ADEQ

ARKANSAS
Department of Environmental Quality

NPDES PERMIT FILE
NPDES # AR0022063
AFIN # 72-00003
Permit PN
Correspondence
Technical Backup
10/3/08 VH Date Scanned

Rene Langston
Executive Director
Springdale Water Utilities
526 Oak Avenue
P.O. Box 769
Springdale, Arkansas 72765-0769

Re: City of Springdale (NPDES #AR0022063; AFIN #72-00003) Pretreatment Program Audit / Municipal Pollution Prevention (P2) Assessment

Dear Mr. Langston:

Please find enclosed the finished report for the audit/assessment conducted September 23 through September 25, 2008. The contents with required actions and recommendations should be made available for review by appropriate City officials. Please respond in writing within thirty (30) days from the date on this correspondence with corrective actions and/or comments.

Springdale appears to have a staff interested and very knowledgeable of the Program and its implementation. Your Pretreatment Program appears to be implemented efficiently. This auditor was impressed with the professionalism exhibited by your personnel during the audit and industry site visits. They should be commended for their work ethics and performance.

One of EPA's main focal points is the integration of Pollution Prevention into cities' Pretreatment Programs. Most of the audit/assessment recommendations are meant to help your Program further evolve in this direction. It does appear the City's voluntary P2 activities have made significant progress regarding reduction in nutrients contributed from its industries and is lauded by this office.

It was truly a pleasure working with your staff during this event and becoming more familiar with Springdale, its industries and your Pretreatment and Pollution Prevention Programs.

Feel free to contact this office with any questions.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist/Attachments

cc: Rudy Molina/EPA 6WQ-PO
Eric Fleming/Inspector Supervisor
Cindy Garner/NPDES Enforcement

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF SPRINGDALE, ARKANSAS

NPDES PERMIT #AR0022063

October 27, 2008

Prepared by Allen Gilliam

ADEQ State Pretreatment Coordinator

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A) INTRODUCTION

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

Pollution Prevention (P2) activities, now being strongly recommended to be fully integrated into Pretreatment Programs nationally, an assessment of cities' P2 programs will be made in conjunction with the audits.

An audit/assessment was performed September 23rd through September 25th, 2008, of the Pretreatment and Pollution Prevention Programs implemented by the City of Springdale, Arkansas. Participants included:

Allen Gilliam	ADEQ / Pretreatment Coordinator
Jennifer Enos	Springdale / Pretreatment Manager
Josh Weaver	Springdale / Lab Technician
Harold Hull	Springdale / Wastewater Facility Director

The goals of the audit/assessment were:

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

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

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

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

Springdale's Pretreatment Program was originally approved 1/1/84. Substantial modifications were submitted, reviewed, approved and incorporated into their NPDES permit on 5/16/00. Recent modifications (10/05) to the National Pretreatment Regulations in 40 CFR 403 will require the City to submit additional modifications to their Program to be current with newest Pretreatment Regulations.

The City's wastewater treatment plant has a design flow of 24 MGD and consists of screening, grit and scum removal, extended aeration (Bardenpho), sand filtration, final clarification, post aeration with an equalization basin. An average 11.3 MGD of treated wastewater is chlorinated and then

de-chlorinated before discharge to Spring Creek. There has been no pattern of toxicity to either species in their effluent.

4.1 MGD of that average flow is contributed from 11 significant industrial dischargers and landfill leachate. The majority of that flow is from their poultry processors' sector. 3,870 dry metric tons of sludge per year is presently being sent to a local landfill.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to four (4) of their industrial users. A checklist was utilized 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 A -1 through A-7.

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 Springdale. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

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

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

It was discovered a comprehensive notification to the City's hazardous waste generators had not been conducted since possibly 1990. The City should send this general notification to the ADEQ list of generators (supplied during the audit) and one with a modified cover letter to all the City's doctors, dentists, hospitals, long term health care providers, X-ray clinics, film processors, veterinarians and pharmacies specifically asking about their disposal practices of mercury (from amalgam restorative fillings), spent silver laden film processing fluids and hazardous ("P" and "U" acutely hazardous) waste medications.

Many of these small businesses are literally under most regulatory "radar screens" but reports and studies seen nationally do indicate hazardous waste is being discharged from them into cities' sewage collection systems.

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

1) Under ***40 CFR 403.8(f)(2)(vi)***: "[the City's] sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings..."

During the file review it appeared the City's chain of custody (C of C) was not complete (see Attach. A-5). It was not clear exactly who the sampler was, who relinquished it, who received it, and so on and so forth, all the way to the final analyst. To this auditor, the "chain" did not appear complete from sampler to the final lab results.

The City needs to explore options to possibly revise its C of C form/procedures to ensure its analytical results are from the "end" of an unbroken chain of custody which will be considered valid in a court of law.

2) Under ***40 CFR 403.12(b)(3)***: "*Description of operations.* The User shall submit a brief *description* of the nature, average rate of production...This description should include a *schematic process diagram* [emphasis added] which indicates points of Discharge to the POTW from the regulated processes."

All files reviewed had basic schematics of their processes but, in this auditor's opinion, were not as detailed as they could be. Kawneer's appeared to be the most comprehensive but, it still could have included more details.

The City should require their IU representatives to submit updated, more detailed, accurate (in relation to actual plant-floor layout) schematics, including a comprehensive, step-by-step narrative description of their processes generating wastewater. Type of chemical baths/rinses could be identified. Most industries have the capability to create computer automated drawings to depict these "schematics" without much effort.

Workpiece(s) flow, P2 practices (counter current flows, ultrasonic cleaning, heated, air-agitated, etc.) and chemical storage areas should be noted. If these documents had been in files reviewed (and current), there might not have been as many questions by this auditor during the site visits.

Dump frequencies and volumes also should be noted from the numerous tanks and vessels at the industries. The City must have this information on file to conduct/require representative sampling and determine types (grabs vs. composite).

Any updates should be dated as to when they were last revised and, as they are now, attached to the City's fact sheets.

3) It's recommended to include an example of a parameter's permit limit calculation in the IUs' fact sheets. The City does include limit calculations in some of their more complex permits, but should they not also be attached to the "evolving" fact sheets? Again, it would have saved this auditor some time in looking for IUs' accurate limits calculations/basis.

4) Recommend an occasional Toxicity Characteristic Leachate Procedure (TCLP under 40 CFR 261.24) be required of landfill leachate being hauled in by truck. This would show good faith efforts on the City's part that it is not accepting (therefore, storing or treating) hazardous waste.

5) Recommend including specific pollution prevention (P2) and best management practices (BMPs) questions on all permit applications and IU survey questionnaires (source reduction, water/energy conservation, etc.).

6) Include specific questions regarding chemical handling procedures in IU inspection forms. Do the facilities move toxic/hazardous chemicals to various process stations via totes, forklifts, dollies, hand-carried buckets, hard line piping, etc. Inspection report could explain the city's concern: "handling, transfer of chemicals is in near floor drains or outside storm drains, proximity of incompatible chemicals, overhead hard line piping of chemicals to different stations appeared rusting in different areas, etc."; or explain why the IU's handling procedures are not of concern: no floor drains in the entire building, IU has an adequate slug/spill prevention plan, and accidental spills would be caught by floor drains which lead to pretreatment, any chemical spills outside could not possibly reach a city sewer or storm drain, etc.

7) It's recommended to include required periodic pollution prevention (P2) or best management practices (BMPs) progress reports' from the City's industries.

Also, provide information to the City's permitted and non-permitted IUs and toxics-related businesses about the National Pollution Prevention Resource Exchange (P2Rx) system at http://www.p2rx.org/ specifically to the EPA Region 6 hub at http://www.zerowastenetwork.org/ for P2 networking which provides evolving practices/success stories and an IU "input" link for their personal entry of success stories.

Success stories from the City's P2 activities, integrated into its Pretreatment Program, will positively reflect the City is going beyond its regulatory minimum.

8) Recommend including the authority to require Best Management Practices (BMPs) by any industry/business sector as deemed appropriate. For instance, machine shops, auto repair and painting shops, dentists, hospitals and other sectors already have BMP templates available.

9) Recommend including P2 audits by a qualified professional and required implementation of findings as an enforcement option in the City's Enforcement Response Plan.

10) Recommend prohibiting the discharge of any pharmaceuticals (from any source) into the sewage system. Then, send out pamphlets with water or sewer bills, outreach material regarding pharmaceuticals and the prohibition of flushing them into the sewer system.

Articles should also be sent to the local newspaper regarding pharmaceuticals passing though the wastewater treatment plant, possibly causing harm to aquatic life, wildlife and possibly human health.

11) Recommend continuing maintenance of public outreach regarding proper disposal of grease from the City's domestic users. The City is lauded for their current activities.

12) Recommend allowing Pretreatment staff some additional time to devote to the City's current P2 activities. Incorporate P2 activities into Pretreatment personnel's daily activities.

13) Consider an Environmental Management System (EMS) be developed for the wastewater utility. It's proven, City money can be saved implementing an EMS. Other utility departments would surely follow suit.

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) The City's Pretreatment Program is not current with the Streamlining Revisions to 40 CFR 403. Program modification must be submitted and will be required upon NPDES permit renewal.

2) These modifications should include a revised maximum allowable headworks loading evaluation indicating whether local limits are necessary or not.

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Springdale NPDES #: AR0022063
Mailing address: P.O. Box 769, 2910 Silent Grove Rd. 72765

Permit Signatory: Rene Langston Title: Exec. Director

Telephone: 479.751.5751 FAX NUMBER: 479.750.4039

Pretreatment Contact: Jennifer Enos Title: Pretreatment Manager
Address: same
Telephone: 479.756.3657
E-mail jennifer_enos@sbcglobal.net
Pretreatment program approval date: 1/1/84

Dates of approval of any substantial modifications: 5/16/00

Month Annual Pretreatment Report Due: January

Pretreatment Year Dates: 12/1 - 11/30 Date(s) of Audit: 9/23-25/08 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	Pret. Coord/ADEQ	501.682.0625

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Jennifer Enos	Pretreatment Manager	479.756.3657
Josh Weaver	Lab Technician	
Harold Hull	WW Facility Director	

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	12/05	none apparent
PCI	5/07	IU pH samples not being done correctly & staffing levels aren't according to Program but given a "satisfactory" rating

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?

* SNC for a late compliance report was addressed. Tele-communications between ADEQ Enforcement and City officials "corrected" the problem. Seems there was some mis-communication earlier between the two.

There have been no major changes in the implementation of the City's Program since the previous audit conducted back in June, 2003. This checklist will reflect the few revisions and updates that have occurred since then.

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
AR0022063	Springdale Wastewater	4/1/04	3/31/2009

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: City
Location Address: 2910 Silent Grove Rd.

Expiration Date of NPDES Permit: 3/31/09

Treatment Plant Wastewater Flow: Design- 24 MGD; Actual (Average)- 11.3 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 1
(See Attach. A-4 for running list)

Industrial Contribution to this Treatment Plant

# of SIUs : 16 # of CIUs : 2
Industrial Flow (mgd): 4.1 Industrial Flow (%) : 36 %

Level of Treatment		Type of Process(es):
Primary		Screening, grit & scum removal, extended
Secondary	✓	aeration (Bardenpho), sand filtration,
Tertiary	✓	final clarification, post aeration w/an equal. basin

Method of Disinfection: chlorination

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Spring Creek then to Osage Creek

Receiving Stream Classification: Segment 3J Ark. River Basin

Receiving Stream Use: primary-secondary contact/raw water source

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

Method of Sludge Disposal:		Quantity of Sludge:
	Land Application	____ dry tons/yr.
	Incineration	____ dry tons/yr.
	Monofill	____ dry tons/yr.
✓	Mun. Solid Waste Landfill	3870 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: conventionals, NH3-N, T.Phos, TRC

a. (continuation of individual treatment plant information for Springdale City 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: NPDES - State
Issuance Date: same
Expiration Date: same

List pollutants that are specified in current sludge permit:
references to CFR 503 Tables 1 Ceiling & Table II Cumulative limits

YES	NO	N/A	
✓			Has the Control Authority submitted results of whole effluent biological toxicity testing.
	✓		Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) there's only been 1 sublethal effect to the ceriodaphnia back in 2/06

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1		
Biomonitoring		4 (fleas) 1 (minnow)/yr		
TCLP			1	
Other:				

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

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.
Metals have decreased significantly because of sand filters. T.Phos has also decreased significantly. (Upgrades' construction completed 11/05). Poultry IUs' voluntary reduction in T.Phos has been deemed a success also.

YES	NO	N/A	
✓			Has the POTW begun tracking the trends in the above samples?
	✓		Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
Late Compliance Report	*Issue addressed & corrected during audit*

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. In first stages of modifying Program to reflect streamlining revisions

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
N/A		

2. Modifications in Progress:

Date Requested	Nature of Modification
n/a	See above discussion

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. **Non-substantial mods only*

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

Date of original Pretreatment Program approval: 1/1/84 [WENDB-PTIM]
Date of most recent Ordinance approved by the Control authority: 8/11/98
Date of most recent Pretreatment Program modification approval: 5/16/00

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:

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

___ ✓ Have provisions been made for the incorporation of Pollution Prevention (P^2) policies by contributing jurisdictions?

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

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. City of Lowell	0	1*	Sewer agreement
2. City of Johnson	0	0	Contract
3. City of Tontitown	0	1**	Contract

* J.B. Hunt Transport; **Landfill Leachate

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

	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)] *"Ongoing"

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

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

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

What methods are used to update the IWS:

✓ Review of newspaper/phone book
✓ Review of plumbing/building permits
✓ Review of water billing records
✓ Permit reapplication requirements
✓ Onsite inspections
___ Citizen involvement
✓ Other (specify) water billing office notifies them about high consumption users and new commercial facilities

How often is the survey to be updated? ongoing

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

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?
Triple T Foods	Pet food mfg. *(Start-up 1/08 @ new location)*	Yes

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

a. 16 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 2 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 14 Noncategorical SIUs
d. 5 Other regulated nonsignificant IUs (Describe) 4 zero dischargers & 1 Landfill leachate

21 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:

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

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

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

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

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

IU NAME	PERMIT EXPIRATION DATE
n/a	

YES NO

✓ ___ Does the Control Authority accept trucked septage *(and port-a-potty wastes)?*

✓ ___ Does the Control Authority accept other trucked wastes? *Landfill leachate*

___ ✓* Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following: **City deems liquid waste hauler questionnaire, manifests and "General Info" adequate (See Attach. A-1 for example)*

YES NO

✓ ___ Does the "liquid waste general info" designate a discharge point? [403.5(b)(8)]

n/a 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
n/a	

Describe the discharge point(s) (including security procedures):
See Attach. A-1c

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

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

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

Pollutant	Limit
n/a	

Landfill leachate permitted w/report only for various parameters

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?

7/24/90 Date Notified letter Method of Notification

Will require sending notification out to dentists, long term care facilities, hospitals, chiropractors, x-ray clinics, veterinarians, pharmacies, etc

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			

YES NO

✓ ___ Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)] *POTW currently gathering info to complete a re-evaluation for the new/upgraded POTW.*

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted? (See Ord. narrative)		MAHL / MAHCs calc'd lb/d / mg/l (Avg. Qpotw = 9.9 mgd)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓	___	___	✓	___	✓	5.07 / 0.06
Cadmium (Cd)	✓	___	___	✓	___	✓	1.09 / 0.013
Chromium-Total	✓	___	___	✓	___	✓	20.62 / 0.25
Copper (Cu)	✓	___	___	✓	___	✓	8.26 / 0.10
Cyanide (CN)	✓	___	___	✓	___	✓	1.60 / 0.02
Lead (Pb)	✓	___	___	✓	___	✓	10.04 / 0.12
Mercury (Hg)	✓	___	___	✓	___	✓	0.003 / 0.036 (ppb)
Molybdenum (Mo) *	___	✓	___	?	___	___	
Nickel (Ni)	✓	___	___	✓	___	✓	5.60 / 0.07
Selenium (Se) *	✓	___	___	✓	___	✓	0.95 / 0.012
Silver (Ag)	✓	___	___	✓	___	✓	20.64 / 0.25
Zinc (Zn)	✓	___	___	✓	___	✓	24.77 / 0.30

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

POLLUTANT	Headworks Analysis Completed? Yes	No	Local Limits Needed? Yes	No	Local Limits Adopted? Yes	No	Numerical Limit Adopted (mg/l)
T.Phos.	City is successfully utilizing industry P2 options & voluntary source reduction						

YES NO

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

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

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)	n/a		
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	1 year	1/year	
Other SIUs	1 year	1/year	
Sampling:			
CIUs	1 year	1/year	
Other SIUs	1 year	1/year	
Reporting:			
CIUs	2 year	2/year	
Other SIUs	2 year	2/year	
Self-Monitoring:			
CIUs	2 year	2/year	
Other SIUs	2 year	2/year	

#	%	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?
✓		To verify IU self-monitoring results?

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

	Analytical Method *	Name of Laboratory
Metals	ICP & cold vapor	Arkansas Analytical
Cyanide	spectrophotometric	American Interplex (AI)
Organics	GC/MS	AI
Other	biomonitoring / Hg	AI / Mercury One

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: Relies on State/EPA certification of contract labs' procedures. In-house QC follows EPA required protocol

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

5 dys Conventionals
2 wks Metals
2 wks Organics

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

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

If yes, explain: _____

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

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

YES NO

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

I. ENFORCEMENT

YES NO

✓* ___ Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] **Not current with the new Streamlining definition*

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

YES	NO	
✓	___	Describe how the Control Authority will investigate instances of noncompliance
✓	___	Describe the Control Authority's types of escalating enforcement responses and the periods for each response
✓	___	Identify by Title the Official(s) responsible for implementing each type of enforcement response
✓	___	Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

civil	$ 1000 /day/violation
criminal	$ _____ /day/violation
administrative	$ 1000 /day/violation

____	Imprisonment
✓	Termination of Service
____	Other: _____

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

YES	NO	
✓	___	When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
✓	___	Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)]. Comment:
n/a		If no, does the Control Authority conduct all of the monitoring?

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

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Date	Return to Compliance? Yes (Date)	No
Danaher	12/06	Meeting	3/07		
		AO w/compliance schedule completed 10/07 with subsequent minor mods	4/07	1/07	(isolated Ni viol 1/08)

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

#	%	
1	7.1	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	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. *Will strongly recommend including enforcement options include these and options to address BMP violations*

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?	

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	$ 0	
Administrative	0	$ 0	
Total	0	$ 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 (City ceased "Linko" data management software & and are satisfied w/their own internal databases and manual tracking system)

___ ✓ 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?
_____
_____
_____

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

If yes, please explain: Nutrients' issues with the neighboring state of Oklahoma has created various lawsuits. City is not having any problems meeting current T.Phos 1 mg/l monthly avg limit.

✓ ___ 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

approx. 3

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:
n/a

		Percent of Total Funding
✓	POTW general operating fund	100
___	IU permit fees	
___	monitoring charges	
✓	industry surcharges *(goes back to GOF)*	
___	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:
Increased sewer rates may result in an increase to the Pretreatment Program

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	auto-samplers, pH meters, etc
✓	___	Safety equipment	standard list
✓	___	Vehicles	van
✓	___	Analytical equipment	colorometric method equipment

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.):
   active with the local four county household haz. waste collection center; they're now dealing with outreach program targeting Ag dischargers; source reduction for T.Phos.; commercial/residential outreach working on grease program

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

3. Has the POTW implemented any kind of public education program? If yes, describe:
   Some presentations still given at the local schools where environmental info is shared; storm water and household hazardous waste programs are active.

4. Does the POTW have any pollution prevention success stories for industrial users documented? somewhat. If yes, please attach.
   3 small metal finishers have gone "zero" discharge using P2 techniques and evaporators. City considers these & 1 Pharma. Mfg'r success stories even though some wastes are hauled off-site. Other SIUs visited during audit had P2 techniques employed but not identified nor documented.

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?

   If yes, which of the "Guides to Pollution Prevention" were used? Personnel has handed out copies of P2 guides to various business sectors such as: hospitals, printers; automotive refinishers and rebuilders

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Kawneer File/ID No. 05-06
Industry Address 600 Kawneer Drive
Industry Description Mfg. Al window and wall frames
Industrial Category Aluminum Forming 40 CFR 467 SIC Code:3442/3354
Avg. Total Flow (gpd) _____ Avg. Process Flow (MGD) 0.10
Industry visited during audit: YES

Comments: _____

FILE #: 2 Industry Name Danaher File/ID No. 05-02R
Industry Address 1609 N. Old Missouri Rd
Industry Description Mfg. hand tools (wrenches, ratchets)
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3423
Avg. Total Flow (MGD) 0.16 Avg. Process Flow (MGD) 0.114

Industry visited during audit: YES

Comments: Plating includes Ni and Tri-valent Cr

FILE #: 3 Industry Name Superior Linen File/ID No. 08-02
Industry Address 1680 E. Mountain Rd., 72764
Industry Description Industrial Laundry
Industrial Category " " 40 CFR n/a SIC Code: 7218
Avg. Total Flow (gpd) _____ Avg. Process Flow (MGD) 0.06 to 0.08

Industry visited during audit: YES

Comments: _____

FILE #: 4 Industry Name George's Processing File/ID No. 04-04
Industry Address 1302 Kansas St.
Industry Description Poultry processor ("kill" to "parts", raw and marinated)

Industrial Category N/A 40 CFR N/A SIC Code: 2015
Avg. Total Flow (gpd) _____ Avg. Process Flow (MGD) 1.24

Industry visited during audit: YES

Comments: _____

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

Industry visited during audit: NO

Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an *(See Attach. A-2 for example)* application for a control mechanism?	✓	✓	✓	✓	
If yes, what is the application date?	5/05	4/05	2/08	4/04	
Does it ask for Pollution Prevention information?	no	no	no	no	
2. Does the file contain a Permit? *(See Attach. A-3 for example revised one)*	✓	✓	✓	✓	
Permit Expiration Date?	✓	✓	✓	✓	
Is a fact sheet included?	✓	✓	✓	✓	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	7/10	5/10	4/13	9/09	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	✓	✓	✓	✓	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	✓	

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	
Records retention?	✓	✓	✓	✓	
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	
Revocation of permit?	✓	✓	✓	✓	
l. Compliance schedules/ progress reports	n/a	n/a	n/a	n/a	
m. General/Specific Prohibitions?	✓	✓	✓	✓	
n. Where technologically and economically achievable, are P^2 aspect included?	no	no	no	no	

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	1	✓	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	2	2	2	2	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	✓	n/a	n/a	n/a	
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	3	n/a	n/a	

Comments: 1) CIU can certify out of CN sampling under CFR 467; 2) "Verbally discussed w/each SIU"; 3) "Reverse" CWF described in permit (See Attach. A-3f) but, fact sheet could also include example of permit calculation limits.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	
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?	1	1	1	1	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	n/a	2	n/a	n/a	

Comments: 1) City's Chains of Custody were questioned because they didn't appear they were complete ("relinquished by" to "received by" were questioned). City rep. indicated she'd have to think about their current practices and re-think their C of C forms (See Attach. A-5); 2) On file and in permit per new CFR 403 requirements (See Attach. A-3ii)

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	1	1	1	1	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections *(See Attach. A-6 for example)*					
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	12/07	5/07	10/07	9/08	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	✓	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	
f. Evaluation of pretreatment facilities?	✓	✓	✓	✓	
g. Evaluation of self-monitoring equipment and techniques?	✓	✓	✓	n/a	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)] *(See Attach. A-7 for example)*	✓	✓	✓	✓	
i. Manufacturing facilities?	✓	✓	✓	✓	

Comments: 1) City requires all IUs to sample using composite samplers

SECTION III: INDUSTRIAL USER FILE REVIEW

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
j.	Chemical handling and storage procedures?	1	1	1	1	
k.	Chemical spill prevention areas?	✓	✓	✓	✓	
l.	Hazardous waste storage areas and handling procedures?	✓	✓	n/a	n/a	
m.	Sampling procedures?	✓	✓	✓	✓	
n.	Laboratory procedures?	✓	✓	✓	✓	
o.	Monitoring records?	✓	✓	✓	✓	
p.	Evaluation of Pollution Prevention opportunities?	✓	✓	✓	✓	
q.	Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting						
10.	Does the file contain self-monitoring reports?	✓	✓	✓	✓	
11.	Does the file include:					
a.	BMR?	arch	arch	n/a	n/a	
b.	90-Day Report?	arch	arch	n/a	n/a	
c.	All periodic reports?	✓	✓	✓	✓	
d.	Compliance schedule reports?	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)?	✓	✓	✓	✓	

Comments: 1) More question could be asked about the facilities' chemical handling procedures. Some IUs only had a barrel or two of chems or some small containers near various work stations. Most had a bulk chemical storage area but how the chemicals got from the receiving docks to either bulk storage or their individual work stations could help City (and IU rep) understand the importance of handling procedures when there may be floor drains or sumps to the City or pretreatment in the handling pathway in case of an accident.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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	
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?	no	no	no	no	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	--	--	--	--	
b. Did POTW respond to the spill?	--	--	--	--	

Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	n/a	✓	n/a	n/a	
b. IU self-monitoring results?	n/a	✓	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	0	2	0	0	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	n/a	✓	n/a	n/a	

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	✓	n/a	n/a	
5. Were all nondischarge violations identified in the file?	n/a	✓	n/a	n/a	
6. Was the IU notified of all violations?	n/a	✓	n/a	n/a	
7. Was follow-up enforcement action taken by the Control Authority?	n/a	✓	n/a	n/a	
8. Did the Control Authority follow its approved ERP?	n/a	✓	n/a	n/a	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	✓	n/a	n/a	
10. Is there a compliance schedule? If yes:	no	✓	no	n/a	
11. Were there any compliance schedule violations?	--	no	--	--	
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	✓	✓	✓	
g. others (specify)					
13. Was the SIU published for SNC?	No	No	No	No	
Date of publication.	--	--	--	--	

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Springdale NPDES #: AR0022063

Date of Audit: 9/23 - 9/25/08 Date entered into QNCR: 10/27/08
(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 Springdale NPDES #: AR0022063

Name, address and phone number of industry:
Danaher Corp., 1609 N. Old Missouri Rd., 479.466.8500 X-1507

Type of industry: Metal Finisher (CFR 433)

Date/Time of visit: 9/24/08 / 10:30 a.m.

Industry contacts: Gary Young/Env. Engineering Tech.

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

Additional comments: Facility has added a second plating line, added 2 storage tanks to pretreatment and are currently adding de-i water units to help replace city (high in chlorides) water used in their plating baths/rinses. It's the last U.S. manufacturer of hand tools (wrenches, e.g.) distributing their products under several name brands. Facility begins with the cold or hot forging of carbon steel for the basic tool shapes. Forged parts are sent thru numerous stand alone machining ops to saw, shear, punch, drill, weld, etc. for further finishing. No wastewater is generated and cutting/coolant fluids are self contained, then shipped off-site when spent.

Visit conducted by: Gilliam/Enos/Weaver Date: 9/24/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Springdale NPDES #: AR0022063

Industry name: Danaher

Additional comments: Pieces are sent to one of the numerous vibratory tumblers for helping remove mill finish. Depending on type of desired finish, pieces are sent to one of several lines: anodizing, painting or plating. The IU utilizes various P2 techniques: counter current flowing most rinse tanks and Ni bath continually carbon filtered for extended use. Another of the polishing stages uses animal fat (tallow) for lubricating the rollers that spin inside a water bath further mirror polishing finished product. Chemical handling is accomplished by numerous methods, some hand carried in buckets, some by fork lift, some hard lined overhead and some auto-pumped from barrels next to different process stations. No floor drains visible.

Pretreatment equipment appeared well maintained which included equalization, chemical precip, floc, polymers and clarification followed by filter presses makes up, in general, the pretreatment.

Both the IU's processes and pretreatment set-up seemed to be well known and recognized by the city personnel. Processes are too complex to try and describe accurately in this short summary. Schematics on file were fairly self-explanatory of product and wastewater flows but, more details could be drawn/narrated. Good questions were asked and the IU rep seemed eager to explain. Sampling point and w.w. flow measurement device/"calibration" seemed acceptable.

Visit conducted by: Gilliam/Enos/Weaver Date: 9/24/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Springdale NPDES #: AR0022063

Name, address and phone number of industry:
Superior Linen, 1680 E. Mountain Rd., 479.756.9330

Type of industry: Industrial Laundry Date/Time of visit:
9/24/08 / 1:00 p.m.

Industry contacts: Terry Harris/Chief Engineer

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

Additional comments: Facility is a typical industrial laundry. They have a total of 7 huge washers, some of which are new and use less water. Very few solvent laden rags/towels are laundered here, mostly uniforms, hotel and restaurant linens and grease rags ("bar-ribs", about 5% of total laundered) are cleaned here.

Visit conducted by: Gilliam/Enos/Weaver Date: 9/24/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Springdale NPDES #: AR0022063

Industry name: Superior Linen

Additional comments:

Total wastewater usage is about 60 to 80 thousand gallons per day with steam injection used in some of the washers. Temperatures can reach around 150 to 170 degrees F but is used in a heat exchanger to pre-heat city water for their washers. Chemicals on site include hydrogen peroxide, non-phosphate soap, bleach, and sulfuric acid (used for neutralization before discharge).

Fairly clean facility with a cleaning crew used nightly to clean up all the lint from the driers and ironing processes. Linens that are ironed are not sent thru the driers since their long ironing "rollers" are steam heated and air dry.

"Pretreatment" is a new DAF unit with polymers (coagulants) added, air injected and an oil and grease skimming.

The unit is rated at 200 gpm. Unit shuts off when their EQ tank is not full. Floculants are first introduced in this tank with air mixing via a manifold on the bottom. They've saved on chemicals and water since installation of the new DAF.

Again, city reps were very knowledgeable about the IU's process, chemicals and pretreatment. IU rep was more than helpful in answering any questions. Sampling/flow monitoring station adequate.

Visit conducted by: Gilliam/Enos/Weaver Date: 9/24/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Springdale NPDES #: AR0022063

Name, address and phone number of industry:
Kawneer, 600 Kawneer Drive, 479.756.4444

Type of industry: Al Forming (CFR 467)

Date/Time of visit: 9/24/08 / 1:55 p.m.

Industry contacts: Gregory Smith/Env. Engineer; Brian Porbeck/ (Process Mngr.)

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

Additional comments:

Facility manufactures aluminum window frames and curtain wall products ("mullions"). ADEQ's new building's aluminum frames, etc. is from Kawneer. Raw material comes in the form of 7 or 12 inch "logs". Billets are pre-heated to approx. 1000 F. prior to being sent through one of two press units, not quite to the melting point but, just hot enough to help the billets be "pressured" thru the dies.

Visit conducted by: Gilliam/Enos/Weaver Date: 9/24/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Springdale NPDES #: AR0022063

Industry name: Kawneer

Additional comments: Aluminum is extruded (currently ~115,000 lbs/day) using two presses through any number (~3,000) of various configured tool-steel dies (dies are cleaned on-site in a caustic bath [pH ~14] followed by rinse). There's no wastewater associated with extrusion and no floor drains in the area. Extruded lengths (~150' long) are air-cooled on rolling racks then stretched/straightened. Work pieces are sent through age ovens to obtain desired strength properties and are further straightened. Once cooled/cut to length, depending on customer specs, pieces are either anodized (approx. 50%), or painted with very little mill finished. Painting consists of a fine liquid mist primer, top coat then a clear coat. No wastewater is generated in this area. Anodizing consists of sending workpieces through 5 tanks: a caustic cleaner bath/rinse, hex-chrome acid bath/2 rinses. Pieces are sent though flash oven with no further wastewater associated. The by-product from treatment of anodizing wastewater, aluminum tri-hydrate, is recycled for use in cosmetics, alum and other products. Pretreatment processes/equipment include hex-chrome reduction, chemical precip with floc and polymers, clarification, sludge filter press with supernatant sent to city after pH adjust (with caustic from die-clean w.w. as needed). Equipment appeared well maintained and functional. P2 techniques included caustic recovery system, an acid purification unit and filtration systems on their baths to extend their life. They're installing a new filter press as their previous one just stopped working. - currently renting one.
Adequate sampling site. City Coordinator brought up some good points and the IU rep seemed at ease and more than cooperative in helping answer questions and explain processes.

Visit conducted by: Gilliam/Enos/Weaver Date: 9/24/08

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Springdale NPDES #: AR0022063

Name, address and phone number of industry:
Georges, 1302 Kansas Street 479.927.7670

Type of industry: Poultry Processing Date/Time of visit:
9/25/08 / 9:00 a.m.

Industry contacts: Bud Kirk/Pretreatment Mgr; Milo Johnson/WW Lead Mgr.

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

Additional comments:

Facility is a "kill" plant and ships out chicken parts, some marinated ready to cook or parts to their deboning facility. Site visit was contained to just the pretreatment "building". Time constraints would not allow for a complete walk through of the "processing" area as it would entail clean "suiting-up" and seeing typical kill/processing operations. All "process" water goes directly to "Pretreatment".

Visit conducted by: Gilliam/Enos/Weaver Date: 9/25/08

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Springdale NPDES #: AR0022063

Industry name: Georges

Additional comments: Facility decided years ago to not use the tri-sodium phosphate as a disinfectant knowing the local political climate and is using peroxic acidic acid or "parasafe" (organic). They used to discharge 30 to 40 ppm T.Phos @ ~1 MGD. They're down to ~13 to 15 ppm now. Different marinates sent in by customers do still contain phosphates with them having no choice about using their blends. They try to capture as much of these marinates as possible for re-use. Current wastewater (~1.2 MGD) from kill/processing building gravity flows to pit ("inspection box") prior to entering the "pretreatment building". WW is first flushed over three large vibrating/sloped screens to remove the largest parts of their process solids (feet, guts, waste chicken parts, etc). WW is then pumped back into one of two circular/rotating barrel type feather screens. These two offal remains are kept separate but hauled off to Simmons for pet foods products. Part of the "pre-cleaned" wastestream is sent back into the process bldg for flushing feathers, etc out of the floor troughs back to pretreatment. After course screening, the wastewater is sent directly to their DAF tank. Polymers, coagulants and compressed air are added to the DAF unit. Four rotating "rake" arms continually skim remaining solids which are sent to a site for land application. "Cleaned" water flows over weir plates into the flume to the city. An equalization basin was decided not necessary since their flows have always been fairly consistent.
Sampling site adequate with an ISCO unit & bubbler flow meter. City rep was very familiar with facilities' ops and pretreatment. IU rep was very familiar with what the City was asking of his company regarding wastewater characteristics.

Visit conducted by: Gilliam/Enos/Weaver Date: 9/25/08

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

SPRINGDALE WATER UTILITIES
LIQUID WASTE TRANSPORT QUESTIONNAIRE

COMPANY IDENTIFICATION

Name of Company _____

Company Address _____

_____

Telephone Number _____

Owner (s) _____

GENERAL INFORMATION

Any claims or judgements pending Yes ( ) No ( )

If yes, explain _____

_____

Type of service provided:
Septic Tank ( ) Portable Toilets ( ) Other ( ) _____

Patrons of service rendered:
Residential ( ) Commercial ( ) Other ( ) _____

VEHICLE INFORMATION

Liability Insurance Co. _____

Liability Insurance Expiration Date _____

Make/ Year	Tank Capacity	Safety Insurance Expiration Date	License #	Licensing Date	ADH#

CERTIFIED DRIVERS OF WASTE TRANSPORT TRUCKS & DRIVER'S LIC. NOS.

1. _____ 2. _____

3. _____ 4. _____

5. _____ 6. _____

WASTE TRANSPORT INFORMATION

Does this vehicle transport any wastes other than household septic tank wastes?
Yes ( ) No ( )
If yes, list the other types of wastes (ie. chemical wastes, oil and grease, motor oil, etc.) and from where they originate (ie. industrial, restaurant, gas stations, etc.) Describe in detail the cleaning procedure used to decontaminate tank and fittings after hauling these materials. (attach additional pages if needed)

Type of Waste	Name, Address, Type of Operation

PERMIT/AUTHORIZATION INFORMATION

List all other permits or authorizations for the disposal of septic tank waste, portable toilet waste, or the other wastes listed above:

Permit Type and Number	Issuing Agency	Expiration Date

CONDITIONS OF DISPOSAL

The Transporter Declares and Agrees:

a. To accept and abide by all provisions of the Liquid Waste Transport Program of Springdale Water Utilities.

b. That the falsification of any information submitted in this Liquid Waste Transport Questionnaire, or on Manifest/Trip tickets shall be cause for forfeiture of disposal privileges.

c. That all drivers involved in transporting waste within the jurisdiction of Springdale Water Utilities must be knowledgeable of the safety requirements for various liquid wastes.

d. That the use on non-licensed drivers shall be cause for forfeiture of disposal privileges.

e. That Liquid Waste Transport Manifest/Trip Tickets shall be retained for three (3) years after the waste discharge date.

f. That Springdale Water Utilities shall be notified in writing of any changes in information given on this questionnaire.

g. That liquid wastes will only be accepted between the hours of 8:00 am and 4:00 pm, Monday through Friday. Liquid waste will not be accepted on weekends and holidays. Liquid wastes will be accepted outside of these hours on an emergency basis only, with prior approval.

h. That liquid waste may only be disposed of at sites specified by Springdale Water Utilities. Currently, the only approved site is the screen located southwest of the wastewater treatment facility Bar Screen Building.

I have examined and am familiar with the information contained in this questionnaire and believe that the submitted information is true, accurate, and complete. In addition, I am aware of the conditions and requirements of Springdale Water Utilities' Liquid Waste Transport Program and agree to meet them at all times. Failure to comply with Program conditions may result in immediate suspension of transporter's privileges and/or possible penalties as allowed by State law.

Date _____ Signature of Owner/Operator _____

SPRINGDALE WATER UTILITIES
LIQUID WASTE TRANSPORT MANIFEST/TRIP TICKET

Name of Transporter_____ ADH#_____
(Company Name)
Name of Driver_____ Truck Lic.#_____
(Please Print)
Driver's License #_____ Tank Cap._____
(Gallons)
Date(s) of Pickup_____

Part I Generator Information and Certification: By signing below, the generator is certifying that the waste is not RCRA hazardous according to the criteria in 40 CFR Part 261.

Name & Address of Generator	Pickup Date	Type Waste	Amt. (gal)	Generator's Signature	Generator's Phone No.

SAMPLE

Total:_____
(gal)

Part II Transporter Certification:
I certify that the information provided above is correct, and that only wastes in Part I of this ticket are contained in this load. I futher certify that this load is made up solely of wastes from portable toilets or domestic septic tanks in the Springdale Water Utilities water service area, and other preapproved sources. I certify that this load contains no chemical or hazardous waste material as listed in 40 CFR Part 261. I am aware that falsification of this ticket may result in forfeiture of the privilege of utilizing Springdale Water Utilities' disposal facilities, and/or penalties of up to $250,000 and 15 years imprisonment as outlined in Section 3008(e) of RCRA.

Truck Driver's Signature_____

Part III Statement of Disposal Site Operator:
I certify that I have been authorized by Springdale Water Utilities to accept the above type wastes and that I have disposed of the above indicated wastes in accordance with the requirements outlined in that authorization.

A-1d

Site Operator's Signature_____

SPRINGDALE WATER UTILITIES
LIQUID WASTE TRANSPORT PROGRAM
GENERAL INFORMATION

Authorization to Discharge

Authorization in advance is required before a company is allowed to dispose of liquid waste at Springdale's Wastewater Treatment Facility. Following are the steps required for authorization.

1. Request and obtain a Liquid Waste Transport Questionnaire.
2. Fill out the questionnaire accurately and completely.
3. Provide additional information if requested.
4. Obtain approval from Springdale's Industrial Pretreatment Coordinator or Industrial Inspector.

Note: If a company does not already have a license to haul liquid waste from the Arkansas Department of Health (ADH) at the time it fills out the Questionnaire, conditional approval may be obtained. This approval allows Springdale Water Utilities' staff to write a letter for the company to ADH, confirming that they are allowed to dump. HOWEVER, no company will be allowed to purchase manifests or dump until they are licensed by the ADH.

Springdale Water Utilities must be notified in writing within five (5) working days of any changes in the information provided.

Purchase of Manifests

Manifests may be purchased by an approved company at Springdale Water Utilities' main office, located at 526 Oak Ave., Springdale, AR. The current cost is $60.00 per manifest, up to 1500 gallons. Additional manifest(s) must be purchased for loads larger than 1500 gallons.

The Water Office is open Monday through Friday, from 8:00 am until 5:00 pm. It is closed on Saturday, Sunday, and the following holidays:

New Year's Day	Veteran's Day
President's Day	Thanksgiving
Memorial Day	Day after Thanksgiving
Fourth of July	Christmas Eve
Labor Day	Christmas

Manifests must be filled out completely.

Septic tanks: Generator Information and Certification section can only be signed by the owner, manager, or occupant of the property being pumped. **A plumber or transporter cannot sign as generator.** The generator receives the back copy of the triplicate manifest. The two front copies are brought with the load to the wastewater treatment plant.

Portable toilets: Write in "Portable Toilets" in place of name and address of generator. Write in the pickup date(s), type of waste, and approximate amount in the appropriate columns. Draw a line through the generator's signature and phone number columns. Attach to the manifest a list of the names of individuals or companies where toilets are set, a physical address for each toilet, the date it was pumped, and the approximate gallons pumped. All three copies are brought with the load to the wastewater treatment plant.

Service Area

Only portable toilet and septic tank waste from Springdale, and areas closer to Springdale than to any other treatment facility are accepted. Specifically, Springdale Water Utilities' service area includes all households or communities that purchase water from Springdale. Generally, waste is accepted north to the middle of Lowell, south to the creek in Johnson, west to the area around Tontitown, Elm Springs, and Cave Springs, and east past Sonora to Spring Valley and the War Eagle area. If a household is on a well or on a rural water system, and you are uncertain whether it is in Springdale's service area, please contact the Industrial Pretreatment Coord. or Industrial Inspector to help in the determination.

Allowed Wastes

Only portable toilet waste and household septic tank waste is accepted.

Prohibited Wastes – Portable Toilets

Formaldehyde-based or other toxic portable toilet chemicals are prohibited. Obtain approval for the chemical(s) being used by submitting an MSDS for each chemical to Springdale Water Utilities in advance of its use. No portable toilet waste will be accepted if it has been visibly contaminated with antifreeze, used oil, or materials other than human waste and hygiene products.
No portable toilet waste is accepted that was generated outside of Springdale's service area.

Prohibited Wastes – Septic Tanks

Only household septic tank waste is accepted. If **ANY TYPE** of business is being run from the building(s) served by the septic tank, regardless of whether only household waste is being discharged, the business must be inspected and issued an identification number (ID#) if approved. This ID# must be written on the manifest, below the name and address of the generator.

Specifically prohibited substances include: Waste from any industrial or commercial process, any vehicle washing or maintenance waste, grease trap waste, petroleum products, photographic or x-ray waste, waste from a site where chemicals or drugs were manufactured, pesticides, animal "dip" or grooming wastes, commercial carpet cleaning waste, RCRA hazardous waste, antibiotics in more than household quantities, wastes with a pH above 11.0 or below 4.5, or any other known or suspected toxic materials. It is up to the waste hauler to insure that the generator is asked whether any toxic substances are present in the septic tank being pumped. The hauler must use his best professional judgement concerning the odor and appearance of the waste to determine whether it should be pumped. **IF IN DOUBT, REJECT THE WASTE OR CALL FOR GUIDANCE!**

No septic tank waste is accepted that was generated outside of Springdale's service area.

Dumping a Load of Liquid Waste

Waste is accepted at Springdale's Wastewater Treatment Facility from 8:00 am until 4:00 pm Monday through Friday, except for the holidays listed in the "Manifest" section above. Arrangements may be made in advance to dump waste on a weekend if a company is providing a service for a community event such as War Eagle craft fair, Featherfest, Rodeo of the Ozarks, etc. Authorization to dump on a weekend may also be obtained if an emergency arises, such as a customer's house flooding, when the transporter's truck is already full of waste from another service call.

Drivers must be authorized by a company to dispose of liquid waste at Springdale's Wastewater Treatment Facility. This is done by sending a letter on company letterhead, signed by the owner or general manager, giving the name and driver's license number of the driver, along with a photocopy of their CDL-endorsed, valid driver's license.

The driver must make sure that the manifest is filled in completely. He must then obtain a signature from a Wastewater Treatment Facility employee (Site Operator) prior to disposal. The Site Operator keeps the front copy of the manifest. The driver is given the second copy, which his company must retain for three (3) years after the waste discharge date. First time drivers must be shown by a trained driver or Site Operator how and where to dump. No waste may overflow the grate. **WASTE THAT OVERFLOWS THE GRATE MAY END UP IN SPRING CREEK! DO NOT LET THIS HAPPEN!** The driver must shovel the solids into the receptacle provided and close the lid. He must then clean up the dump site using the hose provided, turn off the water, and put away the hose before leaving.

Questions?

If you have any problems or questions, please call (479)756-3657 any time. After hours, you may get a recording, but an operator will contact you as soon as possible if it is an emergency.

Attachment A-2

For Office Use Only	
Date due	4/22/05
Date rec'd	
Survey	
Permit App.	✓

City of Springdale, Arkansas
Industrial Waste Questionnaire

1. Company Name: Danaher Tool Group

   Mailing Address: 1609 N Old Missouri Rd Springdale Ar. 72764

   Telephone: (479) 751-8500

2. Address of Facility (if same as above, check [X]): _____

   _____

   Telephone: (if same as above, check [X]): _____

3. Contact Person: Gary Young

   Title: Environmental Technician Telephone: (479) 717-1507

4. Brief description of manufacturing or service activities on premises:

   Forging, Stamping, Broaching, Grinding and Electroplating

   _____

5. Does this company have an industrial user permit with the City of Springdale, AR or has it had one previously? [X] yes [ ] no

   If yes, permit number/expiration date: Permit # 00-01 May 1 2005

6. List other discharge or environmental permits (NPDES, Air, etc.): Air Permit 1415-AR-4

   Stormwater Permit: ARR000000

7. Standard Industrial Classification Code Number(s) and Classification(s) (if known):

   3423 Hand and Edge Tools, Except Machine Tools & Handsaws

8. Are your manufacturing or commercial operations subject to national categorical pretreatment standards? Check one: [X] yes [ ] no

9. Are the applicable national categorical pretreatment standards and the local discharge prohibitions and limitations being met on a consistent basis?
   Check one: [X] yes [ ] no

10. Water Consumption:

Average Total Monthly Water Consumption (gallons) 4,700,000

Estimated Total Monthly Water Consumption in five (5) years 5,000,000

Average Gallons Water Consumed in Products daily None

11. Types/Amounts of wastes generated by this facility: (check all that apply)

Type	Average gallons per day	Estimated	Measured
[X] Domestic wastes (restrooms, showers, etc.)	16,200	[X]	[ ]
[X] Cooling water, non-contact	25,000	[X]	[ ]
[X] Boiler/Tower blowdown	9,800	[X]	[ ]
[ ] Cooling water, contact		[ ]	[ ]
[X] Process	137,000	[X]	[ ]
[ ] Equipment/Facility washdown		[ ]	[ ]
[ ] Air Pollution Control Unit		[ ]	[ ]
[ ] Storm water runoff to sewer		[ ]	[ ]
[ ] Other		[ ]	[ ]

Total wastewater discharged 188,000 gallons per day

12. Wastes are discharged to (check all that apply):

Type	Average gallons per day	Estimated	Measured
[X] Sanitary sewer	188,000	[X]	[ ]
[ ] Storm sewer		[ ]	[ ]
[ ] Surface water		[ ]	[ ]
[ ] Ground water		[ ]	[ ]
[ ] Liquid waste hauler		[ ]	[ ]
[ ] Evaporation		[ ]	[ ]
[ ] Other		[ ]	[ ]

Provide name and address of waste hauler(s), if used.

A-26

13. Attach sketch(es) of general plant process and waste line layouts including location of floor drains and manholes. Include any existing or proposed pretreatment systems and locations and sizes of all existing and proposed connections to the POTW wastewater collection system. Also include details of present and/or proposed monitoring facilities.

14. Describe Processes, Products, and Raw Materials. The following information must be completed for each product line.

- General description of processes for each product line.

  Forging, Stamping, Broaching, Grinding (Vibratory or Belt) and Electroplating

- General description of products produced by type and amount. Please specify if produced seasonally.

  Hand Wrenches

- General description of type and amount of raw materials or process additives used.

  Steel 2,000,000 lbs./Month

- Process discharge is [ ] batch [X] continuous [ ] both.
  If both, _____ % batch 100 % continuous.
  Average number of batches per 24-hour day N/A.

15. Describe hours of operation and number of employees per shift. Specify seasonal variances.

1st Shift: 325 people - 7:00am - 3:30 p.m 2nd Shift: 195 people 3:30 p.m - 12:00am

3rd Shift: 130 people - 12:00am - 7:00am Alpha Shift: A, B, C, D 7 Day/wk 24hrs/da

16. Describe hours of operation of actual or proposed pretreatment facility. Specify discharge hours.

7 Days/week 24hrs/Day

17. Are any process changes or expansions planned during the next three years? Check one:
[X] yes [ ] no

A-2c

If yes, describe the nature of planned changes or expansions (attach extra sheet if necessary):

We will be adding forging capacity

18. If your facility employs processes in any of the industrial categories or business activities listed below and any of these processes generate wastewater or waste sludge, place a check beside the category or business activity (check all that apply).

Industrial Categories

[ ] Adhesives
[ ] Aluminum Forming
[ ] Auto & Other Laundry
[ ] Battery Manufacturing
[ ] Coal Mining
[ ] Coil Coating
[ ] Copper Forming
[ ] Electrical/Electronic Components
[X] Electroplating
[ ] Explosives Manufacturing
[ ] Foundries
[ ] Gum & Wood Chemicals
[ ] Inorganic Chemicals
[ ] Iron and Steel Manufacturing
[ ] Leather Tanning and Finishing
[ ] Mechanical Products
[X] Metal Finishing
[ ] Metal Products & Machinery
[ ] Nonferrous Metals
[ ] Ore Mining
[ ] Organic Chemicals
[ ] Paint & Ink
[ ] Pesticides
[ ] Petroleum Refining
[ ] Pharmaceuticals
[ ] Photographic Supplies
[ ] Plastic & Synthetic Materials
[ ] Plastics Processing
[ ] Porcelain Enameling
[ ] Printing & Publishing

Other Business Activities

[ ] Animal/Vegetable Fats/Oils Blending
[ ] Asbestos Manufacturing
[ ] Auto Garage/Repair
[ ] Beverage Bottler
[ ] Breads/Baked Goods Mfg.
[ ] Brewery/Winery
[ ] Builder's Paper
[ ] Carbon Black
[ ] Car Wash/Transport Truck Wash
[ ] Cement Manufacturing
[ ] Dairy Products Processing
[ ] Feedlots
[ ] Ferroalloy Manufacturing
[ ] Fertilizer Manufacturing
[ ] Fruits and Vegetables
[ ] Glass Manufacturing
[ ] Grain Mills Manufacturing
[ ] Hospital/Health Care
[ ] Ink Formulating
[ ] Meat Processing
[ ] Metal Molding and Casting
[ ] Paint and Body Shop
[ ] Paint Formulating
[ ] Phosphate Manufacturing
[ ] Paving and Roofing (Tars and Asphalt)
[ ] Poultry Processing
[ ] Radiator Shop
[ ] Rendering
[ ] Slaughter/Meat Packing
[ ] Seafood Processing

A-2d

[ ] Pulp and Paper
[ ] Rubber Processing
[ ] Soaps/Detergents Mfg.
[ ] Steam Electric
[ ] Textile Mills
[ ] Timber Products Mfg.

[ ] Sugar Processing
[ ] Other Food/Edible Products Processor

19. Pretreatment devices or processes used for treating wastewater or sludge (check all that apply).

[ ] Air flotation
[ ] Biological treatment. Describe: _____
[ ] Centrifuge
[x] Chemical precipitation
[ ] Chlorination
[ ] Cyclone
[ ] Filtration
[ ] Flow equalization
[x] Grease or oil separation. Describe: Rope Skimmer on Oil Separator Tank
[ ] Grease trap. Frequency of cleaning: _____
[ ] Grit removal
[ ] Ion exchange
[x] Neutralization/pH correction. Describe: pH Adjustment
[ ] Ozonation
[ ] Rainwater diversion or storage. Describe: _____
[ ] Reverse Osmosis
[ ] Screen
[ ] Sedimentation
[ ] Septic tank
[ ] Solvent separation
[ ] Sump
[ ] Other chemical treatment. Describe: _____
[ ] Other physical treatment. Describe: _____
[ ] Other. Describe: _____
[ ] No pretreatment utilized.

Describe pretreatment process:
Plating waste stream
Heavy Metal Removal - Precipitation with sulfide based chemistry
Flocculation - Addition of Anionic Polymer
Settling - Transfered to sludge Holding Tank
Filtration - Filter through Filter press
See Attached sheet for Vibratory Waste Stream

A-2e

Vibratory Waste Stream

- Addition of polymer (coagulant)
- pH adjustment – Adjust pH with 50% liquid caustic or sulfuric acid.
- Settling – Transfer to sludge thickening tank.
- Filtration – Filter waste through hydraulic filter press.
- Filtrate – Sent to vibratory holding tank, so additional settling of suspended particles.

20. If any wastewater analyses have been performed on the wastewater discharge(s) from your facilities, attach a copy of the most recent data to this questionnaire. Include the date of the sample collection and analysis, name of laboratory performing the analysis, and location(s) from which samples(s) were taken (attach sketches, plans, etc., as necessary).

21. Are any liquid wastes or sludges from this facility disposed of by means other than discharge to the POTW collection system? Check one: [X] yes [ ] no

If yes, these wastes may be best described as:

	Estimated Gallons/pounds per year
[ ] Acids and alkalies	
[X] Heavy metal sludges	280,000 lbs
[ ] Inks/dyes	
[ ] Non-petroleum oil and/or grease	
[ ] Organic compounds	
[ ] Paints	
[ ] Pesticides	
[ ] Petroleum oil and/or grease	
[ ] Plating wastes	
[ ] Pretreatment sludges	
[ ] Radiator fluid wastes	
[ ] Solvents/thinners	
[X] Other hazardous wastes	
Specify: (D007) Nickel Strip	150,000 lbs
[ ] Other nonhazardous wastes	
Specify:	

For the above checked wastes, does your company practice:

[ ] on-site storage. Describe: _____

[ ] off-site storage. Describe: _____

[ ] on-site disposal. Describe: _____

[X] off-site disposal. Describe: F006 - Shipped to World Resource Inc for Recycling
D007 - Shipped to Permit Fixed and Deep well injection

22. Is there a slug control / accidental spill prevention plan prepared for this facility? Check one:
[X] yes [ ] no
If so, attach to this application.

23. Priority Pollutant Information (attached chemical lists). Please indicate in the appropriate box by each listed chemical whether it is "suspected to be absent," "known to be absent," "suspected to be present," or "known to be present" in your manufacturing or service activity or generated as a by-product.

. . . . . .

(Signature by an authorized official of you firm is required after completion of this form and review of the information it contains.)

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.

Date: April 18, 2005 Signature: [signature]

Name/Title: General Manager

. . . . . .

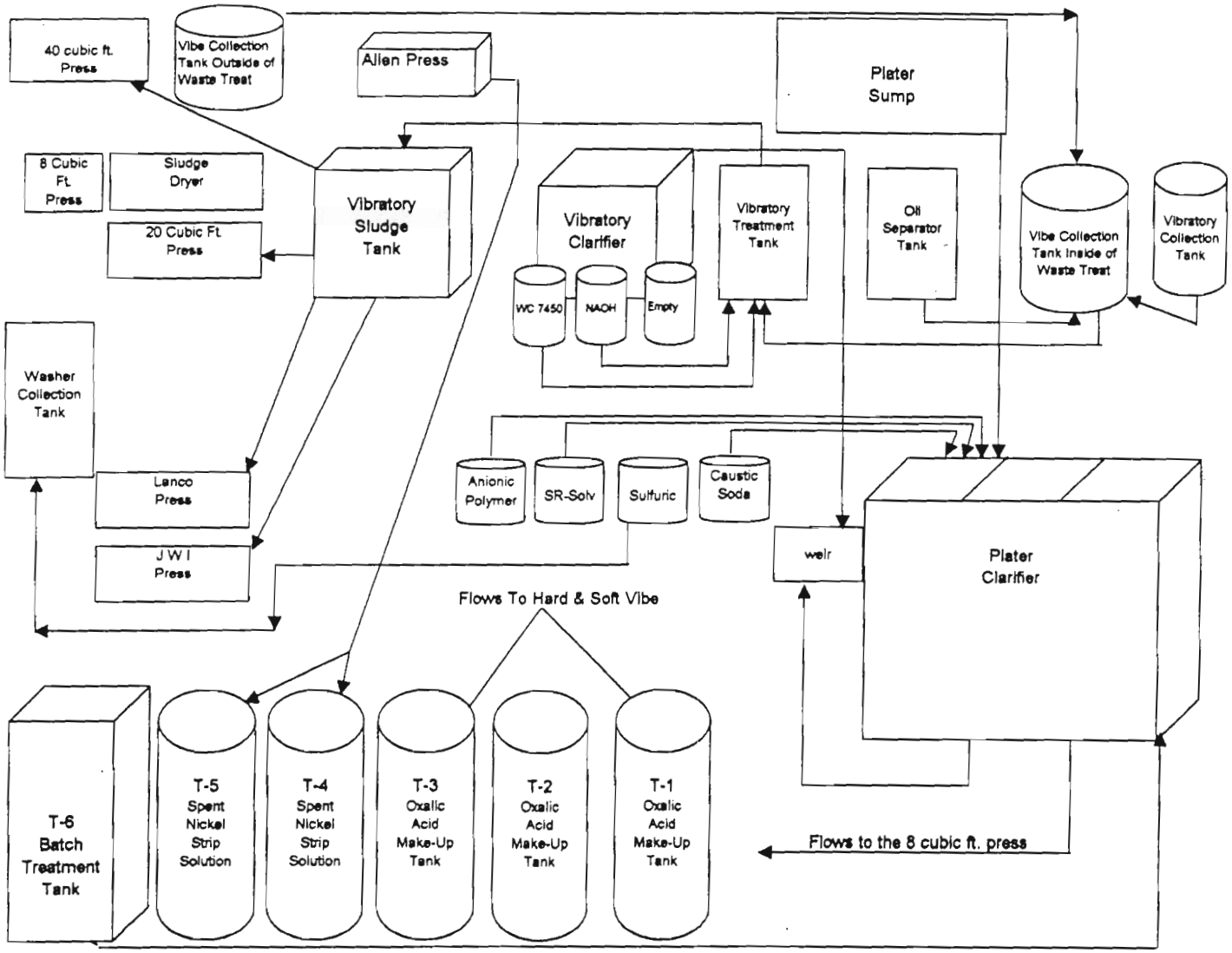
Danaher Chemical List

Nickel Chips	Known to be present
Nickel Chloride	Known to be present
Nickel Sulfate	Known to be present
Chromic Acid	Known to be present
Tri Chrome Stabilizer	Known to be present
Tri Chrome Corrector	Known to be present
Tri Chrome Adjuster	Known to be present
Ammonium Chloride	Known to be present
Aqua Ammonia	Known to be present
Nitric Acid	Known to be present
Ethylenediamine	Known to be present
Sulfuric Acid	Known to be present
Hydrochloric Acid	Known to be present
Caustic Soda Liquid 50%	Known to be present
Oxalic Acid	Known to be present
Hydrogen Peroxide	Known to be present
Cobalt	Known to be present
Esp Soak Cleaner	Known to be present
Monoethanolamine	Known to be present
Sodium Metasylicate	Known to be present
Acidex	Known to be present
Troy 2461 Parts Cleaner (Solvent)	Known to be present
Molydag 20	Known to be present
Keykote 36	Known to be present

Note: This is a list of chemicals that could have a negative impact on the POTW if they were to be released.

If needed an MSDS can be provided for each.

Waste Treat Process Flow Diagram



A-2.j

Note: Filtrate from the vibe presses will go to the vibratory clarifier.
Filtrate from the plater presses will go to the plater sump.

ENVIRONMENTAL TESTING GROUP, INC.

1702 East Central • P.O. Box 507 • Bentonville, Arkansas 72712 • (479) 271-7996 • Fax (479) 271-8394

Customer Name:	Danaher Tool Group	**Date of Report:**	03/11/05	**Control Number:**	0503058
Sample Location:	City Split	**Type of Sample:**	Composite	**Date Received:**	03/04/05 11:10
Sample Date:	03/03/05 - 03/04/05	**Sample Collected By:**	City	**Job No:**	2112
Time of Sample:	08:00 - 07:20	**Delivered to Lab By:**	JHM		

Analysis / *Quality Assurance*

Date	By	Parameter	Concentration	Units	Method	Edition or Ref.	Lbs./Day	RPD	% Spike Recovery: Matrix
03/07/05	JHM	TSS	88.0	mg/L	160.2	EPA	136.51	2.03	--
03/10/05	MFH	Cadmium	0.00	mg/L	7131	SW846	0.0064	3.10	116
03/09/05	MFH	Chromium	0.12	mg/L	7191	SW846	0.1877	5.58	112
03/09/05	MFH	Copper	0.05	mg/L	7211	SW846	0.0757	13.5	119
03/12/05	MFH	Lead	< 0.005	mg/L	7421	SW846	0.0078	3.78	99.0
03/12/05	MFH	Molybdenum	0.13	mg/L	7481	SW846	0.1939	4.55	98.7
03/08/05	MFH	Nickel	0.22	mg/L	7520	SW846	0.3351	0.85	101
03/11/05	MFH	Silver	< 0.010	mg/L	7761	SW846	0.0047	5.07	93.7
03/08/05	MFH	Zinc	0.08	mg/L	7950	SW846	0.1288	0.91	91.0
03/04/05	City	Flow	0.171000	MGD	--	--	--	--	--

A-2-K

Approved by Malcolm F Howell

Malcolm F. Howell
Laboratory Director

ENVIRONMENTAL TESTING GROUP, INC.

1702 East Central • P.O. Box 507 • Bentonville, Arkansas 72712 • (479) 271-7996 • Fax (479) 271-8394

Customer Name:	Danaher	**Date of Report:**	03/11/05	**Control Number:**	0503059
Sample Location:	Grab Sample	**Type of Sample:**	Grab	**Date Received:**	03/04/05 11:15
Sample Date:	03/04/05	**Sample Collected By:**	JHM	**Job No:**	1534
Time of Sample:	10:15	**Delivered to Lab By:**	JHM		

Analysis							*Quality Assurance*	
Date	**By**	**Parameter**	**Concentration**	**Units**	**Method**	**Edition or Ref.**	**RPD**	**MS % Rec**
03/11/05	DAD	Oil & Grease	10.4	mg/L	1664	EPA	4.71	85.0

A-20

Approved by Malcolm F. Howell

Malcolm F. Howell
Laboratory Director

Environmental Testing Group, Inc.
1702 East Central Avenue
Bentonville, AR 72712
Ph: (479) 271-7996 FX: (479) 271-8394

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:
Danaher Tool Group
Gary Young

Phone #:
479-751-8500 x1507

Address:
P.O. Box 149
Springdale, AR 72764

FAX #:
479-751-6914

Project Number:
2112

Project Name:
O+G Grab

Project Location:

Sampler:
X: JHM

Turn-Around:
___ Standard
___ Rush
(surcharges may apply)

A-2

Sample ID	Lab # (Lab use only)	Grab	Composite	Matrix: Water	Soil	Sludge	Other (Specify)	Method Preserved: H_2SO_4	HNO_3	Ice	Non preserved (Iced only)	Fecal Snap Cap	Sampling: Date Sampled	Time Sampled	Analysis Request: Oil & Grease	Other
Grab Sample	0503059	X		X				X					3/4/2005	1015	X	

Relinquished By:	Date	Time	Received By:
Relinquished By:	Date	Time	Received By:
Relinquished By: JHM	Date 3/4/05	Time 1115	Received By Laboratory: WMcClellan

Remarks:

LABORATORY COMMENTS:
Init Lab Temp:

Custody Seals Y N
Bottles Supplied by NETLAB: Y N

Method of Shipment:

Receipt of samples by Environmental Testing Group, Inc. acknowledges acceptance of Standard Terms and Conditions on the reverse side.

SPRINGDALE
WATER UTILITIES

Board of Commission:
Walter L. Turnbow, Chairman
Gary C. George, Vice Chairman
Don L. Gibson, Secretary

k Avenue, P.O. Box 769, Springdale, Arkansas 72765-0769 (501) 751-5751

CHAIN OF CUSTODY RECORD

SAMPLES COLLECTED DURING A 24 HR PERIOD

BEGINNING 03/03/05 0744 HRS TO 03/04/05 0720 HRS

SAMPLE ID/#	TIME COLLECTED	SAMPLE TYPE		METHOD		PRESERVATION	SAMPLERS.
		COMP	GRAB	AUTO	MAN		
050155	0744-0630 03/03-04/05	✓		✓		REF <4°C	JC
050156	0810-0710 03/03-04/05	✓		✓		REF <4°C	JC
050157	0800-0720 03/03-04/05	✓		✓		REF <4°C	JC

LINQUISHED BY:	RECEIVED BY: Josh Weaver	DATE: 03/04/05	TIME: 0735
LINQUISHED BY: Josh Weaver	RECEIVED BY: Joshua Marshall	DATE: 3/4/05	TIME: 0940
LINQUISHED BY:	RECEIVED BY:	DATE:	TIME:
LINQUISHED BY: Joshua Marshall	RECEIVED BY:	DATE: 3/4/05	TIME: 1110

MARKS:

-050155 CINTAS .092050 mgd

- 050157 DANAHER .171 mgd

2112 - 0503058

A-2N

ENVIRONMENTAL TESTING GROUP, INC.

1702 East Central • P.O. Box 507 • Bentonville, Arkansas 72712 • (479) 271-7996 • Fax (479) 271-8394

Customer Name:	Danaher	**Date of Report:**	03/21/05	**Control Number:**	0503120
Sample Location:	Grab Sample	**Type of Sample:**	Grab	**Date Received:**	03/08/05 11:20
Sample Date:	03/08/05	**Sample Collected By:**	GY	**Job No:**	1534
Time of Sample:	10:30	**Delivered to Lab By:**	GY		

Analysis | ***Quality Assurance***

Date	By	Parameter	Concentration	Units	Method	Edition or Ref.	RPD	MS % Rec
03/18/05	MFH	Flashpoint	143.0	Degrees F	SW846-1010	EPA	0.00	--

Purchased 560 gallons in 2004

A-20

Approved by Malcolm F. Howell

Malcolm F. Howell
Laboratory Director

Environmental Testing Group, Inc.
1702 East Central Avenue
Bentonville, AR 72712
Ph: (479) 271-7996 FX: (479) 271-8394

CHAIN OF CUSTODY RECORD AND ANALYSIS REQUEST

Project Manager:
Danaher Tool Group
Gary Young

Phone #:
479-751-8500 x1507

Address:
P.O. Box 149
Springdale, AR 72764

FAX #:
479-751-6914

Project Number:
2112

Project Name:

Project Location:

Sampler:
X: Gary Young

Turn-Around:
___ Standard
___ Rush
(surcharges may apply)

A-2 P

Sample ID	Lab # (Lab use only)	Grab	Composite	Matrix: Water	Soil	Sludge	Solvent	Method Preserved: H_2SO_4	HNO_3	Ice	Non preserved (Iced only)	Fecal Snap Cap	Sampling: Date Sampled	Time Sampled	Analysis Request: Flashpoint	Other
Solvent Sample	503120	X					X				X		3/8/2005	10:30	X	

Relinquished By:	Date	Time	Received By:
[signature]	3-8-05	1120	
Relinquished By:	Date	Time	Received By:
Relinquished By:	Date	Time	Received By Laboratory: [signature]

Remarks:

LABORATORY COMMENTS:
Init Lab Temp:

Custody Seals Y N
Bottles Supplied by NETLAB: Y N

Method of Shipment:

Receipt of samples by Environmental Testing Group, Inc. acknowledges acceptance of Standard Terms and Conditions on the reverse side.

Danaher Tool Group Flow Rate

Date	Time	Location	Initial Reading	Final Reading	Water Usage * 1000			FX
January 2004 Water Flow								
2/9/2004	1:00pm	Main Water	42637000	46410000	3773000	1346080	2426920	1.55
2/9/2004	1:00pm	Boiler Water	2507580	2728620	221040			
2/9/2004	1:00pm	Forge Water	2494330	3009970	515640			
2/9/2004	1:00pm	Heat Treat Water	1478400	1609300	130900			
2/9/2004	1:00pm	Employees	660	29 days	478500			
February 2004 Water Flow								FX
3/9/2004	8:00am	Main Water	46410000	49941000	3531000	1217350	2313650	1.53
3/9/2004	8:00am	Boiler Water	2728620	2964220	235600			
3/9/2004	8:00am	Forge Water	3009970	3507320	497350			
3/9/2004	8:00am	Heat Treat Water	1609300	1759700	150400			
3/9/2004	8:00am	Employees	668	20 days	334000			
March 2004 Water Flow								FX
4/8/2004	10:30am	Main Water	49941000	54038000	4097000	1318480	2778520	1.47
4/8/2004	10:30am	Boiler Water	2964220	3254870	290650			
4/8/2004	10:30am	Forge Water	3507320	3986430	479110			
4/8/2004	10:30am	Heat Treat Water	1759700	1924320	164620			
4/8/2004	10:30am	Employees	668	23 days	384100			
April 2004 Water Flow								FX
5/11/2004	8:30am	Main Water	54038000	58380000	4342000	1401830	2940170	1.48
5/11/2004	8:30am	Boiler Water	3254870	3531360	276490			
5/11/2004	8:30am	Forge Water	3986430	4476400	489970			
5/11/2004	8:30am	Heat Treat Water	1924320	2095590	171270			
5/11/2004	8:30am	Employees	663	28 days	464100			
May 2004 Water Flow								FX
6/8/2004	10:00am	Main Water	58380000	62274000	3894000	1107990	2786010	1.40
6/8/2004	10:00am	Boiler Water	3531360	3761120	229760			
6/8/2004	10:00am	Forge Water	4476400	4798210	321810			
6/8/2004	10:00am	Heat Treat Water	2095590	2301110	205520			
6/8/2004	10:00am	Employees	638	22 Days	350900			
June 2004 Water Flow								
7/12/04	10:00am	Main Water	62274000	67101000	4827000	1276360	3550640	1.36
7/12/04	10:00am	Boiler Water	3761120	4017320	256200			
7/12/04	10:00am	Forge Water	4798210	5075920	277710			
7/12/04	10:00am	Heat Treat Water	0	325800	325800			
7/12/04	10:00am	Employees	641	26 Days	416650			
July 2004 Water Flow								
8/9/04	7:00am	Main Water	67101000	71317000	4216000	1096190	3119810	1.35
8/9/04	7:00am	Boiler Water	4017320	4229490	212170			
8/9/04	7:00am	Forge Water	5075920	5280640	204720			
8/9/04	7:00am	Heat Treat Water	325800	624700	298900			
8/9/04	7:00am	Employees	634	24 Days	380400			
August 2004 Water Flow								
9/9/04	7:00am	Main Water	71317000	76457000	5140000	1311030	3828970	1.34
9/9/04	7:00am	Boiler Water	4229490	4502620	273130			
9/9/04	7:00am	Forge Water	5280640	5557940	277300			
9/9/04	7:00am	Heat Treat Water	624700	938700	314000			
9/9/04	7:00am	Employees	638	28 Days	446600			
September 2004 Water Flow								
10/8/04	7:00am	Main Water	76457000	81060000	4603000	1229640	3373360	1.36
10/8/04	7:00am	Boiler Water	4502620	4734860	232240			
10/8/04	7:00am	Forge Water	5557940	5860340	302400			
10/8/04	7:00am	Heat Treat Water	938700	1231200	292500			
10/8/04	7:00am	Employees	644	25 Days	402500			
October 2004 Water Flow								
11/9/04	7:00am	Main Water	81060000	85811000	4751000	1355560	3395440	1.40
11/9/04	7:00am	Boiler Water	4734860	5011990	277130			
11/9/04	7:00am	Forge Water	5860340	6180620	320280			
11/9/04	7:00am	Heat Treat Water	1231200	1558700	327500			
11/9/04	7:00am	Employees	638	27 Days	430650			
November 2004 Water Flow								
12/9/04	6:00am	Main Water	85811000	90558000	4747000	1399030	3347970	1.42
12/9/04	6:00am	Boiler Water	5011990	5267370	255380			
12/9/04	6:00am	Forge Water	6180620	6585720	405100			
12/9/04	6:00am	Heat Treat Water	1558700	1876700	318000			
12/9/04	6:00am	Employees	647	26 Days	420550			
December 2004 Water Flow								
1/7/05		Main Water	90558000	94067000	3509000	1297560	2211440	1.59
1/7/05		Boiler Water	5267370	5457730	190360			
1/7/05		Forge Water	6585720	7041870	456150			
1/7/05		Heat Treat Water	1876700	2171900	295200			
1/7/05		Employees	647	22 Days	355850			

Attachment A-3

Springdale Water Utilities

526 Oak Avenue P.O. Box 769 Springdale, Arkansas 72765-0769 (479) 751-5751

05-02R
INDUSTRIAL USER PERMIT

In accordance with the provisions of Sewer Use Ordinance #2842

Danaher Tool Group
1609 N. Old Missouri Rd.
Springdale, AR

is hereby authorized to discharge industrial wastewater from the above identified facility into Springdale Water Utilities' sewer system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

This permit shall become effective on June 1, 2008, and shall expire at midnight on May 1, 2010.

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after this expiration date an application must be filed for reissuance of this permit in accordance with the requirements of Sewer Use Ordinance #2842, prior to the expiration date.

By: _____
Rene Langston
Executive Director

Issued this 28TH day of May, 2008

PART 1 - EFFLUENT LIMITATIONS

A. During the period of June 1, 2008 through May 1, 2010, the permittee is authorized to discharge wastewater to Springdale Water Utilities' sewer system from the outfall listed below.

Description of outfall:

Outfall	Description
001	Effluent flow measuring device port located on south wall of tank room on north end of main building.

B. During the period of June 1, 2008 through May 1, 2010 the discharge from Outfall 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with all other applicable regulations and standards contained in Sewer Use Ordinance #2842. Effluent from this outfall consists of all treated and untreated process and nonprocess discharges from the Danaher Tool Group facility in Springdale, AR. Mass limits are calculated based upon an average daily process water flow of 0.250 Million Gallons per Day (MGD). Although Danaher Tool Group, Inc. is not limited to this level of water usage, this does limit the average pounds per day that may be discharged.

Effluent Limitations

Parameter	Daily max. (mg/L)	Monthly ave. (mg/L)	(lb/day)
BOD	@	-----	-----
TSS	Report	Report	Report
Oil & Grease	150	150	313
Phosphorus (total)	Report	Report	Report
Cyanide (total)	1.20	0.65	1.36
Cadmium (total)	0.69	0.43	0.54
Chromium (total)	2.77	1.71	3.57
Copper (total)	3.38	2.07	4.50
Lead (total)	0.69	0.43	0.90
Nickel (total)	3.98	2.38	4.96
Silver (total)	0.43	0.24	0.50
Zinc (total)	2.61	1.48	3.21
Molybdenum (total)	Report	Report	Report
pH	5.0 - 11.0*	-----	-----
T. Toxic Organics	2.13	-----	-----
Flow (MGD)	Report	Report	-----

@No "slug" discharge as defined by City Ordinance.
*The pH shall not be less than 5.0 standard units nor greater than 11.0 standard units at any time.

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

1. General Prohibitions: No person shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass through or interference. These general prohibitions apply to all users of the POTW whether or not they are subject to categorical pretreatment standards or any other Federal, State, or local pretreatment standards or requirements.

2. Specific Prohibitions: No person shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

(a) Pollutants which create a fire or explosive hazard in the POTW, including, but not limited to, wastestreams with a closed-cup flashpoint of less than 140°F (60°C) using the test methods specified in 40 C.F.R. 261.21;

(b) Wastewater having a pH less than 5.0 or more than 11.0, or otherwise causing corrosive structural damage to the POTW or equipment;

(c) Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in interference;

(d) Pollutants, including oxygen-demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;

(e) Wastewater having a temperature greater than 150°F (65°C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104°F (40°C);

(f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;

(g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

(h) Trucked or hauled pollutants, except at discharge points designated by the Control Authority;

(i) Any liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or hazard to life, or to prevent entry into the sewers for maintenance or repair;

(j) Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating the POTW's NPDES permit;

(k) Wastewater containing any radioactive wastes or isotopes except in compliance with applicable Federal or State regulations and approved by the Control Authority;

(l) Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, condensate, deionized water, noncontact cooling water, or unpolluted water;

(m) Sludges, screenings, or other residues from the pretreatment of industrial wastes;

(n) Medical wastes which are deemed by the Control Authority to have the potential to cause acute worker health or safety problems;

(o) Wastewater causing, alone or in conjunction with other sources, the POTW to violate its NPDES permit or the treatment plant's effluent to fail a toxicity test.

(p) Any substance which may cause the POTW's effluent or other product of the POTW such as residues, biosolids (sludges) or scums, to be unsuitable for normal landfill/land application, reclamation or reuse, or to interfere with the reclamation process;

(q) Detergents, surface-active agents, or other substances which may cause excessive foaming in the POTW;

(r) Any material into a manhole through its top unless specifically authorized by the Control Authority.

(s) Water or wastewater into which Anhydrous ammonia has been leaked or "bled off", or any other discharge from an Anhydrous ammonia coolant source.

(t) Any other substance, material, water, or waste, if it appears likely in the opinion of the Executive Director that such wastes can harm either the sewers, sewage treatment process, or equipment, have an adverse effect on the receiving stream, or can otherwise endanger life, limb, public property, or constitute a nuisance.

(3) Pollutants, substances, or wastewater prohibited by this section shall not be processed or stored in such a manner that they could be discharged to the POTW.

PART 2 - MONITORING REQUIREMENTS

A. From the period beginning on June 1, 2008 through May 1, 2010, the permittee shall monitor Outfall 001 for the following:

Parameter (units)	Sample Location	Measurement Frequency	Sample Type
TSS (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Oil & Grease (mg/L)	(1)	1/Month	Grab (3)
Phosphorus (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Cyanide (total) (mg/L)	(1)	2/Year (5)	Grab (3)
Cadmium (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Chromium (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Copper (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Lead (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Nickel (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Silver (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Zinc (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Molybdenum (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
pH (pH units)	(1)	Daily	Grab (3)
T. Toxic Organics	(1)	1/Year (4)	24-hr. Comp. (2)
Flow	(1)	Daily	Totalizer (6)

(1) Refer to the outfall location description listed in Part 1 of this permit.

(2) A 24-hr. Comp. shall consist of flow-weighted samples collected for a period of 24 hours. A minimum of 6 samples must be collected during the sampling period, but 24 or more samples may be collected. The samples shall be flow-proportioned, either automatically or manually, based on the flow measurements obtained from the permittee's effluent flow measuring device.

(3) Refer to Part 2 – Monitoring Requirements revision put into effect on December 1, 2008.

(4) Monitoring for Total Toxic Organics shall be scheduled by Springdale Water Utilities without notice on an annual basis. The industry shall be billed for said sampling and analysis.

(5) Cyanide shall be monitored once during December through May and once during June through November. If a production or pretreatment process using or generating cyanide is put into place, the permit shall be modified to include no less than monthly monitoring for cyanide.

(6) Effluent flow measuring device shall be calibrated no less than once weekly, and record of calibration will be provided to POTW on request. Calibration must show no more than 10% deviation from actual flow.

B. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

PART 3 - REPORTING REQUIREMENTS

A. Monitoring Reports

Monitoring results obtained shall be summarized and reported on an Industrial User Monitoring Report Form. Monitoring and reporting shall be on a monthly basis. The report should indicate the nature and concentration of all pollutants in the effluent which are regulated by the limits set forth in Part 1, Section B, and include maximum and average daily flows. The reports are due on the 10th day of the month following the month being reported. For example, the June, 2008 report is due no later than July 20, 2008. To be considered on time, the report must either be received on or be postmarked by that date. A copy of the pH testing and the analytical report form showing test results shall be attached to the Industrial User Monitoring Report Form. Also attached shall be a copy of the certification statement found in Section D. 5. c. of this permit, signed and dated by an authorized signee.

The Permittee shall, at least quarterly, measure all non-process water usage as well as total water usage. The difference between total water usage and non-process water usage shall be the "process water usage". All wastewater analysis results of the combined process and non-process wastestream shall be adjusted by the following formula:

$$Cr = Cm \times \frac{Ft}{Ft - Fnp}$$

Where: Cr = reported concentration value, mg/L
Cm = measured concentration value, mg/L
Ft = total water usage, gallons per day
Fnp = non-process water usage, gallons per day

B. If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of such monitoring shall be included in the calculation and results shall be reported in the monthly report and submitted to Springdale Water Utilities. Such increased monitoring frequency shall also be indicated on the monthly report.

Springdale Water Utilities

526 Oak Avenue P.O. Box 769 Springdale, Arkansas 72765-0769 (479) 751-5751

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jim Underwood
Danaher Tool Group
1609 N. Old Missouri Rd.
Springdale, AR 72764

RE: Modification of Industrial User Permit to Danaher Tool Group, Springdale, AR, by Springdale Water Utilities.

Permit No. 05-02R

Dear Mr. Underwood

Your request for revision of Discharge Permit No. 05-02 has been reviewed and processed in accordance with Sewer Use Ordinance #2842.

The enclosed issued permi ...naher Tool Group facility located at 16 ...ater Utilities' sewer system. All dischar ...shall be in accordance with the terms

If you wish to appeal or ch ...r conditions imposed in this permit, a p ...nce with the requirements of Sewer Us ...tion date.

REFER TO BACK PAGES
OF OCT. 02

By: _____
Rene Langston
Executive Director

Issued this 28TH day of

Springdale Water Utilities

526 Oak Avenue P.O. Box 769 Springdale, Arkansas 72765-0769 (479) 751-5751

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John LaIcona
Danaher Tool Group
1609 N. Old Missouri Rd.
Springdale, AR 72764

RE: Issuance of Industrial User Permit to Danaher Tool Group, Springdale, AR, by Springdale Water Utilities.

Permit No. 05-02

Dear Mr. LaIcona:

Your request for issuance of Discharge Permit No. 05-02 has been reviewed and processed in accordance with Sewer Use Ordinance #2842.

The enclosed issued permit, #05-02, covers the wastewater discharged from the Danaher Tool Group facility located at 1609 N. Old Wire Rd. in Springdale, AR into Springdale Water Utilities' sewer system. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

If you wish to appeal or challenge any effluent limitations, pretreatment requirements, or conditions imposed in this permit, a petition shall be filed for reissuance of this permit in accordance with the requirements of Sewer Use Ordinance #2842 a minimum of 90 days prior to the expiration date.

By: _____
Rene Langston
Executive Director

Issued this 27th day of April, 2005

Springdale Water Utilities
526 Oak Avenue P.O. Box 769 Springdale, Arkansas 72765-0769 (479) 751-5751

05-02
INDUSTRIAL USER PERMIT

In accordance with the provisions of Sewer Use Ordinance #2842

Danaher Tool Group
1609 N. Old Missouri Rd.
Springdale, AR

is hereby authorized to discharge industrial wastewater from the above identified facility into Springdale Water Utilities' sewer system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit.

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

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

The permittee shall not discharge after the date of expiration. If the permittee wishes to continue to discharge after this expiration date an application must be filed for reissuance of this permit in accordance with the requirements of Sewer Use Ordinance #2842, prior to the expiration date.

By: _____
Rene Langston
Executive Director

Issued this 27th day of April, 2005

PART 1 - EFFLUENT LIMITATIONS

A. During the period of May 1, 2005 through May 1, 2010, the permittee is authorized to discharge wastewater to Springdale Water Utilities' sewer system from the outfall listed below.

Description of outfall:

Outfall	Description
001	Sampling manhole located west of the west side of the Danaher production facility located on Old Missouri Rd. in Springdale, AR.

B. During the period of May 1, 2005 through May 1, 2010 the discharge from Outfall 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with all other applicable regulations and standards contained in Sewer Use Ordinance #2842. Effluent from this outfall consists of all treated and untreated process and nonprocess discharges from the Danaher Tool Group facility in Springdale, AR. Mass limits are calculated based upon an average daily process water flow of 0.250 Million Gallons per Day (MGD). Although Danaher Tool Group, Inc. is not limited to this level of water usage, this does limit the average pounds per day that may be discharged.

Effluent Limitations

Parameter	Daily max. (mg/L)	Monthly ave. (mg/L)	(lb/day)
BOD	@	-----	-----
TSS	Report	Report	Report
Oil & Grease	150	150	313
Phosphorus (total)	Report	Report	Report
Cyanide (total)	1.20	0.65	1.36
Cadmium (total)	0.69	0.43	0.54
Chromium (total)	2.77	1.71	3.57
Copper (total)	3.38	2.07	4.50
Lead (total)	0.69	0.43	0.90
Nickel (total)	3.98	2.38	4.96
Silver (total)	0.43	0.24	0.50
Zinc (total)	2.61	1.48	3.21
Molybdenum (total)	Report	Report	Report
pH	5.0 - 11.0*	-----	-----
T. Toxic Organics	2.13	-----	-----
Flow (MGD)	Report	Report	-----

@No "slug" discharge as defined by City Ordinance.
*The pH shall not be less than 5.0 standard units nor greater than 11.0 standard units at any time.

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

1. General Prohibitions: No person shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass through or interference. These general prohibitions apply to all users of the POTW whether or not they are subject to categorical pretreatment standards or any other Federal, State, or local pretreatment standards or requirements.

2. Specific Prohibitions: No person shall introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

(a) Pollutants which create a fire or explosive hazard in the POTW, including, but not limited to, wastestreams with a closed-cup flashpoint of less than 140°F (60°C) using the test methods specified in 40 C.F.R. 261.21;

(b) Wastewater having a pH less than 5.0 or more than 11.0, or otherwise causing corrosive structural damage to the POTW or equipment;

(c) Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in interference;

(d) Pollutants, including oxygen-demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;

(e) Wastewater having a temperature greater than 150°F (65°C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104°F (40°C);

(f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;

(g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

(h) Trucked or hauled pollutants, except at discharge points designated by the Control Authority;

(i) Any liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or hazard to life, or to prevent entry into the sewers for maintenance or repair;

(j) Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent, thereby violating the POTW's NPDES permit;

(k) Wastewater containing any radioactive wastes or isotopes except in compliance with applicable Federal or State regulations and approved by the Control Authority;

(l) Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, condensate, deionized water, noncontact cooling water, or unpolluted water;

(m) Sludges, screenings, or other residues from the pretreatment of industrial wastes;

(n) Medical wastes which are deemed by the Control Authority to have the potential to cause acute worker health or safety problems;

(o) Wastewater causing, alone or in conjunction with other sources, the POTW to violate its NPDES permit or the treatment plant's effluent to fail a toxicity test.

(p) Any substance which may cause the POTW's effluent or other product of the POTW such as residues, biosolids (sludges) or scums, to be unsuitable for normal landfill/land application, reclamation or reuse, or to interfere with the reclamation process;

(q) Detergents, surface-active agents, or other substances which may cause excessive foaming in the POTW;

(r) Any material into a manhole through its top unless specifically authorized by the Control Authority.

(s) Water or wastewater into which Anhydrous ammonia has been leaked or "bled off", or any other discharge from an Anhydrous ammonia coolant source.

(t) Any other substance, material, water, or waste, if it appears likely in the opinion of the Executive Director that such wastes can harm either the sewers, sewage treatment process, or equipment, have an adverse effect on the receiving stream, or can otherwise endanger life, limb, public property, or constitute a nuisance.

(3) Pollutants, substances, or wastewater prohibited by this section shall not be processed or stored in such a manner that they could be discharged to the POTW.

PART 2 - MONITORING REQUIREMENTS

A. From the period beginning on May 1, 2000 through May 1, 2005, the permittee shall monitor Outfall 001 for the following:

Parameter (units)	Sample Location	Measurement Frequency	Sample Type
TSS (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Oil & Grease (mg/L)	(1)	1/Month	Grab (3)
Phosphorus (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Cyanide (total) (mg/L)	(1)	2/Year (5)	Grab (3)
Cadmium (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Chromium (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Copper (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Lead (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Nickel (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Silver (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Zinc (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
Molybdenum (total) (mg/L)	(1)	1/Month	24-hr. Comp. (2)
pH (pH units)	(1)	Daily	Grab (3)(6)
T. Toxic Organics	(1)	1/Year (4)	24-hr. Comp. (2)

(1) Refer to the outfall location description listed in Part 1 of this permit.

(2) A 24-hr. Comp. shall consist of discrete grab samples collected at regular intervals for a period of 24 hours. A minimum of 6 samples must be collected during the sampling period, but 24 or more samples may be collected. The samples shall be flow-proportioned based on the flow measurements obtained from the permittee's water meter.

(3) A grab sample shall consist of one sample collected at the highest flow for that day.

(4) Monitoring for Total Toxic Organics shall be scheduled by Springdale Water Utilities without notice on an annual basis. The industry shall be billed for said sampling and analysis.

(5) Cyanide shall be monitored once during December through May and once during June through November. If a production or pretreatment process using or generating cyanide is put into place, the permit shall be modified to include no less than monthly monitoring for cyanide.

(6) For reporting purposes, pH shall be analyzed daily, at the time of highest flow, and the highest and lowest pH values for the month shall be reported on the monthly report.

B. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

PART 3 - REPORTING REQUIREMENTS

A. Monitoring Reports

Monitoring results obtained shall be summarized and reported on an Industrial User Monitoring Report Form. Monitoring and reporting shall be on a monthly basis. The report should indicate the nature and concentration of all pollutants in the effluent which are regulated by the limits set forth in Part 1, Section B, and include maximum and average daily flows. The reports are due on the 10th day of the month following the month being reported. For example, the May, 2005 report is due no later than June 20, 2005. To be considered on time, the report must either be received on or be postmarked by that date. A copy of the daily pH testing and the analytical report form showing test results shall be attached to the Industrial User Monitoring Report Form. Also attached shall be a copy of the certification statement found in Section D. 5. c. of this permit, signed and dated by an authorized signee.

The Permittee shall, at least quarterly, measure all non-process water usage as well as total water usage. The difference between total water usage and non-process water usage shall be the "process water usage". All wastewater analysis results of the combined process and non-process wastestream shall be adjusted by the following formula:

$$Cr = Cm \times \frac{Ft}{Ft - Fnp}$$

Where: Cr = reported concentration value, mg/L
Cm = measured concentration value, mg/L
Ft = total water usage, gallons per day
Fnp = non-process water usage, gallons per day

B. If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of such monitoring shall be included in the calculation and results shall be reported in the monthly report and submitted to Springdale Water Utilities. Such increased monitoring frequency shall also be indicated on the monthly report.

C. Automatic Resampling

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

a. Inform Springdale Water Utilities of the violation within 24 hours; and

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

D. Accidental Discharge/Noncompliance Report

1. The permittee shall notify Springdale Water Utilities immediately upon the occurrence of an accidental discharge of substances prohibited by Sewer Use Ordinance #2842. Springdale Water Utilities should be notified by telephone at 756-3659 at all times, including evenings, weekends, and holidays. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken.

Within five days following an accidental discharge, the permittee shall submit to Springdale Water Utilities a detailed written report. The report shall specify:

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

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

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

E. All reports required by this permit shall be submitted to the Springdale Water Utilities at the following address:

Springdale Water Utilities
attn: Pretreatment Manager
P.O. Box 769
Springdale, AR 72765

PART 4 - SPECIAL CONDITIONS

SECTION 1 - REOPENER CLAUSE

A. This permit will be reopened and modified with more stringent requirements resulting from Total Phosphorus limitations, agreements, or voluntary reduction strategies between Springdale Water Utilities and any other agency or organization.

B. This permit will be reopened and modified with any applicable more stringent requirement resulting from Springdale Water Utilities reevaluation of its local limits.

C. This permit will be reopened and modified with any more stringent requirements developed by Springdale Water Utilities as are necessary to ensure POTW compliance with applicable sludge management requirements promulgated by the USEPA (40 CFR 503).

D. This permit will be reopened and modified with any more stringent requirements resulting from new effluent, sludge discharge, or other permits issued to the POTW by the USEPA or the Arkansas Department of Environmental Quality (ADEQ).

SECTION 2 - COMPLIANCE SCHEDULE REPORTING

A. Compliance Schedule: n/a

B. No later than 14 days following each date in any compliance schedule, the permittee shall submit to Springdale Water Utilities a progress report including, at a minimum, whether or not it complied with the increment of progress to be met on such date, and, if not, the date on which it expects to comply with the increment of progress, the reasons for delay, and the steps being taken to return the project to the schedule established.

PART 5 - STANDARD CONDITIONS

SECTION A. GENERAL CONDITIONS AND DEFINITIONS

1. Severability

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

2. Duty to Comply

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

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Action

This permit may be modified, revoked, and reissued, or terminated for good causes including, but not limited to, the following:

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

b) Material or substantial alterations or additions to the discharger's operation which were not covered in the effective permit;

c) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge;

d) Information indicating that the permitted discharge poses a threat to Springdale Water Utilities' collection and treatment systems, POTW, personnel, or the receiving waters;

e) Violation of any terms or conditions of this permit;

f) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

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

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

5. Property Rights

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

6. Limitation on Permit Transfer

Industrial user permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of Springdale Water Utilities. In the event of sale, the permittee must inform the purchaser of all responsibilities and obligations under this permit.

7. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application must be submitted at least 90 days before the expiration date of this permit.

8. Dilution

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

9. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the publicly owned treatment works resulting from noncompliance with any effluent limitation specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. The permittee shall immediately notify Springdale Water Utilities of slug discharges, spills that may enter the public sewer, or any other significant changes in operations, wastewater characteristics, and constituents.

10. Definitions

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

b) POTW--Publicly owned treatment works. For this permit, Springdale Water Utilities' Pollution Control Facility.

c) Composite Sample--A combination of individual samples obtained at regular intervals over a specified time period. The volume of each individual sample may be either proportional to the flow rate during the sample period (flow composite) or constant and collected at equal time intervals during composite period (time composite). Flow composites will be required by this permit.

d) Grab Sample--An individual sample collected in less than 15 minutes, without regard to flow or time.

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

f) Cooling Water--

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

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

g) Monthly Average--Other than for Fecal coliform bacteria, is the arithmetic mean of the values for effluent samples collected over a period of 30 consecutive days. The monthly average for Fecal coliform bacteria is the geometric mean of the value of the effluent samples collected over a period of 30 consecutive days.

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

i) Bypass--Means the intentional diversion of wastes from any portion of a treatment or pretreatment facility.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

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

2. Duty to Halt or Reduce Activity

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

3. Bypass of Permittee's Industrial Pretreatment Facilities

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

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

c) Notification of bypass:

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

Springdale Water Utilities
attn: Pretreatment Manager
P.O. Box 769
Springdale, AR 72765

(2) Unanticipated bypass. The permittee shall immediately notify Springdale Water Utilities verbally at 756-3659, and submit a written notice to the POTW within 5 days. This report shall specify:

(i) A description of the bypass, and its cause, including its duration;
(ii) Whether the bypass has been corrected; and
(iii) The steps being taken or to be taken to reduce, eliminate, and prevent a recurrence of the bypass.

4. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

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

2. Flow Measurements

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

3. Analytical Methods to Demonstrate Continued Compliance

Sampling and analysis of these samples shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto.

4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using approved test procedures or as specified in this permit, the results of this monitoring shall be included in the permittee's self-monitoring reports.

5. Inspection and Entry

The permittee shall allow Springdale Water Utilities, 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 the permit;

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

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

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

e) Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under the permit, could originate.

6. Retention of Records

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

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

7. Record Contents

Records of sampling information shall include:

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

b) Who performed the sampling or measurements;

c) The date(s) analyses were performed;

d) Who performed the analyses;

e) The analytical techniques or methods used; and

f) The results of such analyses.

8. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under criminal laws proceedings as well as being subjected to injunctive relief.

SECTION D. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

Each user must notify the Control Authority of any planned significant changes to the user's operations or system which might alter the nature, quality or volume of its wastewater at least thirty (30) days before the change. **In addition to any other general changes, any activity that increases the amount of Total Phosphorus loading or concentration discharged by the user is specifically considered a significant change.**

(a) The Control Authority may require the user to submit such information as may be deemed necessary to evaluate the changed condition, including the submission of a wastewater discharge permit application under this Code.

(b) The Control Authority may issue a wastewater discharge permit under this Code or modify an existing wastewater discharge permit under this Code in response to changed conditions or anticipated changed conditions.

(c) For purposes of this requirement, significant changes include, but are not limited to, flow changes of twenty percent (20%) or greater, and the discharge of any previously unreported pollutants.

2. Anticipated Noncompliance

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

3. Automatic Resampling

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

a. Inform Springdale Water Utilities of the violation within 24 hours; and

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

4. Duty to Provide Information

The permittee shall furnish to Springdale Water Utilities, within a reasonable time, any information which Springdale Water Utilities may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to Springdale Water Utilities, upon request, copies of records required to be kept by this permit.

5. Signatory Requirements

All applications, reports, or information submitted to Springdale Water Utilities shall be signed and certified.

a) All permit applications shall be signed:

(1) For a corporation: by a corporate officer or other persons performing a similar policy or decision- making function for the corporation;

(2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or

(3) For a government entity: by the administrator, chairman, director, or principal executive responsible for operations at the facility.

b) All applications, correspondence, reports, and self-monitoring reports may be signed by a duly authorized representative of the person described above. A person is a duly authorized representative only if:

(1) The authorization is made in writing by a person described above;

(2) The authorization specified either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, superintendent, or position of equivalent responsibility. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and

c) Certification. Any person signing a document under this section shall make the following certification:

"I certify under the 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 fines and imprisonment for knowing violation."

d) Any change in signatures shall be submitted to Springdale Water Utilities in writing within 30 days after the change.

6. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or with Article IV of Sewer Use Ordinance #2842 shall inform Springdale Water Utilities immediately upon the first awareness of the commencement of the upsets at 756-3659, day or night.

A written follow-up report of the upset shall be filed by the permittee with Springdale Water Utilities within five days. The report shall specify:

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

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

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

The report must also demonstrate that the pretreatment facility was being operated in a prudent and workmanlike manner.

A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations attributable to the upset event.

7. Annual Publication

A list of all industries which were deemed to be Significantly Noncompliant with Springdale Water Utilities' Industrial Pretreatment Program during the twelve (12) previous months starting December 1 shall be annually published by Springdale Water Utilities in the largest daily newspaper within its service area.

8. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from criminal penalties for noncompliance under Sewer Use Ordinance #2842.

9. Penalties for Violation of Permit Conditions

Sewer Use Ordinance #2842 provides that any person who violates a permit condition or implementation is subject to a criminal penalty of up to $1000.00 per day of such violation.

10. Recoveries of Costs Incurred

In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or Sewer Use Ordinance #2842 or causing damage to or otherwise inhibiting Springdale Water Utilities wastewater disposal system shall be liable to Springdale Water Utilities for any expense, loss, or damage caused by such violation or discharge. Springdale Water Utilities shall bill the permittee for the costs incurred by Springdale Water Utilities for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation of Sewer Use Ordinance #2842.

SECTION E. SPECIAL CONDITIONS

1. Voluntary Total Phosphorus Reduction

It is requested that the permittee voluntarily implement and maintain strategic process control initiatives that would reduce the average Total Phosphorus discharged. It is recommended that the permittee design a management plan that would incorporate best management practices (BMPs) and alternative performance strategies in order to achieve the environmental goal of phosphate reduction. The plan would include specific measures to determine whether or not implementation procedures are achieving the performance goal.

If the permittee elects to establish a voluntary Total Phosphorus reduction performance goal, it is recommended that the permittee submit a summary of the management plan and subsequent data that would verify the permittee is meeting the performance goal.

Addendum to all Industrial User Permits Issued by Springdale Water Utilities
Effective November 1, 2006

Part 5

Section E. 2. Slug Control Plan

"Streamlining the General Pretreatment Regulations for Existing and New Sources of Pollution: Final Rule", published in the Federal Register on October 14, 2005, requires that POTWs incorporate slug control requirements into their SIU control mechanisms (permits). In accordance with this, if the Permittee is required by the POTW, either currently or during the effective dates of this permit, to have a written slug control plan, that plan is incorporated herein by reference. A written copy of the plan shall then be attached to both the Permittee's copy and the POTW file copy of this permit.

NOV 2 8 2006

REVIEWED AND APPROVED 11/28/06

DANAHER
TOOL GROUP

1609 N Old Missouri Rd
Springdale, AR 72764
(479) 751-8500

SPILL PREVENTION

CONTROL &

COUNTERMEASURES

PLAN

ORIGINAL:

REVISED: 11/10/06
GENERAL UPDATE

A-3cc

DANAHER
TOOL GROUP

Introduction:

It is the intent of the spill prevention program to keep any undesirable or unexpected releases of chemicals out of the sanitary sewer or other waterway(s). When a chemical is spilled, a plan should be in place, which enables anyone around the spill to react quickly and properly to neutralize, absorb or otherwise render the chemical incapable of doing damage or getting into the sewer.

General:

This spill prevention program procedure will explain how to isolate the various chemicals by their functional properties (i.e. acid, base etc.) as they are received and then explain how to keep them isolated once in storage. It will further describe what actions to take should a spill occur while in storage. Finally the transfer of chemicals to the process where used will be discussed as will action to be taken in the event of a spill or disposal of a solution or tank.

Specifics of Plan:

I. Chemical Storage Areas

A. The hazardous chemicals used and stored in the manufacturing building include oils and coolants, cleaners, acids, caustics and plating solutions. Storage containers include drums, totes, open top storage tanks and closed storage tanks. Although the sewers are within reasonable proximity of these storage areas, the sewer connections are either below concrete or have a closed standpipe, which will prevent material from entering the sewer. Open floor drains lead to the on-site Waste Water Treatment Plant. Trenches, dykes and spill containment platforms or structures are used for bulk containers.

B. Attachment one is a list of all Hazardous Materials (w/MSDS) the facility and groups the chemicals by Subplant (location).

C. All chemicals should be transferred to the end use area by lift truck or drum dolly, in the upright position. If a container is not properly capped, etc. it should never be moved from the storage area

D. In the event of a spill, every effort should be made to quickly clean up the chemical. Follow the On-Site Chemical Release Scenarios and:
   1. Alert supervision if possible
   2. Put on personal protective clothing
   3. Use absorbent floor dry to dyke the spill
   4. If necessary, set up a pump and pump all the liquid possible into a mobile (empty) tote compatible with the chemical.
   5. If the spill is acidic, use lime (if available) to neutralize and sweep up.

E. Any spilled material except oil can be treated in waste treatment, depending on volume. If the volume is too great or if the material is oil, a waste disposal vendor must be called in to take the entire contents. The plant EHS Manager with Sr. Process Engineer should make all decisions on how to treat the spilled material and whether or not the material should be pickup up by an outside vendor for disposal.

F. If the spilled material should, for any reason, get into the city sewer, the City of Springdale must be called immediately. The City Sewer Department phone number is 756-3659 (24 hr) and alert anyone who answers your call of the nature, quantity, volume, type, time and countermeasures of the spill to the City Sewer System.

II. Chemical Loading and Unloading

A. Chemicals will always be unloaded at the receiving dock on the west side of the building. A spill in this location could travel outside the building. Quick response is required. Using the same spill response procedures, discussed above. The spill must be rendered dry enough to load into a drum or hopper and taken to waste treatment for disposal or treatment.

B. Chemicals should not be stored in the Dock area and must be quickly moved to the appropriate storage area!

III. Process Tanks

A. Process tanks are filled with solutions of either acid or caustic material, which may contain nickel, chromium, tin or Copper. Since these are only on the plating side of the building and since any spill will be picked up in the floor trenches and transferred to waste treatment, this special case is separated.

B. All spills around the process tanks will enter the floor trenches by gravity and be automatically pumped into the waste treatment Tanks for treatment. Should the trenches overflow or should the main process tanks have a leak, it may be necessary to use the absorbent floor dry dykes, in addition to pumping into the waste treatment system. If a process tank were to begin leaking it is necessary to shut off all plating rinses and capture this concentrated solution for batch treatment.

C. If the plating trenches should overflow, follow the same spill response procedures as above.

IV. Removing Process Tanks from Service

A. In the event that a tank is to removed from service, the following should be done:

1. Empty the tank content into drains or totes (compatible with the chemical). Treat the tank contents in Wastewater Treatment or arrange for offsite treatment and disposal.
2. Leach the tank to be removed from service and when finished transfer the liquid to the same place as the solution originally in the tank.
3. Triple Rinse the tank and associated paraphernalia. Once the tank is empty and clean (this decision to be made by the HR Manager with the Sr. Process Engineer) it can be hauled to the scrap yard or landfill.

DANAHER
TOOL GROUP

V. General Housekeeping and Monthly Inspections

A. Housekeeping is of the utmost importance where metal finishing work is done. The work and storage areas must be kept clean and in an orderly fashion in order to be safe. At a minimum, the floors must be washed down once per week and the area cleaned up.

B. Empty containers must be triple rinsed, returned to the empty container area and picked up by the supplier ASAP.

C. Monthly inspections of all areas should be made. Inspection should include the following:

1. Any tanks leaking?
2. Are there any spills on floors, which must be cleaned up?
3. Is all of the waste treatment system functional?
4. Does sufficient absorbent material exist or should more be ordered?
5. Are there any conditions found which might contribute towards a spill?
6. Record any spills/drips/leaks on a plant Spill Report (Environmental Incident Report)

The results of these inspections should be discussed with Management supervision and team members. Action must be taken to quickly correct any deficiencies.

Gary Young

Prepared By: Gary Young
Environmental Technician

REVIEWED AND APPROVED 11/28/06

NOV [illegible] 2006

ARKANSAS OPERATIONS
1609 North Old Missouri Rd
Springdale, AR 72764
(479) 751-8500

DANAHER TOOL GROUP

November 10, 2006

Jennifer Enos
Springdale Water Department
PO Box 769
Springdale, AR 72764

Dear Jennifer:

Enclosed is Danaher Tool Group, Inc.'s Toxic Organic Management Plan as required by EPA regulations listed in 40 CFR Part 403. It is Danaher Tool Group, Inc.'s policy to fully comply with all local, state and federal regulations.

Danaher Tool Group will continue to look for ways in which we can eliminate all regulated toxic organic chemicals from our facility. We will also continue to test our waste water for elements regulated by our waste water permit and will scan for toxic organics on an annual basis. All tests will be completed using EPA approved methods. This toxic organic management plan will be updated if any process changes or test results warrant its change.

Danaher Tool Group intends to cooperate with the City of Springdale and any regulatory agencies to facilitate compliance with all regulations. If I can be of further assistance, please call me at (479) 751-8500

Sincerely,

Gary Young
Environmental Technician

A-344

Toxic Organic Management Plan

November 10, 2006

A-3ii

ARKANSAS OPERATIONS
1609 North Old Missouri Rd
Springdale, AR 72764
(479) 751-8500

DANAHER TOOL GROUP

I. Description of Facilities and Solvent Use

A. Process Description

Danaher Tool Group, Inc, Springdale Operations, manufactures mechanics hand tools. These include various styles of wrenches and breaker bars. Raw materials include alloy steel and zinc. Processes used include forging, die casting, metal removal, heat treating, washing, electroplating and assembly.

The primary sources of process water are the parts washing and electroplating. Other sources are cooling tower overflow and boiler blow down. Wastewater from the electroplating operation is treated prior to discharge by reduction, precipitation, filtration and neutralization. The bearing cooling process in heat treat contains no chemicals therefore, treatment is not necessary and the water is directly discharged to the city sewer.

B. Identification of toxic organic chemicals used in plant and entering plant waste waters

1. Chemicals containing toxic organics or suspected of containing toxic organics.

After review of the processes used at Danaher Tool Group, Inc, and review of all MSDS's for this facility, three suspect chemicals were identified, these are:

Chemical	Contains
Black Magic	1,1,1-Trichloroethane 60% Methyl Chloride 10%
Lectra Clean	Trichloroethylene 99%
Methylene Chloride	Methylene Chloride 100%

The following is a description of each chemical; it's use, and approximate annual usage.

Black Magic - Lubricant used to coat chains that contains 1,1,1-Trichloroethane 60% and Methyl Chloride 10%. The contents are held in an aerosol can and the usage is approximately 12 cans per year. This chemical is not used in processing and is not disposed to wastewater.

Lectra Clean - Cleaner used for cleaning electrical connections. This product contains Trichloroethylene 99%. The annual usage for this product is approximately 24- 12 fluid ounce cans. This chemical is not used in processing and is not disposed to wastewater.

Methylene Chloride – Used to degrease parts, this product is 99.5% Methylene Chloride. The annual usage for this product is approximately 5 gallons. This chemical is not used in processing and is not disposed to wastewater.

2. Chemical analysis of treated wastes

Samples are taken from the treated wastewaters of this plant on a regular basis and tested annually for toxic organics regulated under the metal finishing categorical pretreatment standards. No toxic organics have been detected. Attached is a copy of the most recent laboratory report.

II. Description of Control Options Explored

Danaher Tool Group, Inc is committed to a "no solvent" program that has as it's goal to eliminate all solvents that contain toxic organics from plant use. We are currently contacting the manufacturers of the products that contain toxic organics in an effort to substitute non-regulated products for those listed in this plan.

III. Toxic Organic Management Plan

Danaher Tool Group, Inc believes that all of its toxic organic substances used can be prevented from discharge to the sewer. This will be accomplished by vigorously pursuing a "no solvent" program and a program that prohibits sewer disposal of any untreated solvent containing waste.

IV. Certification

"Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the waste waters has occurred since filing of the last report. I further certify that this facility is implementing this toxic organic pollutant management plan submitted to the Control Authority on November 30, 2006."

Gary Young
Environmental Technician
Springdale Operations
(479) 751-8500

Revision to all Industrial User Permits Issued by Springdale Water Utilities
Effective December 1, 2007

Part 2 – MONITORING REQUIREMENTS

Grab Samples

"Streamlining the General Pretreatment Regulations for Existing and New Sources of Pollution: Final Rule", published in the Federal Register on October 14, 2005, requires that "a minimum of four grab samples be taken in all instances to measure pH, cyanide, total phenolics, oil and grease, sulfides, and volatile organic compounds" during a 24 hour period. The 24 hour period does not have to be in the same calendar day.

The following monitoring requirement revisions only apply to any of the following listed parameters that are currently in the attached IU permit:

pH and/or Temperature:
Option 1: Four grabs must be collected and each analyzed within 15 minutes during a 24 hour period, once per month. The four grabs must be collected at times evenly spaced through the time that the IU discharges wastewater. All results shall be reported on the provided form or a form produced by the IU containing all the information listed on the provided form as an attachment to the self-monitoring report. The minimum and maximum pH for that period shall be reported on the IU's self-monitoring report.

Option 2: One grab must be collected and analyzed within 15 minutes, once per month. This result shall be reported on the provided form or a form produced by the IU containing all the information listed on the provided form as an attachment to the self-monitoring report. In addition, the IU must attach a copy of that same day's calibration record and chart recording for a continuously monitoring pH and/or temperature chart recorder to show that the single grab is representative of the IU's discharge for that 24 hour period.

Oil and Grease
Four grabs of the same volume (ie. 250 mL) must be collected directly into separate bottles containing the proper preservative during a 24 hour period, once per month and iced or refrigerated to less than 6 degrees C immediately upon collection. The four grabs must be collected at times evenly spaced through the time that the IU discharges wastewater. The four grabs shall then be composited in the laboratory by the IU's contract laboratory as specified in the "Streamlining Rule", with a single result reported in the IU's self-monitoring report.

T. Cyanide
Four grabs of the same volume (ie. 100 mL) must be collected into a single bottle containing the proper preservative during a 24 hour period, at the frequency specified in the attached permit, and iced or refrigerated to less than 6 degrees C immediately upon collection. The four grabs must be collected at times evenly spaced through the time that the IU discharges wastewater. Then, a single result shall be reported in the IU's self-monitoring report.

Attachment A-4

Handed to me 9/23/08 AE

	Overflows Partially Caused by Grease	Overflows Caused by Grease	Overflows Caused by Non-Domestic Grease
DEC '06	1	2	1 **
JAN '07	3	2	0
FEB '07	4	1	0
MAR '07	1	3	0
APRIL '07	3	2	0
MAY '07	0	3	0
JUNE '07	0	1	0
JULY '07	1	1	0
AUG. '07	0	1	0
SEPT '07	0	2	0
OCT. '07	0	0	0
NOV. '07	2	0	0
TOTALS	**15**	**18**	**1**

DEC '07	1	3	0
JAN '08	0	4	0
FEB '08	2	1	0
MAR '08	3	1	0
APRIL '08	1	1	0
MAY '08	1	0	0
JUNE '08	1	0	0
JULY '08	1	2	0
AUG. '08	0	1	0
TOTALS	**10**	**13**	**0**

**Non-Domestic blockage caused by grease from Kentucky Fried Chicken Restaurant 11/25/07

Attachment A-5

Arkansas Analytical Inc.

11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

14 August 2008

Jennifer Enos
Springdale Water Utility
2910 Silent Grove Rd.
Springdale, AR 72762

RE: Quarterly Water Samples
SDG Number: 0808106

Enclosed are the results of analyses for samples received by the laboratory on 08-Aug-08 08:50. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Norma James

Norma James
President

Arkansas Analytical Inc.
Little Rock, AR 72209
PHONE: 501-455-3233
FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION	Project Description	Turnaround Time
Springdale Water Utility		24 Hour
2910 Silent Grove Rd.	Reporting Information	48 Hour
Springdale, AR 72762	Telephone: 479-756-3657	72 Hour
	FAX: 479-750-7195	Routine (5 Day)
Attn: Jennifer Enos	Bill to/P.O. #: 0015336 00	Preservative Code:
		Bottle Type:

Preservation Codes:
1. Cool, 4 Degrees Centigrade
2. Sulfuric Acid (H_2SO_4), pH < 2
3. Nitric Acid (HNO_3), pH < 2
4. Thiosulfate for Dechlorination
5. Hydrochloric Acid(HCl)
6. Sodium Hydroxide (NaOH), pH > 12

Sampler(s) Signature:

Sampler(s) Printed:

Field Number	SAMPLE COLLECTION Date/s	Time/s	Grab	Comp	Number of Bottles	Sample Matrix	SAMPLE IDENTIFICATION/ DESCRIPTION	TEST PARAMETERS: Cyanide (1,2 P)	Cd, Cr, Cu, Ni, Pb, Ag, Zn (1,3 P)	Cr, Zn (1,3 P)	Oil and Grease (1,2 GA)	Arkansas Analytical Work Order Number: 0808106-
	05/21-22/08	0825-0815		✓	1	W	DANAHER 080370		✓			13
	05/05-06/08	0750-0840		✓	1	W	DANAHER 080401		✓			14
	05/26-27/08	0755-0845		✓	1	W	DANAHER 080455		✓			15
	07/14-15/08	0750-0800		✓	1	W	DANAHER 080527		✓			16
	05/14-15/08	0850-0800		✓	1	W	KAWNEER 080351			✓		17
	08/04-05/08	0815-0730		✓	1	W	KAWNEER 080546			✓		18
	08/05-06/08	0730-0835		✓	1	W	KAWNEER 080549			✓		19

1. Relinquished by: (Signature)	Date/Time	2. Received by: (Signature)
Josh Williams	08/06/08 1400	Velocity
3. Relinquished by: (Signature)	Date/Time	4. Received by lab: (Signature)
Velocity	8-8-08, 0850	Sydney James

SAMPLE CONDITION UPON RECEIPT IN LAB

1. CUSTODY SEALS:	✓ Yes	___ No
2. CONTAINERS CORRECT:	___ Yes	___ No
3. COC/LABELS AGREE:	___ Yes	___ No
4. PRESERVATION CONFIRMED:	___ Yes	___ No
5. RECEIVED ON ICE:	___ Yes	___ No
6. TEMPERATURE ON RECEIPT:	1°C	

FOR COMPLETION BY LAB ONLY

REMARKS / SAMPLE COMMENTS

PAGE 2 OF 2

Springdale Water Utilities

526 Oak Avenue P.O. Box 769 Springdale, Arkansas 72765-0769 (479) 751-5751

Chain of Custody Record

Springdale Wastewater Treatment Plant
2910 Silent Grove Road
P.O. Box 769
Springdale, AR 72762

Phone: 479-756-3657
Fax: 479-750-7159

	Sample Identification	Sample Collection				Sampler	Test Parameters		
		Date (s)	Time (s)	Comp.	Grab				
1	080526	07/24-25/08	0220-0745	✓		MP			
2	080527	07/24-25/08	0750-0820	✓		MP			
3									
4									
5									
6									
7									
8									
9									
10									
						Preservation Code:	1		

		Comments:
Relinquished By: Mike Riley	Date / Time: 07/25/08 0840	
Received By: Martha Henderson	Date / Time: 07/25/08 0845	
Relinquished By:	Date / Time:	Preservation Codes:
Received By:	Date / Time:	1. Cool, 6 degrees Centigrade
Relinquished By:	Date / Time:	2. Sulfuric Acid, pH <2
Received By:	Date / Time:	3. Nitric Acid, pH <2
		4. Sodium Hydroide, pH >12
		5. None
		6. Other

A-5c

Attachment A-6

SAFETY GLASSES
EAR PROTECTION

Springdale Water Utilities
Industrial Inspection Checklist

Industry and Permit Background

Name of Industry: DANAHER TOOL GROUP
Address of Industry: 1609 N. OLD MISSOURI RD.
SPRINGDALE, AR 72764

Permit No.: 05-02

Date of Inspection: 5/9/07
Date of Last Inspection: 11/02/06

Findings (Summary):

Does this IU currently have a plan to control slug discharges as defined under 40 CFR 403.5(b)? ✓ Yes ___ No ___ N/A
Does this IU need a plan to control slug discharges as defined under 40 CFR 403.5(b)? ✓ Yes ___ No ___ N/A

Records and Reports
Records and reports maintained as required by permit. ✓ Yes ___ No ___ N/A
Details:

(a)Adequate records maintained of:
(i) Sampling date, time, exact location ✓ Yes ___ No ___ N/A
(ii) Analyses dates, times ✓ Yes ___ No ___ N/A
(iii) Individual performing analysis ___ Yes ___ No ___ N/A
(iv) Analytical method used ✓ Yes ___ No ___ N/A
(v) Analytical results (consistent with report) ___ Yes ___ No ___ N/A
(b)Monitoring record maintained for a minimum of three years including all original chart recordings ✓ Yes ___ No ___ N/A
(c)Analytical equipment calibration and maintenance records kept ✓ Yes ___ No ___ N/A
(d)Facility operating records kept including operating logs for each treatment unit ✓ Yes ___ No ___ N/A
(e)Quality assurance records kept ✓ Yes ___ No ___ N/A
(f)pH run in-house ✓ Yes ___ No ___ N/A
Details of observed analysis: RONNY MURPHY RAN pH - GOOD CALIBRATION RUNNING DUPS.
DISCUSSED BUFFERS, CALIBRATION PROC.

Permit Verification

Inspection observations verify the permit ✓ Yes ___ No ___ N/A
Details:

(a)Correct name and mailing address of permittee ✓ Yes ___ No ___ N/A
(b)Facility is as described in previous inspection ✓ Yes ___ No ___ N/A
(c)Principle product(s) and production rates conform with those set forth in permit application ✓ Yes ___ No ___ N/A
(d)Treatment processes as described in permit application ✓ Yes ___ No ___ N/A
(e)Notification given to SWU of new, different, or increased discharges ___ Yes ___ No ✓ N/A
(f)Number and location of discharge points are as described in permit ✓ Yes ___ No ___ N/A
(g)All process discharges are permitted ✓ Yes ___ No ___ N/A

Operation and Maintenance
Treatment facility properly operated and maintained ✓ Yes ___ No ___ N/A
Details:

(a)Sludges and solids adequately disposed NONHAZ → WMI HAZ → WOLD ROSES ✓ Yes ___ No ___ N/A
(b)All treatment units in service NI STRIP - PERMAFIX ✓ Yes ___ No ___ N/A
(c)Qualified operating staff provided ✓ Yes ___ No ___ N/A
(d)Established procedures available for training new operators VERBAL TRAINING UNTIL OPERATOR IS PREPARED TO WORK ON OWN ✓ Yes ___ No ___ N/A
(e)SWU notified of bypassing ___ Yes ___ No ✓ N/A
(f)Any bypassing since last inspection ___ Yes ✓ No ___ N/A
(g)Any hydraulic or organic overloads experienced ___ Yes ✓ No ___ N/A

Compliance Schedules
Permittee is meeting compliance schedule ✓ Yes ___ No ___ N/A
Details: IMPLEMENTED THIS MONTH.

Self-Monitoring Program

Permittee flow measurement meets the requirements and intent of the permit — ✓ Yes ___ No ___ N/A

Details: ACT - PAK ON WATER MOTOR

(a)Parameters and sampling frequency agree with permit — ✓ Yes ___ No ___ N/A

(b)Permittee is using method of sample collection required by permit — ✓ Yes ___ No ___ N/A

(c)Sample collection procedures are adequate — ✓ Yes ___ No ___ N/A

- (i) Samples iced during compositing — ___ Yes ___ No ✓ N/A
- (ii) Samples refrigerated during compositing — ___ Yes ___ No ✓ N/A
- (iii) Proper preservation techniques used — ✓ Yes ___ No ___ N/A
- (iv) Flow proportioned samples used when required — ✓ Yes ___ No ___ N/A
- (v) Sample holding times prior to analyses in conformance with 40 CFR Part 136.3 — ✓ Yes ___ No ___ N/A

(d)Monitoring and analyses being performed more frequently than required by permit pH, SOMETIMES N1 — ✓ Yes ___ No ___ N/A

(e)If (d) is yes, results are reported in permittee's self-monitoring report — ✓ Yes ___ No ___ N/A

Permittee laboratory (or contract laboratory used) meets the requirements and intent of the permit — ✓ Yes ___ No ___ N/A

Details:

(a)EPA approved analytical testing procedures used (40 CFR Part 136.3) — ✓ Yes ___ No ___ N/A

(b)If alternative analytical procedures are used, proper approval has been obtained — ___ Yes ___ No ✓ N/A

(c)Parameters other than those required by the permit are analyzed — ___ Yes ✓ No ___ N/A

(d)Satisfactory calibration and maintenance of instruments and equipment — ✓ Yes ___ No ___ N/A

(e)Quality control procedures used — ✓ Yes ___ No ___ N/A

(f)Duplicate samples are analyzed 10 % of the time — ✓ Yes ___ No ___ N/A

(g)Contract laboratory used — ✓ Yes ___ No ___ N/A

(h)Contract laboratory certified by the State of Arkansas — ✓ Yes ___ No ___ N/A

INDUSTRIAL INSPECTION REPORT
Springdale Water Utilities

Industry Name: DANAHER TOOL GROUP

Address: 1609 N. OLD MISSOURI RD.

SPRINGDALE, AR 72764

Years at present location: 25 YR.

Authorized representative: GARY YOUNG

Title: ENV. TECH

Telephone number: 751-8500 1507

Contact representative: SAME

Title:

Telephone Number:

IU Permit Number: 05-02 Expiration Date: 05-01-2010

Industry Type/Category: HAND TOOLS, GEN. HARDWARE SIC: 3423

Nature of Operation: TOOL (WRENCH) MANUFACTURE

No. of Employees: 589 Work hrs./day: 24 Work days/week: 7

Inspection Date/Time: 5/9/07 1400 - 1630

Inspectors: JENNIFER ENOS (name) J. E-Enos (signature)

(name) (signature)

Representatives: GARY YOUNG (name) (signature)

MELISSA TURNOR (name) (signature)

(+ ADEQ, EPA INSPECTORS OBSERVING INSPECTION)

Industry DAN **Page** 5 **of** 12

Raw materials: BAR METAL AND FLAT METAL

Products produced: WRENCHES

Process description: STEEL → CUT → HOT FORGE OR COIL → BLANKS OR CASTINGS FORMING → MACHINING → VIB → HEAT TREAT → PLATING.

Water Source: City ✓ Other

Water Usage: Sanitary ✓ Process ✓

Other BOILER HEAT TREAT

COOLING TOWER

Flow to collection system: APPROX. 0.127 MGD (FY 2005-2006) (7D/WK, 30D/MO, AVE. 3.8 MG/MO.)

Process Areas (Type, location, flow, housekeeping, condition):

MO COATING

2 BARREL PLATING

2 PLATING

1 N. STRIP

(SAME AS PREV.)

VIBRATORY - NOT ALL BOWLS IN USE

WORKING ON ELIMINATING HOT FORGING - GOING TO COLD FORGING AND ADDING SECOND AUTOMATED FORGE.

Comments: REDUCED PHOS. ACID IN HIGH SPEED ACID, BUT NOT ELIMINATED.

Industry DAN Page 6 of 12

Pretreatment Process (Type, Frequency, Location, Flow, Condition):

NONHAZ - PARTS WASHING, VIBRATORY, OIL/WATER SEPARATOR, EFF. FROM NONHAZ. PRESS (WHEN USED).

HAZ - PLATING → HOLDING TANK, CHEM-ADDITION,

HAZ. CLARIFIER → DISCHARGE

HAZ. SLUDGE HANDLED SEPARATELY: PRESSED, DRIED, → HAZ. WASTE DISPOSAL

(SEE ATTACHMENT FOR HAZ. TREAT PROCESS).

Comments: SAME AS PREV. PHOS. CONC. NOT AS HIGH AS LAST INSPECTION TIME.

Diagram:

Process Chemicals and Wastestreams (Description, Type, Amount, Destination):

(SEE pp. 10-11)

Chemical Storage Area (Type, Amount Stored, and Proximity to Floor Drains):

(SEE pp 10-11)

Comments:

Waste Storage Area (Type, Amount Stored, and Proximity to Floor Drains):

NONHAZ → LANDFILL

HAZ → PERMAFIX → (SEE ATTACHED MANIFEST)
→ WORLD RESOURCES CO.

USED OIL → USED OIL SERVICES (SEE MANIFEST)

Comments:

Industry DAN Page 8 of 12

Monitoring Facility (Location, Type, Frequency): SAMPLING MANHOLE IS MH CLOSEST TO HWY 265 – W. OF PLANT, JUST E. OF DRAINAGE DITCH AND S. OF ABANDONED RAILROAD TRACK.

Comments: NEW SAMPLING STATION BEING DEVELOPED AS PART OF COMPLIANCE SCHEDULE.

Contract Laboratory (Name, Address, Phone No., Contact, Parameters):

ENVIRONMENTAL TESTING GROUP 479-271-7996
P.O. Box 507
BENTONVILLE, AR 72712

Sampling Techniques: 24 HR. Q PROP. COMP USING ACT-PAK ON H_2O METER, GRABS

Preservation Techniques: AS PER 40 CFR PART 136

Permit Violation (Past Twelve Months): T. NICKEL (DAILY MAX, MONTHLY AVE. CONC.) VIOL 10/06, AND 12/22/06, DAILY MAX, MONTHLY AVE CONC., AND MONTHLY AVE. LOADING VIOLATIONS.
SNC – AO & COMPLIANCE SCHEDULE

Industry DAN Page 9 of 12

Wastestream to Surface/Groundwater: STORM WATER ARR00769

Permit No.: AIR 1415AR-3

Expiration Date:

EPA ID No. of Hazardous Waste Generator: ARD044484780

RCRA Information: SEE ATTACHED MANIFESTS

Does the IU have copies of the signed manifest? ✓ Yes ____ No

Are the hazardous waste drums properly labeled? ✓ Yes ____ No

Pollution Prevention: SAME

ISO PROP 3 - 2 - DRY 35" } MOLY COATING
KOYKOTE 36 2X55 gal
MOLYPAL 732 - 1X 55 gal

FLASHLESS FORMING - FG 5155 X 2
FG 5135

STOKIFLUSH FLUSHING FLUID 1 X 55 } NO F/D
HEAT TRANSFER FLUID 1X55
AW 100 HYDRAULIC OIL 1X55
MULTIUS - 46 1X55
RUZOD - AW 32 1X55

2407 PARTS CLEANER - 1 X 55 gal } MAINT SHOP
PARTS WASHER -> USED OIL SERVICES
(MIXES W/ USED OIL
VIBRATORY

REFINED AND TESTING OIL HOLDING TANK - OUT OF USE NO F/D

HEAT TREAT - NONCONTACT COOLING WATER LINE

STILL USING PHOS ACID IN VIB. - HOW MANY?

MOP SINK -> PROT. PARTS WASHER

PLATING LINE. ACIDEX LM x 5 (dry)

ELECTRO... US X 5 (dry)

5 gal 5 gal
NI. ADJ. IRON STABILIZER DICOLOY

TRICHROME STABILIZER 1 X 55 + 5 X 5 gal

VIBRATORY RECLAIM COIL. TRICHROME CORRECTOR 2 X 55

TRICHROME COMPOUND A 1X 5 gal TRICHROME ADDITIVE 4X ...

TRICHROME DJ. HCl 1X55 H_2SO_4 1X55

Industry DAN

PRET. 300 gal PALGUARD
SODIUM METASILICATE PENTAHYD – 6 BAGS

BOILER CHEMS CHEM-AQUA 100
CBD-93
H4104C

BURNISH 3 x 330 gal TOTE

OIL 0022 REFRIG. OIL 1 x 3 gal

2 x 1 gal CHEM AQUA 999
BACTICIDE – 415 1 x 5 gal – MT
123 REFRIGERANT

PRET SAPP GRAN. 19 x 50 #
DIATOMACEOUS EARTH
INDEX – BRIGHTENING CHEM
CAUSTIC SODA
FERROUS SULFATE } SOLID
REFRIGERANT – 4 SM. BARREL
AGEFLOC A50 P. 1x55
BREWFLOC AP2619 2x55
SR 50CV 2x55
TRANS – 10K
50% NaOH 6 x 55 gal

HCl 1x55

CBURMID – CHEM SOLN
55
1 – MOLY PAC 732
OVER GRATE IN PRET
50% HYDROGEN PEROXIDE
3x55
1 – ADDITIVE "B"

USED OIL → USED OIL SERVICES (OIL-WATER SEPARATOR)

A-6K

pH CAL – TEMP OR BUFFERS NOT RECORDED
CHANGE EVERY TIME CALIBRATED.

Industry DAN Page 12 of 12

Inspection Summary: GARY AND MELISSA WERE VERY COOPERATIVE. ADEQ INSPECTORS HAD SOME ISSUES RE. STORM WATER (HOUSEKEEPING, STORAGE).

The Industry complied with IWD permit requirements? ✓ Yes _____ No

Comments: REPEATED RECOMMENDATION RE. ELIMINATION OF PHOSPHORIC ACID IN VIBRATORY SYSTEM.

Recommended Actions: _____

Report Completed by: [signature] E-Gas

Date: 9/17/07

HAZ

3 PLATING
Zn PHOS → SUMP → HAZ. TREATMENT SIDE → pH ADJ. →

METAL PRECIP → ANIONIC POLYMER → SEPARATOR

→ COMBINED W/ NON HAZ.

SLUDGE → TANK → PRESS → DRYER → ROLLOFF → HAZ. DISP.

VIBRATORY
PARTS WASHING > HAZ.
OILY WASTE

A-6m

by this bill.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-00

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: AR[illegible]
2. Page 1 of [illegible]
3. Emergency Response Phone: [illegible]
4. Manifest Tracking Number: 000[illegible] FLE

5. Generator's Name and Mailing Address
[illegible]
1609 N. OLD [illegible] RD
SPRINGDALE, AR 72764
Generator's Phone: 479 [illegible]

Generator's Site Address (if different than mailing address)
[illegible]
1609 N. OLD [illegible] RD
SPRINGDALE, AR 72764

6. Transporter 1 Company Name: PERMA FIX TREATMENT [illegible] 918 [illegible]
U.S. EPA ID Number: OK[illegible]

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address
PERMA FIX TREATMENT [illegible]
2700 SOUTH 25TH WEST AVE
TULSA, OK 74107
Facility's Phone: 918 [illegible]
U.S. EPA ID Number: OKD[illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ Hazardous Waste, liquid, [illegible]	1	[illegible]	[illegible]	[illegible]	[illegible]
	2.					
	3. PH 11.72					
	4.					

14. Special Handling Instructions and Additional Information
9a 1: 03DTG001
9a 2
9a 3
9a 4
1. ERG 154
2. ERG
3. ERG
4. ERG
SO #: [illegible]
Doc #: [illegible]
Note: [illegible]

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Young | Signature: [signature] | Month: [illegible] Day: [illegible] Year

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [illegible] | Signature: [signature] | Month Day Year
Transporter 2 Printed/Typed Name | Signature | Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. [illegible] 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name | Signature | Month Day

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
[illegible]	1	[illegible]	000410706 JJK

5. Generator's Name and Mailing Address: Danaher Tool Group, [illegible] Old Missouri Road, Springdale, AR [illegible]
Generator's Site Address (if different than mailing address)
Generator's Phone: [illegible]

6. Transporter 1 Company Name: Freehold Cartage, Inc — U.S. EPA ID Number: NJD054126164

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address: World Resources Company, [illegible], Pottsville PA 17901 — U.S. EPA ID Number: PAD083030227
Facility's Phone: [illegible]

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ Hazardous Waste, Solid, N.O.S., (F006), 9, UN3077, PG III	01	CM	30	Y	F006
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
Use CHEMTREC company code "WORR"
Danaher Tool Group 24hr # 479-[illegible]-4552
Metal Bearing Filtercake To Be Recycled
[illegible]
PA - PA AH 0017

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Gary Young — Signature: Gary Young Danaher Tool — Month 3 Day 30 Year 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: Michael J. Cummings — Signature: [signature] — Month 03 Day 30 Year 07
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number: 34,620 lbs.

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR / INT'L / TRANSPORTER / DESIGNATED FACILITY

USED OIL SERVICE CO., INC.
4387 Catherine St.
Springdale, Arkansas 72762
EPA. I.D. # ARD 000005405
(479) 521-7070

Customer's
Order No. _____ Date 4-26-

M Dealer Tool Grou

Address 1609 old Missouri Rd, Sp

SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.
QR				

QTY	DESCRIPTION	PRICE
2000	Oil @	
	Thanks!!	

16551

A-62

ALL claims and returned goods MUST be accom

Received by _____

DUE BACK NO LATER THAN 11/30/06
Attachment A-7 NOV 2 6 2006

SPRINGDALE WATER UTILITIES
SLUG / SPILL EVALUATION CHECKLIST
(Pages 1 – 4 to be filled out by knowledgeable representative of SIU)

SIU NAME: Danaher Tool Group

PERMIT NO.: 05-02 **CONTACT:** Gary Young

1. SPILL PLAN

a. Type on file: (PIPP, SPCC, TOMP, Contingency): SPCC, TOMP Date: 5/19/03, 5/16/03

b. Number of Spills in last 3 years: 2

2. CHEMICAL STORAGE

a. Attach chemical list, including location of chemical, quantity stored, and container size.

b. Containment: Yes ✓ No _____ Describe: Platers have drains to prevent spilling on the floor waste treatment has containment wall.

Condition: Good _____ Fair ✓ Poor _____ N/A _____

c. Drains / Trenches: Yes ✓ No _____ Routed to: Waste Treatment Area

Distance from storage tanks or drums (in feet): Plater 2 ft. Waste Treatment 5 ft.

d. Spill Potential (High, Medium, Low): Low

3. MANUFACTURING PROCESSES

a. Process solutions in tanks

Chemical Solution Name	Location (attach sketch)	Process Tank Size (in gallons)
Watts Nickel Bath	RP I, RP II BP II	10,000
Cr^{+3} (Tri chrome)	" "	4,000
Cobalt Tin	BP II	750
Acidex	RP I, RP II BP II	1000
Caustic cleaner	RP I RP II BP II	2500

MANUFACTURING PROCESSES – Continued

b. Do Process solution tanks overflow? Yes _____ No X
If they overflowed they would be contained

If so, is overflow liquid contained? (Yes) _____ No _____

Describe containment: drain around each plater

Condition of containment: Good ✓ Fair _____ Poor _____ N/A _____

c. Drains / Trenches: Yes ✓ No _____ Routed to: _____

d. Spill Potential (High, Medium, Low): Low

4. **PRETREATMENT SYSTEM**

a. Evaluate potential for operating upsets: (High, Medium, Low): Medium

b. Calibration frequency of instruments and/or equipment (specify): (e.g. pH probes)

pH probes every ~~other~~ day (CHANGED PER DISCUSSION)

c. Spare parts on hand: Yes ✓ No _____ new probes + amplifiers

d. Excess wastewater holding capacity: Yes ✓ No _____ ~ 2000 gals.

e. Is there a control system to monitor operation of pretreatment system?

Yes ✓ No _____

Describe corrective action which will be taken if an alarm condition occurs: _____

Identify source of alarm and troubleshoot accordingly.

f. By-pass potential: High _____ Medium _____ Low ✓ N/A _____

5. **LOADING / RECEIVING DOCKS**

a. Drains / Sumps: Yes ✓ No _____ If "yes", where routed to:

Storm ✓ Sanitary ____ Pretreatment _____ Other _____

6. **SPECIFIC PROHIBITIONS**

a. Are any items present? Yes ✓ No _____

b. Potential to discharge: High _____ Medium ✓ Low _____ N/A _____

7. **NON-ROUTINE BATCH DISCHARGES**

a. Does facility have these type of discharges? Yes _____ No ✓
(Defined as non-scheduled, occurring at 6 month frequency or longer)

b. Name of chemical solution discharged: _____

8. **NON-DISCHARGED WASTES**

a. Are any generated: Yes ✓ No _____

b. List these Non-Discharged Wastes, if "yes":

Type of Waste (e.g.: waste solvent, waste oil, pretreatment sludge, etc.)	~~Quality~~ Quantity per Year Generated	Disposal Method
Used Oil	20,000 gals. Annually	Hauled OFF (used oil service)
Nickel Strip	21,000 gals Annually	Hauled OFF (Perma Fix)

c. Describe protective measures to prevent accidental discharge of these substances into the sanitary sewer system:

Sanitary Sewer is seperated from waste treatment discharge

A-7c

CERTIFICATION STATEMENT

I certify under the 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 fines and imprisonment for knowing violation.

Gary Young	Environmental Tech	11-13-06
Signature of Authorized Official	Title	Date

A-7d

RECOMMENDATIONS

a. _____ Existing Spill Plan adequate. Combined Slug / Spill Control Plan not needed.

b. _____ New Slug / Spill Control Plan required

c. _____ Add slug provisions to existing Spill Plan

d. ✓ Other ~~deficiencies to be corrected~~: NEW SPCC & TOMP AS SUBMITTED WITH THIS CHECKLIST ADEQUATE. APPEND SPCC PLAN TO DAN PERMIT.

e. _____ No Slug / Spill Control Plan is necessary at this facility

---

Signature: [signature] Date: 11/28/06

SPCC TO BE REVISED UPON INSTALLATION OF CONTAINMENT TANKS AS PART OF ENFORCEMENT ACTIONS IN 2007.

[signature]
1/11/07

A-7e