



ARKANSAS  
Department of Environmental Quality

November 29, 2011

Tim Barry  
Environmental, Safety & Health Manager  
Saint Jean Industries, Inc.  
424 Industrial Park Road  
Heber Springs, Arkansas 72543

Re: Saint Jean's (ARP001023) November 2011 Pretreatment Compliance Assurance Visit (City of Heber Springs #AR0022381)

Dear Mr. Barry,

Under 40 CFR 403.8(f)(2)(v), "[ADEQ will] Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards..."

On 11/8/11, a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel at your facility.

Two grab samples were taken at separate times during the CAV. Because of newly discovered information during and after the CAV, ADEQ's laboratory analysis will be declared null and void as they were not representative of your normal regulated wastewater discharges to the City.

### FINDINGS AND REQUIREMENTS

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

- a) As discussed during the CAV an updated comprehensive wastewater flow schematic must be submitted to reflect the true wastewater flow from the regulated process through the dedicated recirculating cooling tower/vault identifying the most representative sampling point. The old schematic on file (Attachment A-2) does not accurately portray existing wastewater flow conditions. Directional arrows from the quench tank/pit through the dedicated recirculating cooling tower, proposed new sampling point and discharge connection to the City should be depicted.

Extraneous non-wastewater generating sources (machining, die-casting, forging, etc.) may simply be condensed to a small box describing that area's operations. A resulting wastewater schematic may then be more easily "seen" on one 8.5" X 11" sheet of paper.

- b) A comprehensive process description must also accompany this schematic "tying" the two documents together to fully understand your regulated wastewater source (heat-treat quench) and its relation to the discharge practice.

Please submit these two (2) documents to this office no later than sixty (60) days from the date on this correspondence.

- 2) Under **40 CFR 403.12(b)(4)**, “Flow measurement. [Saint Jean] shall submit information showing the measured average daily and maximum daily flow, in gallons per day, to the POTW from each of the following: (i) Regulated process streams...”

As discovered during the CAV and subsequent correspondence, Saint Jean discharges its regulated wastewater at a seven (7) to ten (10) year frequency. This practice has not been correctly reported on Saint Jean’s semi-annual reports or accurately conveyed during ADEQ’s previous CAVs.

- 3) Under **40 CFR 403.12(g)**, “Monitoring and analysis to demonstrate continued compliance. (3) The reports required in paragraphs (b)...[and] (e)...of this section must be based upon data obtained through appropriate sampling and analysis performed during the period covered by the report, which data are representative of conditions occurring during the reporting period.”
- a) If there is no discharge of regulated wastewater during your semi-annual report period(s), so state and per 40 CFR 403.6(a)(ii) sign and certify, “I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”
- b) When there is a discharge of regulated wastewater, submit an accurate “semi-annual” report as per 40 CFR 403.12(e), “Periodic reports on continued compliance. (1) [Saint Jean]...shall submit to the [ADEQ] during the month of [regulated wastewater discharge]...a report indicating the nature and concentration of pollutants in the effluent which are limited by [40 CFR 467]...In addition, this report shall include a record of measured or estimated...[batch?] flows for the reporting period for the Discharge reported in paragraph (b)(4) of this section...except that the [ADEQ] may require more detailed reporting of flows.”

It is now understood that Saint Jean only discharges regulated wastewater every seven (7) to ten (10) years. You’ve indicated in a recent e-mail to this office the last time the dedicated quench tank/pit cooling tower water was discharged was about seven (7) years ago. Is it time for another “clean-out” of the system? If that discharge is a “batch” discharge conducted within a 24 hour period, record that volume in the “semi-annual report” and identify it as such. Production (million off-lbs of aluminum quenched) must be kept track of over that “7 to 10 year period” and also reported.

Please keep this and all Pretreatment correspondence on file for future reference.

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](mailto:gilliam@adeq.state.ar.us).

Sincerely,




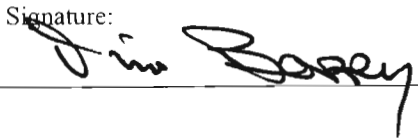
Allen Gilliam  
ADEQ State Pretreatment Coordinator

cc: Donald Knight/General Manager/ Heber Springs Wastewater/1108 West Front Street/Heber Springs, AR 72543

Attachments: “Pretreatment Industrial Inspection” (CAV) and wastewater flow schematic (A-2)

## Pretreatment Industrial Inspection

### Facility Information

<b>Facility Name:</b> Saint Jean Industries, Inc.		Site Address: 424 Industrial Park Road Heber Springs 72543	
Signatory Authority (Name & Title): <del>Yves Mayer - Plant Manager</del> <sup>Mark Lee</sup> or <u>Tim Barry - Env./Safety/Health</u>		Mailing Address (if different):	
Phone: 501.362.9532 <sup>Jeff Banks, Quality</sup>			
Fax: 9572 <sup>Manager</sup>			
Address: 424 Industrial Park Road Heber Springs 72543		Corporate Owner Name and address (if applicable):	
Contact Person (Name & Title): Tim Barry - Env./Safety and Health Coordinator		Phone:	
Phone: 501.362.9572		Fax:	
Fax: <u>tim.barry</u>		Corporate CEO:	
e-mail: <u>greg.cothren@st-ji.com</u>		e-mail:	
Facility Tracking #ARP001050; AFIN #1200058		<b>Last Inspection Date: 11/3/09</b>	
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 467.46 (new source)			
Table of Contents			
I. Summary of Inspection		Page 2 of 10	
A. Inspection Objectives			
B. Inspection Analysis			
II. Pre-Inspection Meeting		Pages 3 & 4 of 10	
A. General Information			
B. Facility Permits			
C. Additional Comments			
III. Attachments:			
A. Industrial Processes		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 5 of 10	
B. Pollution Prevention Activities		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 6 of 10	
C. <del>Pretreatment System (not applicable)</del>		yes <input type="checkbox"/> no <input checked="" type="checkbox"/> Page 7 of 10	
D. Chemical Storage		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 8 of 10	
E. Spill/Slug Control Plan		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 9 of 10	
F. Self-Monitoring/TOMP (not applicable)		yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 10 of 10	
Comments :			
Inspector's Name (Print): Allen Gilliam		Signature: 	
IU Rep's Name (Print): <u>Jim Barry</u>		Signature: 	
Date and Time Inspection Ended: 11/8/11 @ 2:52 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 (CAV) with sampling.			
Checklist of items to be reviewed and/or visually inspected:			
<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 type="checkbox"/> Pretreatment Process	<input 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"/>	
<p>Comments: Facility's processes have not substantially changed since the last CAV on 11/3/09. There has been quite a few personnel changes. Regulated wastewater discharge and frequency to the City was not completely ascertained during the site visit. There were two different versions/understandings of how much and when the heat treat quench water was being discharged. During this site visit, the statement was made that there were no daily "blowdowns" from the quench water cooling tower. This is opposite from what has been reported over the last several years and from what was stated by the previous facility contact. [Subsequent e-mail correspondence with Tim Barry has clarified the facility's discharge practices and volume.]</p>			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Provide a brief narrative of deficiencies/violations or other concerns in the following areas:			
<p>Semi-Annual flow reports have been incorrect as it was discovered during this site visit that heat treat quench wastewater was not being discharged daily, but only when the dedicated quench system cooling water vault needs to be emptied to facilitate sediment cleanout every 7-10 years. The heat treat quench bath contact water (~1000 gallons) is recirculated through the above-noted dedicated cooling tower closed system and is continually re-circulated until it is determined the quench bath water needs to be completely changed out (every several months). If the heat treat bath water requires emptying (maintenance) it is either sent back to the dedicated cooling tower vault via plumbing or boiled off via their on-site evaporator. The only source of contact cooling water on site is the heat-treat quench water circulating through its dedicated cooling tower vault. The entire quench water system is close-looped. Discharge to the City's sewer system is very seldom (every 7-10 years). Sampling/analysis/reporting would then still be required per 40CFR 403.12(e).</p>			
<p>Records Review: Facility will need to submit a comprehensive description of their regulated wastewater processes to match an updated schematic of their true regulated wastewater flow to the discharge point.</p>			
Process Area(s): Adequate, no comment.			
Pretreatment System: N/A			
<p>Self-Monitoring Procedures: Thinking their discharge practices were as stated during previous site visits, their quench tank appeared to be the most adequate point to obtain representative samples. Upon subsequent e-mails with Tim Barry, it was decided taking grab samples from the quench tank/pit's dedicated cooling tower "vault" would provide the most representative sampling point since that is where the regulated wastewater is discharged to the City every 7 to 10 years.</p>			
Spill/Slug Control Plan: Adequate, no comment.			
Sampling Point: See above.			
Chemical Storage: Adequate, no comment.			

<b>II. Pre-Inspection Meeting</b>		
<b>A. General Information</b>		
Date and Time Inspection Started: 11/8/11 @ 8:05 a.m.		SIC/NAICS code(s): 3714, 3444/336330
IU Reps/Titles: Tim Barry – Environmental / Safety and Health Coordinator	ADEQ Reps/Titles: Allen Gilliam / State Pretreatment Coordinator	
End product(s): Aluminum auto suspension components	Lbs. of Aluminum quenched: ~9.2 M off-lbs/184 days	
Days of Operation: 7	Days of Production (if different): same	
Hours of Operation: 24	Hours of Production (if different): same	
Shift 1, hrs.: 6:30a.m. to 2:45 p.m.	Shift 2, hrs.: 2:30 p.m. to 10:45 p.m.	Shift 3, hrs.: 10:30 p.m. to 6:45 a.m.
# of Employees: ~400	Peak Mos.: N/A	“Off” Mos.: 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? Thanksgiving & Christmas		
Are there designated plant clean-up days? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when?		
<b>Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></b>		
<b>If No, explain: As explained above flow reporting for their semi-annual reports have not been correct. Therefore, the equivalent concentration limits have not been correct for this production-based categorical industry.</b>		
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If Yes, explain: One has to sign in, obtain a visitor’s badge and proceed only with an escort. Sampling point is near their heat treat oven and has chain restraints to keep employees away from hot surfaces. Sampler has to be cognizant of parts’ quench cycling as it is auto-controlled. There’s an alarm that sounds prior to the entire “rack” holding the aluminum parts quickly rising out of the quench tank/pit. <b>[This sampling point will now be at the quench tank/pit’s dedicated cooling tower vault.]</b>		
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: Safety glasses and ear protection at a minimum; steel toed boots and hard hats if in casting/forging area.		
<b>Has there been any changes since the last inspection regarding the following items:</b>		
Plant/flow/process layout? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
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: On-site production was provided as ~9.2 million off-lbs/184 production days compared to ~3.9 million off-lbs/184 production days in the latter part of ‘09.		
Raw materials? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:		
Flow rates? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Newly discovered discharge practices completely change the volumes of regulated wastewater discharged (every 7 to 10 years).		
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 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 checked="" type="checkbox"/> * N/A <input type="checkbox"/>		
*Discussions with other key wastewater (cooling tower) personnel indicated the discharged heat treat quench water was not being reported correctly. Production (off-lbs quenched) was viewed (see Attachment A-1) and corrected per conversations with Tim Barry.		
What is the current avg. production rate and process flow? See above.		
Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes <input checked="" type="checkbox"/> no <input type="checkbox"/> <b>From the newly discovered practice of discharging the quench water from its cooling tower only once every 7 to 10 years instead of daily small volume “blow-downs”, equivalent concentration limits will dramatically be changed.</b>		



**Attachment A: Industrial Process(es)**

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

1. Solution heat treat quench water (CFR 467) Yes  No  2. Yes  No

Were processes visually inspected? Yes  No  N/A

Brief description of process(es): Aluminum ingots are melted in 3 gas fired furnaces. Flux is added to control oxidation. Molten Al is either directly transferred to one of 18 casting machines, the electrical de-gas units and/or natural gas-fired ladle heaters. Molds are water-base insulated, sprayed with a release coating application and/or Sprue Press lubricant. There is no wastewater generated in this area. Casting machines are cooled via non-contact water circulating through the molds' water jackets. Aluminum die-casting standards under 40 CFR 464 are not taken into consideration for this facility's limits per 40 CFR 467.01.

After components are cast, they are transferred to the finishing department. This area is equipped with numerous floor-mounted sanders, band saws, enclosed saw cutters, grinding and several enclosed robotic cells. The function of this department is to use power actuated tools and robotics to trim flash, saw parts, sanding/grinding to ensure that the general part tolerances and shapes are met. All coolants, lubricating oils and tramp oils are self-contained, collected in a tank and sent off-site once spent. No wastewater is generated in this area. "Waste" Al is pressed into "pucks" or as generated and are fed back into oven for re-use. Facility rep. indicated these "pucks" or other trimmed aluminum is accounted for in their "off-lbs" production.

Most components, after finishing operations, are transferred to gas fired pre-heat furnaces and are placed into the forge presses. Parts are heated and dip-coated with a graphite lube to facilitate release after forging before going through the pre-heat furnaces.

After undergoing finishing and/or Forging Operations, all parts are heat-treated in either the In-Line Continuous Solution Heat Treat Furnace or batch heat treated in the Drop Bottom Furnaces.

After exiting the Heat Treat Ovens, parts are submerged in the Quench Water Tank/Pit to complete the heat treat process. The quench water (~1,000 gallons) is re-circulated through a dedicated cooling tower (or evaporated on-site). The cooling tower is periodically discharged once every 7 to 10 years. This is the only wastewater federally regulated at this facility.

The quench tank is continually circulated through a cooling tower. Upon returning to the quench tank, flow is accelerated from a ~3" pipe to a ~1" nozzle.

General observations of facility's indoor housekeeping: Clean and uncluttered with no visible mist or smoky areas throughout. Areas directly under the furnaces and die casting machines appeared oily, but there was no evidence of any large spills.

General observations of area outside facility's building: Outside concreted area near the loading dock appeared somewhat oily, but otherwise the rest of the outside area behind the building was orderly/covered with waste material segregated.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured estimated.

<input type="checkbox"/> Process Rinse Overflows	<input type="checkbox"/> Equip. Cleanup	<input checked="" type="checkbox"/> Floor Cleanup < 10 gpd	<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 checked="" type="checkbox"/> Solution heat treatment quench water is batch discharged via a (dedicated) cooling tower "vault" discharge pipe on a 7 to 10 year frequency. ~26,000 gallons is now the estimated discharge volume.		

List Major Raw Materials and Chemicals used:

Aluminum, hydraulic & gear oil, machining coolants and "water treatment chemicals"

Check Waste Stream Pollutants of Concern from Process(es)

<input type="checkbox"/> BOD	<input checked="" type="checkbox"/> CN*	<input checked="" type="checkbox"/> Metals (List): Zinc & Chrome	<input type="checkbox"/> Solvents (List)
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl <sub>2</sub>	<input type="checkbox"/> pH	<input checked="" type="checkbox"/> O&G as alternative to TTO

\*CN is tested 1/yr showing their wastewater contains less than 0.07 mg/l cyanide and are exempt from further testing CN for the second semi-annual report per 40 CFR 467.03(a). This is now totally dependent upon a regulated process wastewater discharge during the facility's reporting year.

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  (*This inspector saw very few opportunities*)

Environmental Management System in place? Yes  No

ISO Certified? 14001 Yes  No

Written Standard Operating Procedures? Yes  No

Explain: There are written descriptions for each processing area to meet customer specifications.

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

Explain: Frequency is determined on an "as needed" basis.

Water Reuse: Yes  No

Explain: Facility recycles both contact and non-contact cooling water.

Cost Accounting to Track Savings: Yes  No

Explain: Not explained, but asserted by facility representative.

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

Explain: Inventory Control.

Employee Training: Yes  No

Explain: Facility has a yearly calendar with schedules marked for OSHA, Environmental and Company policies/training.

Spent Solvent Reclamation? Yes  No  None present in large volumes.

Explain:

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

Explain: Facility has their own box bailer and an aerosol can crusher. They recycle all the above.

Recycle Waste Oil, Solvents, and Lubricants? Yes  No

Explain: Coolants, lubricating oil and tramp oils are collected and sent off-site for recycle.

Other Activities:

**P2 Equipment/Best Management Practices in use:**

Overflow Alarms

Aqueous Cleaning Solutions

Recycling of contact as well as non-contact cooling water

Countercurrent Rinsing

Dragout Collection Trays

Seal-Less Pumps

Air Jets to Blow Parts Dry

Secondary Containment of Process Solutions

Aqueous Paint Stripping Solutions

Bead Blasting to Remove Paint

Water Soluble Cutting Fluids

Recycle Overspray

In-Process Recycle (Ion Exchange, Reverse Osmosis)

Conductivity Meters

Dead Rinse Tanks

Bath / Rinse Filtration



<b>Attachment C: Pretreatment System (Pretreatment not necessary to meet Categorical Standards)</b>			
Are wastestreams segregated before pretreatment?		<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are they pretreated prior to discharge to the sanitary sewer?		<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Was the pretreatment system visually inspected during this visit?		<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer: None			
<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 type="checkbox"/> Chemical Precipitation	<input type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal
<input type="checkbox"/> Sludge Filter Press	<input type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input type="checkbox"/> Solvent Separation
<input 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): N/A			
Does the description match the schematic currently on file?		<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
System Operator(s) Name: N/A			
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 type="checkbox"/> No <input checked="" type="checkbox"/> N/A
List Name(s) and License classification: N/A			
Is training provided to the Pretreatment System Operator(s)?		<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If Yes, list type and frequency:			
Is the discharge from the Pretreatment System?		<input type="checkbox"/> Batch	<input type="checkbox"/> Continuous <input type="checkbox"/> Combination <input checked="" type="checkbox"/> N/A
If any discharges are batch type or combination, describe the following:			
Volume of batch(es): ~26,000 gallons/discharge is now the estimate. It was discovered on this site visit the heat treat quench water is recirculated through its own dedicated cooling tower and is only batch discharged every 7 to 10 years. The quench tank/pit by itself is rarely discharged and then only for clean-out of workpieces and built up sludge on the bottom.			
Describe process from which batch(es) originated (spent bath, e.g.): Solution Heat Treatment quench tank after being re-circulated through a cooling tower for a long period of time.			
Approximate duration of batch discharges: ~26,000 gallons/discharge is estimated based on cubic footage of cooling tower "vault". Duration of discharge was not determined during this site visit.			
Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)	
N/A			

**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. Various drums and containers in small quantities are located near work stations.	<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 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 checked="" type="checkbox"/> Barrels rest on grated self-containment containers

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: Time constraints did not allow for a comprehensive review of the facility's MSDS although it was available.


Chemical storage comments: This inspector could foresee no chemical spills reaching the outside of the building they were in such small quantities. ~40 to 50 barrels and totes are stored in a caged-in area with a sign-out sheet for employees to sign when taking chemicals out.


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

Typically, employees fill buckets from which chemicals are hand pumped at their various work stations. "Bulk" chemicals in barrels are brought in to caged area by specially equipped fork lifts with "jaws" that wrap around barrels for transport to storage area.


**Attachment E: Spill/Slug Control Plan**

Does the facility have a Spill/Slug control plan? <i>Slug discharge potential deemed negligible.</i>	<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 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 checked="" type="checkbox"/> no <input type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	<input checked="" 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 checked="" type="checkbox"/> no
Is it posted in areas where chemicals are used and stored?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input checked="" 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 sampling point condition and flow channel of the following where applicable:

Sampling / Monitoring Point: As previously mentioned, the sampling point was the quench tank just next to heat treatment oven. In the future, it appears sampling from the heat-treat quench tank/pit's dedicated cooling tower "vault" would be the most representative sampling point.

Total Flow Monitoring Point: Batch discharges (~26,000gallons) occur every 7 to 10 years with volumes estimated from the cubic footage measurements (~3,500 ft<sup>3</sup>) of the cooling tower and piping to and from the quench tank/pit. This new information discovered during this site visit precluded a visual inspection of the discharge point from the cooling tower into the City's sewer system.

Point of Connection: Directly to City's sewer from the heat treatment quench tank/pit's dedicated cooling tower.

### Attachment F: Self-Monitoring

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. Sampling point is the quench tank after heat treatment. Employee has to bend over grating to physically dip sample container(s) into quench tank. There's only a small space to reach over into the quench tank to take these samples. Other than being awkward and hot, sampling was thought to be adequate and representative.

\*As stated previously, this sampling point will have to be changed to the quench tank/pit's dedicated cooling tower "vault" for representative samples every 7 to 10 years.

Where is the sample point located?

<input type="checkbox"/> End of Process	<input 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 checked="" type="checkbox"/> *At left-hand side of quench tank, opposite the return from cooling tower nozzle.	

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, Little Rock

Automatic Sampler  or Manual

IU Self-Monitoring Results reviewed: (from last 5/11 semi-annual report)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Is the Contract Lab certified by ADEQ for test parameters?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Dates and Times of Sample Analysis Recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Were correct Sample Types Collected	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Dates and times of Sample Collection Recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Were Self Monitoring records on file for past 3 years?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

List the parameters the facility monitors and the frequency: Semi-annually for all except CN.

<input checked="" type="checkbox"/> Cr(t)	<input checked="" type="checkbox"/> Zn(t)	<input checked="" type="checkbox"/> CN (1/yr)	<input checked="" type="checkbox"/> O&G alternative for TTOs
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Attachment A-1

Date range : 5/1/2011 to 10/31/2011

Sales History

	May		June		July		August		September		October		TOTAL	
	QTY	LBS	QTY	LBS	QTY	LBS	QTY	LBS	QTY	LBS	QTY	LBS	QTY	LBS
5010306	5,000	0	2,500	0	17,500	0	10,000	0	12,500	0	7,500	0	55,000	0
FD04FL063LH	0	0	0	0	0	0	350	0	0	0	0	0	350	0
FD04FL063RH	0	0	0	0	0	0	350	0	0	0	0	0	350	0
GM215KND25L	2,700	13,784	2,700	13,784	1,602	8,178	2,358	12,038	2,394	12,221	1,836	9,373	13,500	69,377
GM215KND25R	2,916	14,959	2,484	12,743	1,836	9,419	2,232	11,450	3,060	15,698	2,160	11,081	14,688	75,349
GM245FL044L	1,200	8,101	1,416	9,559	576	3,889	1,272	8,587	1,104	7,453	768	5,185	6,336	42,774
GM245FL044R	1,224	8,274	1,440	9,734	576	3,894	1,248	8,436	1,128	7,625	768	5,192	6,384	43,156
GM245RL047L	1,320	11,739	1,464	13,019	600	5,336	1,320	11,739	1,247	11,090	888	7,897	6,839	60,819
GM245RL047R	1,320	11,739	1,344	11,952	720	6,403	1,320	11,739	1,284	11,419	840	7,470	6,828	60,721
GM245RU004L	1,200	3,060	1,440	3,672	560	1,428	1,360	3,468	1,040	2,652	597	1,522	6,197	15,802
GM245RU004R	1,200	3,071	1,440	3,685	560	1,433	1,200	3,071	1,280	3,276	640	1,638	6,320	16,173
GM265RU003LH	1,584	12,349	1,404	10,946	0	0	0	0	0	0	480	3,742	3,468	27,037
GM265RU003RH	864	6,642	1,296	9,962	0	0	0	0	0	0	480	3,690	2,640	20,294
GM320RU002L	36	206	0	0	0	0	0	0	36	206	0	72	413	827
GM320RU002R	0	0	36	207	36	207	0	0	36	207	36	207	144	827
GM322FB054L	2,268	17,500	144	1,111	1,658	12,778	2,612	20,154	2,628	20,278	2,664	20,555	11,972	92,376
GM322FB054R	2,196	16,997	108	836	1,692	13,096	2,593	20,070	2,376	18,390	2,988	23,127	11,953	92,516
GM322FL035L	2,848	25,037	0	0	1,216	10,690	2,944	25,881	2,080	18,285	3,360	29,538	12,448	109,430
GM322FL035R	2,848	25,165	0	0	1,216	10,745	2,944	26,013	2,080	18,379	3,328	29,406	12,416	109,708
GM322FL049L	4,160	39,770	0	0	2,048	19,579	4,470	42,733	3,008	28,756	3,320	31,739	17,006	162,577
GM322FL049R	4,160	39,928	0	0	2,016	19,350	4,366	41,905	3,072	29,485	3,360	32,249	16,974	162,916
GM322RU027L	7,008	48,937	0	0	3,296	23,016	7,488	52,289	4,544	31,731	6,912	48,266	29,248	204,239
GM322RU027R	7,008	48,776	0	0	3,296	22,940	7,520	52,339	4,480	31,181	7,232	50,335	29,536	205,571
GMCDYK071L	0	0	0	0	0	0	444	0	438	0	924	0	1,806	924
GMCDYK071R	0	0	0	0	0	0	444	0	438	0	882	0	1,764	882
GMCSSFL046L	72	489	0	0	24	163	48	326	72	489	48	326	264	1,793
GMCSSFL046R	72	490	0	0	24	163	48	327	63	429	48	327	255	1,735
GMDFENL043LH	146,688	569,149	127,096	493,132	137,512	533,547	110,584	429,066	167,536	650,040	117,656	456,505	807,072	3,131,439
GMDFENL043RH	151,252	586,858	132,808	515,295	137,944	535,223	113,944	442,103	156,424	606,925	125,000	485,000	817,372	3,171,403
GMDFWFL048LH	4,368	18,509	3,864	16,373	5,880	24,915	7,560	32,034	24,915	11,592	49,119	15,960	67,827	208,577
GMDFWFL048RH	4,368	18,509	3,864	16,373	5,880	24,915	7,560	32,034	24,915	11,592	49,119	15,960	67,827	208,577
GMHLDBK062L	181	127	0	0	803	563	213	149	0	0	0	0	181	127
GMHLDBK062R	181	127	0	0	803	563	213	149	0	0	0	0	181	127
GMHLDBK062RM	0	0	1,239	869	824	578	199	139	3,371	2,363	3,325	2,331	8,958	6,280
GMHLDRU061L	0	0	1,330	8,682	1,501	9,799	3,096	20,211	2,124	13,865	3,232	21,098	11,283	73,655
GMHLDRU061R	0	0	1,368	8,930	1,512	9,870	3,420	22,326	2,052	13,395	3,053	19,930	11,405	74,452
GMXTSYK065L	0	0	0	0	0	0	366	0	266	0	663	0	1,315	663
GMXTSYK065R	0	0	0	0	0	0	366	0	266	0	641	0	1,273	641
GMZ06FL045L	48	324	24	162	324	2,162	48	324	24	162	24	162	168	1,134
GMZ06FL045R	24	162	24	162	24	162	24	162	112	782	24	162	168	1,136
GMZ06RU011L	120	306	30	77	24	61	102	260	112	286	78	199	466	1,188
GMZ06RU011R	120	307	24	61	24	61	108	276	108	276	78	199	466	1,182
HOCIVKND066L	7,500	28,748	7,560	28,977	4,560	17,478	8,100	31,047	11,700	44,846	22,440	86,013	61,860	237,109
HOCIVKND066R	7,500	28,748	7,560	28,977	4,560	17,478	8,095	31,028	11,494	44,057	21,489	82,367	60,698	232,655
HOMDXRK024L	3,120	20,161	3,070	19,838	1,686	10,895	3,660	23,651	6,120	39,547	5,040	32,568	22,696	146,662
HOMDXRK024R	3,120	20,152	3,070	19,829	1,686	10,890	3,660	23,640	6,120	39,529	5,040	32,553	22,686	146,593
Total Production Parts	381,794	1,649,196	313,328	1,259,777	345,470	1,369,141	330,036	1,441,015	443,637	1,821,151	392,699	1,669,534	2,206,964	9,209,815
GM245FL044L	0	0	24	162	0	0	0	0	0	0	24	162	48	324
GM245FL044R	0	0	0	0	24	162	0	0	0	0	24	162	48	324
GM245RL047L	24	213	0	0	24	213	0	0	6	53	0	0	54	480
GM245RL047R	7	62	33	293	0	0	0	0	6	53	29	258	75	667
GM245RU004L	24	61	0	0	0	0	0	0	9	53	15	38	48	122
GM245RU004R	24	61	0	0	80	205	0	0	0	0	0	0	104	266
GM265FB050L	0	0	13	100	37	285	0	0	42	324	7	54	99	764
GM265FB050R	22	170	24	186	10	77	0	0	19	147	3	23	78	604
GM265FB056L	26	201	21	162	95	733	0	0	0	0	0	0	142	1,096
GM265FB056R	39	302	0	0	69	534	1	8	0	0	5	39	114	882
GM295FB051L	0	0	12	93	12	93	0	0	0	0	0	0	24	185
GM295FB051R	0	0	0	0	10	77	0	0	0	0	0	0	10	77
GM295FL028L	56	493	0	0	0	0	32	282	0	0	0	0	88	775
GM295FL028R	32	283	32	283	0	0	0	0	0	0	0	0	64	566
GM320FB007L	249	1,732	99	689	62	431	13	90	82	570	74	515	579	4,028
GM322FB054L	106	736	69	479	54	375	31	215	53	368	80	556	393	2,730
GM322FB054R	36	278	36	278	36	278	0	0	0	0	0	0	108	833
GM322FB054R	36	279	36	279	0	0	0	0	0	0	0	0	72	557

Attachment A-1

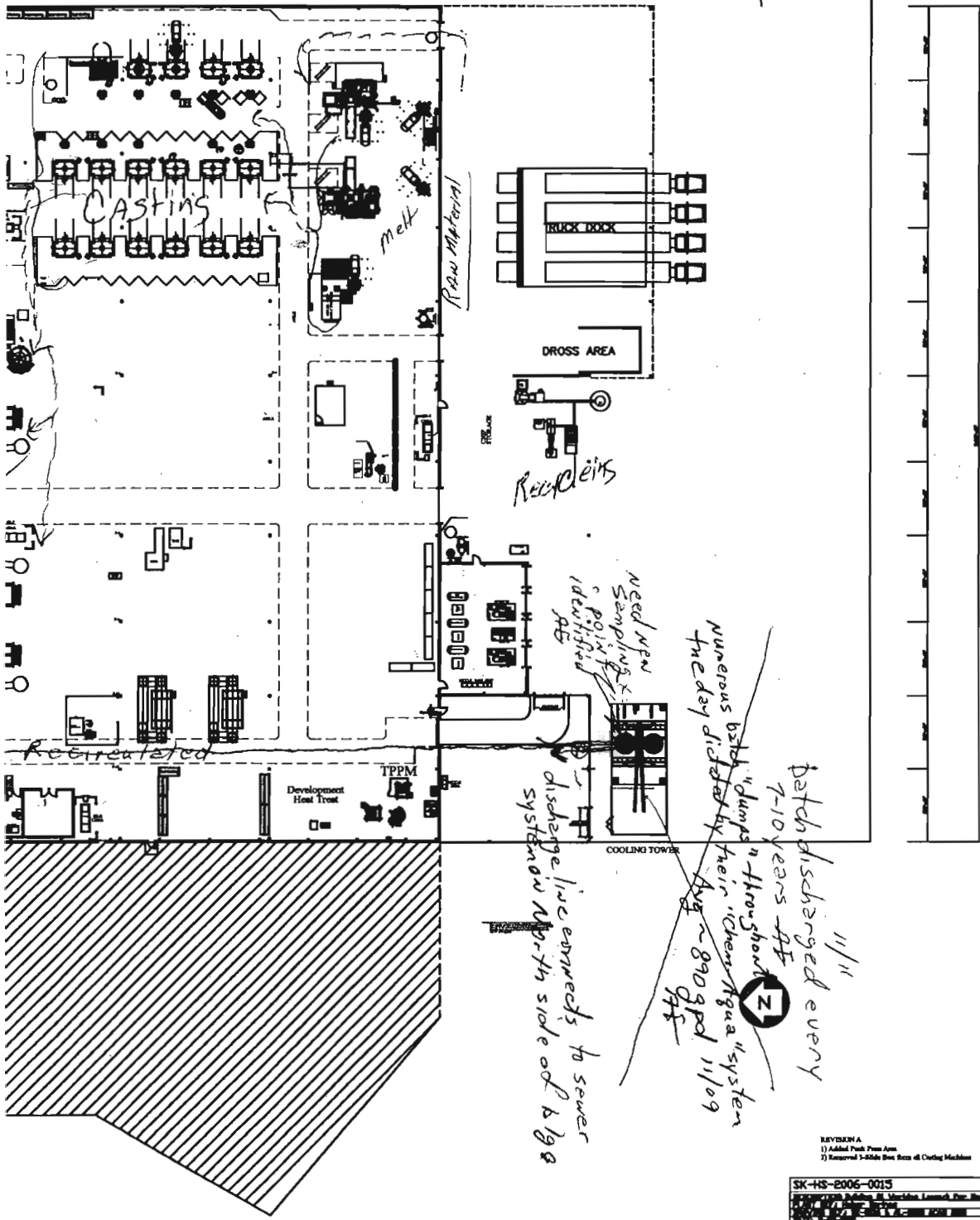
GM322FL035L	64	563	0	0	32	281	10	88	20	176	55	484	181	1,591
GM322FL035R	96	848	0	0	0	0	0	0	0	0	70	619	166	1,467
GM322FL049L	76	727	0	0	64	612	0	0	0	0	96	918	236	2,256
GM322FL049R	77	739	0	0	96	921	0	0	64	614	160	1,536	397	3,810
GM322RU027L	64	447	0	0	32	223	0	0	0	0	0	0	96	670
GM322RU027R	44	306	0	0	0	0	0	0	32	223	0	0	76	529
GMCSSF046L	0	0	24	163	0	0	0	0	0	0	0	0	24	163
GMCSSF046R	0	0	24	163	0	0	0	0	0	0	0	0	24	163
GMSTSF031R	1	9	2	17	5	44	0	0	0	0	0	0	8	70
GMSTSF055L	6	52	1	9	3	26	0	0	0	0	0	0	10	87
GMZ06FL045L	30	203	24	162	0	0	0	0	0	0	0	0	54	365
GMZ06FL045R	29	196	0	0	0	0	0	0	0	0	4	27	33	223
GMZ06RU011L	0	0	6	15	0	15	0	0	9	23	0	0	21	54
GMZ06RU011R	0	0	32	82	0	0	0	0	0	0	0	0	32	82
HOCIVK066R	0	0	0	0	0	0	0	0	0	0	2	8	2	8
HOCIVRK015L	68	261	63	241	40	153	33	126	62	238	60	230	326	1,250
HOCIVRK015R	60	230	76	291	46	176	57	218	71	272	53	203	363	1,389
HOMDXRK024L	10	65	22	142	3	19	8	52	12	78	11	71	66	426
HOMDXRK024R	14	90	20	129	31	200	20	129	24	155	25	161	134	866
Total Service Parts	1,320	9,606	693	4,419	871	6,137	205	1,209	511	3,317	797	6,062	4,397	30,750
GM295FB051R	0	0	0	0	0	0	0	0	0	0	1	8	1	8
Total Other Parts	0	0	0	0	0	0	0	0	0	0	1	8	1	8
Grand Total Sales Parts	383,114	1,658,803	314,021	1,264,196	346,341	1,375,277	330,241	1,442,224	444,148	1,824,468	393,497	1,675,604	2,211,362	9,240,572

16588803  
~~3583~~ 1114 wrong AB  
~~314~~ 821  
~~264~~ 1914

Total lbs # = 9240,572

~~22,942,386.88~~ = million lbs/day generated  
~~184~~ products  
 wrong AB

From - India  
 the country



Attachment A-2  
 Hand Delivered  
 11/3/09  
 AT

Batch discharged every 7-10 years AT  
 Numerous batch "dumps" in through-out  
 Tuesday dictated by their "Chem Aqua" system  
 Aug ~ 890 gpd 11/09  
 AT

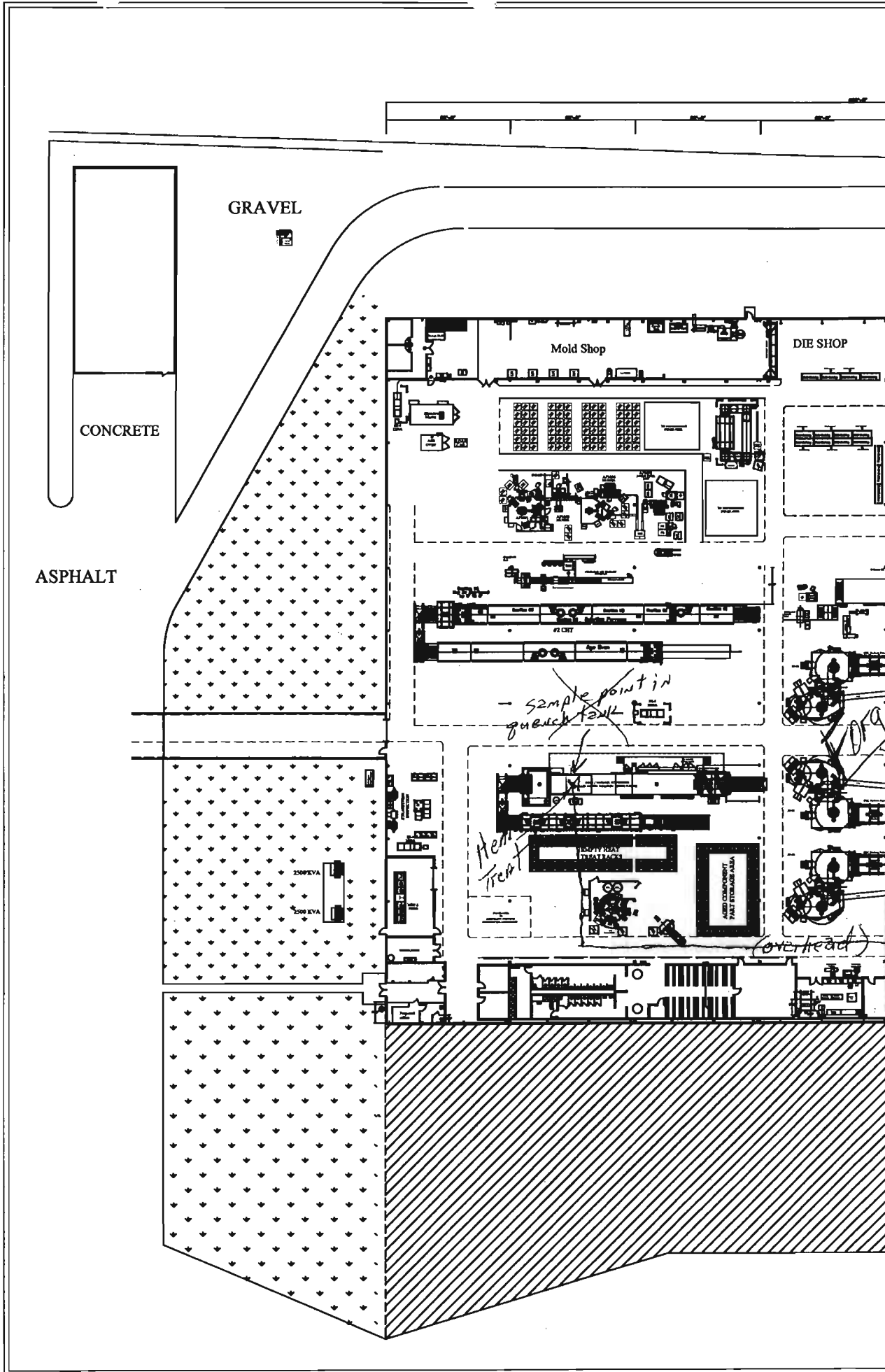
discharge line connects to sewer system on North side of bldg

REVISION A  
 1) Added Peak Flow Area  
 2) Renumbered 1-8546 Box Area of Cooling Machine

SK-HS-2006-0015

DATE	DESCRIPTION

REVISIONS For Information Only



Attachment A-2