

ADEQ

ARKANSAS
Department of Environmental Quality

November 12, 2009

Devin McSpadden
Plant Manager
Defiance Metal Products
944 By Pass Road
Heber Springs, AR 72543

Re: Defiance Metal (Tracking #ARP001047, AFIN #1200214) Pretreatment Compliance Assurance Visit in Heber Springs (NPDES #AR0022381)

Dear Mr. McSpadden,

On 11/4/09, a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel at your facility. This to satisfy requirements of the memorandum of agreement with EPA Region VI in our State's Pretreatment Program implementation procedures to "Randomly sample and analyze the effluent from industrial users and to conduct surveillance activities in order to identify, independent of information supplied by industrial users occasional and continuing noncompliance with pretreatment standards" per 40 CFR 403.8(f)(2)(v).

This office wishes to extend its appreciation to you and your staff for the transparent exchange of information and dialogue during the visit. Your willingness to "open the books" and share process knowledge compliments the true spirit of environmental partnerships.

Defiance is compliant with the Metal Finishing standards in 40 CFR 433.17 and the National Pretreatment Regulations in 40 CFR 403. Attachments A-1 and A-2 confirm concentrations analyzed from samples taken during the site visit are well within the 40 CFR 433.17 limitations.

Find attached supporting documentation: the "Pretreatment Industrial Inspection", your own lab's AA flame analysis of Zn (Attachment A-1) and ADEQ's Certificate of Analysis for all metals analyzed by our lab (Attachment A-2).

If there are further questions or comments, please feel free to contact this office at (501) 682-0625 or electronically at gilliam@adeq.state.ar.us.

Sincerely,



Allen R. Gilliam
ADEQ State Pretreatment Coordinator

cc: Pretreatment File
Don Knight, City Wastewater General Manager, 1108 West Front Street, Heber Springs, 72543

Attachments

Pretreatment Industrial Inspection

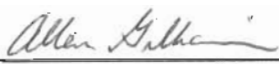

Facility Information

Facility Name: Defiance Metal Products	Site Address: 944 By Pass Road Heber Springs, AR 72543
Signatory Authority (Name & Title): Devin McSpadden / Plant Manager	
Phone: 501.362.1919	Mailing Address (if different):
Fax: 501.362.6160	
Address: same	Corporate Owner Name and address (if applicable):
Contact Person (Name & Title): Bob Taylor Safety Leader	
Phone: 501.362.1919 x – 5232	Phone:
Fax: 501.362.6160	Fax:
e-mail: btaylor@defiancemetal.com	Corporate CEO:
e-mail:	e-mail:
Facility Tracking #ARP0001047; AFIN #1200214	Last Inspection Date: 4/4/06
POTW (City) IU discharges to: Heber Springs (NPDES #AR0022381)	
Industrial Classification:	<input checked="" type="checkbox"/> Categorical <input type="checkbox"/> Significant
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17 (Metal Finishing)	

Table of Contents

I. Summary of Inspection	Page 2 of 11
A. Inspection Objectives	
B. Inspection Analysis	
II. Pre-Inspection Meeting	Page 4, 5 of 11
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 6 of 11
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 7 of 11
C. Pretreatment System	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 8 of 11
D. Chemical Storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 9 of 11
E. Spill/Slug Control Plan	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 10 of 11
F. Self-Monitoring/TOMP	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 11 of 11

Comments :

Inspector's Name (Print): Allen Gilliam	Signature: 
IU Rep's Name (Print): Bob D. Taylor	Signature: 
Date and Time Inspection Ended: 11/4/09 @ 2:26 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 visit with sampling and process walk-through to verify facility file information.

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
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input checked="" type="checkbox"/> Spills/Slug Control Plan
<input checked="" type="checkbox"/> Records Review	<input type="checkbox"/> RCRA information	<input checked="" type="checkbox"/> Process/Flow/Pretreatment Schematics
<input checked="" type="checkbox"/> IU sampling procedures	<input type="checkbox"/> Flow/pH Meter(s)	<input type="checkbox"/> Calibration Records
<input checked="" type="checkbox"/> MSDS Inventory List	<input type="checkbox"/> New MSDS	<input type="checkbox"/>

Comments: Records and MSDS review was cursory, but appeared in good order. Time constraints did not allow for a comprehensive review of their MSDS.

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? Yes No

Provide a brief narrative of ~~deficiencies/violations or other concerns~~ any comments in the following areas:

Records Review: Process as well as pretreatment schematics are going to be further detailed along with their narrative descriptions and sent to this office for inclusion into their file.

Process Area(s): Adequate, no comment.

Pretreatment System: Adequate, no comment.

Self Monitoring/Reporting Procedures: It was discussed the facility contact is required to notify ADEQ (and the City wastewater contact) within 24 hours of becoming aware of a violation. This requirement is in 40 CFR 403.12(g)(2). This will be accomplished in the future.

Facility will be using its own AA flame unit for analysis for metals occasionally comparing results to a certified lab via split samples. An ADEQ Tech Services rep helped their chemist conduct AA analysis on a representative sample during visit. Zn (the only metal analyzed for) levels were twice as high in the morning as they were in the afternoon (See Atch. A-1 for results). This was because of increased rinse flows during the daytime production vs. the night shift when no wastewater is being treated and production is down.

Facility rep indicated they may try to get certification through ADEQ.

CN is sent out to a contract lab.

Spill/Slug Control Plan: Slug control plan determined not necessary. No slug potential discharge identified. Facility rep and this auditor discussed any possibilities of a slug discharge occurring and the final determination was it would not be possible without intimate knowledge of the piping, valves and control panel to purposefully discharge a concentrated bath straight to the City sewer system.

Sampling Point: Adequate, no comment.
Chemical Storage: Adequate, no comment.

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 11/4/09 @ 9:05 a.m.		SIC code(s): 3469	
IU Reps/Titles: Bob Taylor / Safety Leader, Tim Bartley / Chemist, Devin McSpadden / Plant Manager		Control Authority Reps/Titles: Allen Gilliam / ADEQ State Pretreatment Coordinator and Jeff Ruehr / ADEQ Technical Services Supervisor	
End product(s): Metal parts for buses and trucks		Approx. # of units produced: ~1,000+	
Days of Operation: 7		Days of Production (if different): same	
Hours of Operation: 24		Hours of Production (if different): same	
Shift 1, hrs.: 6 a.m. to 2 p.m.	Shift 2, hrs.: 2 p.m. to 10 p.m.	Shift 3, hrs.: 10 p.m. to 6 a.m.	
# of Employees: 200	Peak Mos.: Feb thru June	"Off" Mos.: July thru ~Dec	
Are there any scheduled plant shutdowns? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when?			
Are there designated plant clean-up days? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when?			
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
If No, explain: Facility has had problems with their new metal removal system (MRS) and have violated 40 CFR 433.17 Zn monthly avg. levels a year after they installed it. Some daily maximum limits have also been violated since Defiance began (almost) daily monitoring since 6/08. They've also not reported all violations per 40 CFR 403.12(g)(2), "...the User shall notify the Control Authority [ADEQ] within 24 hours of becoming aware of the violation."			
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? <input checked="" type="checkbox"/> Yes. <input type="checkbox"/> No			
If Yes, explain: Eye and ear protection is required. There are physical and chemical hazards throughout the process/pretreatment areas.			
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. Could be more detailed.			
Processes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: They ceased treating their wastewater through the MRS since ~ 5/09 and gone back to simple chemical precipitation.			
Production Levels? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Raw materials? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Eliminated the soap bath in the first tank of their process and replaced it with just hot City water.			
Flow rates? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: They've reduced their flow rates from 10 gpm to 6 gpm after ceasing use of the MRS.			
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 type="checkbox"/> N/A <input checked="" type="checkbox"/>			
If Yes, was the CWF used to calculate limits? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
Prior to connection to the POTW sanitary sewer? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
At connection to sanitary sewer? yes <input checked="" type="checkbox"/> no <input type="checkbox"/> N/A <input type="checkbox"/>			
What is the current avg. process flow? 8,000 to ~12,000 gpd			

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. Cleaner Bath	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Zn Phosphate rinse	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. City water rinses	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. De-I water rinse	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. Rinse conditioner	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>

Were processes visually inspected? Yes No N/A

Brief description of process(es): Processes include various counter-current rinses and De-I water for make up. Possibly not in order of parts flow, process tanks include a hot City water bath; heated soap bath; a City water rinse; rinse conditioner bath; heated Zn Phosphate; City water rinse; non-chrome sealer rinse; air knives for minimizing drag-out; re-use of De-I water rinse; fresh De-I water halo; paint tank w/15% E-Coat (positive charged paint); two permeate rinses with a final De-I water rinse. Then parts are sent through a dry-off oven then a bake oven.

Facility has scheduled tank "dumps" for all of the above.

Pollution Prevention is being practiced with several counter-current flows from rinses back to baths.

Paint is filtered for maximum usage and coverage.

General observations of facility's indoor housekeeping: Overall, clean and uncluttered. No mist or smoke filled areas observed.

General observations of area outside facility's building: Overall, clean and orderly.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured estimated. If batch discharged, list frequency and volume (1000 gal/month, e.g.).

<input checked="" type="checkbox"/> Process Rinse Overflows ~2,880 gpd continuous	<input type="checkbox"/> Equip. Cleanup	<input type="checkbox"/> Floor Cleanup	<input checked="" type="checkbox"/> Spent Bath Solutions ~3,000 gallons batch discharged ~1 per 2 months
<input type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklifts Maint./Wash	<input checked="" type="checkbox"/> Tank Dragout ~500 gallons/month	<input type="checkbox"/> Air Pollution Devices
<input type="checkbox"/> Boiler Blowdown	<input checked="" type="checkbox"/> Spent Rinse Tanks Batch discharge ~3,000/week	<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:

Cold rolled and hot rolled steel, some aluminum; very little galvanized material; Sodium Metasilicate; Sodium Tripolyphosphate; Zinc phosphate; Manganese Phosphate, Zinc Nitrate; Nickel Nitrate; Triethanolamine, Nitric Acid and Hydrofluozirconic Acid

Check Waste Stream Pollutants of Concern from Process(es):

<input checked="" type="checkbox"/> pH	<input checked="" type="checkbox"/> CN	<input checked="" type="checkbox"/> Metals (List) All 40 CFR 433 metals	<input type="checkbox"/> Solvents (List) IU submitted an approvable TOMP
--	--	--	--

Are there floor drains in the Process area? Yes 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 No

Does this facility practice P2? Yes No

Environmental Management System in place? Yes No

ISO Certified? (9000?) Yes No ("Quality")

Written Standard Operating Procedures? Yes No

Explain:

Preventative Maintenance Program Yes No (hydraulic systems, valves, pumps, etc)

Explain: They have a scheduled program.

Water Reuse: Yes No

Explain: They utilize counter-current flows in process.

Cost Accounting to Track Savings: Yes No

Explain: Facility employs a Superior Performance and Rewards through Communications (SPARC) in-house program. Process improvement teams have to work on at least one process improvement activity per quarter. They have 7 different areas they concentrate on.

Inventory Control / "Green Purchasing": Yes No (lean manufacturing/"env. friendly purchasing", etc)

Explain: "SPARC" program.

Employee Training: Yes No

Explain: Scheduled employee training for safety, quality and production processes.

Spent Solvent Reclamation? Yes No

Explain: It is a non-hazardous solvent, but they do have it hauled off-site for blending as a fuel supplement(?).

Recycle Paper, Aluminum, Boxes, and Pallets? Yes No

Explain: All the above except paper was mentioned. They have an in-house cardboard compactor.

Recycle Waste Oil, Solvents, and Lubricants? Yes No

Explain: Facility recycles waste oil. Non-hazardous "solvent" is hauled off every ~three months.

Other Activities

P2 Equipment/Practices in use:

<input type="checkbox"/> Overflow Alarms	<input type="checkbox"/> Aqueous Cleaning Solutions
<input checked="" type="checkbox"/> De-I water "halo" misting rinse stage (0.2 gpm); low volume-hi pressure	<input checked="" type="checkbox"/> Countercurrent Rinsing
<input checked="" type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input checked="" type="checkbox"/> Air Knives to Reduce Drag-out	<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 type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input checked="" type="checkbox"/> Bath / Rinse Filtration (bags/filters)

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment? Yes No N/A

Are they pretreated prior to discharge to the sanitary sewer? Yes No N/A

Was the pretreatment system visually inspected during this visit? Yes No 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 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"/>
<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): Need a more detailed schematic of pretreatment system tanks, plumbing and chems used.

All process w.w. is pumped from concrete sump (~4' X 6' X 8') into one of three holding tanks. From there the w.w. is pumped into mixing tank where pH is adjusted and mixing takes place, then flows through the clarifier where anion/cationic polymers are added to facilitate flocculation. Floc overflows into another sludge thickening tank which feeds their filter press. Excess fluid from sludge press is sent back to treatment tank. From the third stage of the clarifier, the water is discharged to the City sewer after any necessary pH adjustment. Sludge is sent off-site as a non-hazardous waste. All equipment appeared as clean as could be expected, no leaks observed, operational, no rusting supports, good paint protection and in generally good working order. Operator on duty.

Does the description match the schematic currently on file? Yes & No (not in detail)

System Operator(s) Name: Didn't get name.

Is the System Operator(s) licensed by the State of Arkansas? Yes No N/A

List Name(s) and License classification:

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

If Yes, list type and frequency: They used PPG and Plymouth initially. Now, they use Coral annually for refresher courses.

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: gallons per

Describe process from which batch originated (spent bath, e.g.): All process overflows/dragout rinses and batched discharged baths are commingled in holding pit, then pumped up to holding one of three possible holding tanks prior to pretreatment.

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
In-line "GPI" totalizer (made in Wichita, KS)	Not determined.	Appeared clean and in good working order

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. Bulk chemical storage area is fenced in with all barrels stored on top of grated holding containers	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2. Various work (Zn phosphate, eg) stations had some chemicals stored next to work area, but were out of areas of traffic	<input type="checkbox"/> Yes <input checked="" 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 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 checked="" type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access
<input checked="" 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: Facility rep made them available, but time constraints did not allow for a thorough review.

Chemical storage comments: Volume (small) of chemicals stored, size of building and configuration of process/pretreatment area would preclude any massive slug from entering City's sewer system.

Chemical handling procedures (totes, dolly, buckets, hardline, etc): Basically, all these practices are used depending on volumes to be transported and which workstation the chemicals are to be used.

Attachment E: Spill/Slug Control Plan (Not Applicable, slug potential determined very unlikely)

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?	
(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
Has there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" 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: Sampling point is a ~3" hole in the middle of a hanging metal trough in the last settling tank of the clarifier. Water from this final settling tank enters the trough through numerous holes which drain to this 2" hole in the middle. See picture in file.	
Total Flow Monitoring Point: In-line flow meter. Looked new.	
Upstream Manhole: N/A	
Point of Connection: 2" hole drops straight down into connection to City sewer system.	

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.

Samples are taken from the downspout from clarifier's effluent for metals. Wider mouth bottle samples would have to be taken from the final clarifier's section overflow holes.

Where is the sample point located?

<input 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 (Zn only on this day)

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

If no, record the name and address of Contract Lab: Arkansas Testing and they've begun to use their own in-house AA flame unit.

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

Facility has its own AA Flame unit they're going to start using for compliance.

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 (grabs) Yes No N/A

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

Were Samples preserved correctly (refer to 40CFR Part 136) Preservatives not recorded, but assumed "yes" since bottles came from a certified lab 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: Almost daily for Zn, the parameter they're having problems with. The remaining analyzed 2/yr.

<input checked="" type="checkbox"/> Cd(t)	<input checked="" type="checkbox"/> Cu(t)	<input checked="" type="checkbox"/> Cr(t)	<input checked="" type="checkbox"/> Ni(t)	<input checked="" type="checkbox"/> Pb(t)
<input checked="" type="checkbox"/> Ag(t)	<input checked="" type="checkbox"/> Zn(t)	<input type="checkbox"/> pH	<input checked="" type="checkbox"/> CN'(t)	<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: 6/29/09

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

Comments: It is doubtful any of facility's toxic organics (few to begin with) could enter the sewer system in toxic amounts the way the facility is handling them.

Analyst
Date Started 1:50 PM 11/4/2009
Worksheet Clar 11 04 A
Comment
Methods Ni,Zn
Computer name DCKJZMH1
Serial Number:

Method: Ni (Flame)

Method: Zn (Flame)

Sample ID	Conc mg/L	Mean Abs
Clar Eff 1104	0.5183	0.1527
	11/4/2009	1:59:50 PM
Clar Eff 1104 Dup	0.5194	0.1530
	11/4/2009	2:00:32 PM
Clar Eff 1104 A	0.2822	0.0886
	11/4/2009	2:01:16 PM
Clar Eff 1104 A dup	0.2799	0.0880
	11/4/2009	2:01:58 PM
High Standard	0.4953	0.2809
	11/4/2009	2:02:38 PM

Sample Time

~ 10:00 AM

~ 1:00 PM

- .5

Arkansas Department of Environmental Quality

5301 Northshore Drive

North Little Rock, AR 72118

- CERTIFICATE OF ANALYSIS -

Our Lab#: 2009-2981

Sample ID: Defiance Metal - Clarifier Effluent

Sample Collect Date: 11/4/2009

Sample P
Type:

Report Date: 11/12/2009

<u>Test Group</u>	<u>Test</u>	<u>Result</u>	<u>Units</u>	<u>Analysis Date</u>	<u>MDL</u>	<u>RDL</u>
ICP/MS-T						
	Aluminum	< 20.0	µg/L	11/9/2009	20	20.0
	Antimony	< 10.0	µg/L	11/9/2009	5	10.0
	Arsenic	2.12	µg/L	11/9/2009	0.5	1.00
	Barium	< 10.0	µg/L	11/9/2009	2	10.0
	Beryllium	< 0.50	µg/L	11/9/2009	0.1	0.50
	Boron	163	µg/L	11/9/2009	5	25.0
	Cadmium	< 1.00	µg/L	11/9/2009	0.3	1.00
	Calcium	158	mg/L	11/9/2009	0.04	0.040
	Chromium	1.55	µg/L	11/9/2009	0.3	1.00
	Cobalt	5.48	µg/L	11/9/2009	0.5	1.00
	Copper	58.2	µg/L	11/9/2009	0.5	1.00
	Iron	1410	µg/L	11/9/2009	10	20.0
	Lead	< 1.00	µg/L	11/9/2009	0.1	1.00
	Magnesium	6.15	mg/L	11/9/2009	0.1	0.10
	Manganese	736	µg/L	11/9/2009	0.2	1.00
	Nickel	670	µg/L	11/9/2009	0.5	2.50
	Potassium	180	mg/L	11/9/2009	0.05	0.100
	Selenium	< 2.00	µg/L	11/9/2009	0.5	2.00
	Silicon Dioxide	36.0	mg/L	11/9/2009	0.02	0.20
	Silver	< 5.00	µg/L	11/9/2009	1	5.00
	Sodium	664	mg/L	11/9/2009	0.02	0.040
	Thallium	< 2.50	µg/L	11/9/2009	0.5	2.50
	Vanadium	< 2.50	µg/L	11/9/2009	1	2.50
	Zinc	540	µg/L	11/9/2009	2	3.00