

From: Torrence, Rufus
Sent: Tuesday, December 04, 2012 3:34 PM
To: 'dezell@bmpaint.com'
Subject: AR0022365 AFIN 52-00230 ARP001058 B & M Site Visit for Compliance Assurance: Inspection
Attachments: BMP Lab Report.pdf; BMP_40CFR433_Diagram 20121130.doc; BMP Insp 20120912.doc



December 4, 2012

Denver Ezell, Chemical Mgr
B & M Painting
347 Van Buren
Camden, AR 71701

Re: September 12, 2012 Site Visit for Compliance Assurance: Inspection
(Tracking No. ARP001058, AFIN 52-00230, AR0022365)

Dear Mr. Ezell:

Part of ADEQ responsibility to EPA is to ensure that inspections of industries regulated by categorical pretreatment standards (40 CFR Part 405 – 471) are performed on a periodic basis. These industries are referred to as Categorical Industrial Users (CIUs) if they discharge the regulated wastewater into the local Publicly Owned Treatment Works (POTW). In accordance to 40 CFR 403.12(e), these CIUs must submit periodic reports to the Control Authority (ADEQ or Department) and in accordance with 40 CFR 403.8(f)(2)(v) be inspected by the Control Authority at least bi-annually. ADEQ serves at the Control Authority for the City of Camden POTW.

B&M has processes (Anodizing, Chemical Etching & Coating) in the Camden facility that are regulated by 40 CFR Part 433 and discharges to the City of Camden POTW. Therefore, B&M is a CIU. On Wednesday (September 12, 2012), the Department conducted an inspection of B&M's facility.

The Department appreciates B&M taking the time to show the ADEQ Engineer (Rufus Torrence) the facility in Camden. The inspection consisted of a reviewing the files and inspecting the processes, treatment, chemical storage and exterior storage. During the last inspection of the new annex building (located across the street from the main building), the Department noted that some of the regulated wastewater (rinse water) was piped directly to the sewer without flowing through treatment or the sample point. B&M must either (1) pipe all the rinse wastewater and core process wastewater from the main and annex buildings to a common sampling point or (2) B&M may combine the wastewater samples from all (main and annex buildings) existing outfalls in proportion to flow to produce only one composited sample. The composited sample may be submitted to the lab for one

analysis. Please submit with every semi-annual report a worksheet with detailed calculations showing how B&M determined the percentages for the composited sample. Also, please sign and submit the enclosed ADEQ diagram to the Department with the next semi-annual report only. Please make any necessary corrections in the diagram.

During the inspection, the Engineer combined the wastewater from all outfalls in proportion to flow. The ADEQ lab analysis of the composited sample is attached. B&M wastewater complies with the limits in 40 CFR 433. B&M must continue to sample all regulated wastewater (acid baths, rinses, etc.) before it enters the POTW.

The Department appreciates B&M's continued efforts in periodic reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,

Rufus Torrence,
ADEQ Engineer

Attachments: ADEQ Lab Analysis
ADEQ Inspection Report dated September 12, 2012

Pretreatment Industrial Inspection

Facility Information

Facility Name:		Site Address:	
B&M, Inc		347 Van Buren Camden, AR 71701	
Signatory Authority (Name & Title): Tracy Payne, General Manager			
Phone: (870) 836-3388	Mailing Address (if different):		(Same)
Fax:			
Address: 347 Van Buren	Corporate Owner Name and address (if applicable):		
Camden, AR 71701	(Not Applicable)		
Phone: (Same)			
Fax:	Phone: (Not Applicable)		
Contact Person (Name & Title):	Fax: (Not Applicable)		
Denver Ezell	Corporate CEO: (Not Applicable)		
e-mail: dezell@bmpaint.com	e-mail: (Not Applicable)		
Facility Permit # or ARP001058	Last Inspection Date: September 15, 2010		
POTW (City) IU discharges to: Camden Water Utilities		POTW's NPDES # AR0022365	
Industrial Classification:	<input checked="" type="checkbox"/> Categorical 40 CFR 433	<input type="checkbox"/> Significant	
If Categorical, list which CFR #(s) the facility is subject to:			
Table of Contents			
I. Summary of Inspection		Page	of
A. Inspection Objectives			
B. Inspection Analysis			
II. Pre-Inspection Meeting		Page	of
A. General Information			
B. Facility Permits			
C. Additional Comments			
III. Attachments "Yes" indicates item exists at the facility and attachments will be included			
"No" indicates item does not exist at the facility and attachments aren't necessary			
A. Industrial Processes	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	Page of
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	Page of
C. Pretreatment System	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	Page of
D. Chemical Storage	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	Page of
E. Spill/Slug Control Plan	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	Page of
F. Self-Monitoring/TOMP	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	Page of
Comments : B&M Painting / Military & Aerospace Coating			
Inspector's Name (Print):		Signature:	
Rufus Torrence			
IU Rep's Name (Print)		Signature: (Not Required)	
Denver Ezell			
Date and Time Inspection Ended: September 12, 2012 @ 12:30 pm			

I. Summary of Inspection			
A. Inspection and Objective (Complete Before Inspection)			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Bi-Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s)		Compliance Assurance	
Checklist of items to be reviewed and/or visually inspected:			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input type="checkbox"/> Safety Concerns	
<input checked="" type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Pretreatment Process	<input checked="" type="checkbox"/> TOMP (<i>Guidance on Preparation</i>)	
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input type="checkbox"/> Spills/Slug Control Plan	
<input type="checkbox"/> Records Review	<input type="checkbox"/> RCRA information	<input type="checkbox"/> Process/Flow/Pretreatment Schematics	
<input type="checkbox"/> IU sampling procedures	<input checked="" type="checkbox"/> Flow/pH Meter(s)	<input type="checkbox"/> Calibration Records	
<input type="checkbox"/> MSDS Inventory List	<input type="checkbox"/> New MSDS	<input type="checkbox"/>	
Comments:			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Provide a brief narrative of deficiencies/violations or other concerns in the following areas:			
Records Review <i>No concerns; impromptu file review conducted. B&M appears to keep records for at least 3 years.</i>			
Process Area(s)			
Pretreatment System Ion Exchange			
Self Monitoring Procedures <i>B&M has two outfalls and must monitor at <u>both</u> outfalls. B&M may combine the wastewater sample in proportion to flow and submit only one sample to the lab for analysis.</i>			
Diversion/Sewer Meters			
Spill/Slug Control Plan			
Sampling Point (<i>See Self Monitoring Procedures above</i>)			
Chemical Storage <i>Drums stored on containment trays and no open drains in area.</i>			

II. Pre-Inspection Meeting			
A. General Information			
Date and Time Inspection Started: Sept 12, 2012 @ 10:20 am		SIC code(s): 3471 & 3479	
IU Reps/Titles		Control Authority Reps/Titles	
Denver Ezell, Chemical Manager		Rufus Torrence, Inspector/Engineer	
End product(s): Painted Military/Aerospace Parts (Mfr Elsewhere)		Approx. # of units produced: (N/A)	
Days of Operation: Monday thru Friday		Days of Production (if different):	
Hours of Operation: 7:30 am to 6:00 pm		Hours of Production (if different):	
Shift 1, hrs.: 7:30 am to 6:00 pm	Shift 2, hrs.: to	Shift 3, hrs.: to	
# of Employees: 40	Peak Mos.:	"Off" Mos.:	
Are there any scheduled plant shutdowns? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If yes, when?			
Are there designated plant clean-up days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If yes, when?			
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
If No, explain:			
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
If Yes, explain:			
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
If Yes, explain:			
Has there been any changes since the last inspection regarding the following items:			
Plant/flow/process layout? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, obtain copy of updated schematic for facility file.			
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Production Levels? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Raw materials? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Flow rates? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain			
Are regulated and non-regulated wastestreams combined? yes <input type="checkbox"/> no <input checked="" type="checkbox"/>			
Prior to Pretreatment System? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
If Yes, was the CWF used to calculate limits? yes <input type="checkbox"/> no <input type="checkbox"/>			
Prior to connection to the POTW sanitary sewer? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
At connection to sanitary sewer? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
Production and flows verified for Production-Based Standards? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
What is the current avg. production rate and process flow? (Not Applicable)			
Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes <input type="checkbox"/> no <input type="checkbox"/>			
(Not Applicable)			

Attachment A: Industrial Process(es)			
List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not			
1. Anodizing	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4.	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Chemical Conversion Coating	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Phosphating	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>
Were processes visually inspected? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
Brief description of process(es):			
B&M provides anodizing, chemical conversion coatings, priming and topcoating for machined parts used in the military and aerospace industry. The parts are made and machined elsewhere and delivered to B&M for coating and painting. B&M main customer (Lockheed Martin) is located in Camden.			
General observations of facility's indoor housekeeping: Good			
General observations of area outside facility's building: Good			
Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).			
<input checked="" type="checkbox"/> Process Rinse Overflows	<input type="checkbox"/> Equip. Cleanup	<input type="checkbox"/> Floor Cleanup	<input type="checkbox"/> Spent Bath Solutions
<input type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklifts Maint./Wash	<input type="checkbox"/> Tank Dragout	<input type="checkbox"/> Air Pollution Devices
<input type="checkbox"/> Boiler Blowdown	<input type="checkbox"/> Spent Rinse Tanks	<input type="checkbox"/> Equipment Coolants	<input type="checkbox"/> Non-Contact Cooling Water
<input type="checkbox"/> Stormwater	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
List Major Raw Materials and Chemicals used:			
Check Waste Stream Pollutants of Concern from Process(es)			
<input type="checkbox"/> BOD	<input checked="" type="checkbox"/> CN ⁻	<input checked="" type="checkbox"/> Metals (List) Cd, Cu, Cr, Pb, Ni, Ag & Zn	<input type="checkbox"/> Solvents (List)
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl ₂		
<input type="checkbox"/> O&G	<input type="checkbox"/> S ⁻		
<input type="checkbox"/> pH	<input type="checkbox"/>		
Are there floor drains in the Process area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes list number and the location of all floor drains:			

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Does this facility practice P2? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Environmental Management System in place? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
ISO Certified? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Written Standard Operating Procedures? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Preventative Maintenance Program Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (hydraulic systems, valves, pumps, etc)	
Explain:	
Water Reuse: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Cost Accounting to Track Savings: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Inventory Control / "Green Purchasing": Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (lean manufacturing/"env. friendly purchasing", etc)	
Explain:	
Employee Training: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Spent Solvent Reclamation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (Not Applicable)	
Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Recycle Waste Oil, Solvents, and Lubricants? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Other Activities	
P2 Equipment/Practices in use:	
<input type="checkbox"/> Overflow Alarms	<input type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Fog Spray Rinsing	<input type="checkbox"/> Countercurrent Rinsing
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input checked="" type="checkbox"/> Air Jets to Blow Parts Dry	<input type="checkbox"/> Secondary Containment of Process Solutions
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input type="checkbox"/> Bead Blasting to Remove Paint
<input type="checkbox"/> Water Soluble Cutting Fluids	<input type="checkbox"/> Recycle Overspray
<input checked="" type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input type="checkbox"/> Bath / Rinse Filtration

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are they pretreated prior to discharge to the sanitary sewer?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Was the pretreatment system visually inspected during this visit?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

<input type="checkbox"/> Dissolved air floatation	<input type="checkbox"/> Membrane Tech.	<input checked="" type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Centrifugation	<input type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating
<input checked="" type="checkbox"/> Chemical Precipitation	<input type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal
<input checked="" type="checkbox"/> Sludge Filter Press	<input type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input type="checkbox"/> Solvent Separation
<input checked="" type="checkbox"/> pH Adjustment	<input type="checkbox"/> Sand Trap	<input type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery
<input type="checkbox"/> Belt/Disk Oil Skimmer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):

Pretreatment system is a 500 gallon collection/surge tank; wastewater is pumped from the tank through two Ion Exchange canisters. Treated wastewater is pumped through the IE canisters to the POTW.

Does the description match the schematic currently on file? Yes No N/A

System Operator(s) Name: **Doug Miller**

Does discharge permit require licensed operator? Yes No N/A

Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?) Yes No N/A

List Name(s) and License classification:

(Not Applicable)

Is training provided to the Pretreatment System Operator(s)? Yes No N/A

If Yes, list type and frequency:

Is the discharge from the Pretreatment System? Batch Continuous Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: **3550** gallons per **Day**

Describe process from which batch originated (spent bath, e.g.):

Anodizing, Chemical Conversion & Phosphating

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)

Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area(s)? Yes No

Was this area(s) visually inspected? Yes No N/A

Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. Barrels aligned along wall	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
4.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer

Does the Chemical Storage Area(s) contain any of the following?

<input checked="" type="checkbox"/> Dikes, Berms for Containment	<input type="checkbox"/> Plugs for Floor Drains
<input type="checkbox"/> Secondary Tanks for Holding	<input type="checkbox"/> Premix (low) Concentrations
<input type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access
<input type="checkbox"/> Spills Control Kits for Cleanup	<input type="checkbox"/> Notification Procedures
<input type="checkbox"/> Chemical desegregation within Storage Area	<input type="checkbox"/> Other

Chemical Inventory List (MSDS) on file? Yes No N/A

Were any new MSDS reviewed during the Inspection? Yes No N/A

If yes, list below:

Chemical storage comments: **B&M has stored barrels on individual spill containment platforms.**

Chemical handling procedures (totes, dolly, buckets, hardline, etc):

Buckets

Attachment E: Spill/Slug Control Plan

Does the facility have a Spill/Slug control plan?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no*
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(B) Describes storage and handling of chemicals	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input type="checkbox"/> no
Is it posted in areas where chemicals are used and stored?	<input type="checkbox"/> yes <input type="checkbox"/> no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input type="checkbox"/> yes <input type="checkbox"/> no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input type="checkbox"/> no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point	
Total Flow Monitoring Point	
Upstream Manhole	
Point of Connection:	

*B&M does not have any open drains and a spill/slug plan is not applicable

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.

Guidance on proper sampling technique was discussed with B&M to insure consistency from CIU to CIU across the state.

Where is the sample point located?

<input checked="" type="checkbox"/> End of Process	<input checked="" type="checkbox"/> Pretreatment Effluent	<input type="checkbox"/> Total Flow
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Metered Flow	<input type="checkbox"/> Flow Actuator
<input type="checkbox"/> Private Manhole	<input type="checkbox"/> Utility Manhole	<input type="checkbox"/> Advance Notice Required
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

Is the Sample Collection Site Adequate? Yes No N/A

Does the facility rep. request a split sample on this sampling/inspection? Yes No

Does the facility perform self-monitoring tests in-house? Yes No N/A

If no, record the name and address of Contract Lab: **American Interplex**

Automatic Sampler or Manual

IU Self-Monitoring Results reviewed: Yes No N/A

Is the Contract Lab certified by ADEQ for test parameters? Yes No N/A

Dates and Times of Sample Analysis Recorded? Yes No N/A

Correct Methods Used for Test Analysis (Refer To 40CFR Part 136) Yes No N/A

EPA recommended holding times being met (Refer to 40CFR Part 136) Yes No N/A

Chain of Custody Records for Self-Monitoring Samples Reviewed Yes No N/A

Were correct Sample Types Collected Yes No N/A

Dates and times of Sample Collection Recorded? Yes No N/A

Were Samples preserved correctly (refer to 40CFR Part 136) Yes No N/A

Were Self Monitoring records on file for past 3 years? Yes No N/A

List the parameters the facility monitors and the frequency:

<input type="checkbox"/> Cd(t) 2/yr	<input type="checkbox"/> Cu(t) 2/yr	<input type="checkbox"/> Cr(t) 2/yr	<input type="checkbox"/> Ni(t) 2/yr	<input type="checkbox"/> Pb(t) 2/yr
<input type="checkbox"/> Ag(t) 2/yr	<input type="checkbox"/> Zn(t) 2/yr	<input type="checkbox"/> pH	<input type="checkbox"/> CN ⁻ (t) 2/yr	<input type="checkbox"/> CN ⁻ (a-c)
<input type="checkbox"/> TTO-Vol	<input type="checkbox"/> TTO-B/N	<input type="checkbox"/> TTO-A.E.	<input type="checkbox"/> TTO-Pest	<input type="checkbox"/> Cr(hex)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU report TTO? Analysis Certification Statement

Does the facility have a Toxic Organic Management Plan? Yes No N/A

If yes, Does the plan show how toxic organics are used, stored, and disposed? Yes No N/A

List the date of the last revision to the TOMP: **September 4, 2009**

Is the TOMP being followed as written? Yes No N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? Yes No N/A (If yes, provide description of evidence in comments.)

Comments: **B & M TOMP states that no ("None") TTOs are present in the Camden facility.**



5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: B&M, Inc 52-00230 2012 2843
Attention:
Client Address:

,

Report Date: November 26, 2012
LAB ID: AR12SEP13-01
Comment:

Approved By: _____

Date: November 26, 2012

Client: CSI **Client Sample ID:** BMP
Lab ID: 2012-2843 **Collection Date:** 9/12/2012 11:44:00 AM
Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 12112604 Run: 1

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	4480	200	20		ug/L
Antimony	<100	100	5		ug/L
Arsenic	<10	10	0.5		ug/L
Barium	<100	100	2.0		ug/L
Beryllium	<5	5	0.1		ug/L
Boron	476	250	5.0		ug/L
Cadmium	<10	10	0.3		ug/L
Calcium	2.27	0.4	0.04		mg/L
Chromium	63.1	10	0.3		ug/L
Cobalt	<10	10	0.5		ug/L
Copper	76.5	10	0.5		ug/L
Iron	<200	200	10.0		ug/L
Lead	<10	10	0.1		ug/L
Magnesium	<1	1	0.1		mg/L
Manganese	13.9	10	0.2		ug/L
Nickel	<25	25	0.5		ug/L
Potassium	<10	10	0.05		mg/L
Selenium	<20	20	0.5		ug/L
Silver	<50	50	1.0		ug/L
Sodium	15.2	0.4	0.02		mg/L
Thallium	<25	25	0.05		ug/L
Vanadium	<25	25	1.0		ug/L
Zinc	31.4	30	2.0		ug/L
Dilution Factor	10				
Analyzed By	Robert Graddy				
Analysis Date/Time	Nov 7 2012 2:43PM				
Prep By					
Prep Date/Time					

Analytical Quality Control Results Report

Batch: 12112604	ICP Metals - water (total)
BMP	LIMS ID: 2012-2843

ICP Metals - water (Total) DUP

Run: 1

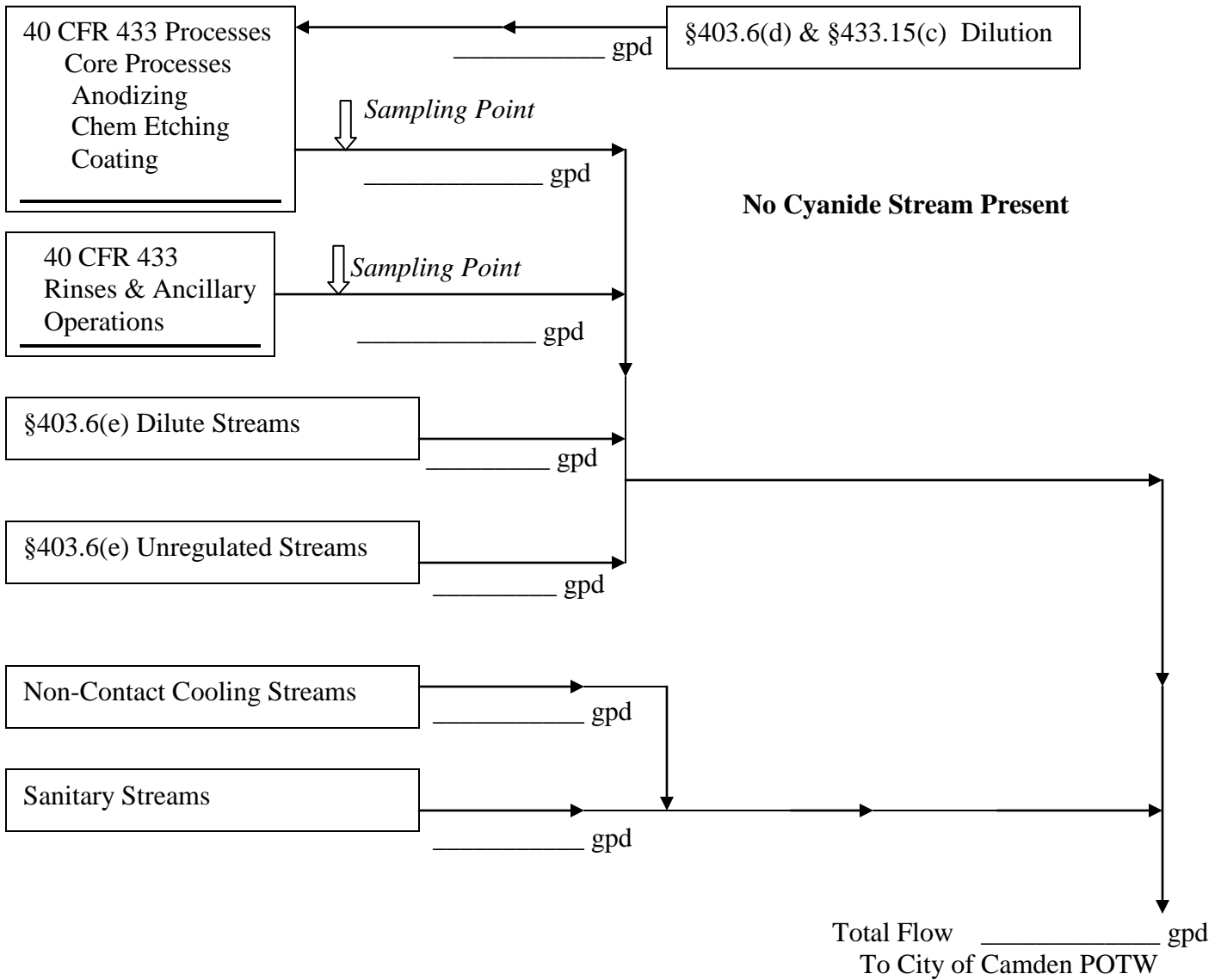
<i>Parameter</i>	<i>Result</i>	<i>DL</i>	<i>RL</i>	<i>Accuracy Control</i>	<i>Precision Control</i>
Magnesium	<1 mg/L	1	1		
Manganese	10 ug/L	2	10		
Manganese (RPD)	31 %				0 - 20
Nickel (RPD)	22 %				0 - 20
Nickel	<25 ug/L	5	25		
Potassium	<10 mg/L	0.5	10		
Potassium (RPD)	66.8 %				0 - 20
Selenium (RPD)	81.5 %				0 - 20
Selenium	<20 ug/L	5	20		
Silver	<50 ug/L	10	50		
Silver (RPD)	66.7 %				0 - 20
Sodium (RPD)	30.2 %				0 - 20
Sodium	11.2 mg/L	0.2	0.4		
Thallium (RPD)	217 %				0 - 20
Thallium	<25 ug/L	0.5	25		
Vanadium (RPD)	94.1 %				0 - 20
Vanadium	<25 ug/L	10	25		
Zinc	32.8 ug/L	20	30		
Zinc (RPD)	4.3 %				0 - 20
Dilution Factor	10				
Analyzed By	Robert Graddy				
Analysis Date/Time	Nov 7 2012 2:49PM				
Aluminum	5700 ug/L	200	200		
Aluminum (RPD)	24.1 %				0 - 20
Antimony (RPD)	82.2 %				0 - 20
Antimony	<100 ug/L	50	100		
Arsenic	<10 ug/L	5	10		
Arsenic (RPD)	121 %				0 - 20
Barium (RPD)	115 %				0 - 20
Barium	<100 ug/L	20	100		

Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
 Ruehr@adeq.state.ar.us
 501-682-0955

Beryllium	<5 ug/L	1	5	
Beryllium (RPD)	200 %			0 - 20
Boron (RPD)	20.4 %			0 - 20
Boron	388 ug/L	50	250	
Cadmium	<10 ug/L	3	10	
Cadmium (RPD)	23.6 %			0 - 20
Calcium (RPD)	70.1 %			0 - 20
Calcium	4.72 mg/L	0.4	0.4	
Chromium	61.8 ug/L	3	10	
Chromium (RPD)	2.2 %			0 - 20
Cobalt (RPD)	40.0 %			0 - 20
Cobalt	<10 ug/L	5	10	
Copper	62.7 ug/L	5	10	
Copper (RPD)	19.9 %			0 - 20
Iron (RPD)	10.0 %			0 - 20
Iron	<200 ug/L	100	200	
Lead	<10 ug/L	1	10	
Lead (RPD)	113 %			0 - 20
Magnesium (RPD)	57.3 %			0 - 20

B & M Painting Camden, Arkansas



If a stream is not present, show NOT PRESENT or N/P. If a stream is present, the wastewater can enter the POTW but currently has no flow, show 0.0 gpd. If a stream is present but the wastewater cannot enter the POTW, show Zero Discharge or Z/D. If an unregulated stream is present but the User has decided not to declare it at this time, show N/P.

Signature of §403.12(b) Professional

Date

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

Plant Manager or the authorized §403.12(l) official

Date
BMP_Diagram.doc (November 30, 2012)