

From: [Jamie Belcourt \(adpce.ad\)](mailto:jamie.belcourt@adpce.ad)
To: [Toomer, Jonathan \(jonathan.toomer@mecinc.com\)](mailto:jonathan.toomer@mecinc.com); steve.adcock@mecinc.com
Cc: [Jason Bolenbaugh \(adpce.ad\)](mailto:jason.bolenbaugh@adpce.ad); [Stacie Wassell \(adpce.ad\)](mailto:stacie.wassell@adpce.ad); [Richard Healey \(adpce.ad\)](mailto:richard.healey@adpce.ad)
Subject: Defiance Metal Products of Arkansas (Pretreatment ID ARP001047; AFIN 12-00214) Pretreatment Compliance Inspection Report
Date: Monday, December 5, 2022 4:21:39 PM
Attachments: [Defiance Metals Products IU 20220928.pdf](#)
[image003.png](#)

Mr. Toomer,

Attached is Defiance Metal Products' Industrial User Inspection Report for the pretreatment compliance inspection conducted on September 28, 2022.

If you have any questions or concerns, please let me know.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
**Division of Environmental Quality | Office of Water Quality
Policy and Administration**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT



ARKANSAS

ENERGY & ENVIRONMENT

December 6, 2022

Mr. Jonathan Toomer, EHS Manager
Defiance Metal Products
944 Bypass Rd.
Heber Springs, AR 72543
Via email to: jonathan.toomer@mecinc.com

RE: Industrial User Inspection
AFIN: 12-00214

Permit Tracking No.: ARP001047

Dear Mr. Toomer:


On September 28, 2022, I performed an Industrial User Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

No violations were noted at the time of the inspection. Please refer to the inspection report for more detail and comments. If I can be of any assistance please contact me at (501) 682-0858 or Jamie.Belcourt@adeq.state.a.us.

Sincerely,

A handwritten signature in blue ink that reads 'Jamie Belcourt'.

Jamie Belcourt
State Pretreatment Coordinator, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

Pretreatment Compliance Inspection	
Facility Information	
Facility Name: Defiance Metal Products (dba Mayville Engineering Company)	Site Address: 944 Bypass Road Heber Springs, AR 72543
Signatory Authority (Name & Title): Jonathan Toomer, EHS Manager	
Phone: (501) 887-4719	Mailing Address (if different):
Address: Same as site address	Corporate Owner Name and address (if applicable): Defiance Metal Products 715 South Street Mayville, WI 530510
Contact Person (Name & Title): Jonathan Toomer, EHS Manager	Phone: (920) 387-4500
Phone: (501) 362-1919	Fax:
Fax:	Corporate CEO:
Email: jonathan.toomer@mecinc.com	Email:
Facility Tracking #ARP001047 ; AFIN: 12-00214	Last Inspection Date: 11/09/2011
POTW (City) IU discharges to: Heber Springs	POTW's 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 PSNS)	
Table of Contents	
I. Summary of Inspection Page 2 of 14	
A. Inspection Objectives	
B. Inspection Analysis	
II. Pre-Inspection Meeting Page 3 of 14	
A. General Information	
B. Facility Permits	
C. Additional Comments	
III. Attachments	
A. Industrial Processes	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Page 6 of 14
B. Pollution Prevention Activities	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Page 8 of 14
C. Pretreatment System	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Page 9 of 14
D. Chemical Storage	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Page 11 of 14
E. Spill/Slug Control Plan	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Page 12 of 14
F. Self-Monitoring/TOMP	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Page 13 of 14
Comments: None.	
Inspector's Name (Print): Jamie Belcourt	Signature: 
Date and Time Inspection Ended: 09/28/2022 @ 1400	

I. Summary of Inspection			
A. Inspection and Objective (Complete Before Inspection)			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Semiannual	<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
<u>Inspection Objective(s)</u> : Pretreatment Compliance Inspection; conduct facility walk-through to update facility processes/changes since last inspection.			
<u>Checklist of items to be reviewed and/or visually inspected</u> :			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input checked="" 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 checked="" 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"/>	
<u>Comments</u> : Inspection participants included Jonathan Toomer (EHS Manager), Steve Adcock (Coatings Engineer), and Jamie Belcourt (State Pretreatment Coordinator). Both facility representatives were knowledgeable of facility operations and wastewater generation and pretreatment on-site.			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
<u>Provide a brief narrative of deficiencies/violations or other concerns in the following areas</u> :			
<u>Records Review</u> : Reviewed and observed production and pretreatment processes that were given during the 11/09/2011 inspection to determine any changes that have been made with said processes since last inspection date. Reviewed sampling analytical data on file at OWQ prior to today's inspection.			
<u>Process Area(s)</u> : Clean and orderly.			
<u>Pretreatment System</u> : Chemical Precipitation and Sedimentation			
<u>Self-Monitoring and/or Reporting Procedures</u> : Sampling point is a downward vertical entrance to a 3" pipe in the middle of the trough in which supernatant from the clarifier is fed.			
<u>Diversion/Sewer Meters</u> : N/A			
<u>Spill/Slug Control Plan</u> : Slug control plan determined not necessary. No slug discharge potential identified as there are no floor drains that go directly to the city sewer. The wastewater system is also entirely contained below grade and acts as an entire secondary containment.			
<u>Chemical Storage</u> : Adequate, no comment.			

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 09/28/2022 @ 1216	SIC code(s): 3469/32551 & 332116	
IU Reps/Titles: Jonathan Toomer (EHS Manager), Steve Adcock (Coatings Engineer)	Control Authority Reps/Titles: Jamie Belcourt (State Pretreatment Coordinator)	
End product(s): Metal parts for buses and trucks		
Days of Operation: 5	Approx. # of units produced: N/A; Facility is concentration-based and not production-based.	
Hours of Operation: 0600 - 1430	Days of Production (if different): same	
Shift 1, hrs.: 0600 - 1430	Hours of Production (if different): 1 shift, 5 days per week	
Number of Employees: 226	Shift 2, hrs.: N/A	
Are there any scheduled plant shutdowns? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If yes, when? Holiday slowdown	Shift 3, hrs.: N/A	
Are there designated plant clean-up days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	Peak Mos.: May – August	“Off” Mos.: November - December
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 special entry procedures for the discharge/sample point locations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:		
<u>Are there safety concerns/identified hazards that the inspector should be aware of?</u> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, explain: Typical hazards associated with production facilities. Ear and eye protection, and steel-toed boots are required. Physical and chemical hazards present through the process and pretreatment areas.		
<u>Have there been any changes since the last inspection regarding the following items:</u>		
Plant/flow/process layout? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> <u>If yes, obtain copy of updated schematic for facility file.</u> Since the 11/09/2011 inspection, the facility has expanded its electro-coating (e-coat) and powder coat (p-coat) lines. Facility has also added a laser operation that is not connected to the pretreatment system. Regulated wastewater is generated only by the e-coat process, per facility personnel. Facility changes since the last inspection date have not impacted the processes. Facility still utilizes the same system and chemicals.		
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:		
Production Levels? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Since the last inspection in 2011, production levels have increased.		
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"/> N/A <input checked="" type="checkbox"/>
If so, are wastestreams combined prior to entrance into the pretreatment system?	Yes <input type="checkbox"/> No <input type="checkbox"/>
If wastestreams combine, was the combined wastestream formula (CWF) used to calculate limits?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Was the CWF applied prior to connection to the POTW sanitary sewer?	Yes <input type="checkbox"/> No <input type="checkbox"/>
At the connection to sanitary sewer?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Production and flows verified for production-based standards?	Yes <input type="checkbox"/> No <input type="checkbox"/>
What is the current average production rate and process flow? Facility averages approximately 5,000 gallons per day (GPD) with a maximum of 6,500 GPD.	
Is the production rate or flow substantially different (+/-20%) from those used in calculating limits?	Yes <input type="checkbox"/> No <input type="checkbox"/>

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if the process is categorical by definition [40 C.F.R. chapter I, subchapter N, Parts 405 – 471]

1. 6% Magna spray cleaner	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Rinse conditioner	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. 7-10% Magna spray cleaner	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5. Zinc phosphate rinse	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
3. City water rinses	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): According to Steve Adcock, the twelve (12) step bath process steps include: 1) a 6% Magna spray cleaner, 2) a 7-10% Magna spray cleaner, 3) a city water rinse, 4) a rinse conditioner bath, 5) a heated zinc phosphate, 6) a city water rinse, 7) Chem Sealer 59, 8) a non-chrome sealer, 9) a countercurrent deionized water rinse, 10) a sloped dip paint tank with an estimated 20% e-coat [positive charged black paint in deionized water], 11) two permeate rinses, and 12) a final virgin deionized water rinse. Wastewater generated via processes is tracked on a daily basis.

Following the bath process, the parts are sent through a cure oven (375°F) for about 26 minutes for the finished product. Parts are subjected to gradually increasing temperatures to dry and cure in the hottest part of the oven and then sent through a cooling tunnel.

Tanks #3 & #6 are continuously overflowed to below-grade grated troughs to the below-grade mixing sump, and then routed to pretreatment area or holding tanks. Some rinse water from Tank #6 is also counter-current flowed. Some of the rinse from Tank #6, and all of the contents of Tanks #9 & #13 are counter-current flowed back to the previous “bath” for make-up water. Facility has scheduled tank empties on a weekly basis for Stages 3, 4, 6, and 7. Stage 5 is left alone and not emptied. Stage 8 is emptied once a month.

Bag filters (25 – 50 micron, depending upon the spray/rinse) are used to aid in keeping some of the sprays, rinses, and e-coat paint filtered for maximum use and longevity.

Wastewater storage tanks are used when the pretreatment system is not operational. Wastewater is pretreated usually from 0500 to 1700.

Vibratory tumbler with ceramic media and soapy water is used on raw material. The volume discharged has not been determined. However, this does drain to the same below-grade grated trough that gravity feeds into the below-grade mixing sump prior to pretreatment.

Adequate pollution prevention (P2) is present at the facility with the use of counter-current flows and in-process filtration.

The process and pretreatment area is surrounded by a 4” curb, acting as a secondary containment for all process water, rinse water, and pretreatment wastewater contained. In addition, there are dikes and berms around the storage tanks.

Other facility operations that do not generate wastewater are laser operations, machining, forming, welding, and final assembly.

General observations of facility's indoor housekeeping: Facility was maintained; walkways clear of debris.

General observations of area outside facility's building: Outside of facility was well-maintained.

Check all sources of wastewater being discharged into the City's collection system. Indicate average gallons per day (GPD) (measured or estimated). If batch discharged, list the frequency and volume (1,000 gal/month, e.g.).

<input checked="" type="checkbox"/> Process Rinse Overflows ~3,000 GPD	<input type="checkbox"/> Equip. Cleanup	<input checked="" type="checkbox"/> Floor Cleanup Minimal amount	<input checked="" type="checkbox"/> Spent Bath Solutions ~3,000 gallons batch discharged weekly
<input type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklift Maint./Wash	<input checked="" type="checkbox"/> Tank Dragout Minimal amount	<input type="checkbox"/> Air Pollution Devices
<input type="checkbox"/> Boiler Blowdown	<input checked="" type="checkbox"/> Spent Rinse Tanks Batch discharge ~3,000 gallons per 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 of major raw materials and chemicals used:

Cold and hot-rolled steel, some aluminum; minimal amount of galvanized material; sodium metasilicate, sodium tripolyphosphate; zinc phosphate; manganese phosphate, zinc nitrate; nickel nitrate, triethanolamine, nitric acid, hydrofluozirconic acid

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

<input type="checkbox"/> BOD	<input checked="" type="checkbox"/> CN ⁻	<input checked="" type="checkbox"/> Metals (List): All 40 C.F.R. 433 metals	<input type="checkbox"/> Solvents (List): Facility submitted an approvable TOMP on 06/29/2009
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl ₂	<input type="checkbox"/> O&G	<input type="checkbox"/> S ⁻
<input checked="" type="checkbox"/> pH	<input type="checkbox"/>		

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 <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? 14001 – obtained October 2018	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Written Standard Operating Procedures?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Explain: Facility follows Technical Spec. #16949	
Preventative Maintenance Program?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Explain: Facility has a scheduled program for routine maintenance of equipment.	
Water Reuse?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Explain: Facility utilizes counter-current flows in the process and small volume rinses.	
Cost Accounting to Track Savings:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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.	
Inventory Control / “Green Purchasing”:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (lean manufacturing/”green purchasing”, etc.)
Explain: SPARC program	
Employee Training:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Explain: Scheduled employee training for safety, quality, and production processes.	
Spent Solvent Reclamation?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Explain: Non-hazardous solvent.	
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Explain:	
Recycle Waste Oil, Solvents, and Lubricants?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Explain: Facility recycles waste oil. Non-hazardous solvent is disposed of every three (3) months.	
Other Activities: N/A	
<u>P2 Equipment/Practices in use:</u>	
<input checked="" type="checkbox"/> Overflow Alarms [located in sump/pit]	<input type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Deionized Rinsing [2 - 3 GPH – Stage 5]	<input checked="" type="checkbox"/> Countercurrent Rinsing
<input checked="" type="checkbox"/> Dragout Collection Trays [end of Stages 5 & 8]	<input type="checkbox"/> Seal-Less Pumps
<input type="checkbox"/> Air Jets to Blow Parts Dry	<input checked="" type="checkbox"/> Secondary Containment of Process Solutions
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input type="checkbox"/> Bead Blasting to Remove Paint
<input checked="" type="checkbox"/> Water Soluble Drawing Compounds in Press Room [Core Cut 6186 synthetic oil]	<input type="checkbox"/> Recycle Overspray
<input type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input checked="" type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input checked="" 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 checked="" 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 type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Centrifugation	<input checked="" 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 checked="" type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery
<input type="checkbox"/> Belt/Disk Oil Skimmer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):</p> <p>Regulated process wastewater is pumped into one (1) of four (4) holding tanks and into a below-grade concrete sump/pit. The sump/pit is approximately six (6) feet wide, eight (8) feet long, and four (4) feet deep (6' X 8' X 4'). Within the sump/pit, sulfuric acid and ferric chloride is mixed. From the sump/pit, the wastewater is pumped into a mixing tank where the pH is auto-adjusted, mixed with polymer, and flows to the clarifier to facilitate flocculation/settling. Flocculent from this process overflows into another sludge thickening tank, which is fed to the filter press. Sludge generated from the wastewater treatment process is sent off-site for disposal as a non-hazardous waste. Excess fluid from the sludge filter press is sent back to the sump/pit. After the clarifying process and pH adjustment (if needed), water is discharged to the City of Heber Springs via sewer. During the site visit, it was observed that there was not flocculent floating above the clarifier as witnessed during the 11/09/2011 inspection. All equipment appeared clean and operations with no apparent leaks.</p>			
Does the description match the schematic currently on file?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
<p>DEQ does not currently have a schematic on file. This was requested during the on-site inspection. Facility personnel provided this information following the inspection.</p>			
<p>System Operator(s) Name: Chris Martindale; Casey Verser</p>			
Does discharge permit require licensed operator?			<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Is the System Operator(s) licensed by the State of Arkansas?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
List Name(s) and License classification: Operators are not licensed at this time.			
Is training provided to the Pretreatment System Operator(s)?			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
If yes, list type and frequency: Monthly training provided by chemical supplier.			
Is the discharge from the Pretreatment System?			<input checked="" type="checkbox"/> Batch <input type="checkbox"/> Continuous <input type="checkbox"/> Combination
<p>If any discharges are batch type or combination, describe the following: Continuous while in operation; system stops at the end of shift</p>			

Volume of each batch: 5,000 – 6,000 GPD on average; maximum 8,000 – 9,000 GPD		
Describe process from which batch originated (spent bath, e.g.): All process rinses overflow and batched discharged baths commingle in below-grade holding pit or storage tanks. These are then pumped to their pretreatment system.		
<u>Approximate duration of batch discharge:</u>		
Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
In-line GPI totalizer	Not determined/discussed	4,964 gallons

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Was this area(s) visually inspected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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. Chemicals stored next to area of use but 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
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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Were any new MSDS reviewed during the Inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		
If yes, list below:		
Chemical storage comments: Volume of chemicals stored, building size, and configuration of process/pretreatment area would prevent any slug from entering the City's sewer system.		
Hazardous waste storage comments: None on-site.		
Chemical handling procedures (totes, dolly, buckets, hardline, etc.): All practices are utilized depending upon volume to be transported and the location of use.		
Hazardous waste handling procedures: Facility does not generate hazardous waste.		

Attachment E: Spill/Slug Control Plan

Does the facility have a spill/slug control plan? Slug discharge potential is negligible.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
--	--

If yes, are the following requirements in place: (Refer to 40 C.F. R. 403.8(f)(2)(v)(A-D))

- | | |
|---|--|
| Is the spill/slug control plan more than two (2) years old? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| (A) Describes discharge practices including non-routine batch (slug) discharges | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| (B) Describes storage and handling of chemicals | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| (C) Procedures for immediate notification to POTW of slug discharges | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| (D) 1. Describes measures for controlling toxic/hazardous pollutants | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| 2. Describes procedures and equipment for emergency response | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 checked="" type="checkbox"/> N/A |
| 4. Does the facility have spill/slug notification procedures posted? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| 5. Are these procedures posted in areas where chemicals are used and stored? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| 6. Are personnel provided training in the event of a spill or slug discharge? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| 7. Have there been any non-routine episodic discharges or chemical spills in the past year? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| 8. If so, 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 downward vertical entrance to a 3” pipe in the middle of the trough in which supernatant from the clarifier is fed.

Total Flow Monitoring Point: In-line flow meter.

Upstream Manhole: N/A

Point of Connection: 3” hole located in the trough with clarifier supernatant spilling into it. 3” hole drops down into connection to the City of Heber Springs’ sewer system.

Attachment F: Self-Monitoring & TTO/TOMP Requirements

Sampling Collection Description:

Grab sample is collected from the center of the trough prior to entrance to the city sewer.

Where is the sample point located?

The sampling point is located at a downward vertical entrance to a 3" pipe in the middle of the trough in which supernatant from the clarifier is fed prior to entrance to the city sewer.

<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 point adequate? Yes No N/A

Did the facility request a split sample on this sampling/inspection?
Samples were not collected during this inspection. Yes No N/A

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 Laboratories
3301 Langley Avenue
Searcy, AR 72143

Automatic Sampler Manual Sampling

IU Self-Monitoring Results reviewed (Refer to 40 C.F.R. Part 136) Yes No N/A

Contract lab certified by DEQ for test parameters? Yes No N/A

Dates and times of sample analysis recorded? Yes No N/A

Correct methods used for test analysis? Yes No N/A

EPA recommended holding times being met? 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? Yes No N/A

Were self-monitoring records on file for the past three (3) years? Yes No N/A

List the parameters the facility monitors and the frequency:

<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 TOMP? 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:

06/29/2009

Is the TOMP being followed as written?

Yes No N/A

If no, is there evidence that a TOMP is needed?

Yes No N/A

Comments: None.