun-2014 1341 by 285	Analyzed: 11-Jun-2014 1741 by 311		Batch: S36921	

AIC No. 179479-2

Sample Identification: L246-048520 0614027 Grace Permitted Outfall 6/4/2014 935

Analyte	Result	RL	Units	Qualifier
<b>Total Cyanide</b> SM 4500-CN C,E 1999	< 0.01	0.01	mg/l	
Prep: 09-Jun-2014 0836 by 308	Analyzed: 10-Jun-2014 0914 by 308		Batch: W48023	

179479



Environmental Enterprise Group, Inc.  
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

L246-08520

Environmental Enterprise Group, Inc.  
220 North Knoxville  
Russellville, Arkansas 72801  
(479) 968-6767 Fax (479) 968-1956

Company Name:			Phone #:			Requested Analysis										Laboratory Control Number	Remarks (Please note special detection limits below.)												
City Corporation			(479) 968-4989																										
Address:			Fax #:																										
P.O. Box 3186 Russellville, AR 72811-3186			(479) 968-3430																										
Project Name or Number:			Purchase Order #:																										
Grace			Printed:			Cr, Cd, Cu, Pb, Ni, Ag, Zn																							
Sampling Personnel Signature(s):			Charlotte Petrick			Method Preserved																							
Sample I.D.	Date	Time	Comp	Grab	Cont.Type		# of Containers	Sample Matrix								CN (I)													
					Plast	Glass		H2SO4	HNO3	NAOH	HCL	Ice	None	Water	Soil				Air	Sludge	Other								
Grace Permitted Outfall	6/4/2014	on 940	x			1		x			X		X												0614026				
Grace Permitted Outfall	6/5/2014	off 940		x		1			x				x												x		0614027		
Relinquished by: Charlotte Petrick			Date: 6/5/14	Time: 1141	Received by: Stacyren			Date: 6/5/14	Time: 1150																				
Received by: Megan Hatcher			Date: 6-5-14	Time: 1145	Relinquished by: Stacyren			Date: 6/6/14	Time: 1100										4.0										
Relinquished by: Megan Hatcher			Date: 6-5-14	Time: 1150	Received by Laboratory:			Date: 6-6-14	Time: 11:00																				
Comments:																													

①  
②  
A-26

received  
7/7/14

POSTED

June 24, 2014  
Control No. 179908  
Page 3 of 4

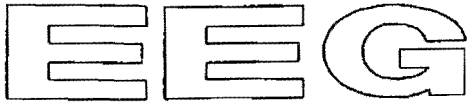
City Corporation  
Post Office Box 3186  
Russellville, AR 72811-3186

### ANALYTICAL RESULTS

AIC No. 179908-1

Sample Identification: L246-048589 0614144 Grace Permitted Outfall 6/18/2014 910 6/19/2014 925

Analyte	Result	RL	Units	Qualifier
Chromium EPA 200.7	1.8	0.007	mg/l	
	Prep: 23-Jun-2014 0844 by 285	Analyzed: 23-Jun-2014 1902 by 305	Batch: S36981	



Environmental Enterprise Group, Inc.  
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

L246-048589

179908

Environmental Enterprise Group, Inc.  
220 North Knoxville  
Russellville, Arkansas 72801  
(479) 968-6767 Fax (479) 968-1956

Company Name:										Phone #:										Requested Analysis										Laboratory Control Number	Remarks (Please note special detection limits below.)										
City Corporation										(479) 968-4989																															
Address:										Fax #:																															
P.O. Box 3186 Russellville, AR 72811-3186										(479) 968-3430																															
Project Name or Number:										Purchase Order #:																															
Grace										Printed:																															
Sampling Personnel Signature(s):										Charlotte Petrick																															
Charlotte Petrick										Charlotte Petrick																															
Sample I.D.										Date		Time		Comp		Grab		Cont. Type		# of Containers		Method Preserved					Sample Matrix														
Grace Permitted Outfall										6/18/2014		on 7:10		x						1																					
										6/19/2014		off 9:25		x		x																0604144									
Relinquished by:										Date:		Time:		Received by:										Date:		Time:															
Charlotte Petrick										6/19/14		9:47																													
Received by:										Date:		Time:		Relinquished by:										Date:		Time:															
Stagner										6/19/14		0947																													
Relinquished by:										Date:		Time:		Received by Laboratory:										Date:		Time:															
Stagner										6/20/14		1100		Jimmy Day										6/20/14		1215															
Comments:																														8.2c											

① A-2d

A-2d

Attachment A-3

**NOTICE OF VIOLATION  
INDUSTRIAL PRETREATMENT PROGRAM  
March 25, 2014**

**Industry:** POM, Inc.  
**Address:** Post Office Box 430  
Russellville, Arkansas 72811

**Permit No.:** WDP 2013

This notice is based on findings of violation of the conditions of your wastewater contribution permit issued under the authority of City of Russellville Ordinance No. 2105.

**Violation:** Daily Maximum chromium and zinc, Maximum Monthly Average chromium and zinc limitations exceeded. Failure to report violation to Control Authority and failure to submit Toxic Organic Management Plan certification

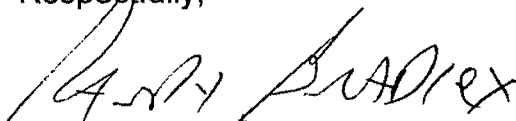
A review of the permittee's June – December 2014 semi-annual self-monitoring report shows a chromium reading of 2.9 mg/L and a zinc reading of 3.0 mg/L. These exceeds the daily maximum and maximum monthly average.

**Corrective Action Required:** POM, Inc. must submit for approval a plan of corrective action for the violations within 30 days from receipt of this Notice. This plan at a minimum must include the cause, corrective actions taken and date of compliance with permit limits.

Pursuant to City of Russellville Ordinance No. 2105, failure to comply with this Notice of Violation will result in administrative fines of \$1,000.00 per day for each day the violation occurs, termination of sewer services, or both.

If you have any questions concerning this Notice, you may contact me at 968-2080 ext 224, Monday through Friday, 8:00 a.m. to 4:00 p.m.

Respectfully,



Randy Bradley  
Pretreatment Coordinator



Received  
10/27/14

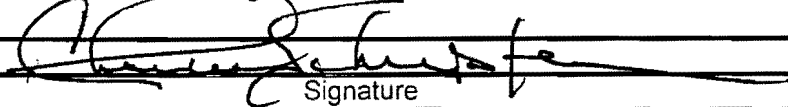
**RUSSELLVILLE PRETREATMENT PROGRAM  
SELF-MONITORING REPORT**

Company Name: POM, Inc. Permit #WDP 2013  
 Mailing Address: Post Office Box 430, Russellville, AR 72811  
 Facility Address: 200 South Elmira Avenue. Russellville AR 72801  
 Representative: Charlie Schrepfer / Plant Manager  
 Monitoring Period \_\_\_\_\_ June - December 2014

Daily Max			
Parameter	Concentration (mg/L)	Permit Limit (mg/L)	Violation (Yes/No)
Cadmium (T)	<0.004	0.69	No
Chromium(T)	2.9	2.77	Yes
Copper (T)	0.16	3.38	No
Lead (T)	<0.04	0.69	No
Nickel (T)	0.014	3.98	No
Silver (T)	<0.007	0.43	No
Zinc (T)	3	2.61	Yes
Cyanide (T)	<0.01	1.2	No
TTO	N/A	2.13	N/A

Monthly Average Max			
Parameter	Concentration (mg/L)	Permit Limit (mg/L)	Violation (Yes/No)
Cadmium (T)	<0.004	0.07	No
Chromium (T)	2.9	1.71	No
Copper (T)	0.16	2.07	No
Lead (T)	<0.04	0.43	No
Nickel (T)	0.014	2.38	No
Silver (T)	<0.007	0.24	No
Zinc (T)	3	1.48	No
Cyanide (T)	<0.01	0.65	No
TTO	N/A	.....	N/A

"I certify under penalty of law that this document and all attachments were prepared under my direct 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 is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

 Signature	10/27/14 Date
---	------------------



**E n v i r o n m e n t a l  
E n t e r p r i s e G r o u p , I n c .**

220 North Knoxville Russellville, Arkansas 72801  
Phone (479) 968-6767 Fax (479) 968-1956  
www.eegonline.com

October 1, 2014  
Control No. 183001  
Page 3 of 5

POM  
200 South Elmira  
Russellville, AR 72801

**ANALYTICAL RESULTS**

**AIC No. 183001-1**

**Sample Identification:** L391-048966 0914200 Eff Manhole 9-24-14 0915 9-25-14 0815

<b>Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>Chromium</b> EPA 200.7	Prep: 29-Sep-2014 0917 by 302	<b>2.9</b> Analyzed: 30-Sep-2014 1445 by 302	<b>0.04</b>	<b>mg/l</b> Batch: S37467	<b>D</b> Dil: 5
<b>Zinc</b> EPA 200.7	Prep: 29-Sep-2014 0917 by 302	<b>3.0</b> Analyzed: 30-Sep-2014 1445 by 302	<b>0.02</b>	<b>mg/l</b> Batch: S37467	<b>D</b> Dil: 5
<b>Cadmium</b> EPA 200.8	Prep: 29-Sep-2014 0917 by 302	<b>&lt; 0.004</b> Analyzed: 30-Sep-2014 1307 by 302	<b>0.004</b>	<b>mg/l</b> Batch: S37467	
<b>Copper</b> EPA 200.8	Prep: 29-Sep-2014 0917 by 302	<b>0.16</b> Analyzed: 30-Sep-2014 1307 by 302	<b>0.006</b>	<b>mg/l</b> Batch: S37467	
<b>Lead</b> EPA 200.8	Prep: 29-Sep-2014 0917 by 302	<b>&lt; 0.04</b> Analyzed: 30-Sep-2014 1307 by 302	<b>0.04</b>	<b>mg/l</b> Batch: S37467	
<b>Nickel</b> EPA 200.8	Prep: 29-Sep-2014 0917 by 302	<b>0.014</b> Analyzed: 30-Sep-2014 1307 by 302	<b>0.01</b>	<b>mg/l</b> Batch: S37467	
<b>Silver</b> EPA 200.8	Prep: 29-Sep-2014 0917 by 302	<b>&lt; 0.007</b> Analyzed: 30-Sep-2014 1307 by 302	<b>0.007</b>	<b>mg/l</b> Batch: S37467	

**AIC No. 183001-2**

**Sample Identification:** L391-048966 0914201 Eff Manhole 9-25-14 1200

<b>Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>Total Cyanide</b> SM 4500-CN C,E 1999	Prep: 29-Sep-2014 1324 by 308	<b>&lt; 0.01</b> Analyzed: 29-Sep-2014 1555 by 308	<b>0.01</b>	<b>mg/l</b> Batch: W49384	

A-3c

182001



Environmental Enterprise Group, Inc.  
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

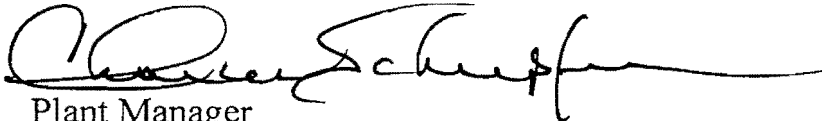
L391-048966

Environmental Enterprise Group, Inc.  
220 North Knoxville  
Russellville, Arkansas 72801  
(479) 968-6767 Fax (479) 968-1956

Company Name:		Phone #:		Requested Analysis													Laboratory Control Number  Remarks (Please note special detection limits below.)							
POM		(479) 968-2880		pH: 6.0 @ 1200 Temp: 26.8 By: ZA																				
Address:		Fax #:																						
200 South Elmira, Russellville, AR 72801		(479) 968-2840																						
Project Name or Number:		Purchase Order #:																						
Semi-Annual Testing																								
Sampling Personnel Signature(s):				Printed :																				
<i>Megan Hatcher Zac Anderle</i>				<i>Megan Hatcher Zac Anderle</i>																				
Sample I.D.	Date	Time	Comp.	Grab	Cont. Type		# of Containers	Method Preserved					Sample Matrix					Metals*	Total Cyanide	pH	Laboratory Control Number	Remarks		
					Plast.	Glass		H2SO4	HNO3	NaOH	HCL	Ice	None	Water	Soil	Air	Sludge						Other	
Eff Manhole	9-24-14	0915	X		X		1		X						X								0914200	
Eff Manhole	9-25-14	1200		X	X		1			X				X									0914201	
Eff Manhole	+	+		X	X		0					X	X					X					↓	
Relinquished by: <i>Zac Anderle</i>				Date: 9-25-14		Time: 1530		Received by:				Date:		Time:										
Received by: <i>Stacy Kren</i>				Date: 9/25/14		Time: 1530		Relinquished by:				Date:		Time:										
Relinquished by: <i>Stacy Kren</i>				Date: 9/26/14		Time: 1100		Received by Laboratory: <i>Stacy Kren</i>				Date: 9/26/14		Time: 1400										
Comments: *Metals: Cd, Cr, Cu, Pb, Zn, Ni, Ag Run 200.7 with a detection limit of 20 ug/l on Zn.				RvSL 2.6°C																				

TTO Certification:

Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since the filing of the last report. I further certify that this facility is implementing the revised Toxic Organic Management Plan, as of March 1st, 2010.

A handwritten signature in black ink, appearing to read "Charles Schrepfer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Plant Manager  
Charles Schrepfer

12/3/14

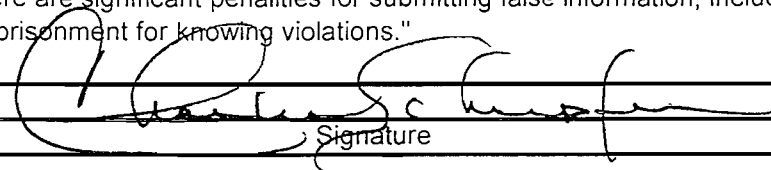
**RUSSELLVILLE PRETREATMENT PROGRAM  
SELF-MONITORING REPORT**

Company Name: POM, Inc. Permit #WDP 2013  
 Mailing Address: Post Office Box 430, Russellville, AR 72811  
 Facility Address: 200 South Elmira Avenue. Russellville AR 72801  
 Representative: Charlie Schrepfer / Plant Manager  
 Monitoring Period \_\_\_\_\_ June - December 2nd Sample 2014

Daily Max			
Parameter	Concentration (mg/L)	Permit Limit (mg/L)	Violation (Yes/No)
Cadmium (T)	<0.004	0.69	No
Chromium(T)	0.89	2.77	No
Copper (T)	0.099	3.38	No
Lead (T)	<0.04	0.69	No
Nickel (T)	<0.012	3.98	No
Silver (T)	<0.007	0.43	No
Zinc (T)	0.55	2.61	No
Cyanide (T)	<0.01	1.2	No
TTO	N/A	2.13	N/A

Monthly Average Max			
Parameter	Concentration (mg/L)	Permit Limit (mg/L)	Violation (Yes/No)
Cadmium (T)	<0.004	0.07	No
Chromium (T)	0.89	1.71	No
Copper (T)	0.099	2.07	No
Lead (T)	<0.04	0.43	No
Nickel (T)	<0.012	2.38	No
Silver (T)	<0.007	0.24	No
Zinc (T)	0.55	1.48	No
Cyanide (T)	<0.01	0.65	No
TTO	N/A	.....	N/A

"I certify under penalty of law that this document and all attachments were prepared under my direct 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 is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

	
Signature	Date

POM  
200 South Elmira  
Russellville, AR 72801

### ANALYTICAL RESULTS

AIC No. 184158-1

Sample Identification: L391-049083 1014203 Eff Manhole 10-29-14 0850 10-30-14 0750

Analyte	Result	RL	Units	Qualifier
<b>Chromium</b> EPA 200.7	<b>0.89</b>	0.04	mg/l	D
	Prep: 04-Nov-2014 0925 by 313	Analyzed: 07-Nov-2014 1248 by 302	Batch: S37670	Dil: 5
<b>Cadmium</b> EPA 200.8	<b>&lt; 0.004</b>	0.004	mg/l	
	Prep: 04-Nov-2014 0925 by 313	Analyzed: 07-Nov-2014 1100 by 302	Batch: S37670	
<b>Copper</b> EPA 200.8	<b>0.099</b>	0.006	mg/l	
	Prep: 04-Nov-2014 0925 by 313	Analyzed: 07-Nov-2014 1100 by 302	Batch: S37670	
<b>Lead</b> EPA 200.8	<b>&lt; 0.04</b>	0.04	mg/l	
	Prep: 04-Nov-2014 0925 by 313	Analyzed: 07-Nov-2014 1100 by 302	Batch: S37670	
<b>Nickel</b> EPA 200.8	<b>0.012</b>	0.01	mg/l	
	Prep: 04-Nov-2014 0925 by 313	Analyzed: 07-Nov-2014 1100 by 302	Batch: S37670	
<b>Silver</b> EPA 200.8	<b>&lt; 0.007</b>	0.007	mg/l	
	Prep: 04-Nov-2014 0925 by 313	Analyzed: 07-Nov-2014 1100 by 302	Batch: S37670	
<b>Zinc</b> EPA 200.8	<b>0.55</b>	0.002	mg/l	
	Prep: 04-Nov-2014 0925 by 313	Analyzed: 07-Nov-2014 1100 by 302	Batch: S37670	

AIC No. 184158-2

Sample Identification: L391-049083 1014204 Eff Manhole 10-30-14 1150

Analyte	Result	RL	Units	Qualifier
<b>Total Cyanide</b> SM 4500-CN C,E 1999	<b>&lt; 0.01</b>	0.01	mg/l	
	Prep: 03-Nov-2014 0835 by 308	Analyzed: 03-Nov-2014 1656 by 308	Batch: W49808	



Environmental Enterprise Group, Inc.  
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

L391-049083

184158

Environmental Enterprise Group, Inc.  
220 North Knoxville  
Russellville, Arkansas 72801  
(479) 968-6767 Fax (479) 968-1956

Company Name: POM						Phone #: (479) 968-2880						Requested Analysis								Laboratory Control Number  Remarks (Please note special detection limits below.)																																																								
Address: 200 South Elmira, Russellville, AR 72801						Fax #: (479) 968-2840						<table border="1"> <tr><td>Metals*</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Total Cyanide</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>PH</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </table>									Metals*																		Total Cyanide																			PH																		
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Relinquished by: <i>Megan Hatcher</i>						Date: 10/31/14		Time: 1100		Received by Laboratory: <i>[Signature]</i>						Date: 10/31/14		Time: 1415																																																										
Comments: *Metals: Cd, Cr, Cu, Pb, Zn, Ni, Ag Run 200.7 with a detection limit of 20 ug/l on Zn.						Rush																10.0°C																																																						

D  
10  
A-34

Received  
2/9/2010 [initials]

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  
Taber Extrusions, LLC.  
915 South Elmira  
Russellville, AR 72802  
Clint Hawkins, Plant Engineer
2. Parent Company, Street and mailing address and telephone number (if different from 1)  
National Medical-LP  
1965 Pratt Blvd.  
Elk Grove Village, IL 60007  
(847) 806-7200

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

Taber Extrusions, LLC extrudes heavy aluminum parts.  
Processes include solution heat treat/water quench, stretch/annealing,  
artificial aging ovens, & ultrasonic testing.

4. List the Standard Industrial Classification Number for your company: 3354

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>2,500</u>	(X)	( )
b. <input type="checkbox"/> Boiler blowdown	_____	( )	( )
c. <input checked="" type="checkbox"/> Cooling water, non-contact	<u>5,000</u>	(X)	( )
d. <input checked="" type="checkbox"/> Cooling water, contact	<u>15,000</u>	(X)	( )
e. <input type="checkbox"/> Process	_____	( )	( )
f. <input type="checkbox"/> Equipment/facility washdown	_____	( )	( )
g. <input type="checkbox"/> Air pollution control unit	_____	( )	( )
h. <input checked="" type="checkbox"/> Storm water runoff	_____	( )	( )
i. <input type="checkbox"/> Other (describe): _____	_____	( )	( )

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:



	Gallons per day	Estimated	Measured
a. <input checked="" type="checkbox"/> Sanitary sewer	<u>20,000</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. <input type="checkbox"/> Storm sewer	_____	<input type="checkbox"/>	<input type="checkbox"/>
c. <input type="checkbox"/> Surface water	_____	<input type="checkbox"/>	<input type="checkbox"/>
d. <input type="checkbox"/> Ground water	_____	<input type="checkbox"/>	<input type="checkbox"/>
e. <input type="checkbox"/> Trucked waste	_____	<input type="checkbox"/>	<input type="checkbox"/>
f. <input checked="" type="checkbox"/> Evaporation	<u>5,000</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. <input type="checkbox"/> Other: _____	_____	<input type="checkbox"/>	<input type="checkbox"/>
Total Wastewater Discharged:	<u>25,000</u>		

7. List any pollution prevention, waste minimization, or recycling programs practiced at this facility:

We Recycle all aluminium scrap for recycling.

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

YES (enclose copy)  NO

SECTION B - Facility Operation Characteristics

1. Number of shifts per 24hr day: 3 2. Number of employees per shift: 14

3. Shift starting times: 1st 7 am/pm 2nd 3 am/pm 3rd 11 am/pm

4. Principal product produced: Aluminium Extrusions (Heavy)

5. Raw materials and process chemicals used: Aluminium Alloy, Natural Gas,

---

6. Production process:  Batch  Continuous  Both: 100 %Batch/ \_\_\_\_\_ %Continuous  
Average number of batches per 24hr work day: \_\_\_\_\_

7. Is production subject to seasonal variations?  NO  YES (describe) Not Seasonal, but is dependent upon orders & product mix

---

8. Are any process changes or expansions planned during the next three years?  NO  YES  
If yes, please attach separate sheet of explanation.

Replacement of existing cooling towers.

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 checked="" 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 type="checkbox"/> Grit Removal                      | <input type="checkbox"/> Septic Tank                      |
| <input type="checkbox"/> Centrifuge              | <input type="checkbox"/> Ion Exchange                      | <input type="checkbox"/> Solvent Recovery                 |
| <input 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/<br>Diversion |
| <input type="checkbox"/> Dissolved Air Flotation | <input type="checkbox"/> pH Adjustment                     | <input type="checkbox"/> Sump                             |
| <input type="checkbox"/> Filtration              | <input type="checkbox"/> Reverse Osmosis                   | <input type="checkbox"/> Other: _____                     |
| <input type="checkbox"/> Flow Equalization       | <input type="checkbox"/> Screens                           | <input type="checkbox"/> None                             |
| <input type="checkbox"/> Grease Trap             | <input 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 ( <i>hydraulic oil</i> ) |
| <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"/> Flouanthene               | <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 checked="" type="checkbox"/> Zinc & compounds    |
| <input checked="" 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 checked="" type="checkbox"/> Acids and/or Alkalis	<u>17,500 gal/yr</u>	<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	<u>2,500 gal/yr</u>
<input checked="" type="checkbox"/> Oil & Grease	<u>40,000 gal/yr</u>	<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: Spent Caustic & Hydraulic oil are stored on-site prior to being trucked off-site for disposal.

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

( ) NO

(X) YES:

Permit Number: ARD 06 530 4495

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."

Clint Hawkins  
Printed Name  
Clint Hawkins  
Signature

Plant Engineer  
Title  
10/15/09  
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

5 A 4 e



**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 2005**

Company Name: TABER EXTRUSIONS – Limited Partnership  
Mailing Address: 915 South Elmira, Russellville, Arkansas 72801<sup>2</sup>  
Facility Address: 915 South Elmira, Russellville, Arkansas 72801<sup>2</sup>  
Facility Representative: Clint Hawkins, Plant Engineer

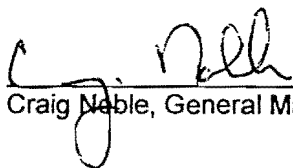
The above industrial user is authorized to discharge industrial wastewater to the City of Russellville wastewater collection and treatment system at the manhole located 25 feet east of the truck weight scale building, in accordance with the provisions of City of Russellville Pretreatment Ordinance, No. 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 October 15, 2009, 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 Neble, General Manager

December 15 2010  
Date

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 equivalent concentration effluent limitations stated below for all wastewater discharged to the City of Russellville wastewater collection and treatment system, as regulated by 40 CFR 467 – ALUMINUM FORMING CATEGORICAL PRETREATMENT STANDARDS.

<u>PARAMETER</u>	<u>1 day Maximum</u>	<u>Monthly Average Maximum</u>
CN (T)	0.38 mg/L	0.14 mg/L
Cr	0.58 mg/L	0.21 mg/L
Zn	1.92 mg/L	0.71 mg/L
O&G	70.18 mg/L	30.43 mg/L

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>Instantaneous minimum – maximum</u>
pH	6.0 – 9.0 S.U.

PART 2 – MONITORING REQUIREMENTS

- A. Samples shall be collected at the process discharge collection sump, located east of the machine shop. All sampling shall be done during normal work and discharge cycles. For maximum semiannual average limitations all samples collected during the semiannual monitoring period by the permittee or Control Authority will be averaged to determine compliance.
- B. The permittee shall collect a sample and have it analyzed by an independent laboratory certified by the Arkansas Department of Environmental Quality for the parameters and at the frequency listed below.

<u>PARAMETER</u>	<u>MINIMUM FREQUENCY</u>	<u>TYPE</u>
Flow	Monthly	Meter <sup>1</sup>
CN (T)	2/Year	Grab <sup>3</sup>
Cr	2/Year	24-Hr Composite <sup>2</sup>
Zn	2/Year	24-Hr Composite <sup>2</sup>
O&G	2/Year	Grab <sup>3</sup>
pH	2/Year	Grab <sup>3</sup>

<sup>1</sup> Categorical process discharge will be monitored with an approved device, which must be calibrated/verified at least annually. Any day a sample is collected, the daily process flow must be recorded.

<sup>2</sup> Time-proportional composite sampling technique.

- 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.
- 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 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 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.

**Taber Metals Permit No. WDP 2005**  
Concentration Limitation Development

Production Year	Total Pounds of Production	Total Wastewater Discharged - Gallons	Number of Days in Production	Average Pounds Production/Day	Average Gallons Discharged/Day
2007	15,231,038	6,228,852	253	60,202	24,620
2008	20,559,534	9,596,519	265	77,583	36,213
2009	26,876,949	6,247,389	291	92,361	21,469
<b>Average</b>	<b>20,889,174</b>	<b>7,357,587</b>	<b>270</b>	<b>76,715</b>	<b>27,434</b>

40CFR467.35 Core Pollutant Limits in lb/million off-lbs of extruded		
Pollutant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.15	0.061
Cyanide	0.098	0.041
Zinc	0.49	0.21
Oil & Grease	18	8.8

40CFR467.35 Extrusion Press Leakage Pollutant Limits in lb/million off-lbs of extruded		
Pollutant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.65	0.27
Cyanide	0.43	0.18
Zinc	2.16	0.9
Oil & Grease	77	39

1) Total lbs adding 1 day max and max. monthly averages		
Pollutant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.8	0.331
Cyanide	0.528	0.221
Zinc	2.65	1.11
Oil & Grease	95	47.8

2) Convert to allowable Pounds based on 0.077 million off-lbs extruded/day		
Pollutant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.062	0.025
Cyanide	0.041	0.017
Zinc	0.204	0.085
Oil & Grease	7.32	3.68

40CFR467.35 Press Heat Treat Contact Cooling Water and Solution Heat Treat Contact Cooling Water Pollutant Limits in lb/million off-lbs of aluminum quenched		
Pollutant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.9	0.37
Cyanide	0.59	0.25
Zinc	2.98	1.25
Oil & Grease	110	53

A5d



3) Convert to allowable Pounds based on 0.077 million off-lbs extruded/day

Pollutant	Maximum for any 1 day	Maximum for monthly average
Chromium	0.069	0.028
Cyanide	0.045	0.019
Zinc	0.229	0.096
Oil & Grease	8.47	4.08

4) Add Total Pounds (#2 and #3) allowable

Pollutant	Maximum for any 1 day	Maximum for monthly average
Chromium	0.131	0.053
Cyanide	0.086	0.036
Zinc	0.433	0.181
Oil & Grease	15.79	7.76

5) Convert to concentration limits based on 0.027 mgd  
 $\text{mg/L} = \text{lbs} / (8.34) (0.027)$

Pollutant	Taber Metals New Permit Limits	
	Maximum for any 1 day / mg/L	Maximum for monthly average / mg/L
Chromium	0.58	0.21
Cyanide	0.38	0.14
Zinc	1.92	0.71
Oil & Grease	70.18	30.43

## **TABER EXTRUSIONS, LLC**

Permit No: WDP 2005

Effective Date: 12/15/2010      Expiration Date: 11/30/15

Address: 915 South Elmira Ave  
Russellville, Arkansas 72802  
(479) 968-1021 Fax: (479) 968-8645

Parent Company: National Material - LP  
1965 Pratt Blvd.  
Elk Grove Village, Illinois 60007

Authorized Representatives: Clint Hawkins, Plant Engineer

SIC: 3354 - Heavy aluminum extrusions

Employs: 42

Reporting Requirement: Semi-annual

Compliance:

Attachment A-7



11/12/2014

RE: Monthly Process Flow Report

Pretreatment Coordinator  
City Corporation  
P.O. Box 3186  
Russellville, AR 72811

Dear Mr. Bradley,

Enclosed is Taber Extrusions' Monthly Process Flow Report. This report is for the month of October 2014. An oil & grease test is also enclosed. If you have any questions or need additional information, please contact me at (479) 968-1021, ext. 245.

Sincerely,

Robert Taylor  
EH&S Manager

Enclosure

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 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.

Robert Taylor  
Signature

11-12-14  
Date

For City Corporation Use Only

This document was received:

7/28/14  
Date

1510  
Time

by

Avery Smith  
Signature

Comments: \_\_\_\_\_

**RUSSELLVILLE PRETREATMENT PROGRAM  
SELF-MONITORING REPORT**

Company Name: Taber Extrusion, L.P. Permit #: WDP 2005

Mailing Address: 915 South Elmira Avenue, Russellville AR 72802

Facility Address: 915 South Elmira Avenue. Russellville AR 72802

Representative: Robert Taylor, EH&S Manager.

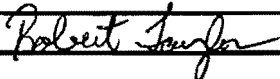
Monitoring Period: October 2014

Daily Max			
Parameter	Concentration (mg/L)	Permit Limit (mg/L)	Violation (Yes/No)
Chromium		0.58	
Cyanide (T)		0.38	
Zinc		1.92	
Oil & Grease	31	70.18	No

Monthly Average Max			
Parameter	Concentration (mg/L)	Permit Limit (mg/L)	Violation (Yes/No)
Chromium		0.21	
Cyanide (T)		0.14	
Zinc		0.71	
Oil & Grease		30.43	
pH		6.0 - 9.0 S.U.	

Total number of production days in period:	27	Days
Total number of production pounds in period:	2,241,129	Pounds
Total gallons discharged for period:	420,010	Gallons = 15,556/day AT

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

	11-12-14
Signature	Date

A-76

183435

Environmental Enterprise Group, Inc.  
220 North Knoxville  
Russellville, Arkansas 72801  
(479) 968-6767 Fax (479) 968-1956



Environmental Enterprise Group, Inc.  
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

L323-049016

10 October 2014

①

A-7c

Company Name: Taber Metals								Phone #: (479) 968-1021 ext. 245				Requested Analysis										Laboratory Control Number	Remarks (Please note special detection limits below.)		
Address: P.O. Box 1418, Russellville, AR 72801								Fax #: (479) 968-8645																	
Project Name or Number:								Purchase Order #:																	
Sampling Personnel Signature(s): Megan Hatcher								Printed: Megan Hatcher																	
Sample I.D.	Date	Time	Comp.	Grab	Cont. Type		# of Containers	Method Preserved						Sample Matrix						O&G					
					Plast.	Glass		H2SO4	HNO3	NACH	HCL	Ice	None	Water	Soil	Air	Sludge	Other							
Eff Manhole	10-10-14	0825		X		X	1	X									X							1014082	
Relinquished by: Megan Hatcher								Date: 10-10-14		Time: 0845		Received by:						Date:		Time:					
Received by: Stacyren								Date: 10/10/14		Time: 0845		Relinquished by:						Date:		Time:					
Relinquished by: Stacyren								Date: 10/10/14		Time: 1100		Received by laboratory: Jimmy Ray						Date: 10/10/14		Time: 1330					
Comments: Ruck 6.0c																									



Environmental  
Enterprise Group, Inc.

220 North Knoxville Russellville, Arkansas 72801  
Phone (479) 968-6767 Fax (479) 968-1956  
www.eegonline.com

October 14, 2014  
Control No. 183435  
Page 3 of 4

Taber Metals  
Post Office Box 1418  
Russelville, AR 72801

ANALYTICAL RESULTS

AIC No. 183435-1

Sample Identification: L323-049016 1014082 Eff Manhole 10-10-14 0825

Analyte	Result	RL	Units	Qualifier
Oil and Grease EPA 1664A	31	5	mg/l	
	Prep: 13-Oct-2014 1415 by 285	Analyzed: 14-Oct-2014 0901 by 285	Batch: B9196	

Taber Metals  
 Post Office Box 1418  
 Russelville, AR 72801

**DUPLICATE RESULTS**

Analyte	AIC No.	Result	RPD	RPD Limit	Preparation Date	Analysis Date	Dil	Qual
Oil and Grease	183430-2	< 5 mg/l			13Oct14 1415 by 285	14Oct14 0901 by 285		
	Batch: B9196 Duplicate	< 5 mg/l	0.00	20.0	13Oct14 1415 by 285	14Oct14 0901 by 285		
Oil and Grease	183436-2	< 5 mg/l			13Oct14 1415 by 285	14Oct14 0901 by 285		
	Batch: B9196 Duplicate	< 5 mg/l	0.00	20.0	13Oct14 1415 by 285	14Oct14 0901 by 285		

**LABORATORY CONTROL SAMPLE RESULTS**

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Oil and Grease	40 mg/l	89.0	78.0-114			B9196	13Oct14 1415 by 285	14Oct14 0901 by 285		
	40 mg/l	88.0	78.0-114	1.13	20.0	B9196	13Oct14 1415 by 285	14Oct14 0901 by 285		

**LABORATORY BLANK RESULTS**

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Oil and Grease	< 5 mg/l	5	5	B9196-1	13Oct14 1415 by 285	14Oct14 0901 by 285	

# City Corporation Pretreatment Program

## Record of pH

pH Method: SM 18th 4500-H + B Electronic Method

---

Facility Name: Taber

Date / Time Sample Collected: 4/8/14 @ 1010 Collected by: CAF

Date / Time Sample Analyzed: 4/8/14 @ 1011 Analyzed by: CAF

pH value sample: 6.67 Temp: 18.2

pH value duplicate: 7.63 Abs. Diff. (sample duplicate): \_\_\_\_\_

Starting Flow <sup>5960</sup> 3,925,960 Date 4/8/14 = 10,990 gpd  
Ending Flow 2,916,950 Date 4/9/14  
16950 AG

pH meter # H-160

pH meters used are calibrated each morning - record of calibration on file in the PCW lab.

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# City Corporation Pretreatment Program

## Record of pH

pH Method: SM 18th 4500-H + B Electronic Method

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Facility Name: Taber

Date / Time Sample Collected: 10/2/14 @ 1042 Collected by: CJP

Date / Time Sample Analyzed: 10/2/14 @ 1045 Analyzed by: CJP

pH value sample: 6.46

Temp: 26.2 C

pH value duplicate: 6.49

Abs. Diff. (sample duplicate): 0.03

Starting Flow ~~3,559,000~~ <sup>3,559,000</sup> 55,900 Date 10/2/14 <sup>2</sup>  
Ending Flow ~~3,662,330~~ <sup>3,662,330</sup> 66,230 Date 10/3/14 <sup>1</sup>  
= 10,330 gpd  
AG

pH meter # H-160

pH meters used are calibrated each morning - record of calibration on file in the PCW lab.

Attachment A8

**City Corporation  
Significant Industrial User Inspection Report**

Facility Name: Taber Extrusions  
Inspection Date: October 2, 2014

<b>Fact Sheet</b>
<b>Permitted Outfall(s)</b>
1. <i>Attach a copy of the pertinent page from the current Industrial User's permit listing and describing the permitted outfall(s) to the City's sewer system.</i>
<b>Effluent Limitations</b>
2. <i>Attach a copy of the pertinent page of the current Industrial User's permit listing the effluent limitations for the permitted outfall(s) to the City's sewer system.</i>
<b>Self Monitoring Requirements</b>
1. <i>Attach a copy of the pertinent page from the current Industrial User's permit listing the self monitoring requirements for the permitted outfall(s) to the City's sewer system</i>

**City Corporation  
Significant Industrial User Inspection Report**

Facility Name: Taber Extrusions  
Inspection Date: October 2, 2014

<b>General Conditions</b>	
1. Has the Industrial User's permit been terminated?  <i>If yes, list date and reason.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
2. Has the Permittee submitted an application for a new permit at least 90 (ninety) days before the expiration date of the current permit? <i>Applicable only if nearing expiration date of current permit. If yes, list date received and any comments.</i>	<input type="checkbox"/> Yes, <input type="checkbox"/> No, <input checked="" type="checkbox"/> Not Applicable
<b>Information Requirements</b>	
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?	<input type="checkbox"/> Yes, <input type="checkbox"/> No, <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes, <input type="checkbox"/> No,
<b>Annual Publication</b>	
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? <i>If yes, list date and publication(s) or other media.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
<b>Violation Penalties</b>	
1. Has the Permittee been subject to any civil penalties for violating any permit condition? <i>If yes, list.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
2. Has the Permittee been subject to any criminal penalties for willfully or negligently violating permit conditions? <i>If yes, list</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
<b>Facility Inspection</b>	
<b>General Information</b>	
Arrival Time:	In @ 940 / Out @ 1050
Inspector(s):	Charlotte Petrick, Senior lab Analyst
Contact(s):	Robert Taylor
Permit Number:	WDP 2005
Site Address:	915 South Elmira Ave, Russellville, AR 72802
Mailing Address:	Same As Above
Primary Contact:	Robert Taylor
Title:	Plant Engineer
Telephone:	968-1021 ext 245
e. mail:	rtaylor@taberextrusions.com
Additional Contact:	Scotty Goodyear
Title:	Health, Safety and Environmental Coordinator

**City Corporation  
Significant Industrial User Inspection Report**

Facility Name: Taber Extrusions

Inspection Date: October 2, 2014

Telephone:	968-1021 ext 255
Additional Contact:	Mark Wilcox
Title:	Maintenance Supervisor
Telephone:	968-1021 ext 236
<b>Comments:</b> Plant Manager Allen Shavers	

**Process Information**

SIC Code(s):	3354				
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**Raw Materials:** Aluminum

**Process Description:** Extrusion of Aluminum with quench wash and some heat treat with quench wash.

**Products:** Various aluminum parts; electric motor housings, hunting bow risers, and various parts for DOD

**Operations Information**

	1st Shift	2nd Shift	3rd Shift
Number Of Employees: (Avg.)	48	47	15
Working Hours:	0700 – 1500	1500 – 2300	2300 – 0700
Hours/Day:	8	8	8
Days/Week:	5	5	5

**Notes:** 110 employees, the amount of employees is seasonal. Some six day weeks as needed.

**Water Source & Usage**

Source:	Volume (GPD):	Usage:	Volume (GPD):
City:	25,000	Process:	18,000
Landlord:		Sanitary:	1,000
Other:		Consumed in Product:	
Other:		Evaporation:	6,000
Other:		Other:	
Total:		Total:	25,000
<i>List all water account number(s):</i>			
<i>List wastewater account number(s):</i>			
<i>If applicable.</i>			

**Process Waste-Streams**

Source Description:	Volume (GPD):	Code Type: *
Contact Cooling water	15,000	BD
Extrusion sump water	2000	CD

A-8c

**City Corporation  
Significant Industrial User Inspection Report**

Facility Name: Taber Extrusions  
Inspection Date: October 2, 2014

**\* 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

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

The plumbing plans are on file in the pretreatment office. The pre-treatment office is waiting for sketches from Taber.

**Permit Compliance Appendix**

**Industrial User Permit**

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

**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.*
3. Has the Industrial User's permit been modified for good causes since the permit was granted?  Yes,  No  
*If yes, list causes and modifications.*
4. 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.*
5. Has the Permittee increased or decreased the use of potable or process water?  Yes,  No,
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

**City Corporation  
Significant Industrial User Inspection Report**

Facility Name: Taber Extrusions  
Inspection Date: October 2, 2014

- 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

**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.*

Large settling tank with oil / water separator at the effluent. An oil skimmer has been placed before the primary sump pump, at the intermediate phase, and before the effluent pump. The pretreatment area is covered to protect it from rainwater and prevent oil from escaping. A second oil skimmer tank has been set in place prior to the effluent going to the sewer main. An 8,000 gallon used oil storage silo has been installed

1. Number of pretreatment operators on staff: 3

**City Corporation  
Significant Industrial User Inspection Report**

Facility Name: Taber Extrusions  
Inspection Date: October 2, 2014

2. Do operators hold State of Arkansas Waste Water Treatment Operator Licenses?	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
3. If so, list number of employees having each classification of license:	
Class I:	Class II:
Class III:	Class IV:
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.):	

**Bypass Of Treatment Facilities**

1. Has the Permittee bypassed treatment facilities? <i>If yes, detail below. If no, or not applicable, skip section.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable
2. Is bypass unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist?	<input type="checkbox"/> Yes, <input type="checkbox"/> No
3. Is bypass for essential maintenance to assure efficient operation, which does not cause effluent limitations to be exceeded?	<input type="checkbox"/> Yes, <input type="checkbox"/> 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?	<input type="checkbox"/> Yes, <input type="checkbox"/> 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?	<input type="checkbox"/> Yes, <input type="checkbox"/> No
6. Did written notice of an unanticipated bypass specify;	
a) A description of the bypass, and its cause, including its duration,	<input type="checkbox"/> Yes, <input type="checkbox"/> No
b) Whether the bypass has been corrected,	<input type="checkbox"/> Yes, <input type="checkbox"/> No
c) The steps being taken or to be taken to reduce, eliminate, and prevent a reoccurrence of the bypass?	<input type="checkbox"/> Yes, <input type="checkbox"/> No

**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? <i>If yes, detail below. If no, or not applicable, skip section.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No <input type="checkbox"/> 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? <input type="checkbox"/> Yes, <input type="checkbox"/> No <i>If yes, list wastes, disposal methods, contractor, etc. If no, explain. <input type="checkbox"/> Not Applicable</i>	

**Removed Substances**

1. Is the Permittee disposing of solids, sludge, 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? <i>If yes list wastes, disposal methods, contractor, etc.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable
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Waste oil recycled by Agricultural Services Inc. 411 West Dixon Rd, Little Rock, AR 72206 AR Reg # -A8585186761 EPA ID -ACR000006528 Sodium Hydroxide removed by K-com Transportation Waste oil and NaOH removed every 6-8 months. Used acid put into a large barrel and removed as needed by Opak out of Jacksonville, AR	
2. Is the Permittee <i>complying</i> with any additional local and State standards including such standards or requirements that may become effective during the term of this permit? <i>If yes, list additional standards. If no, explain.</i>	<input type="checkbox"/> Yes, <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
<b>Process Control Laboratory</b>	
1. Does the Permittee operate its' own laboratory for pretreatment process controls? <i>If yes, list parameters analyzed and any additional comments. If no, skip section.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
2. Is the process control laboratory certified by the State of Arkansas?	<input type="checkbox"/> Yes, <input type="checkbox"/> No
3. Number of pretreatment system laboratory technicians on staff:	
4. Are laboratory technician(s) certified in wastewater analysis?	<input type="checkbox"/> Yes, <input type="checkbox"/> No
<b>Representative Sampling</b>	
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? <i>If yes, list equipment used by the Permittee for sampling and/or analysis and any additional comments.</i> <i>If no, detail deficiencies.</i> <i>Not applicable, if no Industrial User sampling and analysis equipment is used.</i>	<input type="checkbox"/> Yes, <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
2. Has Control Authority been notified and has Control Authority approved the changing of any sampling points?	<input type="checkbox"/> Yes, <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
<b>Flow Measurement</b>	
1. Does the Permittee utilize a wastewater flow meter(s) or water meter(s) for flow determination? <i>If wastewater meter, list type(s) used and complete section.</i> <i>If water meter used, skip section.</i>	<input checked="" type="checkbox"/> Wastewater Flow Meter(s) <input type="checkbox"/> Water Meter(s)
GPI Great Plans, Model 09 inline flow meter.	
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?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No

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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)?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
<b>Self Monitoring Procedures</b>	
<i>Not applicable if no discharge and self monitoring requirements suspended; skip section.</i>	
1. Is the Permittee monitoring outfall(s) for the required parameters?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
2. Are all parameters being sampled at the designated sampling point(s)?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
3. Are any pollutants monitored more frequently than required by the Industrial User's permit?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
Sampling performed by: <input checked="" type="checkbox"/> Outside Laboratory <input type="checkbox"/> Industrial User If independent laboratory or laboratories used, list name(s): EEG, Russellville AR	
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?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
Name of independent laboratory or laboratories used: EEG, Russellville AR	
<i>Review laboratory analysis reports, monthly self monitoring reports, and any chain of custody records or sampling event records.</i>	
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,	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
b) Who performed the sampling or measurements	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
c) The date(s) analyses were performed,	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
d) Who performed the analyses,	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
e) The analytical techniques or methods used,	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
f) The results of such analyses?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
<input checked="" type="checkbox"/> Correct sample types or methods.	<input checked="" type="checkbox"/> Correct handling and preservation techniques. *
<input checked="" type="checkbox"/> Correct sample frequency.	<input checked="" type="checkbox"/> Correct laboratory analysis methods. *
* In accordance with 40 CFR Part 136 and amendments thereto.	

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<b>Automatic Re-sampling</b>				
1. Did the results of the Permittee's self monitoring wastewater analysis indicate a violation of the Industrial User's permit had occurred? <input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No				
<i>If yes, list each violation separately. If no or not applicable, skip section.</i> <input type="checkbox"/> Not Applicable <i>(Not applicable if no discharge and self monitoring requirements suspended.)</i>				
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
1. Did the Permittee have any occurrence of an accidental discharge of substances prohibited by Ordinance 2105 or any slug loads or spills that may enter the public sewer? <i>If yes, detail below. If no, skip section.</i> <input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No				
2. Did the Permittee immediately notify the Control Authority upon the occurrence? <input type="checkbox"/> Yes, <input type="checkbox"/> 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? <input type="checkbox"/> Yes, <input type="checkbox"/> No				
4. Did the Permittee submit to the Control Authority a detailed written report within seven days following the accidental discharge? <input type="checkbox"/> Yes, <input type="checkbox"/> 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? <input type="checkbox"/> Yes, <input type="checkbox"/> 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? <input type="checkbox"/> Yes, <input type="checkbox"/> 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? <input type="checkbox"/> Yes, <input type="checkbox"/> No				
<b>Operating Upset Report</b>				
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 2105? <input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No				
<i>If yes, detail below. If no, skip section.</i>				
2. Did the Permittee inform the Control Authority within 24 hours of becoming aware of the upset? <input type="checkbox"/> Yes, <input type="checkbox"/> No				

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3. Did the Permittee file a written follow-up report of the upset to the Control Authority within 5 (five) days?	<input type="checkbox"/> Yes, <input type="checkbox"/> 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?	<input type="checkbox"/> Yes, <input type="checkbox"/> 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?	<input type="checkbox"/> Yes, <input type="checkbox"/> No
6. Did the report contain all steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset?	<input type="checkbox"/> Yes, <input type="checkbox"/> No
7. Did the report also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner?	<input type="checkbox"/> Yes, <input type="checkbox"/> No

**Special Monitoring And Reporting Requirements**

1. Does the Permittee have any additional or special monitoring requirements particular to this Industrial User? <i>If yes, attach copy of pertinent page of the industrial user's permit. If no, skip section.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
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**Compliance Schedule Requirements**

1. Was the Industrial User under a compliance schedule with the City? <i>If yes, attach copy of the Industrial User's compliance schedule. If no, skip section.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No		
2. Did the Permittee submit quarterly compliance reports the Pretreatment Office?			
1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No	<input type="checkbox"/> Yes, <input type="checkbox"/> No

**Records Retention**

1. Is the Permittee retaining records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by user's permit, and records of all data used to complete the application for permit, for a period of at least three years from the date of the sample, measurement, report or application?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> 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?	<input type="checkbox"/> Yes, <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable

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<b>Planned Facility Changes</b>	
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? <i>If not applicable, skip next question.</i>	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable
2. Did the Permittee give notice to the Control Authority 90 days prior to the above planned changes?	<input type="checkbox"/> Yes, <input type="checkbox"/> No <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes, <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
<b>Signatory Requirements</b>	
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.	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> 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)?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
<b>Cost Recoveries And Penalties</b>	
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?	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No <input type="checkbox"/> Not Applicable
<b>Facility Site Inspection</b>	
<b>Spill Prevention</b>	
1. Does the facility have a spill prevention plan? <i>If no, skip next question.</i>	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
Taber has installed a concrete pad on the outside of the caustic area. This pad has a curb to contain the liquid and a small pit with a sump pump to control the spill and dispose of properly. Taber has up dated the spill plan as of May 2012.	
2. Is a copy of the spill prevention plan on file with the Control Authority?  Copy dated May 2012 on file.	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
<b>Slug Control</b>	
1. Were the Industrial User's slug control and prevention measures evaluated?	<input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No
2. Are adequate precautions being taken and proper procedures followed to prevent accidental spills and slug loads?	<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No

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<b>Chemical and Hazardous Waste Storage</b>		
Chemical Type Or Product Name:	Maximum Amount Stored:	Proximity To Floor Drains: (In feet.)
Caustic / Sodium Hydroxide	2500 gal	Drain capped
Fire fighting power	13 5 gal pales	27 Ft
Lubrications	100 gal	27 Ft
Protect Sol 512	150 gal	27 ft
Super Lub 7695Q	100 gal	27 ft
Nitric Acid / in lab	10 L	NA
<b>Pollution Controls</b>		
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 its permit?		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable
<i>Not applicable if no pretreatment equipment, skip section.</i>		
Plant looks good.		
2. Does the Permittee's proper operation and maintenance include;		
a) Effective performance;		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
b) Adequate funding;		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
c) Adequate operator staffing and training;		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
d) Adequate laboratory and process controls?		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
3. Does the Permittee have proper records of operation and maintenance of pretreatment equipment?		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
<b>Manufacturing Facilities</b>		
1. Were manufacturing or production facilities inspected?		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
<i>Not applicable if no manufacturing or production facilities.</i>		<input type="checkbox"/> Not Applicable
Manufacturing area has received lots of attention; the overall area is clean.		
<b>Pretreatment Facilities</b>		
1. Were pretreatment facilities inspected?		<input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No
<i>Not applicable if no pretreatment equipment.</i>		<input type="checkbox"/> Not Applicable
Pretreatment equipment appeared to be operating as designed, area fairly clean.		

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**Self Monitoring Procedures**

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

**Entry And Inspection**

1. Has the Permittee allowed the Control Authority or an authorized representative upon the presentation of credentials and other documents as may be required by law to;
- a) Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of user's permit,  Yes,  No
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of user's permit,  Yes,  No
  - c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under user's permit,  Yes,  No
  - d) Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and  Yes,  No
  - e) Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under user's permit, could originate, be stored, or be discharged to the sewer system?  Yes,  No