ADEQ

A R K A N S A S
Department of Environmental Quality

March 7, 2013

Terry Phillips
Acting 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. Phillips,

Please find enclosed the finished report for the audit/assessment conducted February 12 through February 14, 2013. No deficiencies or required actions were identified during the Audit. Your Pretreatment personnel should be lauded for the effective implementation and enforcement of the City's Pretreatment Program requirements.

The contents with recommendations should be made available for review by appropriate City officials.

One of EPA's main focal points is the integration of Pollution Prevention (P2) into cities' Pretreatment Programs. Most of the 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. It is felt more can be done as resources come available to reduce and/or eliminate toxic and incompatible pollutants from entering the City's sewage collection system. Pollution Prevention is a win-win-win proposition for your industries, the City and the environment.

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

Please feel free to contact this office with any questions at (501) 682-0625 or at gilliam@adeq.state.ar.us.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist/Attachments

ec: Rudy Molina/EPA 6WQ-PO
Jason Bolenbaugh/Inspector Supervisor
Craig Uyeda/Enforcement Manager

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PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF SPRINGDALE, ARKANSAS

NPDES PERMIT #AR0022063

March 7, 2013

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 February 12th through the 14th, 2013, of the Pretreatment and Pollution Prevention Programs implemented by the City of Springdale, Arkansas. Participants included:

Allen Gilliam	ADEQ / Pretreatment Coordinator
Brad Stewart	Springdale / Pretreatment Manager
Jennifer Enos	Springdale / Wastewater Facilities Manager

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 or reducing the introduction of toxic and incompatible pollutants from non-domestic 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.

There have been no substantial changes to the City's implementation and enforcement of their Pretreatment Program since the last Audit in 9/08. Several years ago the City's Pretreatment Manager, Jennifer Enos, was promoted to the Wastewater Facilities Manager position. Brad Stewart was hired as the new Pretreatment Manager and brought with him a comprehensive background in Pretreatment Regulation implementation from another Arkansas' Pretreatment City. This transition resulted in no impacts on the implementation of the City's Pretreatment Program as Mr. Stewart's interest in correct implementation of the Federal Pretreatment Regulations was obvious during this Audit.

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.

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 10.6 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 15 significant industrial dischargers, 2 of which are categorical (4 other categorical metal finishers are considered non-significant since they have achieved zero discharge). The majority of the average flow is from their poultry processor sector. Approximately 4,000 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 five (5) 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-5.

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.

There were no deficiencies identified in the City's implementation or enforcement of its approved Pretreatment Program.

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

1) It is strongly recommended to send the appropriate industry representatives your latest narrative version of your industries' processes generating wastewater AND wastewater flow line schematics of their various processes through pretreatment to the final sampling point.

40 CFR 403.12(b)(3) requires: "*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."

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 flow, P2 practices (counter current flows, air knives/curtains, air-agitated tanks, in-situ filtration, water or energy conservation, etc.) and chemical storage areas should be noted.

Dump or batch frequencies and volumes should also be noted from the various 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 attached to the City's industry fact sheets. The City should have the same process information and schematics in its files as their industries. If these documents had been in the City's IU files reviewed there might not have been as many questions by this auditor during the site visits.

2) It is strongly recommended to continue to work on the City's IU fact sheets to include more pertinent information. See Table 11-1 of EPA's "Industrial User Permitting Guidance Manual" (9/12) at http://cfpub.epa.gov/npdes/docs.cfm?view=allprog&program_id=3&sort=date_published for an example of the components for a fairly simple fact sheet.

3) It is strongly recommended to compile a master list of all (the more recent) IU surveys conducted summarizing the findings in an abbreviated version. See Chapter 2, Tables 2.1 through 2.3 of EPA's "Guidance Manual for POTW Pretreatment Program Development" (10/1/83) for examples of what a master list may look like. It was discovered that your office did have a copy of this guidance. A summary or digested version of your IU surveys would best serve you in remaining knowledgeable about what industries/businesses may have toxic chemical on their premises that could accidently be batch discharged to your sewer system vs. those that only have domestic wastewater that do not need to be further scrutinized by an individual site visit.

4) It is strongly recommended to continue the City's public outreach program regarding proper disposal practice of oil and grease. While it appears the City has implemented and enforced good best management practices at its commercial food related establishments sanitary sewer overflows from residential areas remain to be alleviated. As discussed during the Audit this outreach process may have to be a continual process to be sustainable.

5) Include the permit revocation clause per Springdale's Ordinance #2842, Section IV, Part F. in the IUs' permits.

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

7) Tailor the IU surveys to "fit" the operations possibly ongoing in each industry/business sector. These surveys should include a certification statement similar to the one in 40 CFR 403.6(a)(2)(ii) signed and dated by an authorized representative.

8a) Include more specific narrative descriptions regarding chemical handling procedures on IU inspection forms. Do the facilities move toxic/hazardous chemicals from the loading docks to the main chemical storage area then to various stations via forklifts, barrel dollies, hand-carried buckets, hard line piping, etc? The inspection report could explain any concerns regarding "handling, transfer of chemicals is near floor drains or outside storm drains, proximity of incompatible chemicals, overhead hard line piping of chemicals to different stations appeared to be 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."

8b) The IU inspection form should include a more specific narrative description of the industry's process/pretreatment tanks and appurtenances. Do the tanks, valves and flow-lines appear to be in good condition and working order? Are there signs of rusting or leakages that should be pointed out to the industry representative? Is the overall indoor and outdoor housekeeping of the facility appear neat and orderly or is it cluttered posing possible hazards to workers or jeopardizes storm water quality?

9) It is recommended to send the City's industries their reporting requirements in a special notice type correspondence document. The Industry reporting requirements in 40 CFR 403.12 are often overlooked by both the industries and the Cities. One of the most prevalent reporting requirements overlooked by the industries is the notification requirement in 40 CFR 403.12(j), "*Notification of changed Discharge.* All Industrial Users shall promptly notify the Control Authority...in advance of any substantial change in the volume or character of pollutants in their Discharge..." While "substantial change" is subjective, any change in the industry's operations or processes may have a qualitative or quantitative effect on its discharge to the City.

10) It is recommended to send out the hazardous waste notification in 40 CFR 403.12(p) to the new hazardous waste generators with Springdale addresses. ADEQ's newest list was provided to the City's Pretreatment personnel during the Audit. While the Pretreatment Regulations state this is a one-time industry notification requirement it is realized small quantity and conditionally exempt generators tend open for business or "close shop" in one city only to move to another. This occurs quite frequently throughout the State.

11) For the zero discharging categorical industries the City has permitted it is recommended to include which effluent guideline they would have been subject to if they were a discharging facility. In this office's opinion and for example it would make it most clear if their permits' cover

page stated something to the effect, "American Tubing is hereby permitted as a non-discharging Industrial User with processes covered under the Metal Finishing category in 40 CFR 433. As such, it may not discharge any regulated wastewater associated with any metal finishing processes into Springdale's Water Utilities' sewer system..."

12) It is recommended to require periodic pollution prevention (P2) or best management practices (BMPs) progress reports from the City's industries. It is realized most have already incorporated pollution prevention into their day-to-day activities to decrease their expenses, but chronicled P2 activities could be of benefit to others on the National Pollution Prevention Resource Exchange at http://p2rx.org/ . At least three of the industries visited were practicing P2 through water or energy conservation while one was directing their activities to the "5S" system to reduce waste and optimize productivity through maintaining an orderly workplace and using visual cues to achieve more consistent operational results which is part and parcel of EPA's Lean Manufacturing project. More information regarding this initiative can be gained at http://www.epa.gov/lean/environment/methods/fives.htm . Success stories from the City's P2 activities, integrated into its Pretreatment Program, will positively reflect the City is going beyond its regulatory minimum.

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

The City's Pretreatment Program is not current with the Streamlining Revisions to 40 CFR 403. Program modifications must be submitted regardless of the City's expired permit which is administratively continued.

The below Program modifications are but several of the required modifications necessary to be current with what is required in the revised Federal Pretreatment Regulations. One is this office's recommendation regarding adopting the legal authority to implement best management practices to any business sector which is not specifically required in Streamlining revisions to 40 CFR 403:

a. Include Criminal Penalties in the City's Pretreatment Ordinance per EPA's Model Ordinance and 40 CFR 403.8(f)(1)(iii)(B)(5);

b. Include best management violations (narrative standards) and their appropriate enforcement options in the modified Program's Enforcement Response Guide per 40 CFR 403.8(f)(2)(viii)(C);

c. Recommend including the legal authority to require Best Management Practices (BMPs) by any industry/business sector as deemed appropriate for purposes of reducing toxic and incompatible pollutants from being discharged to the City's

sewage collection system. Machine shops, auto repair and painting shops, dentists, hospitals and other sectors already have BMP templates available.

d. Consider re-evaluating the City's maximum allowable headworks and maximum allowable industrial loadings (MAHLs and MAILs) to determine whether local limits are necessary or demonstrate they are not.

   The last time this evaluation was conducted site specific data used was from 8/96 through 7/98. With the recent use of more sensitive analytical methodologies; therefore, more reliable data, the old MAHLs and MAILs will more than likely be changed with some parameters possibly being significantly changed.

* * * * * * * *

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: Springdale Water Utilities NPDES #: AR0022063
Mailing address: P.O. Box 769, 2910 Silent Grove Rd. 72765

Permit Signatory: Terry Phillips Title: Acting Exec. Director

Telephone: 479.751.5751 Fax Number: 479.750.4039

Pretreatment Contact: Brad Stewart Title: Pretreatment Manager
Address: same
Telephone: 479.756.3657
E-mail: bstewart@springdalewater.com

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: 2/12-14/13 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Brad Stewart	Pretreatment Manager	479.756.3657
Jennifer Enos	Wastewater Facilities Mngr.	"

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	5/27/10	No deficiencies noted

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?

There have been no major changes in the implementation of the City's Program since the previous audit conducted in November, 2008. This checklist will reflect the few revisions and updates that have occurred since then.

The City's NPDES permit is expired, but has been administratively continued because of EPA. The City's Pretreatment Program has not been modified to come into compliance with the Streamlining revisions to 40 CFR 403, the Federal Pretreatment Regulations because of this.

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0022063	Springdale Wastewater	4/1/04	3/31/2009
			(Administratively continued)

2. Individual Treatment Plant Information

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

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 24 MGD; Actual (Avg)- 10.6 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages: 13

Industrial Contribution to this Treatment Plant

# of SIUs: 15 # of CIUs: 6 (w/4 zero discharging)

Industrial Flow (mgd): 4.95 Industrial Flow (%): 47 %

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 contact recreation; raw water source; propagation of desirable fish and aquatic life

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

Method of Sludge Disposal:		Quantity of Sludge:	
	Land Application		dry tons/yr.
	Incineration		dry tons/yr.
	Monofill		dry tons/yr.
✓	Mun. Solid Waste Landfill	3989	dry tons/yr. *(last 3 yrs' avg)*
	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 and WET

SECTION I: GENERAL INFORMATION

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

YES NO

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

Issuing Authority: ADEQ
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 been no lethality or sub-lethality shown in either species over the last 3 yrs (12 tests)

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1	1	
Biomonitoring		4		
TCLP			0	
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. Poultry IUs' voluntary reduction in T.Phos has been deemed a success and "leveled off" in loading to the POTW.

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)
None	

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. **Loss of an SIU*

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?

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: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ ✓ 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.			

* J.B. Hunt Transport (truck wash/maintenance)

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

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

Briefly describe other problems: _____

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

IU Name	Problem	NPDES Permit Violation Yes	No
n/a			

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 P2 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

SECTION II: PROGRAM ANALYSIS AND PROFILE

✓ 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?

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

a. 15 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 6 Categorical Industrial Users (CIUs) [WENDB-CIUS] *(4 zero discharging)*
c. 13 Noncategorical SIUs
d. 4 Other regulated nonsignificant IUs (Describe) 4 zero discharging CIUs
19 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:

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	

✓ ___ 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*

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 ?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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):
Driver must notify treatment plant personnel and dump is witnessed.
Manifest system has not changed since the audit 5 years ago.

YES NO

___ ✓ 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	

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?

2/09 Date Notified letter Method of Notification

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

✓	Federal Register	✓	Journals, Newsletters
✓	Meetings, Training	✓	Other internet
✓	Government Agencies	___	Other ___

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

If yes, complete the information below:

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ 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. *(Sent to landfill)*

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 has successfully utilized 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)			

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1 year	1/year	N/A
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	N/A

#	%	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	American Interplex (AI)
Cyanide	spectrophotometric	AI
Organics	GC/MS	AI
Other	biomonitoring / Hg - 1631E	Huther & Assoc/ 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? *IUs' are kept in sampling tech's files and part of training.*

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

If yes, explain: n/a

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

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

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

I. ENFORCEMENT

YES NO

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

*In Program, but not in Ord.

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

*In permits, but not in Ord.

	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	Action Date	Return to Compliance? Yes (Date)	No

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

#	%	
0	0	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
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. *Program mods will have to address BMP violation enforcement options*

SECTION II: PROGRAM ANALYSIS AND PROFILE

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]

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:
(City backs up all Pretreatment docs on a portable hard drive stored elsewhere)

✓	___	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) _____

YES	NO

SECTION II: PROGRAM ANALYSIS AND PROFILE

✓ ___ 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?
Program is silent on how such info would be physically handled.

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

If yes, please explain: Nutrients' issue has tied up the City's NPDES permit. A TMDL is reviewed by EPA and could result in lower T.Phos limits for the City; therefore, possible TBLLs for some of their IUs.

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

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:

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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.):
   Working with IUs for source reduction of T. Phos; actively promoting the local police dept's prescription drug drop-off program; FOG education programs including bill stuffers (thru a partnership with the U of A's Division of Agriculture; information booths at public and private events, e.g: earth day fair at local industries.

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:
   POTW tours are conducted on a regular basis for interested parties/groups including local schools, Boy Scouts, local university classes and IU reps. Stormwater and household haz waste programs are active.

4. Does the POTW have any pollution prevention success stories for industrial users documented? somewhat. If yes, please attach.
   3 metal finishers have achieved "zero" discharge using P2 techniques. Other IUs observed during site visits were practicing P2, but no chronological documentation was provided.

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 handed out copies of P2 guides years ago to various business sectors such as: hospitals, printers; automotive refinishers and rebuilders

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Tyson Foods - Berry St. File/ID No. 09-04
Industry Address 600 N. Berry St.
Industry Description Poultry kill and further processing
Industrial Category N/A 40 CFR N/A SIC Code: 2015/2016
Avg. Total Flow (MG/mo) 33 Avg. Process Flow (MG/mo) 31

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name Cintas File/ID No. 08-01
Industry Address 580 N. Monitor Rd.
Industry Description Industrial Laundry
Industrial Category N/A 40 CFR N/A SIC Code: 7200
Avg. Total Flow (MGD/mo) 1.7 Avg. Process Flow (MG/mo) 1.6

Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name American Tubing File/ID No. 08-03
Industry Address 2191 Ford Ave.
Industry Description Etching Cu tubing for heat exchange applications
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3499/3498
Avg. Total Flow (gpd) ?? Avg. Process Flow (MGD) Zero discharge

Industry visited during audit: YES

Comments: Facility just began the same ops for Al tubing. No forming or heat treatment.

FILE #: 4 Industry Name Sonstegard Foods File/ID No. 12-02
Industry Address 915 N. Jefferson
Industry Description Egg processing
Industrial Category N/A 40 CFR N/A SIC Code: 2013
Avg. Total Flow (MG/mo) 1.4 Avg. Process Flow (MG/mo) 1.3

Industry visited during audit: YES

Comments:

FILE #: 5 Industry Name Triple T File/ID No. 12-03
Industry Address 1013 N. Jefferson
Industry Description Pet food intermediate processing from chicken by-products
Industrial Category N/A 40 CFR N/A SIC Code: 2047
Avg. Total Flow (MG/mo) .75 Avg. Process Flow (MG/mo) .69

Industry visited during audit: YES

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?	✓	✓	1	✓	✓
2. Is the user subject to categorical pretreatment standards?	no	no	1	no	no
a. New source or existing source (NS or ES)?	n/a	n/a	1	n/a	n/a
b. Is this IU one identified as having P^2 potential?	no	no	no	no	no

B. Control Mechanism

1. Does the file contain an *(See Attach. A-1 for example)* application for a control mechanism?	✓	✓	✓	✓	✓
If yes, what is the application date?	7/09	3/08	3/08	9/12	9/12
Does it ask for Pollution Prevention information?	no	no	no	no	no
2. Does the file contain a Permit? *(See Attach. A-2 for example)*	✓	✓	✓	✓	✓
Permit Expiration Date?	✓	✓	✓	✓	✓
Is a fact sheet included?	2	2	2	2	2
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	✓
b. Expiration date?	9/14	4/13	4/13	11/17	11/17
c. Statement of nontransferability?	✓	✓	✓	✓	✓
d. Appropriate discharge limitations?	✓	✓	1	✓	✓
e. Appropriate self-monitoring requirements?	✓	✓	1	✓	✓
f. Sampling frequency?	✓	✓	1	✓	✓
g. Sampling locations?	✓	✓	1	✓	✓
h. Requirement for flow monitoring?	✓	✓	1	✓	✓
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	1	✓	✓
j. Applicable IU reporting requirements?	✓	✓	3	✓	✓

Comments: 1) Zero discharger (non-Significant); (2) City personnel are currently working on them; 3) Certification statements (See Attch A-4 for example)

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	✓
Records retention?	✓	✓	✓	✓	✓
Civil and Criminal Penalty provisions?	1	1	1	1	1
Revocation of permit?	no	no	no	no	no
l. Compliance schedules/ progress reports	n/a	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	no
C. Application of Standards					
1. Has the IU been properly categorized?	✓	✓	✓	✓	✓
2. Were both Categorical Standards and Local Limits properly applied?	✓	✓	✓	✓	✓
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	n/a
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	n/a	n/a
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	n/a	n/a	n/a	n/a
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	n/a
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	✓
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	✓

Comments: 1) Permits have confusing language regarding civil and criminal liability. See Attch. A-2s, parts 8 and 9. The City's Pretreatment Ord. does not include criminal penalties; only civil penalties, but the permits mention criminal penalties.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	1	✓	✓
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	1	✓	✓
b. Sample date and time?	✓	✓	1	✓	✓
c. Sample type?	✓	✓	1	✓	✓
d. Wastewater flow at the time of sampling?	✓	✓	1	✓	✓
e. Sample preservation procedures?	✓	✓	1	✓	✓
f. Chain-of-custody records?	✓	✓	1	✓	✓
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	1	✓	✓
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	n/a	n/a	1	n/a	n/a
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	2	2	n/a	2	2
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	1	✓	✓
Inspections *(See Attach. A-3 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	11/12	11/12	11/12	10/12	10/12
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	✓
b. Inspection date and time?	✓	✓	✓	✓	✓

Comments: 1) Zero discharging Metal Finisher; 2) Flow proportional composites

SECTION III: INDUSTRIAL USER FILE REVIEW

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
c.	Name and title of IU official contacted?	✓	✓	✓	✓	✓
d.	Verification of production rates?	n/a	n/a	n/a	n/a	n/a
e.	Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	✓
f.	Evaluation of pretreatment facilities?	1	1	1	1	1
g.	Evaluation of self-monitoring equipment and techniques?	3	3	n/a	3	3
h.	Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)] *(See Attach. A-5 for example)*	✓	✓	✓	✓	✓
i.	Manufacturing facilities?	✓	✓	✓	✓	✓
j.	Chemical handling and storage procedures?	2	2	2	2	2
k.	Chemical spill prevention areas?	✓	✓	✓	✓	✓
1.	Hazardous waste storage areas and handling procedures?	2	n/a	2	n/a	n/a
m.	Sampling procedures?	✓	✓	n/a	✓	✓
n.	Laboratory procedures?	✓	✓	n/a	✓	✓
o.	Monitoring records?	✓	✓	n/a	✓	✓
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?	n/a	n/a	✓	n/a	n/a
b.	90-Day Report?	n/a	n/a	✓	n/a	n/a
c.	All periodic reports?	✓	✓	n/a	✓	✓
d.	Compliance schedule reports?	n/a	n/a	n/a	n/a	n/a

Comments: 1) Although there is a "yes or no checkbox" there could be more narrative regarding the working condition (rusting or leakages, possibly needing maintenance; in good operating condition, etc); 2) Nothing mentioned regarding chem (including haz waste) handling procedures from dock to work stations; 3) "Field reports" include more info on these procedures

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
12. Did the IU report on all required parameters?	✓	✓	n/a	✓	✓
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	n/a	✓	✓
14. Did the IU report flow?	✓	✓	n/a	✓	✓
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	✓
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	✓	✓
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	n/a
18. Has the IU developed a Slug Control and Prevention Plan?	n/n	n/n	n/n	n/n	n/n
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	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	n/a	n/a
b. IU self-monitoring results?	n/a	✓	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	n/a
2. How many reports submitted during the past reporting year indicated discharge violations?	0	2	0	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	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	n/a
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	n/a
6. Was the IU notified of all violations?	n/a	✓	n/a	n/a	n/a
7. Was follow-up enforcement action taken by the Control Authority?	n/a	✓	n/a	n/a	n/a
8. Did the Control Authority follow its approved ERP?	n/a	✓	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	n/a
10. Is there a compliance schedule? If yes:	no	no	no	no	n/a
11. Were there any compliance schedule violations?	--	--	--	--	n/a
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	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: 2/12 - 2/14/13 Date entered into QNCR: 3/7/13
(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:
Triple T Foods, 1013 N. Jefferson, 479.751.4506

Type of industry: Pet Food Mfgr. Date/Time of visit: 2/13/13 / 8:30 a.m.

Industry contacts: Sharon Wade - Assistance Plant Manager & Phillip Dawson- Maint. Coordinator

		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 brings in raw (mechanically separated) chicken or turkey carcasses and processes it into an intermediate meat for dog food. Outside customers do the final processing/addition of other supplements for the final product.
No entrails are included in the raw material. Some suppliers' meat does have small amounts of bone in it.
Their offal is sent to Simmons for pet food. Sludge from the DAF is picked up by Terra Renewal Service for composting/land application.
"Duraquat" is their main cleaning chemical.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

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: Triple T Foods

Additional comments:

The ground meat travels by conveyor through a metal detector and then through an "audio" which breaks down any bone material further.

This meat is piped to different augers; then into hoppers; then to the "pappas" machine (grinder); then to another blender where water is added then sent to the plate freezers (takes about 2 to 2 ½ hours to freeze). After freezing is complete the frozen meat is broken up, goes through another metal detector; then sprayed with dehydrated dye (non-food grade); placed into plastic lined boxes and sent to the trucks as their "finished product" some of which is still frozen.

The bulk of the wastewater generated is from the cleaning of the various types of grinders, augers and "plate freezers".

All below grade drains from the clean-up ops gravity flow to a sump in the pretreatment system area. The level of the sump is float controlled. Solids are screened out while the wastewater is pumped to the DAF where the solids are skimmed off the top and sent to an offal holding tank. The "header" (serpentine series of PVC pipe with incoming w.w.) is where the anionic and cationic polymers are injected.

Even the trucks bringing in the raw product is washed down on-site with its w.w. sent through pretreatment.

Adequate sampling point through a parshall flume prior to discharge to the City. Flow records are also kept near the sampling point.

Polymers are stored in the sampling room where it's warm and dry.

City rep was familiar with the facility's ops and the facility's reps were familiar with what their City issued permit required.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

(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:
Sonstegard Foods, 915 North Jefferson St., 479.872.0700

Type of industry: Egg Processsing Date/Time of visit:
2/13/13 / 9:37 a.m.
Industry contacts: Salvador Jecobo - Production Manager

		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 brings in "reject" (off-spec) eggs from various hatcheries from across the U.S. Some are too small, double-yolk and some cracked, but don't meet quality specs. Over 1 million eggs per day are processed. The actual egg cracking ops were down for the day, but chilled liquid and frozen egg products were being loaded into containers for shipment to various customers for their use in making other egg containing products (shampoo, mayonnaise, etc).

The "egg cracker" is a stainless steel (SS) "V" shaped unit which can crack numerous eggs at a time. The yolks can be separated from the whites either of which is filtered for shell parts and membranes and drain to different stations for further processing.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

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: Sonstegard Foods

Additional comments: The egg (fluid), whether that be yolks, whites or whole egg is sent through a chiller (from ~60F to ~32F) and sent to outside silos (20,000 gallons for the egg whites; 12,000 gallons for yolks and 12,000 for whole eggs) awaiting further processing. Their product is 50% whites, 25% yolk and 25% whole (combination of the whites and yolks). The various egg fluids (3 different types) are piped in from the silos; pasteurized by flowing the fluid through SS tubes starting from to ~150F and held at that temp. for 6 minutes then cooled back down to 32F. This pasteurizing process is done twice.
All the stainless steel lines which transport the liquid egg product is CIP (cleaned-in-place) with sodium hydroxide.
All eggs are first washed at a pH of ~10 to 11 s.u. These chemicals are over-head piped (tag-labeled w/chems that flow through it) to their stations. This building's floor is sloped to the floor drains which goes to the Pretreatment building.
The main chemical storage room is in a separate building from the egg processing. Various sized containers (200 to ~1000 gallons) A silicone based defoamer is also used. Any spills would drain to a holding tank before pretreatment. All chems are auto-pumped to the various stations as needed.
Most of the egg shells are shipped to a company that makes calcium pills with some being land applied or sent to their dog food plant in Minnesota. The truck docks are sloped toward the main building and any rain or w.w. is pumped to a wet well prior to being sent to the pretreatment building.
Pretreatment consists of a mixing tank where the cationic/anionic polymers are mixed and pH (nitric acid) adjusted as necessary then sent to the DAF unit. The "skimmings" from the DAF are pumped to a trailer outside.
Adequate sampling point. The City coordinator was familiar with the facility's processes/pretreatment and the facility rep was very open during the walk-through.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

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:
Tyson Foods - Berry Street, 600 North Berry St., 479.750.5340
Type of industry: Poultry kill and further processing
Date/Time of visit: 2/13/13 / 10:50 a.m.

Industry contacts: Roger Harlan-W.W. Manager & Mark Dooly-Complex Env. Manager

		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 poultry kill/further processing plant. This site visit bypassed the actual "production" floor knowing where the wastewater is generated. The site visit began between the production facility and its pretreatment building. There are 3 lines coming underground from the production building: 1) the kill line (where some offal is removed and sent to a trailer (near the production bldg) to keep a lot of the evisceration "packs" from reaching pretreatment; 2)the feather side and 3) the cook plant. The cook plant's w.w. gravity feeds to a pit which is combined with the feather line's w.w. 2 dual rotating screens screen the meat parts out while the other screens the feathers out with its w.w. sent to a pit for re-use in flushing out the feather line troughs (water re-use). What "breading" is not captured in the further processing line is also flushed down to the offal tank. If the offal tank fills up, they either pump it to totes or if there's a tanker on-site, it pumps out the offal tank and hauls off-site so the offal tank can be put back into use.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

(signature of auditor conducting visit)

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

Control Authority: City of Springdale NPDES #: AR0022063
Industry name: Tyson Foods - Berry Street
Additional comments: The cook plant side's w.w. is now combined with the feather line so any breading will cling to the feathers and won't clog up the screen. Feathers are augered up to a feather shredder. The feathers are pressed to remove as much w.w. as possible and shredded before being sent the offal tank then off-site. The meat line is also screened & augered, shredded and sent to offal tank. Every Monday, Wed & Friday, the main pit in pretreatment bldg is cleaned out and sent back thru pretreatment. Even the dry dock area's stormwater is sent through pretreatment unless it looks clear. If clear it is allowed to drain as stormwater. One of the first steps in pretreatment is to add organic coagulants to the w.w. This helps the cationic/anionic polymers which form the pin floc to come together more efficiently for removal. They've installed an "Edge" unit which takes the red color out the w.w. That w.w. is sent to two DAF units in series. The polymers are added in floc tubes (manifold) of the first DAF then to the 300,000 gallon aerated EQ tank. Under normal operations, after treatment in the 2nd DAF the wastewater is sent to the effluent weir and then to the City. On weekends and on occasion when treatment is not satisfactory, the w.w. is circulated through the 2nd DAF and the EQ tank to prevent the w.w. from "going septic". The sludge from the DAF units are sent to a holding tank, dewatered and trucked off-site. Through trial and effort by Mr. Harlan, he has reduced the COD from ~16,000 to ~380 mg/l.
Auto sampler is adequate as well as the sampling point. City rep was very cognizant of the facility's ops and pretreatment. The facility reps were very transparent with their knowledge of the pretreatment ops and permit conditions.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

(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:
Cintas, 580 N. Monitor Rd., 479.751.7934
Type of industry: Industrial Laundry Date/Time of visit:
2/13/13 / 2:10 p.m.
Industry contacts: Justin Permenter and Jeff Key

		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	✓*		

*Heat recovery

Additional comments:
Facility is a typical industrial laundry. They have a total of 7 huge washers, 6 of which are 450 "pounders", 1 is a 275 "pounder" and then two small "pony" washers, 1 which is 125 "pounder" and a 60 "pounder" just for small loads too small for the large washers. Very few solvent laden rags/towels are laundered here, mostly uniforms, hotel and restaurant linens and kitchen grease rags are cleaned here. It was noted that mop heads, some red "shop" rags and door entrance throw rugs were also cleaned. Items to be laundered are put into baskets to be weighed to correct weight per product and sent to the washing machines. Soap is sent to the washing machines in the correct amount to clean the pre-weighed items.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Springdale NPDES #: AR0022063

Industry name: Cintas

Additional comments:

Most every wash to dry operation is automated. The correct amount of soap, wash time, temperature, rinse, steam, spin, etc. are all programmed to complete the wash cycle.

The soap used is alkaline with a "builder". Anti-chlor is added after the bleach. This is automated also. Eclipse is the name of the soap. The floor is sloped in this area back to a floor trough which goes to their holding pit. This "dirty" pit w.w. is sent to a shaker screen where any lint, sand, etc. Then the w.w. is pumped through the heat reclaimer for use in pre-heating the wash water and then to the ~35,000 gallon equalization tank which is continually being mixed. This tank serves the purpose of mixing the dirty water with even dirtier water. It is sent to pretreatment once a pre-determined level (12 feet?) is reached, signaled by a float switch and shuts off at 6 feet. Treatment is a simple DAF unit with a manifold system for injection of coagulants and polymers. "Sour" (sulphuric acid) is added to bring the pH back down as necessary. Even the pretreatment settings are pre-set to auto feed chemicals as necessary. The skimmings from the top of the DAF unit is sent to a filter press, de-watered and placed into a dumpster to be sent to the landfill. Adequate sampling point at parshall flume with an ISCO sampler totally enclosed with electricity.

The City rep was familiar with the facility's operations and pretreatment and the facility reps were open and cooperative.

Visit conducted by: Gilliam/Stewart Date: 2/13/13

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:

American Tubing, 2191 Ford Ave, 479.365.6813

Type of industry: Metal Finisher (Zero discharging) Date/Time of visit: 2/14/13 / 9:20 a.m.

Industry contacts: Ken Frisch, Operations Manager

		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	✓*		

Working toward being a "5S" company

Additional comments: The site visit at this facility was to confirm the City had correctly classified this categorical metal finisher was a zero discharger of any federally regulated w.w. The "metal finishing" wastewater is generated from the nitric acid passivation and subsequent rinse which is evaporated with its sludge being sent off site as a non haz waste. Facility changed from trichloroethylene to the more environmentally friendly N-propyl bromide (150F) as its degreaser. This was mainly because of revisions to the Clean Air Act.

Visit conducted by: Gilliam/Stewart Date: 2/14/13

(signature of auditor conducting visit)

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

Control Authority: City of Springdale NPDES #: AR0022063
Industry name: American Tubing
Additional comments: Facility makes (bends/shapes) heat exchange "manifolds" and serpentine heat exchange configurations out of coiled small diameter copper pipe mainly for the air conditioning industry. The copper is drawn at another facility in Arkansas (98% to 99% of the pipe is less than 7/8" in diameter with the remainder up to an 1 & 5/8 " diam). The facility is just now beginning similar ops on aluminum pipe for similar end products. Raw coils of copper tubing are straightened out and cut to desired length. 97% is cut with a small rotary disk minimizing the waste copper. The tubing is actually pulled as it is cut, leaving no waste copper chips. Some of the tubing is end-swaged to be brazed into another. The shaping and cutting machines are self-contained with any hydraulic oils, coolants self-contained in a tray below the each machine. They're replacing the floor trays and installing elevated capture trays reducing the cutting oils/coolants from reaching the floor. They are also easier to drain. This waste fluid goes to the evaporator as well as their mop water which makes up the majority (~90%) of their wastewater. Stainless steel baskets full of cut tubing is lowered into the hot N-propyl bromide tank and rotated for most efficient degreasing. The baskets are raised up and out of the degreasing tank to a level that's super heated (~190F) to evaporate/flash out any remaining degreaser. The baskets are then raised above the super heated zone to one with refrigeration coils where any degreaser vapor is precipitated back down into the degreaser tank with about 100% recovery. The degreaser is sent through a still to further boil and condense it back to its virgin properties. Any sludge/still bottoms are sent to a fuel blending company as non-haz. The small operation of nitric acid etching/cleaning & rinse would meet the core operation applicability under 40 CFR 433 (Metal Finishing). Both of these tanks are cleaned/pumped out ~twice/yr to a holding tank, neutralized with caustic and sent to the evaporator. A "big" year would be ~2,000 gallons evaporated to meet the City's permit conditions. The evaporator is ~90" long, 42.5" wide and 68" high. It's gas fired, has a capacity of ~330 gallons and runs about 72 hrs/week.
The facility rep indicated they were working diligently to become a "5S" company ("to reduce waste and optimize productivity through maintaining an orderly workplace"). All floor drains have been cemented. The facility appeared clean, orderly with no visible haze.
There was no evidence of any regulated w.w. being discharged or or could be discharged to the City.

Visit conducted by: Gilliam/Stewart Date: 2/14/13

Allen Gilliam

(signature of auditor conducting visit)

Attachment A

DATE DUE 09/15/09

Name: _____

Application No. _____

Sent: ~~4/07/09~~ Received: _____

FOR CITY USE ONLY

APPLICATION FOR PERMIT
FOR DISCHARGE OF COMMERCIAL
OR INDUSTRIAL WASTES TO
SPRINGDALE SEWAGE WORKS

1. General Instructions:

Please complete this application and return to the following address:

Industrial Pretreatment Coord.
Springdale Water Utilities
P. O. Box 769
Springdale, AR 72765 Telephone (479)756-3657

Failure to return this application to the Director within 30 days is a punishable violation of City Ordinance No. 1388. You should notify the Director at the above address immediately if you are unable to return this application within 30 days. Only the Director's written permission for a time extension will be acceptable.

2. Firm Name: Tyson Foods, Inc.

Address: 600 N. Berry St. Springdale, AR 72764

Phone: (479) 750-5316

3. Standard Industrial Classification Code Number(s): 2015, 2016

4. Quantity of Wastewater:

	Current City of Springdale Records	Industry Self-Monitoring or Projection	
a. Average Daily Total Wastewater Flow Rate, Gallons/Day	.898 666 .707,767	.800,000 .700,000	NORMAL PRODUCTION NORMAL AVG DAY + WEEK AND HOLIDAYS
Maximum Daily Total Wastewater Flow Rate, Gallons/Minute	1.337	1.300	
b. Average Daily Process Wastewater Flow Rate, Gallons/Day (wastewater other than sanitary wastes and cooling water)		.800,000 MG/D	
Maximum Daily Process Wastewater Flow Rate, Gallons/Minute (wastewater other than sanitary wastes and cooling water)		1,100 GPM	

List Periodic or Seasonal Variations: NONE

5. Describe any pretreatment facilities currently in use: SEE INDUSTRIAL WASTE DISCHARGE QUESTIONAIRE.

6. For all parameters asterisked in Column 1, provide the information requested in Columns 6, 7 and 8:

1	2	3	4	5	6		7	8
*	Parameter	Units	Pretreatment Standard	City of Springdale Monitoring	Is Pretreatment Standard Met on a Regular Basis? Yes	No	Industry Self-Monitoring	Expected Quality After Additional Pretreatment, If Required
	BOD_5	mg/l						
		lb/day	(*)					
	COD	mg/l						
		lb/day						
	TSS	mg/l						
		lb/day	(*)					
	pH		>5.0 - <11.0					
	Temperature ° F.		150					
	Oil & Grease	mg/l	150					
		lb/day						
	T. Cyanide	mg/l						
		lb/day						
	Cadmium	mg/l						
		lb/day						
	T. Chromium	mg/l						
		lb/day						
	Copper	mg/l						
		lb/day						
	Lead	mg/l						
		lb/day						
	Mercury	mg/l						
		lb/day						
	Nickel	mg/l						
		lb/day						
	Zinc	mg/l						
		lb/day						
	T. Metals	mg/l						
		lb/day						

(*) Limitations to be set for specific industries which will provide a net loading in the influent to the Springdale wastewater treatment plant which is within the treatment capability of the treatment plant and which complies with federal, state, or city requirements.

7. If applicable pretreatment standards are not being met consistently, is additional pretreatment and/or alteration of current operation and maintenance (O & M) required by your firm to meet the limitation?

Yes _____ No ✓

Remarks: _____

N/A 8. If additional pretreatment and/or O & M are required to meet the applicable pretreatment standards, submit the shortest schedule by which your firm will provide such additional pretreatment. The completion date in this schedule shall not be later than _____ from the date of this application or no later than the compliance date established by applicable National Categorical Pretreatment Standards, whichever date occurs first.

The schedule shall contain a list of the major events leading to compliance. The expected dates of completion of such events shall also be given. Refer to Part 9 below for any other requirements which must be addressed in developing this schedule.

9. Other Pretreatment Requirements:

10. Certification:

I declare that I have examined this report and certify that to the best of my knowledge and belief, it is true, correct and complete.

Certified by: Matt C Title: GENERAL PRODUCTION MANAGER

Date: 7/14/09

The above certification must be a representative of the company with the authority to sign on behalf of the company.

A-1c

Attachment A-2

Springdale Water Utilities

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

Matt Evans
General Production Manager
Tyson Foods, Inc. – Berry St.
600 N. Berry St.
Springdale, AR 72764

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: Issuance of Industrial User Permit to Tyson Foods, Inc. - Berry St., Springdale, AR, by Springdale Water Utilities.

Permit No. 09-04

Dear Mr. Evans:

Your request for issuance of Discharge Permit No. 09-04 has been reviewed and processed in accordance with Sewer Use Ordinance #2842.

The enclosed issued permit, #09-04, covers the wastewater discharged from the Tyson Foods, Inc. - Berry St. facility located at 600 N. Berry St., 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 20th day of August, 2009

Springdale Water Utilities

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

09-04
INDUSTRIAL USER PERMIT

In accordance with the provisions of Sewer Use Ordinance #2842

Tyson Foods, Inc. - Berry St.
600 N. Berry St.
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 September 1, 2009, and shall expire at midnight on September 1, 2014.

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 20th day of August, 2009

A-2 b

PART 1 - EFFLUENT LIMITATIONS

A. During the period of September 1, 2009 through September 1, 2014, the Permittee is authorized to discharge wastewater to Springdale Water Utilities' sewer system from the outfall listed below.

Description of outfall:

Outfall	Description
01	Manhole located in east sampling building, north of the pretreatment plant off Berry St.

B. During the period of September 1, 2009 through September 1, 2014, 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 discharges from the Tyson Foods, Inc. - Berry St. facility in Springdale, AR.

Effluent Limitations

Parameter	Daily max. (mg/L)	Monthly ave. (mg/L)
pH	5.0 - 11.0*	------
Temperature	150° F	------
Flow	Report (MGD)	Report (MGD)
BOD5	Report	------
TSS	Report	------
Total P	Report	------
Ammonia as N	Report	------

*The pH shall not be less than 5.0 standard units nor greater than 11.0 standard units.

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 September 1, 2009 through September 1, 2014, the Permittee shall monitor Outfall 001 for the following:

Parameter (units)	Sample Location	Measurement Frequency	Sample Type
pH (pH units)	(1)	1/Month	Grab (2)
Temperature (°F)	(1)	1/Month	Grab (2)
Flow (MGD)	(1)	Daily	Meter (3)
BOD5 (mg/L)	(1)	1/Month	24-hr. Comp. (4)
TSS(mg/L)	(1)	1/Month	24-hr. Comp. (4)
Total P (mg/L)	(1)	1/Month	24-hr. Comp. (4)
Ammonia as N (mg/L)	(1)	1/ Month	24-hr. Comp. (4)

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

(2) **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.

(3) Daily flows are to be recorded from the Permittee's Parshall flume.

(4) A 24-hr. Comp. shall consist of discrete grab samples collected at regular intervals for a period of 24 hours. A minimum of 12 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.

(5) A grab sample shall consist of four samples collected at times evenly spaced during the hours of discharge.

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 September, 2009 report is due no later than October 10, 2009. To be considered on time, the report must either be received on or be postmarked by that date. A copy of the pH and temperature 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.

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 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 (479)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 and cause 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: Industrial Pretreatment Coordinator
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 ADEQ.

SECTION 2 - COMPLIANCE SCHEDULE REPORTING

No later than 14 days following each date in the 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 public treatment 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: Industrial Pretreatment Coordinator
P.O. Box 769
Springdale, AR 72765

(2) Unanticipated bypass. The Permittee shall immediately notify Springdale Water Utilities verbally at (479)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 or Sewer Use Ordinance #2842 shall inform Springdale Water Utilities immediately upon the first awareness of the commencement of the upsets at (479)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.

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.

Attachment A-3

Springdale Water Utilities
Industrial Inspection Checklist

Industry and Permit Background

Name of Industry: Tyson Foods Inc. Berry Street
Address of Industry: 600 N. Berry Street
Springdale, AR 72764

Permit No.: 09-04

Date of Inspection: 11/8/12
Date of Last Inspection: 11/29/11

Findings (Summary): IU in compliance

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

Does this IU need a plan to control slug discharges as defined under 40 CFR 403.5(b)? 09 ~~X~~ Yes X 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:

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 — Ops & Bush Commission ✓ Yes ___ No ___ N/A
(b)All treatment units in service — ✓ Yes ___ No ___ N/A
(c)Qualified operating staff provided — ✓ Yes ___ No ___ N/A
(d)Established procedures available for training new operators — ✗ ___ 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:

Self-Monitoring Program

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

Details:

(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 — ~~✓ 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 (0)% 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: Tyson Foods Inc.- Berry Street

Address: 600 N. Berry Street

Springdale, AR 72764

Years at present location: 52 years

Authorized representative: Roger Harlen

Title: Env. And Wastewater Manager

Telephone number: 751-8500 Ext. 1507

Contact representative: Same as Above

Title:

Telephone Number:

IU Permit Number: 09-04 Expiration Date: 9/1/14

Industry Type/Category: Poultry Processing SIC: 2015

Nature of Operation: kill plant and further processing of chicken

No. of Employees: 1250 Work hrs./day: 24 Work days/week: 6

Inspection Date/Time: 11/8/12 100 Am

Inspectors: Brad Stewart (name) _____ (signature)

_____ (name) _____ (signature)

Representatives: Roger Harlen (name) _____ (signature)

_____ (name) _____ (signature)

A-3d

Industry TYSB

Raw materials: Live Chicken

Products produced: Cooked and further processed chicken

Process description: Chickens are killed, scalded, defeathered and eviscerated. Chicken is either frozen or further processed. Some product is breaded, marinated and cooked.

Water Source: City ✓ Other

Water Usage: Sanitary ∝ Process ∝

Other Boilers

Cooling Towers

Flow to collection system: ~1 MGD

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

Kill area is dry ("blood trough" drains to Pretreatment. All further process areas drain to Wastewater

Comments:

Industry TYSB

Page 6 of 12

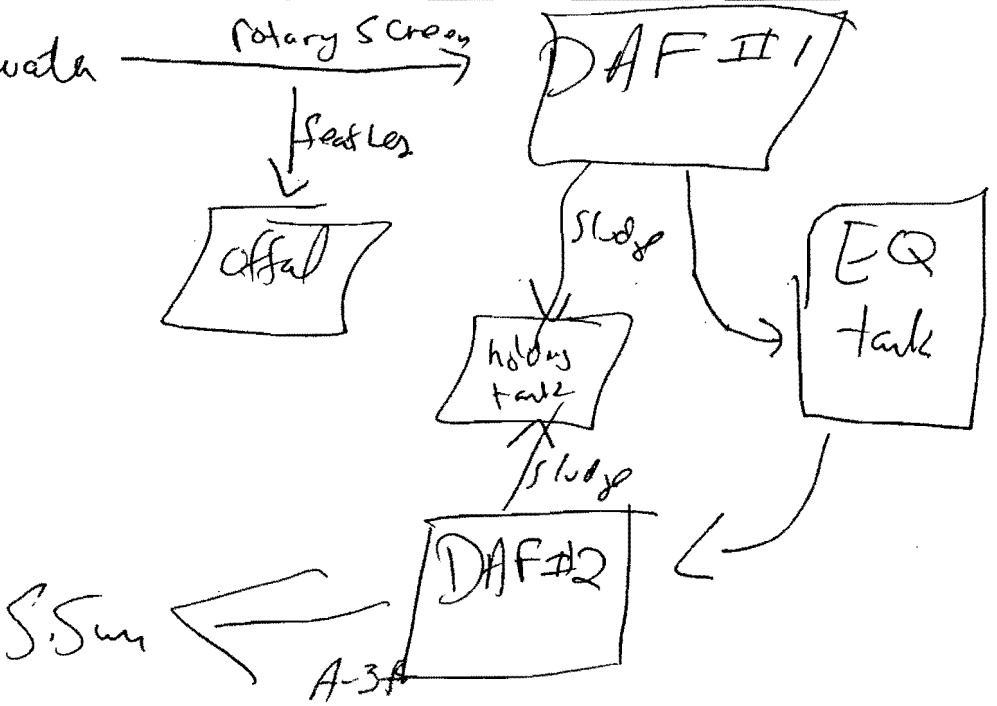
Pretreatment Process (Type, Frequency, Location, Flow, Condition):

Process wastewater is captured in a large pit, & it is pumped thru a rotoscreen to remove feathers + other offal. Wastewater from pit is pumped to DAF #1 and then to a 300,000 gal EQ tank. Microorganisms are added and wastewater is pumped to 2nd DAF before being discharged to Sanitary Sewer.

Sludge is captured in holding tank(s) and removed by Gros & Bush.

Comments:

Diagram:



Industry TYSB **Page** 7 **of** 12

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

Sanitation Chemicals are stored in a locked, bermed room (in main plant). floor drains go to holding pit in wastewater

See pg 10 for List

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

See above

Comments:

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

- Sludge is stored in Holding tank
- Used OIL (300 gal)
- offal to Orca Byproducts

Comments:

Industry TYSB Page 8 of 12

Monitoring Facility (Location, Type, Frequency):

- Locked Sample shed north of Offal Building
- Refrigerated Auto sampler
- V-notch weir for Flow monitoring

Comments:

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

ETG
PO Box 307
Bentonville, AR 72712

Sampling Techniques: 24 hr Flow proportional composite + Grabs

Preservation Techniques: Per 40 CFR Part 136

Permit Violation (Past Twelve Months): NONE

Industry TYSB Page 9 of 12

Wastestream to Surface/Groundwater: ~~Gager~~ Stormwater

Permit No.: ARR00A076

Expiration Date:

EPA ID No. of Hazardous Waste Generator: N/A

RCRA Information: - COD vials (Heritage Environmental)

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

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

Pollution Prevention: - reuse of water
- dry pickup of product

Sanitation Chemicals

Ecolab

-Quadexx	100	(7)	55 gal
"	200	(3)	" "
"	300	(9)	" "
"	400	(4)	" "
"	500	(5)	" "
"	600	(4)	" "
"	700	(3)	" "
"	800	(4)	" "
- Vortexx V		(7)	55 gal
- Fresh FX		(2)	300 gal
- NaOH		(2)	300 gal
- Bleach		(1)	2,500 gal

N/A

Industry T&B Page 2 of 12

Inspection Summary: IU has good records; facility clean & in good working order

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

Comments: None

Recommended Actions: None

Report Completed by: [signature]

Date: 11/9/12

Mark Dooly - new Complex E. manager
Jackie Greenfield - plant manager
Joel Ferguson - assistant plant manager

	BOD	TSS
16/23	345	112
26	293	110
27	546	396
28	242	208
31	292	82

- Fresh Ex - (2) 300 gal totes
- locked room
- NaOH - 300 gal tote

Attachment A-4

American Tubing, Inc.

December 3, 2012

Attn: Jennifer Enos
Springdale Water Utilities
POB 769
Springdale, AR 72765-0769

Ref.: 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.

I further certify that American Tubing, Inc. has not discharged any process wastewater in the previous 90 days, and will not do so within the next 90 days.

Best Regards,

Charles M. Lewis

Charles M. Lewis
American Tubing, Inc.
President

2191 Ford Avenue • Springdale, Arkansas • 72764-4701
479.756.1291 • 800.447.0284 • Fax: 479.756.1346
www.americantubing.com

Attachment A-5

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

SIU NAME: Tyson Berry Street

PERMIT NO.: 04-06 **CONTACT:** Sonny Jones

1. **SPILL PLAN**

   a. Type on file: (PIPP, SPCC, TOMP, Contingency): SPCC Date: Nov 2003

   b. Number of Spills in last 3 years: 1

2. **CHEMICAL STORAGE** – See attached sheets

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

   b. Containment: Yes _____ No _____ Describe: _____

   _____

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

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

   Distance from storage tanks or drums (in feet): _____

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

3. **MANUFACTURING PROCESSES**

   a. Process solutions in tanks

Chemical Solution Name	Location (attach sketch)	Process Tank Size (in gallons)
MARINADE	SAWLINE 1	200 GALLONS
MARINADE	SAWLINE 2	250 GALLONS
MARINADE	SAWLINE 3	250 GALLONS
MARINADE	SAWLINE 4	300 GALLONS

MANUFACTURING PROCESSES – Continued

b. Do Process solution tanks overflow? Yes _____ No ✓

If so, is overflow liquid contained? Yes N/A No _____

Describe containment: N/A

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

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

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

4. **PRETREATMENT SYSTEM**

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

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

Daily - ph probe Quarterly - temperature probe

c. Spare parts on hand: Yes ✓ No _____

d. Excess wastewater holding capacity: Yes ✓ No _____

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: operator on duty will check entire system and make changes to correct alarm condition, operator will notify supervisor and supervisor will follow-up

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: N/A

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 per Year Generated	Disposal Method
Waste oil	8,000 Gallons	Recycled
Areosol waste solvent	less than 55 gallons	Recycled
Pretreatment Sludge	43,680,000 lbs.	Land Application

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

Waste oil and Areosol waste solvent is stored in an area where there is no drains and a containment wall. Pretreatment Sludge is monitored daily and any spills will be contained in pretreatment facility preventing any discharge into the sanitary sewer system.

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.

Signature of Authorized Official	Title	Date
	Wastewater Mgr.	11/27/06

ASd

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: _____

_____

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

Signature: J. E. Gano Date: 11/27/06

NOTE - CAREFULLY REVIEW SECONDARY CONTAINMENT NEXT UNSCHEDULED INSP. SEEM TO BE RELYING A LOT ON WW PITS AND PROCESSING PLANT NOTIFICATION OF PROBLEMS. MAY NEED TO REVISE PLAN OR ADD MORE CONTAINMENT.

Jem

A-5e

Tyson Foods, Berry Street Plant
Bulk Chemical List

Diesel Fuel
Location: Outside fuel shed Container size: 500 gallons Quantity Stored: 1
Containment: Yes X No ___ Describe: Concrete Curbing
Condition: Good X Fair ___ Poor ___ N/A ___
Drain/Trenches: Yes ___ No X Routed to: N/A
Distance from storage tanks or drums (in feet): N/A
Spill Potential (High, Medium, Low): Low

1568 (Tub Wash) Ethanolamine Potassium Hydroxide
Location: Tub Washroom Container size: 55 gallons Quantity Stored: 1
Containment: Yes ___ No X Describe:
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 3 feet
Spill Potential (High, Medium, Low): Low

3101FSC (Tub Wash) Sodium Hydroxide, Sodium Hypochlorite
Location: Tub Washroom Container size: 55 gallon Quantity Stored: 1
Containment: Yes ___ No X Describe:
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 1 foot
Spill Potential (High, Medium, Low): Low

5440 Heavy Duty Degreaser
Location: Outside shipping dock Container size: 200 gallons Quantity Stored: 1
Containment: Yes ___ No X Describe:
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 1 foot
Spill Potential (High, Medium, Low): Low

5767 Cleaner/Degreaser
Location: Inside shipping dock Container size: 200gallons Quantity Stored: 1
Containment: Yes ___ No X Describe:
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 3 feet
Spill Potential (High, Medium, Low): Low

Anhydrous Ammonia
Location: Outside tank & piping Container size: 68,000 lbs Quantity Stored: 1
Containment: Yes ___ No _X_ Describe:
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No __ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 150 feet
Spill Potential (High, Medium, Low): Low

Drewchlor 5107 (Sodium Chlorite)
Location: Outside Live Receiving Container size: 1500 gallon Quantity Stored: 1
Containment: Yes ___ No _X_ Describe:
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No __ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 100 feet
Spill Potential (High, Medium, Low): Low

Drew 6015 (Hydrogen Chloride)
Location: Outside Live Receiving Container size: 1500 gallons Quantity Stored: 1
Containment: Yes ___ No _X_ Describe:
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 100 feet
Spill Potential (High, Medium, Low): Low

FM Hydraulic Fluid
Location: Maintenance shop Container size: 275 gallons Quantity Stored: 1
Containment: Yes ___ No _X_ Describe:
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 10 feet
Spill Potential (High, Medium, Low): Low

Sodium Hypochlorite
Location: Outside Maintenance Shop Container size: 5000 gallons Quantity Stored: 1
Containment: Yes ___ No _X_ Describe:
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 3 feet
Spill Potential (High, Medium, Low): Low

Oxygen Scavenger
Location: Boiler Room Container size: 70 gallons Quantity Stored: 1
Containment: Yes X No ___ Describe: plastic containment basin
Condition: Good X Fair ___ Poor ___ N/A ___
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 15 feet
Spill Potential (High, Medium, Low): Low

Potassium Hydroxide
Location: Wastewater Facility Container size: 5000 gallons Quantity Stored: 1
Containment: Yes ___ No X Describe:
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 4 feet
Spill Potential (High, Medium, Low): Low

Boiler Treatment
Location: Boiler Room Container size: 70 gallon Quantity Stored: 1
Containment: Yes X No ___ Describe: plastic containment basin
Condition: Good X Fair ___ Poor ___ N/A ___
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 20 feet
Spill Potential (High, Medium, Low): Low

Nalco 1722
Location: Boiler Room Container size: 280 gallon Quantity Stored: 1
Containment: Yes X No ___ Describe: plastic containment basin
Condition: Good X Fair ___ Poor ___ N/A ___
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 15 feet
Spill Potential (High, Medium, Low): Low

Ecosorb 606 Deodorizer
Location: Wastewater Facility Container size: 55 gallon Quantity Stored: 1
Containment: Yes ___ No X Describe:
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 20 feet
Spill Potential (High, Medium, Low): Low

A-5h

WT-FS812 Ferric Sulfate Solution
Location: Wastewater Facility Container size: 5000 gallon Quantity Stored: 1
Containment: Yes X No __ Describe: Concrete Containment Basin
Condition: Good X Fair _____ Poor _____ N/A _____
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

WT-6485C Cationic Polymer Solution
Location: Wastewater Facility Container size: 3000 gallons Quantity Stored: 1
Containment: Yes X No ___ Describe: Concrete Containment Basin
Condition: Good X Fair _____ Poor _____ N/A _____
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

WT-FS289 Antifoam
Location: Wastewater facility Container size: 275 gallons Quantity Stored: 2
Containment: Yes ___ No X Describe
Condition: Good _____ Fair _____ Poor _____ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 15 feet
Spill Potential (High, Medium, Low): Low

WT-ST44S Sodium Thiosulfate
Location: Wastewater facility Container size: 275 gallons Quantity Stored: 3
Containment: Yes ___ No X Describe
Condition: Good _____ Fair _____ Poor _____ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 15 feet
Spill Potential (High, Medium, Low): Low

WT-6135GDA Anionic Polymer Solution
Location: Wastewater Facility Container size: 3000 gallons Quantity Stored: 1
Containment: Yes X No ___ Describe: Concrete containment basin
Condition: Good X Fair _____ Poor _____ N/A _____
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

WT-6781GX Polyquaternary Amine Solution
Location: Wastewater facility Container size: 5000 gallons Quantity Stored: 1
Containment: Yes ___ No X Describe
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 20 feet
Spill Potential (High, Medium, Low): Low

WT-SA15 Sulfuric Acid
Location: Wastewater facility Container size: 330 gallons Quantity Stored: 1
Containment: Yes ___ No X Describe
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 15 feet
Spill Potential (High, Medium, Low): Low

Citric Acid
Location: Chemical Room Container size: 450 lb drum (powdered) Quantity Stored: 2
Containment: Yes ___ No X Describe
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

DCI – 646 (Alkali)
Location: Chemical Room Container size: 275 gallons Quantity Stored: 3
Containment: Yes ___ No X Describe
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

DQS Sanitizer (Quaternary Ammonium)
Location: Chemical Room Container size: 55 gallons Quantity Stored: 4
Containment: Yes ___ No X Describe
Condition: Good ___ Fair ___ Poor ___ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

HD Acid (Minerals Acids)
Location: Chemical Room Container size: 275 gallons Quantity Stored: 2
Containment: Yes ___ No _X_ Describe
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

PELS Caustic Soda Beads
Location: Chemical Room Container size: 50 lb bags Quantity Stored: 500
Containment: Yes ___ No _X_ Describe
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

Power Lube (mineral oil)
Location: Chemical Room Container size: 55 gallons Quantity Stored: 2
Containment: Yes ___ No _X_ Describe
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

Scrub All (Alkaline Salts)
Location: Chemical Room Container size: 275 gallons Quantity Stored: 3
Containment: Yes ___ No _X_ Describe
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

Smoke Clean (Alkali)
Location: Chemical Room Container size: 275 gallons Quantity Stored: 3
Containment: Yes ___ No _X_ Describe
Condition: Good _____ Fair _____ Poor _____ N/A __X__
Drain/Trenches: Yes _X_ No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

Soil Solv (Neutralized Alkaline Salts)
Location: Chemical Room Container size: 275 gallons Quantity Stored: 2
Containment: Yes ___ No X Describe
Condition: Good _____ Fair _____ Poor _____ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

Sulfn – 10 (Organic Acids)
Location: Chemical Room Container size: 450 lb drums Quantity Stored: 3
Containment: Yes ___ No X Describe
Condition: Good _____ Fair _____ Poor _____ N/A X
Drain/Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 5 feet
Spill Potential (High, Medium, Low): Low

NALCO 53510 Cooling Water Treatment
Location: Refrigeration Room Container size: 70 gallons Quantity Stored: 1
Containment: Yes X No _____ Describe: Plastic containment basin
Condition: Good X Fair _____ Poor _____ N/A _____
Drain Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 30 feet
Spill Potential (High, Medium, Low): Low

NALCO Strabrex 70
Location: Refrigeration Room Container Size: 70 gallons Quantity Stored: 1
Containment: Yes X No ____ Describe: Plastic containment basin
Condition: Good X Fair ____ Poor ____ N/A ____
Drain Trenches: Yes X No ___ Routed to: Wastewater influent pit
Distance from storage tanks or drums (in feet): 30 feet
Spill Potential (High, Medium, Low): Low

https://icis.epa.gov/icis/inspection/AddInspection.do?actionMethod=initiate&epaOrState=S&CMType=INS&fromICIS

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ICIS NPDES: Add Inspection

Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: Pretreatment Prog. Audit

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

* Compliance Monitoring Type: AFO Defined, AFO Designation, Aerial Photography, **Audit**, Audit (IU)

* Linked Facility

FACILITIES

Program System Acronym	Identifier		Facility Site Name	Address	FRS ID
NPDES	AR0022063	VALIDATE	Springdale (Allen Gilliam)		

Compliance Monitoring Dates

Planned Start Date:	2/12/13	Actual Start Date:	2/12/13
Planned End Date:	2/14/13	Actual End Date:	2/14/13

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

* Programs: NPDES - Post Administrative Penalty Case (Settlement), **NPDES - Pretreatment**, NPDES - Sanitary Sewer Overflow (SSO), NPDES - Section 308 Information Requests, NPDES - Sludge/Biosolids

State Statute:

* Compliance Monitoring Action Reason: Agency Priority, Citizen Complaint/Tip, **Core Program**, For Cause, Random Inspection

* Compliance Monitoring Agency Type: State Contractor, State - Using Federal Credential, **State**, Regional, Other Federal

Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: No

Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity?: State

If Joint, what was the purpose of the participation of the other party?:

Which party had the lead?:

Government Contacts

CONTACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes:

ADD / REMOVE

NAICS Codes:

ADD / REMOVE

Priorities

OECA National Priority: 2009 - (CA Only) - Air Toxics - Flares; 2009 - (CA Only) - Air Toxics - LDAR; 2009 - (CA Only) - Air Toxics - Surface Coating; 2009 - (CA Only) - Financial Assurance; 2009 - (CA Only) - MP - Mining

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

Media Monitored

Media Monitored:

Compliance Monitoring Media Indicator

Multimedia Indicator: ☐

Compliance Monitoring Information

Number of Days Physically Conducting Activity: 3

Number of Hours Physically Conducting Activity: 24

Compliance Monitoring Action Outcome: Satisfactory

Compliance Monitoring Rating Code:

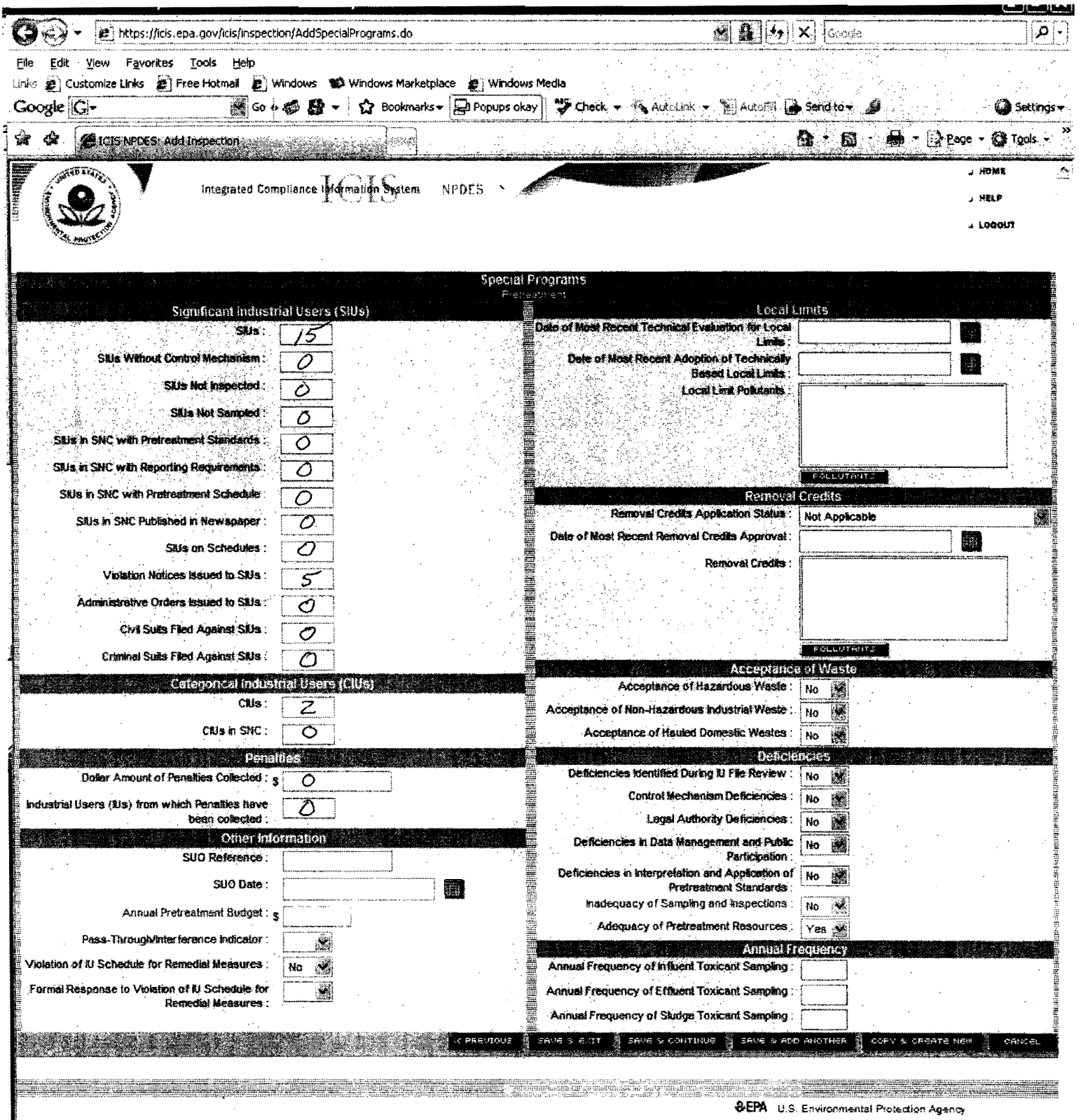
Compliance Monitoring Comments

Compliance Monitoring Comments:

User Defined Fields

1: ☐

Trusted sites 100%



https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Integrated Compliance Information System ICIS NPDES

HOME
HELP
LOGOUT

Special Programs

Pretreatment

Significant Industrial Users (SIUs)

SIUs :	15
SIUs Without Control Mechanism :	0
SIUs Not Inspected :	0
SIUs Not Sampled :	0
SIUs in SNC with Pretreatment Standards :	0
SIUs in SNC with Reporting Requirements :	0
SIUs in SNC with Pretreatment Schedule :	0
SIUs in SNC Published in Newspaper :	0
SIUs on Schedules :	0
Violation Notices Issued to SIUs :	5
Administrative Orders Issued to SIUs :	0
Civil Suits Filed Against SIUs :	0
Criminal Suits Filed Against SIUs :	0

Categorical Industrial Users (CIUs)

CIUs :	2
CIUs in SNC :	0

Penalties

Dollar Amount of Penalties Collected : $	0
Industrial Users (IUs) from which Penalties have been collected :	0

Other Information

SUO Reference :	
SUO Date :	
Annual Pretreatment Budget : $	
Pass-Through/Interference Indicator :	
Violation of IU Schedule for Remedial Measures :	No
Formal Response to Violation of IU Schedule for Remedial Measures :	

Local Limits

Date of Most Recent Technical Evaluation for Local Limits :	
Date of Most Recent Adoption of Technically Based Local Limits :	
Local Limit Pollutants :	

POLLUTANTS

Removal Credits

Removal Credits Application Status :	Not Applicable
Date of Most Recent Removal Credits Approval :	
Removal Credits :	

POLLUTANTS

Acceptance of Waste

Acceptance of Hazardous Waste :	No
Acceptance of Non-Hazardous Industrial Waste :	No
Acceptance of Hauled Domestic Wastes :	No

Deficiencies

Deficiencies Identified During IU File Review :	No
Control Mechanism Deficiencies :	No
Legal Authority Deficiencies :	No
Deficiencies in Data Management and Public Participation :	No
Deficiencies in Interpretation and Application of Pretreatment Standards :	No
Inadequacy of Sampling and Inspections :	No
Adequacy of Pretreatment Resources :	Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling :	
Annual Frequency of Effluent Toxicant Sampling :	
Annual Frequency of Sludge Toxicant Sampling :	

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

EPA U.S. Environmental Protection Agency

Trusted sites 100%