ADEQ

ARKANSAS
Department of Environmental Quality

NPDES PERMIT FILE
NPDES # AR0021768
AFIN # 58-00105
_____ Permit
_____ ✓ Correspondence
_____ Technical
_____ Date Scanned & Init

July 18, 2008

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

Re: City of Russellville (Permit Number: AR0021768 AFIN: 58-00105) Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Bradley:

Please find enclosed the finished report for the audit/assessment conducted by me from June 23 through 26, 2008. Please make the report available for review by appropriate City officials. You and the City officials should discuss and evaluate the recommendations and required actions in the report. Please respond in writing within thirty (30) days with the City's proposed actions to my findings in the report.

The department and I thank you for your cooperation during the audit. The recommendations in the attached audit/assessment are intended to aide the Russellville Water & Sewer System pretreatment personnel with achieving the objectives of the Clean Water Act.

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

Sincerely,

Rufus J. Torrence
ADEQ Pretreatment Engineer

Encl: Audit/Assessment Checklist

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

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF RUSSELLVILLE, ARKANSAS

NPDES PERMIT #AROO21768

JULY 18, 2008

PREPARED BY: RUFUS TORRENCE

ARK DEPT OF ENVIRONMENTAL QUALITY (ADEQ) ENGINEER & AUDITOR

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LIST OF ATTACHMENTS

A) INTRODUCTION

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

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

The auditor performed an audit/assessment from June 23 to June 26, 2008 on the Pretreatment Program implemented by City Corporation for the city of Russellville, Arkansas. Participants included:

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

The goals of the audit/assessment were:

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

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

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

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

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

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

On June 23, 2008 the auditor conducted a pre-audit meeting with key personnel involved in the pretreatment program; the auditor met with Randy Bradley, Larry Collins and Craig Noble. The primary topic of the meeting focused on the current issue which the City has with Dardanelle. The City of Dardanelle has challenged the City Corp petition to discharge to the Arkansas River. After the pre-audit meeting Randy Bradley conducted a tour of the treatment plant for the auditor. The City's wastewater treatment plant consists of primary clarifiers, biotowers, intermediate clarifiers, trickling filters, activated sludge, and final clarification. Treated wastewater is chlorinated and discharged to Whig Creek. There has been no pattern of lethality shown recently from the POTW's effluent; however the whole effluent toxicity test in March 2007 had a sub-lethal failure for the fathead minnows (pimephates promelas).

The plant's design flow is 7.3 MGD and has an average flow of ~5.4 MGD. Approximately 22.7% of the average flow is from 13 significant industrial contributors (SIUs), 3 of the SIUs are categorical (subject to Federal/State regulations). The city's one poultry processor makes up most of the permitted industry flow.

The City disposes approximately 442 dry tons of sludge per year in a nearby landfill.

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

After examining the industrial user files the auditor visited the Dardanelle city park across the Arkansas River from the proposed City Corp outfall 002.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City of Russellville (City Corp). Section C includes recommendations to help improve the implementation and enforcement of the City Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D. The program needs to be modified to comply with the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of the deficiencies found in the City of Russellville's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the City's approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow. "[Gilliam Audit 2003]" is a reference to the audit performed by Allen Gilliam in December 2003; this reference is used to denote a repeat deficiency.

1) [Gilliam Audit 2003] Under ***40 CFR 403.8(f)(2)(i) and required action #1 from the 2/98 audit***: "The [City Corp] shall…implement procedures to: Identify and locate all possible IUs which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of IUs made under this paragraph shall be made available to the [ADEQ] upon request..."

Two (2) lists of Russellville's IUs (ADEQ's haz waste generators w/Russellville mailing addresses and one from the Arkansas Manufacturers Register) were provided during the audit and were discussed during the initial interview. City Corp personnel were familiar with some but, not all, nor could locate documentation of survey information for most of the businesses/potential SIUs contained on those lists. There were also industries/businesses in the community of Dover that City Corp should have documented information on. The City must conduct a comprehensive industry/business survey and have documentation available.

The listing will also help facilitate identifying and locating unknown categoricals, other SIUs as well as those business/industry groups with P2 opportunities.

Maintain a listing of those non-domestic dischargers that are using septic systems for disposal.

[Torrence Audit 2008] The City Pretreatment Coordinator has conducted an Industrial User survey on the industries in Russellville and has documentation; however, the Coordinator had no documentation on a survey for the community of Dover. The City must survey the community of Dover.

2) [Gilliam Audit 2003] Under ***40 CFR 403.8(f)(2)(iv)***: "[City Corp. shall]...Receive and analyze self-monitoring reports [for compliance]…"

POM is sampling/analyzing their total plant flow which consists of both regulated and dilution wastewater. Their permit (Attachment A-3) does make a very general statement that the IU can report to verify compliance using the "back calculation" using the CWF.

Back calculating using the combined wastestream formula (CWF) under ***40 CFR 403.6(e)*** to verify compliance with the categorical pretreatment standards in ***40 CFR 433*** is acceptable with accurate regulated vs. dilution flow measurements. Attachment A-8 shows POM's self monitoring results using a (reverse) "dilution factor" in its calculations. This factor does not appear accurate according to POM's own flow measurement ratio on the day of sampling. Flows reported indicate a (reverse) dilution factor of 68%, not 44% as reported by the IU rep. (in the IU's favor this time).

It was also noted that two of the self-monitoring reports by POM had the exact monthly flows, down to the gallon for the two (2) semi-annual reports. This should be checked out also. The City must review more closely its IU reports for accuracy to verify compliance.

[Torrence Audit 2008] POM is currently sampling all and only regulated wastewater; therefore, the Combined Wastestream Formula (CWF) is no longer applicable for POM. Therefore, the City must strike all language in POM's permit which references the CWF; remove paragraph C on page 3 in Part 2 (attachment D-1/1).

3) [Gilliam Audit 2003] Under ***40 CFR 403.8(f)(1)(iii)(C)*** "Control mechanisms [permits] must contain…Effluent limits based on categorical pretreatment standards, local limits…etc". Taber's permit must include daily maximum limitations, not just monthly maximums and their permit needs to be re-issued based on their most current average production and flow data.

Two non-categorical IUs' (Dana and Ladish) "local limits" (see Attachment A-4) seemed excessively high, could not be explained and no documentation could be located for their basis.

As a "new source" by definition, Grace's permit must be revised to reflect pretreatment standards for new sources under ***40 CFR 433.17*** (cadmium will be the only metal limit affected).

[Torrence Audit 2008] MAHLE's (formerly Dana) permit has local limits for metals. The current local limits for metals do not have a firm technical basis. Until the City confirms the need for local limits for metals, the City must not include local limits in current permits since the existing local limits for metals do not have a firm technical basis. The City must develop local limits based on current water quality standards for the receiving stream (Whigg Creek) or demonstrate that local limits are not necessary.

4) [Gilliam Audit 2003] Under ***40 CFR 403.8(f)(5)*** "[City Corp.] shall implement an Enforcement Response Plan," ***and Section III (Enforcement Response Guide) of Appendix E (Enforcement Response Plan) of the "Pretreatment Program"*** the minimum enforcement response the pretreatment coordinator will take for a discharge limit exceedence is a Notice of Violation (NOV).

No documentation of a NOV or even a phone call "record of communication" could be located for POM's O&G violation in 10/03.

[Torrence Audit 2008] Sugar Creek continues to violation the BOD local limit (550 mg/l) in the approved program (see Appendix K). The City has entered into a consent agreement (see attachment J-1/1) with Sugar Creek to allow this SIU time to mitigate the problem. The consent agreement expires in June 2008 and the City must either escalate enforcement or modify the approved program to remove the BOD limit.

5) [Gilliam Audit 2003] Under ***40 CFR 403.8(f)(2)*** "[City Corp.] shall...implement procedures to ensure compliance with the requirements of a Pretreatment Program." And, on page 17 of the approved ***"Pretreatment Program"***, it's indicated approximately 2.35 full time equivalent employees (FTE) would be available for implementation of the City's program.

Observations made and administrative deficiencies found during this audit would indicate less than this 2.35 FTE number of employees are active in implementing the program. Based on the findings/procedural deficiencies noted above, City Corp must allow more time and possibly more personnel to implement effectively the basic program requirements.

[Torrence Audit 2008] The city currently has only 1.95 FTE employees dedicated to the pretreatment program. The City must consider either adding more employees, dedicating more employees' time to the program, or modifying the approved program to show the need for fewer employees.

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

1) [Gilliam Audit 2003] Recommend revising/adding language into the current pretreatment ordinance specific legal authority to require the City's non-domestic dischargers to implement Best Management Practices (BMPs) and Pollution Prevention (P2) techniques.

Discussions regarding City Corp possibly implementing a grease trap program would be supported by having the legal authority to require BMPs to be implemented at all of its food related industries.

BMPs and P2 practices could also be required (as necessary) across the board for other business sectors such as dentist offices, health related facilities, auto body repair shops, machine shops, etc. The administrative burden of additional permits would not be necessary with this "cover all" authority.

2) [Gilliam Audit 2003] Develop and include fact sheets in each IU file identifying pertinent information such as: processes/flows with updated schematics, rationale for being deemed "Significant", ...

3) [Gilliam Audit 2003] Recommend follow-up site visits (as deemed necessary) at facilities sent the industrial user survey questionnaires (***deficiency #1 above***) to verify responses.

4) [Gilliam Audit 2003] Recommend re-evaluating why some parameters are included in the non-categorical IUs' permits. And, why the limits are so high for Dana and Ladish/Trinity (these were the only two [2] non-categorical IUs' that files were reviewed during the audit. Are there others with similarly high limits and no basis for the parameters to be monitored for?).

[Torrence Audit 2008] Referring to the requirement in paragraph 3 above under Required Actions, the City is to remove local limits from Dana's (MAHLE] permit.

5) Under 40 CFR 403.12(j) & (p)(1) "[City Corp.] shall...Notify IUs of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and Subtitles C and D of the Resource Conservation and Recovery Act." The City has included the notification in the IWS form circulated to local industries. The auditor recommends that the City send a specific letter of notification to all thirteen (13) SIUs.

6) The auditor recommends that the City ask POM to confirm the necessity for pretreating the wastewater prior to release to the POTW. Historically, iron phosphatizers can meet 40CFR433 limits without treatment.

7) The City should insert language into POM's permit to emphasize that no process wastewater from the 40 CFR Part 464 Metal Molding and Casting operations can be discharged to the POTW. The City may insert this language in Part 1 (Effluent Limitations): "There shall be no discharge of process wastewater to the POTW from any operation regulated by 40 CFR Part 464 Metal Molding and Casting."

8. The City may develop local limits for BOD and use a "mass allocation" rather than a uniform concentration limit. The City can allocate the allowable BOD load to the POTW to provide relief to Sugar Creek and still leave ample loading for other local SIUs with potentially large organic loadings to the POTW.

D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS

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

2) Comply with most the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply.

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

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

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

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

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

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

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

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

* * * * * * * *

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

A. GENERAL INFORMATION

Control Authority Name: *Russellville City Corporation* NPDES # *AR0021768*
Mailing address: *P.O. Box 3186, Russellville, AR 72811-3186*

Permit Signatory: *Craig Noble* Title: *General Manager*

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

Pretreatment Contact: *Randy Bradley* Title: *Pretreatment Coordinator*
Address: *same*
Telephone: *(479) 968-2080 ext. 133* E-Mail: rbradley@citycorporation.com

Pretreatment program approval date: *1/13/84*

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

Month Annual Pretreatment Report Due: *February*

Pretreatment Year Dates: *1/1 - 12/31* Date(s) of Audit: *06/23-26/08* (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

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

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*05/07*	*No Apparent Deficiencies Noted*
PCI	*04/06*	*Inspections not documented; Taber with illegal direct disc*

YES	NO	
___	✓	Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?
		If yes, describe the required corrective action: _____
___	✓	Is the Control Authority currently in SNC or RNC?

. . . . . .

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	4/1/05	3/31/10

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

2. Individual Treatment Plant Information

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

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 7.3 MGD; Actual (Average)- 5.426 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 13 # of CIUs : 3
Industrial Flow (mgd): 1.23* Industrial Flow (%) : 22.7 %
*ConAgra (poultry) makes up ~ 0.9 MGD of this

Level of Treatment		Type of Process(es):
Primary	✓	primary clarifiers; biotowers; intermediate
Secondary	✓	clarifiers; trickling filters, activated
Tertiary	✓	sludge & final clarification

Method of Disinfection: chlorination

Dechlorination ____ YES ✓ NO

0

Effluent Discharge

Receiving Stream Name: Whiq Creek

Receiving Stream Classification: Segment 3F Ark. River Basin

Receiving Stream Use: secondary contact recreation

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

Method of Sludge Disposal:		Quantity of Sludge:
✓	Land Application	441.3 dry tons/yr.
____	Incineration	____ dry tons/yr.
____	Monofill	____ dry tons/yr.
____	Mun. Solid Waste Landfill	____ dry tons/yr.
____	Public Distribution	____ dry tons/yr.
____	Lagoon Storage	____ dry tons/yr.
____	Other (specify)	____ dry tons/yr.

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

a. (continuation of individual treatment plant information for City Wastewater Treatment Plant.)

YES NO

✓ ___ Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: *same*
Issuance Date: *same*
Expiration Date: *same*

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

YES NO N/A

✓ ___ ___ Has the Control Authority submitted results of whole effluent biological toxicity testing.

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) *No but in March 2007 the effluent had a sub-lethal effect on the Pimephales promelas (Fathead Minnows).*

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Biomonitoring		4		
TCLP			1	
Other: TKN,etc			12	

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

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

YES NO N/A

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

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

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

Parameters Violated	Cause(s)
Total Suspended Solids	*O&M*

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
N/A		Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
	✓	Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.

1. Modifications:

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

2. Modifications in Progress: NONE

Date Requested	Nature of Modification
N/A	

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 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 2/13/92
Date of most recent Pretreatment Program modification approval: 3/20/92

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

___ ✓ Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no: *City of Dover is connected & has some small IUs*

✓ ___ 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^2) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	City of Dover	unknown	unknown	their Ord.adopts
2.				Russ. by reference
3.				

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

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

Briefly describe other problems: _____

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

IU Name	Problem	NPDES Permit Violation Yes	No
n/a		___	___
		___	___

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

___ ✓ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?

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

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

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

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

How often is the survey to be updated? ongoing

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

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?

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

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

YES NO

___ ✓ Has the POTW identified any IUs with Pollution Prevention opportunities?

✓ ___ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

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

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

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

IU NAME	PERMIT EXPIRATION DATE
n/a	

YES NO

✓ ___ Does the Control Authority accept trucked septage & grease trap wastes?

___ ✓ Does the Control Authority accept other trucked wastes?

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

YES NO

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

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

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

Pollutant	Limit
pH	

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

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

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

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

Pollutant	Limit
O & G	100 ppm
BETX	10 - 100 ppm
Naptha	"

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

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

June 2007 Date Notified IWS Method of Notification

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

____	Federal Register	____	Journals, Newsletters
✓	Meetings, Training	✓	Other Internet
✓	Government Agencies	____	Other _____

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
n/a			

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

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

[1]*Back in 1990 the control authority evaluated the need for local limits; these 1990 limits are not current with present water quality standards. The Control Authority next permit will require the control authority to re-evaluate local limits.*

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	
N/A							

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)	*Local Limits are not current at this time*		
Cadmium (Cd)			
Chromium-Total			
Copper (Cu)			
Cyanide (CN)			
Lead (Pb)			
Mercury (Hg)			
Molybdenum (Mo)			
Nickel (Ni)			
Selenium (Se)			
Silver (Ag)			
Zinc (Zn)			

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

N/A

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

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

*Sect I in the ERP also shows monitoring requirement

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

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

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
___	✓	If requested? *(CA splits samples only when requested)*
___	✓	To verify IU self-monitoring results?

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

	Analytical Method *	Name of Laboratory
Metals	ICP	EEG
Cyanide	Spectro	"
Organics	GC/MS	"
Other		

Were all wastewater samples analyzed by 40 CFR 136 methods? Yes

* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe:
POTW relies on ADEQ Certification

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

5 days Conventionals
3 wks Metals
1 mos Organics

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

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

If yes, explain: _____

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

YES	NO	
✓	___	Scheduled compliance monitoring
✓	___	Unscheduled compliance monitoring
✓*	___	Demand monitoring for IU compliance
✓	___	IU self-monitoring
___	___	Other: _____

*Sect 1.D in the ERP shows Demand Monitoring

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

I. ENFORCEMENT

YES NO

___ ✓* Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] **Sect 4.8.a cites [403.8(f)(2)(vii)] and not [403.8(f)(2)(viii)].*

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

YES NO

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

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

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

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

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

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

civil $ 1000 /day/violation (Ord 5.7.2)
criminal $ 1000 /day/violation (Ord 5.8)
administrative $ _____/day/violation

✓ Imprisonment (Ord 5.8)
_____ Termination of Service (Ord 5.4.2)
_____ Other: _____

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

YES NO

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

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

Comment: Permits reference 40CFR403 but not specifically 40 CFR 403.12(g)

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	N/A	
___	✓	___	Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
Sugar Creek Foods		Consent Agreement	May 2007		✓*

*Sugar Creek is working with CA; CA plans to revise program to allocate the BOD MAIL(lbs/day) to allow Sugar Creek a higher BOD concentration limit.

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

#	%	
0	0	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
1	7.6	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES	NO	
___	✓	Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. ___

Has the Control Authority experienced any of the following:

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount	
Civil	0	$	
Administrative	0	$	
Total	0	$	[WENDB-IUPN]

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES	NO	
✓		Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:
		YES NO
		✓ ___ computerized
		✓ ___ hard copy
		___ ___ OTHER: _____

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
✓		Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking
		Other: _____
		Can IU monitoring data can be retrieved by:
✓		Industry name
✓		Pollutant type
✓		Industrial category or type
✓		SIC Code
✓		IU discharge volume
	✓	Geographic location
N/A		Receiving treatment plant (i.e. if > one plant in the system)
		Other (specify) _____
✓		Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
	✓	Have IUs requested that data be held confidential?

How is confidential information handled by the Control Authority?
CA places information in separate file and locks drawer.

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

If yes, please explain: The POTW is having trouble meeting the limits in the NPDES permit and the CA wants to move the outfall to the Ark Riv; the City of Dardanelle has challenged the proposal. Local limit implementation is on hold pending the outcome.

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

K. RESOURCES

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

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

YES NO

___ ✓ Have any problems in program implementation been observed which appear to be related to inadequate funding?
If yes, describe and show below the source(s) of funding for the program:

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

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

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	2 Isco portable; 3 portable & 2 bench pH meters;
✓	___	Safety equipment	standard list
✓	___	Vehicles	1 Truck
✓	___	Analytical equipment	CA checks conventionals in RWSS lab; sends metals to contract lab

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

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

CA has not documented any efforts

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

No source identified

3. Has the POTW implemented any kind of public education program? If yes, describe:

U of A - Morrilton Chemistry Professor brings a class to tour the POTW every semester.

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

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?

No

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

FILE #: 1 Industry Name POM File/ID No. 2013
Industry Address 200 S. Elmira Ave. 72801
Industry Description Mfg. Parking Meters
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3999,3824
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 1000

Industry visited during audit: YES

Comments: POM has 40CFR464 Aluminum Die Casting Operation on site-All 40CFR464 MM&C regulated wastewater is hauled off-site for disposal. (48 Employees)

FILE #: 2 Industry Name Taber File/ID No. 2005
Industry Address 915 S. Elmira, 72811
Industry Description Mfg. aircraft support structures and compound bow parts
Industrial Category Aluminum forming 40 CFR 467 SIC Code: 3354
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) _____

Industry visited during audit: YES

Comments: Taber has large presses capable of handling 12" dia billets. (89 Employees)

FILE #: 3 Industry Name Grace Mfg. File/ID No. 2016
Industry Address 614 Rt. 247 72802
Industry Description Chemical Etching to manufacture bone saws, et.al.
Industrial Category metal finish 40 CFR 433 SIC Code: 3841
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 80,000

Industry visited during audit: YES

Comments: Grace has 40CFR463 Plastic Molding operation on site (Presently no pret regs) (80 Employees)

FILE #: 4 Industry Name MAHLE (Dana Corp) File/ID No. 2003
Industry Address 2301 E. 16th St.
Industry Description Machining of industrial camshafts (steel)
Industrial Category n/a 40 CFR n/a SIC Code: 3710
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) 6,000

Industry visited during audit: YES

Comments: Machining & heat treating, NaOH & synthetic coolants. Heat treat quench tank overflow & filter backwash (250 Employees)

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

Industry visited during audit: YES

Comments: Sugar Creek manufactures locally its own one gallon plastic jugs; jugs are filled with dairy product, frozen and shipped. (40 Employees)

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

A. Industrial User Characterization

		POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
1.	Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	✓
2.	Is the user subject to categorical pretreatment standards?	✓	✓	✓	X	X
	a. New source or existing source (NS or ES)?	ES	ES	NS	N/A	N/A
	b. Is this IU one identified as having P^2 potential?	X	X	X	X	X

B. Control Mechanism

1.	Does the file contain an application for a control mechanism?	✓	✓	✓	✓	✓
	If yes, what is the application date?	3-1-05[1]	3-30-05[1]	2-7-07	5-9-01[2]	7-25-07
	Does it ask for Pollution Prevention information?	X[3]	X[3]	X[3]	X[3]	X[3]
2.	Does the file contain a Permit?	✓	✓	✓	✓	✓
	Permit Expiration Date?	3-31-10	3-31-10	3-31-10	3-31-10	3-31-10
	Is a fact sheet included?	X	X	X	X	X

Comments:

1. CA issued permits for only one year pending implementation of new local limits but the City of Dardanelle intervened and CA reissued new permits without asking for new applications.

2.CA claims that MAHLE processes have not changed since the last application dated 5-9-01 and issued a new permit without asking for a new application.

3. Section A para 7 on page 2 in the application (see Attachment A-2/5) asks the SIU to list P2 information.

4. CP => Cover Page of Permit

5. Permits with 40CFR433 Metal Finisher limits

6. MAHLE permit has inappropriate local limits; need to revise permit to remove them.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	CP[4]	CP[4]	CP[4]	CP[4]	CP[4]
b. Expiration date?	CP[4]	CP[4]	CP[4]	CP[4]	CP[4]
c. Statement of nontransferability?	4-F	4-F	4-F	4-F	4-F
d. Appropriate discharge limitations?	✓[5]	✓	✓[5]	X[6]	✓[7]
e. Appropriate self-monitoring requirements?	✓[8]	✓[9]	✓[8]	X[6]	✓[10]
f. Sampling frequency?	✓[8]	✓[9]	✓[8]	X[6]	✓[10]
g. Sampling locations?	✓[11]	✓[11]	✓[11]	✓[11]	✓[11]
h. Requirement for flow monitoring?	✓	✓	✓	✓	✓
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	✓
j. Applicable IU reporting requirements?	✓	✓	✓	X[6]	✓
k. Standard conditions for:					
Right of Entry?	4-B	4-B	4-B	4-B	4-B
Records retention?	4-C	4-C	4-C	4-C	4-C
Civil and Criminal Penalty provisions?	4-I	4-I	4-I	4-I	4-I
Revocation of permit?	4-H	4-H	4-H	4-H	4-H
l. Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	N/A
m. General/Specific Prohibitions?	X	X	X	X	X
n. Where technologically and economically achievable, are P^2 aspect included?	X	X	X	X	X

Comments:
7. Permits with Conventional pollutant limits and general prohibitions
8. Permits with 2/yr sampling frequency for 40 CFR 433 limits
9. Permits with 2/yr sampling frequency for Cyanide, Chromium & Zinc
10. Permits with 1/wk sampling frequency for conventional pollutants
11. Sampling location is shown on Cover Page of permit

SECTION II: PROGRAM ANALYSIS AND PROFILE

	POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
C. Application of Standards					
1. Has the IU been properly categorized?	✓	✓	✓	✓	✓
2. Were both Categorical Standards and Local Limits properly applied?	✓	✓	✓	✓[6]	N/A
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	✓[12]	✓[12]	✓[12]	✓[12]	✓[12]
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	✓[13]	N/A	N/A	N/A
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	X[14]	N/A	N/A	N/A	N/A
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	N/A	N/A	N/A	N/A	N/A
7. Is the Control Authority applying a bypass provision to this IU?	X	X	X	X	X

Comments:

12. CIUs had no revision in applicable categorical standards; CA is in the process of updating approved program to include recent Streamlining updates.

13. See Attachment G for Taber calculated effluent/permit limits.

14. POM is not subject to the CWF; CA needs to remove para C on page 3 in Part 2 of permit. See attachment D-1/1.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	✓
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	✓
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	✓
b. Sample date and time?	✓	✓	✓	✓	✓
c. Sample type?	✓	✓	✓	✓	✓
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	✓
e. Sample preservation procedures?	✓	✓	✓	✓	✓
f. Chain-of-custody records?	✓	✓	✓	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓[15]	✓
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	✓[16]	✓[17]	✓[18]	N/A	N/A
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	timed	timed	timed	timed	timed
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓

Comments:
15. CA reported MAHLE NC (noncompliant) for pH in Feb 2008 Annual report; pH is down close to 7 now.
16. POM developed a TOMP; see attachment E.
17. Taber has elected the Oil & Grease monitoring option [40CFR467.03(b)].
18. Grace has no TTOs on-site.
19. Page 4 of inspection is located on Attachment C-4/27.
20. Insp report does not show verification of rates; however, Taber submits monthly reports on rates. See attachment H.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
Inspections					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	✓
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	✓
b. Date of last Inspection	1-2-08	12-12-07	2-21-08	3-13-08	12-18-07
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	Page 4[19]	Page 4[19]	Page 4[19]	Page 4[19]	Page 4[19]
b. Inspection date and time?	Page 4[19]	Page 4[19]	Page 4[19]	Page 4[19]	Page 4[19]
c. Name and title of IU official contacted?	Page 4[19]	Page 4[19]	Page 4[19]	Page 4[19]	Page 4[19]
d. Verification of production rates?	N/A	X[20]	N/A	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	Page 7	Page 7	Page 7	Page 7	Page 7
f. Evaluation of pretreatment facilities?	Page 33	Page 33	Page 33	Page 33	Page 33
g. Evaluation of self-monitoring equipment and techniques?	Page 33	Page 33	Page 33	Page 33	Page 33
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	Page26	Page26	Page26	Page26	Page26
i. Manufacturing facilities?	Page 5,33	Page 5,33	Page 5,33	Page 5,33	Page 5,33
j. Chemical handling and storage procedures?	Page 27	Page 27	Page 27	Page 27	Page 27
k. Chemical spill prevention areas?	Page 26	Page 26	Page 26	Page 26	Page 26
l. Hazardous waste storage areas and handling procedures?	Page 27	Page 27	Page 27	Page 27	Page 27
m. Sampling procedures?	Page 17,33	Page 17,33	Page 17,33	Page 17,33	Page 17,33
n. Laboratory procedures?	Page 17	Page 17	Page 17	Page 17	Page 17
o. Monitoring records?	Page 19	Page 19	Page 19	Page 19	Page 19
p. Evaluation of Pollution Prevention opportunities?	X	X	X	X	X
q. Control Authority inspector signature?	Cover Letter	Cover Letter	Cover Letter	Cover Letter	Cover Letter

SECTION II: PROGRAM ANALYSIS AND PROFILE

	POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	✓	✓	✓	✓	✓
11. Does the file include:					
a. BMR?	Archived	Archived	Archived	N/A	N/A
b. 90-Day Report?	Archived	Archived	Archived	N/A	N/A
c. All periodic reports?	✓	✓	✓	N/A	N/A
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	N/A
12. Did the IU report on all required parameters?	✓	✓	✓	✓	✓
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	✓	✓	✓
14. Did the IU report flow?	✓	✓	✓	✓	✓
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	✓
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	✓	✓
17. Did the IU report all changes in its discharge? [403.12(j)]	N/A	N/A	N/A	N/A	N/A
18. Has the IU developed a Slug Control and Prevention Plan?	✓	✓	✓	✓	✓
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	X[21]	X[21]	X[21]	X[21]	X[21]
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	X[21]	X[21]	X[21]	X[21]	X[21]
b. Did POTW respond to the spill?	X[21]	X[21]	X[21]	X[21]	X[21]

Comments:
21. No industry listed above had a spill but back in 2005 Tyson had an ammonia spill that caused problems at the WWTP.
22. CA uses "OP32" to track all SIUs.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
E. Enforcement					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	✓[22]	✓[22]	✓[22]	✓[22]	✓[22]
b. IU self-monitoring results?	✓[22]	✓[22]	✓[22]	✓[22]	✓[22]
c. If NS CIU was it compliant within 90 days from commencement of discharge?	N/A	N/A	N/A	N/A	N/A
2. How many reports submitted during the past reporting year indicated discharge violations?	1 Zinc	1 O&G	0	1 pH	26 BOD
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	X[23]	X[23]	X[23]	X[23]	X[23]
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	X[23]	X[23]	X[23]	X[23]	X[23]
5. Were all nondischarge violations identified in the file?	N/A	N/A	N/A	N/A	N/A
6. Was the IU notified of all violations?	✓	✓	N/A	✓	✓
7. Was follow-up enforcement action taken by the Control Authority?	✓[24]	✓[24]	N/A	✓[24]	✓[24]
8. Did the Control Authority follow its approved ERP?	✓[24]	✓[24]	N/A	✓[24]	✓[25]
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	✓[26]	✓[26]	N/A	✓[26]	✓[25]
10. Is there a compliance schedule? If yes:	X	X	X	X	X
11. Were there any compliance schedule violations?	N/A	N/A	N/A	N/A	N/A
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	N/A	N/A	N/A	N/A	✓

SECTION II: PROGRAM ANALYSIS AND PROFILE

	POM FILE 1	Taber FILE 2	GRACE FILE 3	MAHLE FILE 4	SUGAR FILE 5
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	N/A	N/A	N/A	N/A	✓
b. TRC	N/A	N/A	N/A	N/A	✓
c. Pass through/Interference	N/A	N/A	N/A	N/A	✓
d. Spill/slug loads	N/A	N/A	N/A	N/A	X
e. Reporting	N/A	N/A	N/A	N/A	X
f. Compliance schedule	N/A	N/A	N/A	N/A	X
g. others (specify)	N/A	N/A	N/A	N/A	X
13. Was the SIU published for SNC?	N/A	N/A	N/A	N/A	✓
Date of publication.	N/A	N/A	N/A	N/A	2-10-08

Comments:

23. Currently the IUs are not responding within 24 hours of becoming aware of a violation of the MAXIMUM limit.

24. CA mailed NOVs as follow-up enforcement action.

25. CA sent NOVs to Sugar Creek; enforcement escalated to a Consent Agreement.

26. The problems were not chronic and IUs immediately returned to compliance.

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Russellville NPDES #: AR0021768

Date of Audit: 12/16 - 18/03 Date entered into QNCR: 5/21/04

(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

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, 72802; 479.968.1021 ext 245

Type of industry: Al extrusions CFR 467.35 (Subpart C) Date/Time of visit: 06/25/08 @ 3:55 pm

Industry contacts: Clint Hawkins, Plant Engineer
Chawkins@taberextrusion.com

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

Comments:

1. Taber has an O&G removal system (revolving tube with scrapper); however, the O&G was not being removed but returning to the front of the system. The capture vessel was missing and the O&G simply circulated and concentrated. The CA asked Taber to reinstall the capture vessel (a bucket).

2. No P2 activity was documented.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(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:

Taber has the second largest press (8600 ton) in the USA; 12 inch diameter aluminum billets are saw cutted to lenth (about 24 inches). The billets are heated in a gas-fired furnace press into shapes through iron dies.

Taber provides extrusions for the aircraft, compound bow and gun industry.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(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 SR 247, 479.968.5455 ext 1051

Type of industry: Metal Finish CFR 433.17

Date/Time of visit: 06/25/2008 @ 8:25 am

Industry contacts: Glen Henke, EHS Director
ghenke@gracemfg.com

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

Additional comments:
1. Grace performs chemical etching with ferric and HCL acid; the etching falls under the 40 CFR 433 Metal Finishing category. Grace also has a 40 CFR 463 Plastic Molding & Forming operation; presently there are no pretreatment standards for this category.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(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:

2. The pretreatment system is located in a separate building; the system is a traditional precip and floc operation. However, the system is located in the building below grade in a concrete basin which provides inherent spill control.
3. Grace sends solid waste to a nearby landfill.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(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:

POM (Park-O-Meter), 200 S. Elmira Ave., 479.968.2880

Type of industry: Metal Finish CFR 433.15

Date/Time of visit: 06/25/2008 @ 2:45 pm

Industry contacts: Charlie Schrepper - Plant Manager
Brent Huneycutt - Quality Manager
quality@pom.com

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

Additional comments:

1. POM has a five (5) stage phosphate washer; the phosphating falls under the 40CFR433 Coating core operation. POM also has 40CFR464 Metal Molding and Casting operations on-site. The wastewater from the MM&C operations is hauled on-site.

2. pH adjustment to Precip metals.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(signature of auditor conducting visit)

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

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: POM

Additional comments:

3. POM may be able to meet 40CFR433 limits without a pretreatment system. The auditor recommends sampling the incoming potable water and the raw untreated wastewater to confirm that POM is not adding heavy metals to the wastewater.

4. No P2 activity was documented.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(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:

MAHLE (formerly, Dana Corp.), 2301 E. 16th St., 479.967.8797

Type of industry: Mfg. camshafts

Date/Time of visit: 06/25/2008 @ 10:15 am

Industry contacts: David Sheets, EHS Coordinator
david.sheets@us.mahle.com

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

Additional comments:

1. No categorical processes at this site; MAHLE discharges about 6000 gpd of process wastewater. MAHLE has the potential to have large swings in pH; the CA has MAHLE classified as a SIU to provide permit oversight of the process wastewater from the alkaline treatment of the camshafts in the facility. MAHLE uses acetic acid to lower the pH before the wastewater is discharged to the collection system.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: MAHLE

Additional comments:

2. MAHLE has inline gravity settlement to remove chips, shavings and large particles from the wastewater before it is discharged to the POTW.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Russellville NPDES #: AR0021768

Name, address and phone number of industry:

Sugar Creek Foods (Formerly Eskimo Pie) 301 North El Paso

800-445-2715

Type of industry: Frozen Desserts Ice Cream Mixture

Date/Time of visit: 06/25/2008 @ 1:20 pm

Industry contacts: Scott Van Horn, President & Owner

scottv@sugarcreekfoodsinc.com

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

Additional comments:

1. This facility discharges about 30,000 gpd of process wastewater with high BOD (1200 to 2000 mg/l). Appendix K in the approved program shows a BOD limit of only 550 mg/l. Therefore, Sugar Creek is in constant violation of the local limit for BOD. Sugar Creek has declared financial hardship and cannot install adequate pretreatment. The CA is in the process of relaxing the BOD limit for Sugar Creek by updating the program to use "mass allocation" instead of a uniform concentration limit.

Visit conducted by: Torrence/Bradley Date: 7-15-08

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Russellville NPDES #: AR0021768

Industry name: Sugar Creek Foods

Additional comments:

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

Visit conducted by: Torrence/Bradley Date: 7-15-08

(signature of auditor conducting visit)

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:

Taber Extrusions, L.P.
915 South Elmira Avenue
Russellville, AR 72802
(479) 968-1021

2. Name, title, and telephone number of authorized representative and alternate:

Clint Hawkins, Plant Engineer
(479) 968-1021 x245
Charles Smith, Maintenance Sup.
(479) 968-1021 x236

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

Taber Extrusions, L.P. is an aluminum extrusion facility (heavy). Aluminum alloys in the form of a billet are heated and pressed to shape through individual dies. Other capabilities include Heat Treating, Quenching & Aging.

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.	Domestic wastes	4,500	✓	
b.	Boiler blowdown			
c.	Cooling water, non-contact			
d.	Cooling water, contact (combined)	≈14,000		✓
e.	Process (combined)			
f.	Equipment/facility washdown			
g.	Air pollution control unit			
h.	Storm water runoff			
i.	Other (describe): Nitric Acid Sodium Hydroxide			

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:

A-1/5

		Gallons per day	Estimated	Measured
a.	Sanitary sewer	≈ 5,000	✓	
b.	Storm sewer			
c.	Surface water			
d.	Ground water			
e.	Trucked waste			
f.	Evaporation			
g.	Other:			
	Total Wastewater Discharged:	5,000		

7. List any pollution prevention, waste minimization, or recycling programs practiced at this facility: Aluminum scrap is collected and sent offsite for recycling. Contain mat for possible oil spills.

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: 20

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

4. Principal product produced: Heavy Aluminum Extrusions

5. Raw materials and process chemicals used: Aluminum

6. Production process: (Batch) Continuous Both: 100 %Batch/____%Continuous
Average number of batches per 24hr work day: 7

7. Is production subject to seasonal variations? (NO) YES (describe) _____

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

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):

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

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

Biological Treatment	Grit Removal	Septic Tank
Centrifuge	Ion Exchange	Solvent Recovery
Chemical Precipitation	✓Oil & Grease Separator	Spill Protection
Chlorination	Ozonation	Stormwater Storage/
Dissolved Air Flotation	pH Adjustment	Diversion
✓ Filtration	Reverse Osmosis	Sump
Flow Equalization	Screens	Other: _____
Grease Trap	Sedimentation	None

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

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

3. Toxic Pollutant Information (cont.):

Benzidine	Dinitrotoluene	Phthalate esters
Beryllium & compounds	Diphenylhydrazine	✓PCB's

A-3/5

Cadmium & compounds	Endosulfan & metabolites	Polynuclear aromatics
Carbon tetrachloride	Endrin & metabolites	Selenium & compounds
Chlordane	Ethylbenzene	Silver & compounds
Chlorinated benzenes	Flouranthene	TCDD
Chlorinated ethanes	Haloethers	Tetrachloroethylene
Chloroalkyl ethers	Halomethanes	Thallium & compounds
Chlorinated naphthalene	Heptachlor & metabolites	Toluene
Chlorinated phenols	Hexachlorobutadiene	Toxaphene
Chloroform	Hexachlorocyclohexane	Trichloroethylene
2-chlorophenol	Hexachlorocyclopentadiene	Vinyl chloride
Chromium & compounds	Isophorone	Zinc & compounds
Copper & compounds	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
✓ Acids and/or Alkalis	100 Gals	Pesticides	
✓ Heavy Metal Sludges	10,000 Gals	Plating Wastes	
Inks/Dyes		Pretreatment Sludges	
✓ Oil & Grease	60,000 Gals	Solvents/Thinners	
Organic Compounds		Other Wastes:	
Paints			

3. Check the appropriate practice for items above:

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

Describe: Nitric/Water Solution & Hydrochloric/Water Solution - Disposed of by Univar USA; Sodium Hydroxide Solution - Recycled by T.E. Marron; Spent Oil - Recycled by ASI, Inc.

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

NO (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."

Signature

3/30/05
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) 968-4989

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
Facility Address:	915 South Elmira, Russellville, Arkansas 72801
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 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: July 1, 2007

Expiration Date: Midnight, March 31, 2010

Craig Noble, General Manager

June 21, 2007
Date

B-1/5

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.

PARAMETER	1 day Maximum	Monthly Average Maximum
CN (T)	0.71 mg/L	0.29 mg/L
Cr	0.47 mg/L	0.19 mg/L
Zn	2.35 mg/L	0.98 mg/L
O&G	85.54 mg/L	42.06 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.

PARAMETER	Instantaneous minimum – maximum
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.

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

[1] 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.

[2] Time-proportional composite sampling technique.

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

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

D. The permittee will conduct a resample within 15 days from receipt of a report of analyses, which shows a violation of maximum limitations for any parameter.

PART 3 – REPORTING REQUIREMENTS

A. Semiannual Self-Monitoring Reports: The permittee will submit semiannual self-monitoring reports for the pollutants monitored during each six-month period. **These reports are due on or before June 30 and December 31.** The report must contain the results of all samples collected during the monitoring period, the daily maximum and monthly average discharge volume, and a signed certification statement that all sampling and analysis was performed according to EPA regulations. Flows shall be reported to the pretreatment coordinator each month using the self-monitoring form.

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

C. The permittee shall notify the Control Authority prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristic of the wastewater being discharged to the City of Russellville wastewater collection and treatment system, or any new construction or process modifications involving plumbing changes. This notification shall be written and the permittee must receive Control Authority approval before changes can occur.

D. Slug Discharge Report: The permittee shall notify the Control Authority immediately of any slug discharges released into the City of Russellville wastewater collection and treatment system. The notification shall include the location of the discharge, type of waste, concentration and volume of the waste, and corrective action taken. The notification shall be made telephonically within 24 hours of the release to 968-4989 or 968-2105, Monday through Friday from 7:00a.m. to 4:00p.m., or to 968-1148 if the notification is made on weekends, holidays or during the evening or night. Within five (5) days of the notification, the permittee must submit a detailed written report describing the cause of the discharge and actions to be taken by the permittee to prevent future occurrences.

E. A notice shall be permanently posted on the permittee's bulletin board or other prominent place-advising employees of the notification procedure in the event of an accidental spill into the City of Russellville wastewater collection and treatment system. The permittee shall ensure that all employees who may cause or witness such an event are advised of the emergency notification procedures.

F. All reports required by this permit must be signed by either the owner, general partner, a principal executive officer of at least the level of vice president, or a responsible individual who has received written delegation of this authority from either the owner, general partner, or a principal executive officer of at least the level of vice president.

G. All written reports required by this permit will be submitted to the following address:

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

PART 4 – STANDARD CONDITIONS

A. The permittee shall comply with all the general prohibitive discharge standards in the City of Russellville Pretreatment Ordinance, No. 1388.

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.

J. Severability: The provisions of this permit are severable, and if any provision of this permit, or the application of any provisions of this permit to circumstances, is held invalid,

the application of such provisions to other circumstances, and the remainder of this permit shall not be affected thereby.

K. Property Rights: The issuance of this permit does not convey any property rights in either real or personal, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of federal, state or local regulation.

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

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

City Corporation
Wastewater Treatment Plant
404 Jimmy Lile Road
Russellville, Arkansas 72802

N. Permit Expiration: This permit will expire on **March 31, 2010**. The permittee must reapply for a discharge permit at least 180 days prior to the expiration date.

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

December 13, 2007

Mr. Robert Dunn
General Manager
Taber Extrusions, L.P.
915 South Elmira
Russellville, Arkansas 72802

Re: Semi Annual Inspection / Unannounced

Mr. Dunn:

Enclosed you will find your copy of the semi annual inspection that I completed on December 12, 2007. The following items were noted during this inspection and require your attention:

1. The waste oil removed by the oil/water separator was being piped back into the process water. This waste should be captured for recycling and not placed back into your system.
2. Records of all maintenance on any pretreatment equipment must be maintained for review and copy during pretreatment inspections.
3. A new letter giving Mr. Clint Hawkins signature authority if he will be submitting reports, applications and information to this office.

Please submit a corrective action report addressing the above noted items. This report should contain actions taken to correct the stated items, date of correction and actions taken to ensure compliance with permit requirements. This report is due in this office within thirty (30) days from receipt of this notice.

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

Respectfully,

Randy Bradley
Pretreatment Coordinator

C-1/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion, L.P
Inspection Date:	December 12, 2007

General Conditions

1. Has the Industrial User's permit been terminated? *If yes, list date and reason.*	☐ Yes, ☑ 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? *Applicable only if nearing expiration date of current permit. If yes, list date received and any comments.*	☐ Yes, ☐ No, ☑ Not Applicable

Information Requirements

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

C-2/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusion, L.P

Inspection Date: December 12, 2007

Annual Publication

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

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

The Courier – February 18, 2007

Violation Penalties

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

   If yes, list.

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

   If yes, list

C-3/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion, L.P
Inspection Date:	December 12, 2007
Facility Inspection	
General Information	
Arrival Time:	1020 / Out @ 1130
Inspector(s):	Randy Bradley, Pretreatment Coordinator; Charlotte Petrick, Lab Analyst
Contact(s):	Clint Hawkins
Permit Number:	WDP 2005
Site Address:	915 South Elmira Ave, Russellville, AR 72802
Mailing Address:	Same As Above
Primary Contact:	Clint Hawkins
Title:	Plant Engineer
Telephone:	968-1021 ext 245
Fax:	968-8645
Additional Contact:	Scotty Goodyear
Title:	Health, Safety and Environmental Coordinator
Telephone:	968-1021 ext 255
Additional Contact:	Charles Smith
Title:	Maintenance Supervisor
Telephone:	968-1021 ext 236
Comments: Robert Dunn, General Manager; Taylor Fulton, Division Controller.	

C-4127

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Process Information

SIC Code(s):	3354				

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

C-5/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusions
Inspection Date:	December 12, 2007

Operations Information

	1st Shift	2nd Shift	3rd Shift
Number Of Employees: (Avg.)	48	23	18
Working Hours:	0700 – 1500	1500 – 2300	2300 – 0700
Hours/Day:	8	8	8
Days/Week:	6/7	6/7	6/7

Notes:

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
List all water account number(s):			
List wastewater account number(s):			
If applicable.			

Notes:

C - 6/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusions

Inspection Date: December 12, 2007

Process Waste-Streams

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

*** Code Types:**

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

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

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

C-7/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusion

Inspection Date: December 12, 2007

Permit Compliance Appendix

Industrial User Permit

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

General Conditions

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

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

   If yes, skip next question.

Taber has the requirement to submit monthly O&G results until corrective measures installed prove to have corrected the excessive O&G

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.

C-8/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusion	
Inspection Date: December 12, 2007	
1. Has the Industrial User's permit been modified for good causes since the permit was granted? *If yes, list causes and modifications.*	☐ Yes, ☑ No
2. Has the Industrial User's permit been assigned or transferred to a new owner and/or operator since the permit was issued? *If yes, list new owner and/or operator and give date assigned or transferred.*	☐ Yes, ☑ No
3. Has the Permittee increased or decreased the use of potable or process water? *If yes, explain.* ☐ Increased water use. ☐ Decreased water use.	☐ Yes, ☑ No, ☐ Not Applicable

C-9/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

General Permit Standards

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

a)	Having a temperature higher than 104 degrees F (40 degrees C),	☐ Yes, ☑ No
b)	Containing more than 150 PPM by weight of fats, oils, and grease,	☐ Yes, ☑ No
c)	Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases; or pollutants with a closed cup flash-point of less than one hundred forty (140) degrees Fahrenheit (60 degrees C), or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the POTW,	☐ Yes, ☑ No
d)	Containing any garbage that has not been ground by house hold type or other suitable garbage grinders,	☐ Yes, ☑ No
e)	Containing any ashes, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or other solids or viscous substances capable of causing obstructions or other interference's with proper operation of the sewer system,	☐ Yes, ☑ No
f)	Having a pH lower than 6.0 or higher than 9.0, or having any other corrosive property capable of causing damage or hazards to structures, equipment or personnel of the sewer system,	☐ Yes, ☑ No
g)	Containing toxic or poisonous substances, such as wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions, in sufficient quantity to injure or interfere with any wastewater treatment process, to constitute hazards to human or animals, or to create any hazard in waters which receive treated effluent from the sewer system treatment plant,	☐ Yes, ☑ No
h)	Containing noxious or malodorous gases or substances capable of creating a public nuisance; including pollutants which may result in the presence of toxic gases, vapors, or fumes;	☐ Yes, ☑ No
i)	Containing solids of such character and quantity that special and unusual attention is required for their handling,	☐ Yes, ☑ No
j)	Containing any substance which may affect the treatment plant's effluent and cause violation of the NPDES permit requirements,	☐ Yes, ☑ No
k)	Containing any substances which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines of regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act or other regulations or criteria for sludge management and disposal as required by the State,	☐ Yes, ☑ No
l)	Containing color which is not removed in the treatment process,	☐ Yes, ☑ No
m)	Containing any medical or infectious wastes,	☐ Yes, ☑ No
n)	Containing any radioactive wastes or isotopes, or	☐ Yes, ☑ No
o)	Containing any pollutant, including BOD pollutants, released at a flow rate and/or concentration, which would cause interference with the treatment plant?	☐ Yes, ☑ No

C- 10/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

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.

1. Number of pretreatment operators on staff: 3
2. Do operators hold State of Arkansas Waste Water Treatment Operator Licenses? ☐ Yes, ☑ No
3. If so, list number of employees having each classification of license:

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

Comments:

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

C-11/27

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Bypass Of Treatment Facilities

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

Comments:

C-12/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusion

Inspection Date: December 12, 2007

Facility Activity Reduction Requirements

1. Is the Permittee's treatment facility experiencing any reduction of efficiency of operation, or loss or failure of all or part of the treatment facility? ☐ Yes, ☑ No

   If yes, detail below. If no, or not applicable, skip section. ☐ Not Applicable

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

Removed Substances

1. Is the Permittee disposing of solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act? ☑ Yes, ☐ No

   If yes, list wastes, disposal methods, contractor, etc. ☐ Not Applicable

   If no, explain.

Waste oil recycled by Agricultural Services Inc.

411 West Dixon Road, Little Rock AR 72206

AR Reg # - A8585186761

EPA ID – ACR000006528

Sodium Hydroxide removed by K-Com Transportation

2. Is the Permittee complying with any additional local and State standards including such standards or requirements that may be come effective during the term of this permit? ☐ Yes, ☐ No

   If yes, list additional standards. If no, explain. ☑ Not Applicable

C-13/27

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Process Control Laboratory

1. Does the Permittee operate its' own laboratory for pretreatment process controls? *If yes, list parameters analyzed and any additional comments. If no, skip section.*	☐ Yes, ☑ No
2. Is the process control laboratory certified by the State of Arkansas?	☐ Yes, ☐ No
3. Number of pretreatment system laboratory technicians on staff:	
4. Are laboratory technician(s) certified in wastewater analysis?	☐ Yes, ☐ No

Representative Sampling

1. Is all equipment used for sampling and analysis routinely calibrated, inspected and maintained to ensure their accuracy and verified by records of maintenance or calibration? *If yes, list equipment used by the Permittee for sampling and/or analysis and any additional comments.* *If no, detail deficiencies.* *Not applicable, if no Industrial User sampling and analysis equipment is used.*	☐ Yes, ☐ No ☑ Not Applicable
2. Has Control Authority been notified and has Control Authority approved the changing of any sampling points?	☐ Yes, ☑ No ☐ Not Applicable

C-14/27

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Flow Measurement

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

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?	☑ Yes, ☐ No
3. Has the Permittee submitted a written certification of the flow measurement device(s) calibration by an independent source qualified to install and/or calibrate flow measurement equipment and has been granted permission by the Control Authority to use device(s)?	☑ Yes, ☐ No
4. Are devices selected capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes?	☑ Yes, ☐ No

Date of last Calibration is September 21, 2007. Copy of calibration included..

C-15/27

Facility Name: Taber Extrusion

Inspection Date: December 12, 2007

Self Monitoring Procedures

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

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

   Sampling performed by: ☑ Outside Laboratory ☐ Industrial User

   If independent laboratory or laboratories used, list name(s):

   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? ☑ Yes, ☐ No

   Name of independent laboratory or laboratories used:

   EEG, Russellville AR

Review laboratory analysis reports, monthly self monitoring reports, and any chain of custody records or sampling event records.

1. *Do records of sampling and analyses include;*
   - *a) The date, exact place, time, and methods of sampling or measurement, and preservation techniques or procedures,* ☑ *Yes,* ☐ *No*
   - *b) Who performed the sampling or measurements* ☑ *Yes,* ☐ *No*
   - *c) The date(s) analyses were performed,* ☑ *Yes,* ☐ *No*
   - *d) Who performed the analyses,* ☑ *Yes,* ☐ *No*
   - *e) The analytical techniques or methods used,* ☑ *Yes,* ☐ *No*
   - *f) The results of such analyses?* ☑ *Yes,* ☐ *No*

☑ *Correct sample types or methods.* ☑ *Correct handling and preservation techniques.* *

☑ *Correct sample frequency.* ☑ *Correct laboratory analysis methods.* *

* *In accordance with 40 CFR Part 136 and amendments thereto.*

C-16/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Automatic Re-sampling

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

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

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

Date of violation:	Notified the City within 24 hours?	Repeated pollutant sampling and analysis?	Submitted re-sample results?	Results submitted within 30 days?
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No
	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No

C-17/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Records Retention

1. Is the Permittee retaining records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by user's permit, and records of all data used to complete the application for permit, for a period of at least three years from the date of the sample, measurement, report or application?	☑ Yes, ☐ No
2. Are all records that pertain to matters that are the subject of special orders or any other enforcement action or litigation activities brought by the Control Authority being retained and preserved by the Permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired?	☐ Yes, ☐ No ☑ Not Applicable

Planned Facility Changes

1. Has the Permittee had any facility expansion, production increase, or process modifications, which results in new or substantially increased discharges or a change in the nature of the discharge? *If not applicable, skip next question.*	☐ Yes, ☑ No ☐ Not Applicable
2. Did the Permittee give notice to the Control Authority 90 days prior to the above planned changes?	☐ Yes, ☐ No ☑ Not Applicable
3. Has the Permittee given advance notice to the Control Authority of any planned changes in the permitted facility or activity, which may result in noncompliance with the Industrial User's permit requirements?	☑ Yes, ☐ No ☐ Not Applicable

New press with associated building to be installed starting this summer. Letter requesting this change received June 20, 2007.

C-18/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusion

Inspection Date: December 12, 2007

Special Monitoring And Reporting Requirements

1. Does the Permittee have any additional or special monitoring requirements particular to this Industrial User? ☑ Yes, ☐ No

   If yes, attach copy of pertinent page of the industrial user's permit. If no, skip section.

Monthly O&G sampling until corrective measures installed prove to correct excess O&G discharge

Compliance Schedule Requirements

1. Was the Industrial User under a compliance schedule with the City? ☐ Yes, ☑ No

   If yes, attach copy of the Industrial User's compliance schedule. If no, skip section.

2. Did the Permittee submit quarterly compliance reports the Pretreatment Office?

1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No	☐ Yes, ☐ No

C-19/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Operating Upset Report

1. Did the Permittee experience any upset in operations that placed the Permittee in a temporary state of noncompliance with the provisions of either the user's permit or with Ordinance 1388? *If yes, detail below. If no, skip section.*	☐ Yes, ☑ No
2. Did the Permittee inform the Control Authority within 24 hours of becoming aware of the upset?	☐ Yes, ☐ No
3. Did the Permittee file a written follow-up report of the upset to the Control Authority within 5 (five) days?	☐ Yes, ☐ No
4. Did the report contain a description of the upset, the cause(s) thereof, and the upset's impact on the Permittee's compliance status?	☐ Yes, ☐ No
5. Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if not corrected, the anticipated time the noncompliance is expected to continue?	☐ Yes, ☐ No
6. Did the report contain all steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset?	☐ Yes, ☐ No
7. Did the report also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner?	☐ Yes, ☐ No

C - 20/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusion	
Inspection Date: December 12, 2007	
Accidental Discharge Report	
1. Did the Permittee have any occurrence of an accidental discharge of substances prohibited by Ordinance 1388 or any slug loads or spills that may enter the public sewer? *If yes, detail below. If no, skip section.*	☐ Yes, ☑ No
2. Did the Permittee immediately notify the Control Authority upon the occurrence?	☐ Yes, ☐ No
3. Did the Permittee's notification include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken?	☐ Yes, ☐ No
4. Did the Permittee submit to the Control Authority a detailed written report within seven days following the accidental discharge?	☐ Yes, ☐ No
5. Did the report contain a description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the Permittee's compliance status, including the location of the discharge, type, concentration and volume of the waste?	☐ Yes, ☐ No
6. Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur?	☐ Yes, ☐ No
7. Did the report contain all steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance?	☐ Yes, ☐ No

C-21/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Facility Site Inspection

Spill Prevention

1. Does the facility have a spill prevention plan? ☑ Yes, ☐ No
   If no, skip next question.

2. Is a copy of the spill prevention plan on file with the Control Authority? ☑ Yes, ☐ No

Copy dated September 16, 2003 on file

Slug Control

1. Were the Industrial User's slug control and prevention measures evaluated? ☑ Yes, ☐ No

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

slug control plan submitted - plan dated September 28, 2006.

C-22/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Signatory Requirements

1. Do all applications, reports, or information submitted to the Control Authority contain the appropriate signature as required in the Wastewater Contribution Permit, Part 3, paragraph F.	☑ Yes, ☐ No
2. Has the Permittee submitted a request to the Control Authority for permission to change its' authorized representative, if authorization is under paragraph (d)?	☐ Yes, ☑ No

Need new authorization for Clint to be the authorized representative to sign forms and reports.

Cost Recoveries And Penalties

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

C-23/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	June 21, 2007

Pollution Controls

1. Is the Permittee at all times properly operating and maintaining all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with it's permit? ☑ Yes, ☐ No ☐ Not Applicable

Not applicable if no pretreatment equipment, skip section.

All production area shows improved housekeeping. Lots of new paint and general housekeeping, plant looks much better than in previous visits.

2. Does the Permittee's proper operation and maintenance include;
   a) Effective performance; ☑ Yes, ☐ No
   b) Adequate funding; ☑ Yes, ☐ No
   c) Adequate operator staffing and training; ☑ Yes, ☐ No
   d) Adequate laboratory and process controls? ☑ Yes, ☐ No

3. Does the Permittee have proper records of operation and maintenance of pretreatment equipment? ☐ Yes, ☑ No

Need to keep records of all maintenance of equipment

C-24/27

City Corporation
Significant Industrial User Inspection Report

Facility Name: Taber Extrusion		
Inspection Date: December 12, 2007		
Chemical and Hazardous Waste Storage		
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

C-25/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Manufacturing Facilities

1. Were manufacturing or production facilities inspected? *Not applicable if no manufacturing or production facilities.*	☑ Yes, ☐ No ☐ Not Applicable

Manufacturing area has received lots of attention; the overall area is cleaner, with new paint on most of the equipment and better housekeeping throughout the plant.

Pretreatment Facilities

1. Were pretreatment facilities inspected? *Not applicable if no pretreatment equipment.*	☑ Yes, ☐ No ☐ Not Applicable

New Oil / Water separator unit installed August 20, 2006. Model 6v. Need to place catch container under spout of Oil/Water separator. At this visit the oil removed by the Oil/Water separator is being piped back into the sump.

Self Monitoring Procedures

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

C-26/27

City Corporation
Significant Industrial User Inspection Report

Facility Name:	Taber Extrusion
Inspection Date:	December 12, 2007

Entry And Inspection

1. Has the Permittee allowed the Control Authority or an authorized representative upon the presentation of credentials and other documents as may be required by law to;

a)	Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of user's permit,	☑ Yes, ☐ No
b)	Have access to and copy, at reasonable times, any records that must be kept under the conditions of user's permit,	☑ Yes, ☐ No
c)	Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under user's permit,	☑ Yes, ☐ No
d)	Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and	☑ Yes, ☐ No
e)	Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under user's permit, could originate, be stored, or be discharged to the sewer system?	☑ Yes, ☐ No

If answered no to any question, detail all instances of noncompliance.

C-27/27

Excerpt from POTW permit

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

[4] Permittee must implement the approved toxic organic management plan to submit a certification in lieu of monitoring for this parameter.

C. To determine semi-annual compliance with categorical regulations, the permittee may incorporate total plant effluent analyses results into the Combined Wastestream Formula (CWF) and back-calculate the concentrations of the categorical process effluent.

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

E. The permittee will conduct a resample within 15 days from receipt of a report of analyses, which shows a violation of maximum limitations for any parameter.

PART 3 – REPORTING REQUIREMENTS

A. Semiannual Self-Monitoring Reports: The permittee will submit semiannual self-monitoring reports for the pollutants monitored during each six-month period. **These reports are due on or before June 30 and December 31**. Monthly flow reports are due by the last day of the month for all flows recorded during the previous month. The reports must contain the results of all samples collected during the monitoring period, the daily maximum and monthly average discharge volume, and a signed certification statement that all sampling and analysis was performed according to EPA regulations.

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

C. The permittee shall notify the Control Authority prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristic of the wastewater being discharged to the City of Russellville wastewater collection and treatment system, or any new construction or process modifications involving plumbing changes. This notification shall be written and the permittee must receive Control Authority approval before changes can occur.

D. Slug Discharge Report: The permittee shall notify the Control Authority immediately of any slug discharges released into the City of Russellville wastewater collection and treatment system. The notification shall include the location of the discharge, type of waste, concentration and volume of the waste, and corrective action taken. The notification shall be made telephonically within 24 hours of the release to 968-4989 or 968-2105, Monday through Friday from 8:00a.m. to 4:00p.m., or to 968-1148 if the notification is made on weekends, holidays or during the evening or night. Within five (5) days of the notification, the permittee must submit a detailed written report describing the cause of the discharge and actions to be taken by the permittee to prevent future occurrences.

E. A notice shall be permanently posted on the permittee's bulletin board or other prominent place-advising employees of the notification procedure in the event of an accidental spill into the City of Russellville wastewater collection and treatment system. The permittee shall ensure that all employees who may cause or witness such an event are advised of the emergency notification procedures.

"Quality" <quality@pom.com>

02/20/2008 01:27 PM

To <RBradley@citycorporation.com>
cc
bcc
Subject RE: Toxic Organic Management Plan

I do not have the information to back up the TTO Testing that is stated in table 1. I am trying to locate this information now. If it can't be found I'll see if I can get it retested. This is a Charlie item and will have to wait till he returns. If Figure 1 does not show up, view document in web layout, not sure why it will not work normally.

If I need to make changes let me know.

Brent Huneycutt
Quality Assurance Manager
POM Inc.
quality@pom.com
http://www.pom.com
ph: (479)968-2880
fx: (479)968-2840

From: RBradley@citycorporation.com [mailto:RBradley@citycorporation.com]
Sent: Wednesday, February 20, 2008 6:32 AM
To: Quality
Subject: Re: Toxic Organic Management Plan

That is OK, can you send me a electronic copy by e-mail so I can be reviewing before Charlie signs off on this plan?

Randy Bradley
City Corporation
Pretreatment Coordinator
479-968-2080 Ext:133

"Quality" <quality@pom.com>

02/19/2008 02:51 PM

To<rbradley@citycorporation.com>
cc
SubjectToxic Organic Management Plan

Good afternoon Mr. Bradley,

I have most of the Toxic Organic Management Plan rewritten as you asked with all MSDS documented. Charlie is going to be out for a few weeks due to surgery, he will need to read and sign our new plan. So I was going to ask for a continuance until Charlie has a chance to return. His surgery is this week in Little Rock and the doctors say at least two week recovery. I will let you know if anything changes.

Thanks,

Brent Huneycutt
Quality Assurance Manager
POM Inc.
quality@pom.com
http://www.pom.com
ph: (479)968-2880
fx: (479)968-2840

TOXIC ORGANIC MANAGEMENT PLAN.doc

TOXIC ORGANIC MANAGEMENT PLAN
POM INCORPORATED
RUSSELLVILLE, ARKANSAS

1. Description of Facilities and Solvent Use

A. Process Description

POM Inc. is a privately owned corporation which manufactures parking meters in Russellville, Arkansas. We also do contract manufacturing for production facilities across the world. Our capabilities include mechanical and electronic design, prototyping and production, zinc and aluminum die casting, zinc and aluminum metal finishing, plastics injection molding, electrostatic powder painting and acrylic enamel paint lines with bake ovens, machine shop, mechanical and electronics assembly lines, Quality Control and testing, software development, marketing, advertising and sales.

Wastewater types and volumes are depicted in figure I. Wastewater from the two paint systems and metal finish are composed primarily of overflow rinse water and rinse water from metal finishing operation. Treatment of wastewater consists of daily chemical precipitation of each system. The combined waste stream is treated with chemical precipitation to cause flocculation of solids and metals. Treatment of wastewater consists of daily treatment of each system with meta bisulfite to remove heavy metals and soda ash to raise the pH to a preset limit by the City Corporation. After a settling period, the mixture is decanted, tested and released into the city sewer system. The remaining heavy metal and sludge is containerized and shipped to an outside source for disposal/recycle

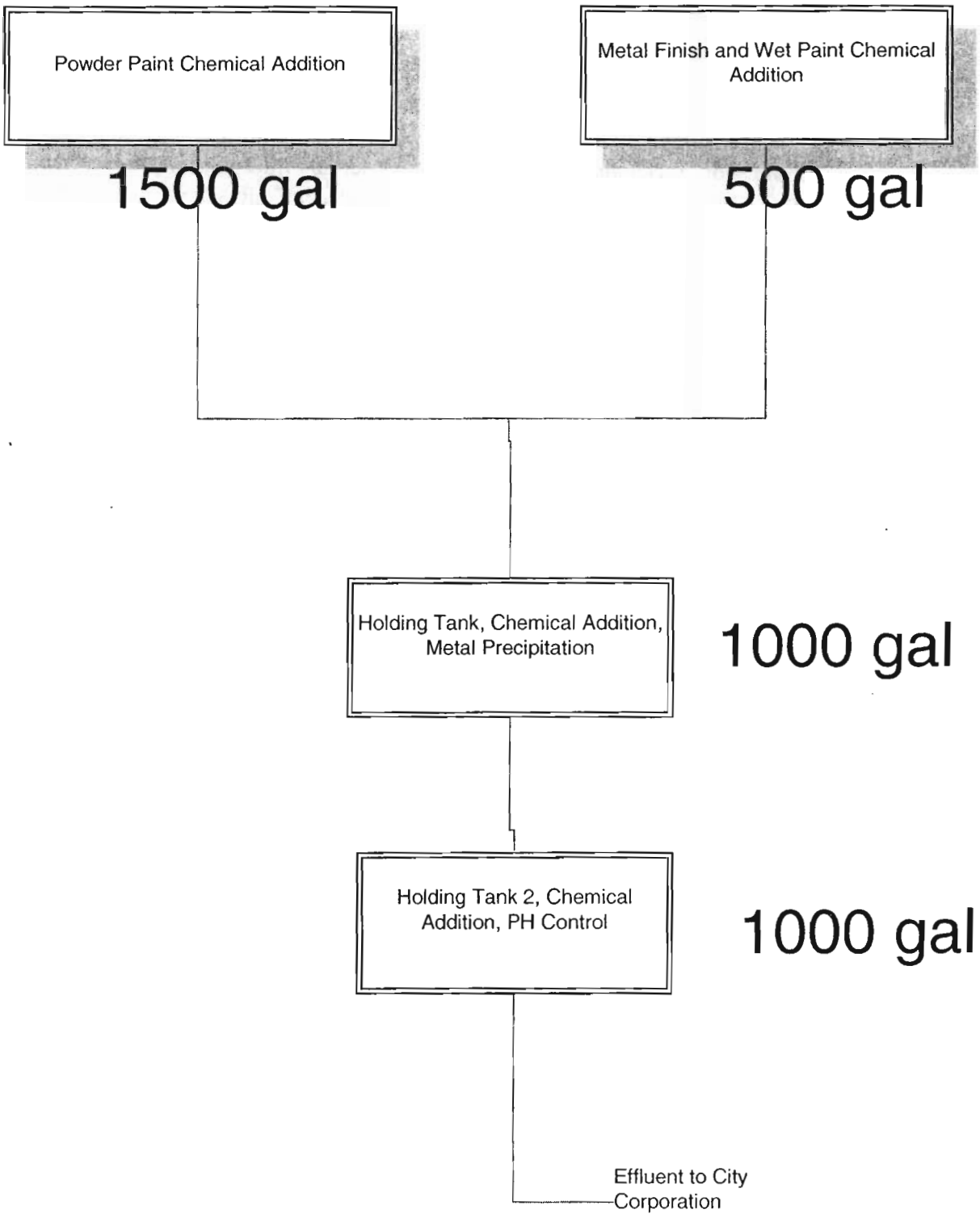
Identification of Toxic Organic Chemicals Entering the Plant Wastewaters

B. Chemical Analysis of Treated Wastewaters

Samples were taken of the plants treated wastewater for analysis of 110 toxic organics regulated under the metal finishing categorical pretreatment standards. Samples collected were 24 hour regulated composite samples for acid extractible and base/neutral compounds. Grab samples for volatible organics were taken every 4 hours and were composited before analysis. Samples were taken over a period when all production lines were fully operational. Samples were analyzed by an outside laboratory using the appropriate EPA procedures. Toxic organic compounds detected at concentrations greater than 0.008 mg/1 are listed in table I.

Figure 1

PH checks are performed at all stages.
Powder Paint Line - Average Monthly Usage: 15,200 Gallons
Wet Paint and Metal Finishing - Average Monthly Usage: 90 Gallons



E - 4/8

Table 1

TTO Testing

	Compound Detected	Amount
Test 1	Chloroform	.009 mg/1
Test 2	None detected	none detected
Test 3	Chloroform	.010 mg/1

2. Identification of Solvents Used In Manufacturing Operations That Are Directly Associated To Effluent Sent To City Corporation.

A. Solvent Storage Areas – Solvents, Paints, Corrosion Inhibitors, Cleaners, Coolants and Lubricants are in a non-drained storage areas. Accidental spills are not possible in these locations. Floor drains are sealed off, it is not a potential hazard for chemicals to enter the waste water system for these stored chemicals.

B. Process Chemicals that are potential Hazards for accidental discharge:

- Meta Bisulfite – Used to treat the effluent, trained personnel are the only users. Meta Bisulfite is used to remove heavy metals.
- Soda Ash – Used to treat the effluent, trained personnel are the only users. Soda Ash is used to raise the pH to the preset level required by City corporation.
- Oakite 3 – This is a powdered detergent used in metal finishing, trained personnel are the only users. Soap is dispensed into bowl tumblers, rinse water from bowl tumbler is discharged into waste water stream and then into settling tanks.

Paint Line chemicals:

Oakite Gardoclean S 5065

Liquid, phosphate-free, multi-metal, alkaline cleaner

Gardoclean S 5065 has no ETDA-type chelates which can interfere with precipitation waste treatment systems, but it does have sequestrants to reduce scale from hard water salts. Gardoclean S 5065 is free of phosphate, phosphorous, NPE surfactants and it is biodegradable.

Chemical Characteristics:

Chemical composition.....blend of alkaline salts, sequestrants, inhibitors, surfactants

Physical form.....amber to yellow liquid

Odor.....mild
Specific gravity (approx).....1.14 an 20° C
Viscosity.....< 10 cps
Flash point.....none
Foaming tendency.....low when heated to 120° F or above
Recommended diluent.....water
Maximum solubility.....complete
Behavior in hard water.....sequesters
Rinsability.....good
Biodegradable surfactants.....yes
Phosphorous free.....yes
NPE surfactant free.....yes
Normal working concentrations.....2 – 30% by volume
Normal working temperatures.....120 - 180° F
PH at working concentrations.....11 – 12

Oakite CrysCoat 2147

Detergent Irion Phosphate for multimetal processing, conversion coating

Chemical Characteristics
Chemical composition.....acidic blend of phosphates, activator agents, biodegradable surfactants and florides
Physical form.....pale yellow liquid
Odor.....mild
Specific gravity (approx.).....1.216 at 20° C
Flash point.....none
Foaming tendency.....low
Recommended diluent.....water
Maximum solubility.....complete
Rinsability.....good
Biodegradable surfactants.....yes
Phosphate free.....no
Normal working concentrations.....2 to 3% by volume
Normal operating temperatures.....38° to 60° C
PH at working concentrations.....4.0 @ 2.0% by volume
Hazardous Ingredients:

Phosphoric acid		1-5	1	1
Sodium chlorate		1-10	NE	NE
Gluconic acid		1-5	NE	NE
Diethylene glycol butyl ether (+)		1-5	NE	NE
Non-hazerdous ingredients		Bal.		

Oakite FH3

Chromic final rinse that follows iron or zinc phosphating and chromating
Oakite FH3 contains ingredients that remove unreacted salts deposited by the conversion coatings or left by contaminated rinses
Chemical Characteristics
Chemical composition.....highly acidic material containing chromic acid
Physical form.....liquid
Odor.....acrid
Hygroscopic tendency.....none
Specific gravity.....1.285 +/- .005 at 68° F
Biodegradable surfactants.....N/A
Color.....brown to dark brown
Behavior in water.....good
Foam tendency.....none
PH as used.....3.5 to 4.5
Flash Point.....none
Maximum solubility.....complete
Recommended dilutents.....water

Oakite FH3 is a highly acidic material and strong oxidant containing chromic acid. Keep concentrate away from combustible, organic or readily oxidizable materials. Avoid contact or mixing with chlorine releasing materials. In case of spills or leakage, flush area with plenty of water

Hazardous Ingredients:

Chromium oxide (+)		< 10	NE	NE
Chromium Trioxide (+)		20-30	.05	.01
Non-Hazardous ingredients			Bal.	

Unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard.

All components of this material are on the US TSCA Inventory.

3. Toxic Organic Management Plan

A. As a result of floor drains being sealed off, process chemicals under controlled procedures and access of process chemicals only available to trained employees in conjunction with the POM Slug Discharge Program, POM believes that all of its toxic organic pollutants can be controlled eliminating an accidental discharge to the City Corporation.

4. Training

A. All personnel involved with any material containing regulated organic solvent will be trained on this Toxic Organic Management Plan, Slug Discharge Plan and all other OSHA regulatory procedures concerning handling and storage of hazards chemicals.

B. Training consist of :

- The Toxic Organic and hazardous chemicals known to be in use at the POM facility and in the areas they are located/used.
- Location of drains with the emphasis upon the location of toxic organic materials.
- Toxic Organic Management Plan and the proper procedures for handing and disposing of the respective hazardous chemicals including labeling and all other OSHA Regulatory Guidelines.
- Slug Discharge Program

5. Inspection and verification of compliance

A. All storage areas and cleaning operations are checked once a month by the safety manager and documented. Area supervisors have been trained to periodically check their respective areas for compliance with the Toxic Organic Management Plan insuring accidental spills do not occur contaminating effluent discharged to the City corporation.

B. Implementation: All provisions here in will be fully implemented by April 1st 2008.

City Corporation

Pretreatment Coordinator
P.O. Box 3186
205 W 3rd Place
Russellville, AR 72811-3186
Fax.: 479/968-3265

Wastewater Screening Form

City of Russellville Pretreatment Ordinance #1388 requires that all industrial/commercial dischargers to the Russellville Wastewater sanitary sewer meet specific requirements regarding quality and quantity of their discharged wastewater. These requirements are mandated by the U.S. Environmental Protection Agency under the Federal Clean Water Act. In order to assess compliance with the applicable city, state and federal requirements, City Corporation is collecting information from all "non-domestic" dischargers on the system. This Wastewater Screening Form is the first step in this process. **Please complete both sides of this form and return it to the above address within 30 days of receipt.** If you have any questions, please call City Corporation Pretreatment Coordinator at 479-968-2080 Ext 133.

Part I – Industry Information

Business Name: _____

Business Location: _____

Business Mailing Address: _____

Contact Person Name: _____

Title: _____

Telephone Number: _____

Business Hours: _____ Business Days: ☐ Mon. ☐ Tues. ☐ Wed. ☐ Thurs. ☐ Fri. ☐ Sat. ☐ Sun.

Number of Employees: _____

Water Works Account Number(s):
(Include all Active Account Number(s) _____

Part II – Wastewater Characteristics

Type of Business: _____

Process(s) Performed: _____

Products Manufactured: _____

SIC Code: _____ NAICS Code: _____

Please check all sources of wastewater discharged from you facility to the sanitary sewer.

Type of Wastewater		Estimate Percent of Total Discharge	Type of Wastewater		Estimate Percent of Total Discharge
Bathrooms/Domestic			Laundry		
Kitchen/Restaurant			Metal Working		
Floor Cleaning			Plating Baths		
Tank Wastes			Equipment Cleaning		
HVAC/Boiler Discharges			Pretreatment System		
Vehicle Maintenance Wash			Machine Coolants		
Waste Product Disposal			Other Non-domestic Sources		

Part II – Continued

Indicate all materials listed below that have a potential for sanitary sewer discharge in some form at your facility. Many of these will be listed on Material Safety Data Sheets:

Yes	No		Yes	No		Yes	No	
☐	☐	Gasoline	☐	☐	Whole Blood	☐	☐	Lime Slurries
☐	☐	Xylene	☐	☐	Fleshings	☐	☐	Lime Residues
☐	☐	Tolulene	☐	☐	Entrails	☐	☐	Sodium Chloride
☐	☐	Diesel	☐	☐	Paper (Non-Domestic)	☐	☐	Sodium Sulfate
☐	☐	Benzene	☐	☐	Styrofoam	☐	☐	Radioactive Wastes
☐	☐	Naptha	☐	☐	Plastic Containers	☐	☐	Radioactive Isotopes
☐	☐	Sulfides	☐	☐	BOD	☐	☐	Storm Water
☐	☐	Kerosene	☐	☐	COD	☐	☐	Surface Water
☐	☐	Ethers	☐	☐	Temperature > 140° F	☐	☐	Ground Water
☐	☐	Alcohols	☐	☐	Medical Wastes	☐	☐	Roof Runoff
☐	☐	Swimming Pool Drainage	☐	☐	Non-Biodegradable Cutting Oils	☐	☐	Non-Contact Cooling Water
☐	☐	Aldehydes	☐	☐	Noxious Gasses	☐	☐	Subsurface Drainage
☐	☐	Peroxides	☐	☐	Toxic Solids	☐	☐	Ketones
☐	☐	Chlorates	☐	☐	Poisonous Solids	☐	☐	Condensate
☐	☐	Perchlorates	☐	☐	Toxic Gases	☐	☐	De-Ionized Water
☐	☐	Bromates	☐	☐	Poisonous Gases	☐	☐	Artesian Well Water
☐	☐	Carbides	☐	☐	Toxic Liquids	☐	☐	Unpolluted Water
☐	☐	Hydrides	☐	☐	Poisonous Liquids	☐	☐	Sludges
☐	☐	Wood	☐	☐	Noxious Liquids	☐	☐	Screenings
☐	☐	Closed Cup Flash Point < 140° F	☐	☐	Hauled or Trucked Liquid Waste	☐	☐	Corrosive Characteristics
☐	☐	LEL > 10%	☐	☐	Noxious Solids	☐	☐	Detergents
☐	☐	pH > 9.0 s.u.	☐	☐	Malodorous Liquids	☐	☐	Surfactants
☐	☐	pH < 6.0 s.u	☐	☐	Malodorous Gases	☐	☐	Mineral Oils
☐	☐	Ashes	☐	☐	Malodorous Solids	☐	☐	Cooking Oils
☐	☐	Cinders	☐	☐	Dye Wastes	☐	☐	Petroleum Oil
☐	☐	Sand	☐	☐	Vegetable Tanning	☐	☐	Fuel Oils
☐	☐	Plastic	☐	☐	Colored Solutions	☐	☐	Pretreatment Residue
☐	☐	Ground Garbage	☐	☐	Inert Suspended Solids	☐	☐	Silver Waste/Film processing fluid
☐	☐	Un-Ground Garbage	☐	☐	Fuller Earth	☐	☐	Mercury Waste/ Amalgam

Part III – RCRA Notification for Hazardous Waste Disposed to the Sanitary Sewer

The USEPA regulations require that local control authorities notify users that there are identification and disposal requirements for hazardous waste. 40 CFR 403.12(p)(1)-(4) States "All users shall notify the POTW of any discharges into the POTW of a Substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261". All users shall dispose of any sludge or spent chemicals in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act. For further instruction on hazardous waste identification and disposal contact the Arkansas Department of Environmental Quality (ADEQ) Hazardous Waste Division at 682-0833. ☐ Yes ☐ No Hazardous Waste Discharge to Sanitary Sewer

Part IV – Certification Statement

40 CFR 403.12 requires that this report be signed by a Chief Executive Officer of at least the level of Vice President, a general Partner or Proprietor, or a Duly-Authorized Representative.

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

Signed: _____ Date: _____

Printed Name and Title: _____

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
2004	21,222,740	4,720,757	295	71,941	16,003
2005	20,167,667	6,949,359	277	72,807	25,088
2006	20,243,539	5,990,930	272	74,425	22,025
Average	20,544,649	5,887,015	281	73,058	21,039

40CFR467.35 Core
Pollutant Limits in lb/million off-lbs of extruded

Polluant	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

Polluant	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

Polluant	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 0.073 million off-lbs extruded/day

Polluant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.058	0.024
Cyanide	0.039	0.016
Zinc	0.193	0.081
Oil & Grease	6.94	3.49

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

Polluant	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

3) Convert to allowable Pounds based on 0.073 million off-lbs extruded/day

Polluant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.066	0.027
Cyanide	0.043	0.018
Zinc	0.218	0.091
Oil & Grease	8.03	3.87

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

Polluant	Mximum for any 1 day	Maximum for monthly average
Chromium	0.124	0.051
Cyanide	0.082	0.034
Zinc	0.411	0.172
Oil & Grease	14.97	7.36

5) Convert to concentration limits based on 0.021 mgd
mg/L = lbs / (8.34) (0.021)

	Taber Metals New Permit Limits	
Polluant	Mximum for any 1 day / mg/L	Maximum for monthly average / mg/L
Chromium	0.71	0.29
Cyanide	0.47	0.19
Zinc	2.35	0.98
Oil & Grease	85.54	42.06

"Clint Hawkins" <chawkins@taberextrusions.com>
05/14/2007 10:11 AM

To "Randy Bradley" <rbradley@citycorporation.com>
cc
bcc
Subject 2004, 2005 and 2006 Data

History: This message has been replied to.

Randy,

Here's the data you requested for Taber:

	2004	2005	2006
Production (lbs.)	21,222,740	20,167,667	20,243,539
Wastewater (gallons)	4,720,757	6,949,359	5,990,930
Number of Production Days	295	277	272

Pleas let me know if you need anything else.

Regards,

Clint Hawkins

G-3/3

TABER

May 1, 2008

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 April 2008. If you have any questions or need additional information, please contact me at (479) 968-1021, ext. 245.

Sincerely,

Clint Hawkins
Plant Engineer

Enclosure

H-1/2

Process Flow Information

Time Period for Report:	April 2008
Total Number of Production Days in Period:	23 Days (April)
Total Number of Production Pounds in Period:	1,726,765 Pounds (April)
Total Gallons Discharged for Period:	506,244 Gallons (April)

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.

Clint Hawkins
Signature

5-1-08
Date

For City Corporation Use Only

This document was received: 6/23/08 Date 1510 Time by Randy Bradley Signature

Comments: Received on 6/24/08 - Randy Bradley

H-2/2

Announcing

The
City of Russellville Pretreatment Workshop
And Breakfast

Where: City Corporation Construction Facility
3105 Mobile Ave
Russellville, AR
(1 block west of the Treatment Plant, next to the Russellville Animal Shelter)

When: Thursday September 1, 2005
8:00am – 9:30am

Topic: New permits / Local Limits and other items of interest

Please ensure someone from your company attends this meeting. Any question about this meeting or for directions please call me at 968-2080 ext. 133. See you there.
Randy Bradley, City Corporation Lab Lead

I - 1/1

May 30, 2007

Memo for Record

One this date members of City Corporation's management team met with Mr. Scott Van Horn on the future of Eskimo Pie facility. The members present were Craig Noble, General Manager; Larry Collins, Operations Manager; and Randy Bradley, pretreatment coordinator. Mr. Van Horn informed us that he had purchased this business and had a contract with Dryers to continue the manufacturing of frozen ice cream mix for them until May – June 2008. The name of the facility will be Sugar Creek Foods International. Mr. Van Horn is aware of the issue of no pretreatment facility at this location and he ask if we could work with him on allowing them to continue until the contract with Dryers was complete before installation of any new equipment. The reason for his request is that he is not sure what Sugar Creek Foods will be producing after the contract with Dryers is finished. It was agreed that Sugar Creek Foods would continue to pay the surcharges as outlined in their permit, but no enforcement action would be taken for excess BOD or oil/grease until new product line is determined. Mr. Van Horn assured City Corporation that they would purchase any lands or equipment needed to ensure compliance with pretreatment requirements once his product was determined.

Consent Agreement

J-1/1

June 16, 2008

Mr. Stacey Noblett, dba On Site Portable Toilets
P.O. Box 1005
3821 South Arkansas.
Russellville, Arkansas 72811

Permit No.: WHDP 0007

Dear Mr. Noblett:

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: June 20, 2008 **Expiration Date: June 30, 2009**

Larry D. Collins, Operations Manager

K - 1/1

TABER

December 31, 2007

RE: Semi-Annual Self-Monitoring Report Correction

Russellville Water & Sewer System
Randy Bradley
P.O. Box 3186
Russellville, AR 72811

Dear Mr. Bradley,

Enclosed is Taber Extrusions' Semi-Annual Self-Monitoring Report. This report is for the period of the Second Half of 2007. If you have any questions or need additional information, please contact me at (479) 968-1021, ext. 245.

Sincerely,

Clint Hawkins
Plant Engineer / HS&E Coordinator

Enclosure

L - 1/3

Industry:	Taber Extrusions, LLC	**Contact:**	Clint Hawkins
Address:	915 South Elmira Avenue Russellville, AR 72802 (479) 968-1021, ext. 245	**Title:**	Plant Engineer
Type or Report:	Semi-Annual		

Daily Max			
Parameter	**Categorical Concentration (Ave.) (mg/L)**	**Categorical Limit (mg/L)**	**Violate (Yes/No)**
pH	6.1	6.0 – 9.0	No
Chromium	0.007	0.71	No
Cyanide T	0.010	0.47	No
Zinc	0.450	2.35	No
Oil & Grease	23	85.54	No

Monthly Average			
Parameter	**Categorical Concentration (Ave.) (mg/L)**	**Categorical Limit (mg/L)**	**Violate (Yes/No)**
pH	6.1	6.0 – 9.0	No
Chromium	0.007	0.29	No
Cyanide T	0.010	0.19	No
Zinc	0.450	0.98	No
Oil & Grease	*16.8	42.06	No

*Average Reading (10, 12, 23, 12, 23, 21)

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.

Clint Hawkins
Signature

1-2-08
Date

For City Corporation Use Only

This document was received: 1/17/08 (Date) 1110 (Time) by Kerry Battrey (Signature)

Comments: This Report Reviewed 1/18/08 - Kerry Battrey

L-2/3

Additional Information

Time Period for Report:	Second Half of 2007
Sample Dates: (Sample Results)	**(10.0)** 7/9/2007 (O&G only) **(12.0)** 8/31/2007 **(23.0)** 9/12/2007 (O&G only) **(12.0)** 10/18/2007 (O&G only) **(23.0)** 11/9/2007 (O&G only) **(21.0)** 12/7/2007 (O&G only)
Production Pounds on Sample Dates:	0 pounds (7/9/2007) 44,410 pounds (8/31/2007) 30,697 pounds (9/12/2007) 104,452 pounds (10/18/2007) 55,750 pounds (11/9/2007) 67,779 pounds (12/7/2007)
Gallons Discharged on Sampled Dates:	12,555 gallons (7/9/2007) 10,537 gallons (8/31/2007) 13,604 gallons (9/12/2007) 34,668 gallons (10/18/2007) 44,515 gallons (11/9/2007) 30,427 gallons (12/7/2007)
Total Number of Production Days in Period:	116 days
Total Number of Production Pounds in Period:	7,016,979 pounds
Total Gallons Discharged for Period:	3,919,301 gallons

EEG
Environmental
Enterprise Group, Inc.

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

ANALYTICAL RESULTS

AIC No. 119077-1
Sample Identification: L246-040443 0508001 Taber 5/1/2008 828

Analyte	Method	Result	RL	Units	Batch	Qualifier
Oil and Grease	EPA 1664A	< 5	5	mg/l	B5075	

AIC No. 119077-2
Sample Identification: L246-040443 0508002 Taber 4/30/08 815-5/1/2008 833

Analyte	Method	Result	RL	Units	Batch	Qualifier
Chromium	EPA 200.7	< 0.007	0.007	mg/l	S22964	
Zinc	EPA 200.7	0.27	0.002	mg/l	S22964	

AIC No. 119077-3
Sample Identification: L246-040443 0508003 Taber 5/1/2008 829

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W24987	

Analytical Services Provided By: AMERICAN INTERPLEX CORPORATION LABORATORIES

M - 1/7

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

SAMPLE PREPARATION REPORT

AIC No. 119077-1

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Oil and Grease	-	02MAY08 1324 100		B5075	

AIC No. 119077-2

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Metals	02MAY08 1132 282	02MAY08 1356 235		S22964	

AIC No. 119077-3

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Total Cyanide	05MAY08 1136 07	05MAY08 1709 258		W24987	

Analytical Services Provided By: AMERICAN INTERPLEX CORPORATION LABORATORIES

M-2/7

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

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.1 mg/l	102/98.0	85-115	3.71	20	W24987	
Chromium	0.5 mg/l	100/102	85-115	1.78	20	S22964	
Zinc	0.5 mg/l	103/104	85-115	1.74	20	S22964	
Oil and Grease	40 mg/l	98.5/98.8	78-114	0.253	20	B5075	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.1 mg/l	95.6/95.8	75-125	0.209	20	W24987	
Chromium	0.5 mg/l	97.9/98.3	75-125	0.397	20	S22964	
Zinc	0.5 mg/l	- / -	75-125	0.312	20	S22964	X
Oil and Grease	40 mg/l	111	78-114	-	20	B5075	

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC Sample	Qual
Cyanide	SM4500-CN C,E	< 0.01	mg/l	0.01	0.01	W24987-1	
Chromium	EPA 200.7	< 0.007	mg/l	0.007	0.007	S22964-1	
Zinc	EPA 200.7	< 0.002	mg/l	0.002	0.002	S22964-1	
Oil and Grease	EPA 1664A	< 2	mg/l	2	2	B5075-1	

Analytical Services Provided By: AMERICAN INTERPLEX CORPORATION LABORATORIES

M-B/7

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

QUALITY CONTROL PREPARATION REPORT

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Cyanide	05MAY08 0839	07	05MAY08 1633	258		W24987-2	
Cyanide	05MAY08 0839	07	05MAY08 1635	258		W24987-3	
Metals	02MAY08 0814	282	02MAY08 1340	235		S22964-2	
Metals	02MAY08 0814	282	02MAY08 1342	235		S22964-3	
Oil and Grease	-		02MAY08 0929	100		B5075-2	
Oil and Grease	-		02MAY08 0929	100		B5075-3	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Cyanide	05MAY08 0839	07	05MAY08 1639	258		W24987-4	
Cyanide	05MAY08 0839	07	05MAY08 1641	258		W24987-5	
Metals	02MAY08 0814	282	02MAY08 1344	235		S22964-4	X
Metals	02MAY08 0814	282	02MAY08 1346	235		S22964-5	X
Oil and Grease	-		02MAY08 1020	100		B5075-4	

LABORATORY BLANKS

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	QC Sample	Qualifier
Cyanide	05MAY08 0839	07	05MAY08 1631	258		W24987-1	
Metals	02MAY08 0814	282	02MAY08 1337	235		S22964-1	
Oil and Grease	-		02MAY08 0929	100		B5075-1	

Analytical Services Provided By: AMERICAN INTERPLEX CORPORATION LABORATORIES

M-4/7

119077

EEG
Environmental Enterprise Group, Inc.
PROVIDING CUSTOMIZED SERVICES NATIONWIDE

L246-0404413

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

Company Name:	Phone #:
City Corporation	(479) 968-4989
Address:	**Fax #:**
P.O. Box 3186 Russellville, AR 72811-3186	(479) 968-3430
Project Name or Number:	**Purchase Order #:**
Taber	
Sampling Personnel Signature(s): Charlotte Petrick	**Printed :** Charlotte Petrick

Sample I.D.	Date	Time	Comp.	Grab	Cont.Type: Plast.	Cont.Type: Glass	# of Containers	Method Preserved: H2SO4	HNO3	NAOH	HCL	Ice	None	Sample Matrix: Water	Soil	Air	Sludge	Other	Requested Analysis: O & G	Metals: Cr, Zn	CN(T)	Laboratory Control Number	Remarks (Please note special detection limits below.)
Taber	5/1/2008	828		X		X	1	X				X		X					X			0508001	
Taber	4/30/2008 5/1/2008	on 815 off 853	X		x		1		x			X		X						X		0508002	
Taber	5/1/2008	829		x			1			x		x		x							x	0508003	

Relinquished by: Charlotte Petrick	Date: 5/1/8	Time: 903 ~~840~~	Received by: ~~Charlotte Petrick~~	Date:	Time:
Received by: Dara R. Norris	Date: 5-1-08	Time: 0903	Relinquished by:	Date:	Time:
Relinquished by: Dara R Norris	Date: 5-1-08	Time: 1600	Received by Laboratory: Samantha Reiny	Date: 5/2/08	Time: 9:20

Comments:

M-5/7

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

Company Name: City Corporation
Phone #: (479) 968-4989
Address: P.O. Box 3186 Russellville, AR 72811-3186
Fax #: (479) 968-3430
Project Name or Number: Taber
Purchase Order #:
Sampling Personnel Signature(s): Charlotte Petrick
Printed : Charlotte Petrick

Sample I.D.	Date	Time	Comp.	Grab	Cont. Type: Plast.	Cont. Type: Glass	# of Containers	Method Preserved: H2SO4	HNO3	NAOH	HCL	Ice	None	Sample Matrix: Water	Soil	Air	Sludge	Other	Requested Analysis: pH	Laboratory Control Number	Remarks (Please note special detection limits below.)
Taber	5/1/2008	830		x	x		2						x	x					x		

Relinquished by: Charlotte Petrick	Date: 5/1/8	Time: 830	Received by: Charlotte Petrick	Date: 5/1/8	Time: 830
Received by:	Date:	Time:	Relinquished by:	Date:	Time:
Relinquished by:	Date:	Time:	Discarded by: Charlotte Petrick	Date: 5/1/8	Time: 835

Comments:

M - 6/7

City Corporation Pretreatment Program

Record of pH

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

Facility Name: Taber

Date / Time Sample Collected: 5/1/8 @ 830 Collected by: GPP

Date / Time Sample Analyzed: 5/1/8 @ 831 Analyzed by: GPP

pH value sample: 6.15 Temp: 24.4C

pH value duplicate: 6.36 Abs. Diff.(sample duplicate): 0.21

Starting Flow & Time: 458,941 @ 815

Ending ~~Starting~~ Flow & Time: 488,628 @ 820

GPP

pH meter # IQ-150

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

M-7/7

EPA

United States Environmental Protection Agency
Washington, D. C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 2 5	3 AR0021768 11	12 080623 17	18 G	19 S	20 1

Remarks: PRETREATMENT PROGRAM AUDIT

21 22 66

Reserved	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70	71	72	73 74	75 80

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 2 5	3 AR0021768 11	12 080625 17	18 U	19 S	20 2

Remarks: 05 SIU SITE VISITS

21 22 66

Reserved	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70	71	72	73 74	75 80

Section B: Facility Data

Name and Location of Facility Inspected
City Corp of Russellville
404 Jimmy Lile Rd. P.O. Box 3186
Russellville, AR 72811

Entry Time: [X] AM [X] PM 6/23/08 2:00pm
Exit Time/Date: 6/26/08 11:00am

Permit Effective Date: 4-1-05
Permit Expiration Date: 3-31-10

CODE SHEET

Pretreatment Audit

		CODE
Auditor's Name	Torrence	
Permit Number	AR0021768	
Audit Date	06/23-26/08	DTIA
Date Permit Modified to require pretreatment	1-13-84	PTIM

PPETS WENDR DATA ELEMENTS

Significant IUs without Control Mechanisms	0	NOCM
Number of Significant IUs	13	SIUS
Number of Categorical IUs	3	CIUS
Technical Evaluation for Local Limits	Y	EVLL
Adoption of Technically-Based Local Limits	N	ADLL
Significant IUs not inspected or sampled	0	NOIN*
Significant IUs in significant noncompliance with standards or reporting	1	PSNC*
Significant IUs in significant noncompliance with self-monitoring	0	MSNC
Significant IUs in significant noncompliance with self-monitoring and not inspected or sampled	0	SNIN*