



ARKANSAS  
Department of Environmental Quality

April 4, 2012

Ken Johnson, Manager  
Pine Bluff Wastewater Utility  
1520 S. Ohio Street  
Pine Bluff, Arkansas 71601-6055

Re: City of Pine Bluff (AFIN: 35-00149 NPDES Permit Number: AR0033316)  
Pretreatment Program Audit & Municipal Pollution Prevention (P2) Assessment

Dear Mr. Johnson:

Please find enclosed the finished report for the audit/assessment conducted by the Department from March 20<sup>th</sup> through 22<sup>nd</sup>, 2012. The report should be made available for review by appropriate industrial and City officials. The Pine Bluff staff should discuss and evaluate the findings in this report. Please respond to the required actions and recommendations in writing within thirty (30) days.

The Department appreciates the staff's assistance. The staff appeared very interested in both the Pretreatment and Pollution Prevention Programs. Most of the recommendations in the attached audit/assessment are intended to aide the City's pretreatment program with achieving the objectives of the Clean Water Act.

If the City has questions or concerns, please do not hesitate to contact the Department at (501) 682-0626 or [torrence@adeq.state.ar.us](mailto:torrence@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Rufus J. Torrence".

Rufus J. Torrence, Water Division Engineer

Encl: Audit Report/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)  
Eric Fleming / Mgr-Field Services (w/o attmt)

**PRETREATMENT PROGRAM AUDIT/  
POLLUTION PREVENTION ASSESSMENT**

**PINE BLUFF, ARKANSAS**

**NPDES PERMIT #AR0033316**

**APRIL 4, 2012**

**PREPARED BY: Rufus Torrence  
ADEQ Water Division Engineer and Auditor**

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**

**5301 Northshore Drive**

**NORTH LITTLE ROCK, ARKANSAS 72118-5317**

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C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs

D) Required Program Modifications to the Approved Pretreatment Program Necessary to Bring the Program Into Compliance with the Letter or Intent of the Current Regulatory Requirements

## **LIST OF ATTACHMENTS**

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Supporting Documentation

Attachments:    A . . . . . Permit Application (Tyson)  
                      B . . . . . Permit (Tyson)  
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                      F . . . . . Monitoring Report (Tyson)

## **A) INTRODUCTION**

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

An audit/assessment was performed March 20 through March 22, 2012, on the Pretreatment Program implemented by the Pine Bluff Wastewater Utility (PBWU). Participants included:

|                  |                                     |
|------------------|-------------------------------------|
| Rufus Torrence   | ADEQ/Engineer & Auditor             |
| Vincent Miles    | Pine Bluff/Pretreatment Coordinator |
| Ken Johnson      | PBWU Manager                        |
| Stacey Carpenter | Lab Supv/Boyd Point WWTP            |
| Jamie Kentle     | Secretary/Boyd Point WWTP           |

The goals of the audit/assessment were:

- \* To determine the implementation and compliance status of the City of Pine Bluff Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403 and other applicable regulations
- \* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges
- \* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements
- \* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof

Pine Bluff Pretreatment Program was originally approved on September 18, 1984. In August 2005 PBWU submitted a modification to ADEQ to update the entire program to include incorporation of an enforcement response plan, evaluation of the maximum allowable headworks loading and revisions to the pretreatment ordinances. In May 2007 ADEQ publicly noticed the modification and final approval was contingent upon PBWU adopting the pretreatment ordinance. PBWU never adopted the ordinance. Nonetheless, in October 2005 EPA promulgated revisions to 40 CFR 403. These revisions are commonly referred to as the "Streamlining Revisions". The City's NPDES permit requires PBWU to resubmit a new proposed modification to include the Streamlining Revisions.

The POTW design flow is 14 MGD and the average flow is 8.63 MGD. Ten (10) significant industrial users (SIUs) discharge approximately 3 MGD to the POTW. Four (4) of the SIUs are also categorical industrial users. The POTW consists of two (2) aerated lagoons followed by two (2) primary ponds and, finally, followed by two (2) polishing ponds. The entire system covers approximately 490 acres. After the wastewater exits the polishing ponds, it enters a chlorine contact chamber before it is discharged to the Arkansas River. Presently, the effluent is exhibiting no toxicity to aquatic life. The sludge is accumulating in the lagoons.

The primary goal of the national pretreatment program is to ensure that PBWU complies with all limits in its NPDES permit. The national pretreatment program stresses Pollution Prevention to reduce the amount of wastewater discharged to the POTW and local limits to control point source loadings to the POTW. Tyson is the primary non-domestic point source of organic loading and discharges approximately 17,000 lbs/day of BOD<sub>5</sub>. Preliminary engineering calculations indicate that the lagoons design capacity should be at least 25,000 lbs/day for BOD<sub>5</sub>. A significant source of the BOD<sub>5</sub> and TSS loading comes from aquatic plants growing in the lagoons. The BOD<sub>5</sub> and TSS effluent concentrations are consistently within 90 to 100% of the permit limits. The POTW has a BMP in place to help ensure continued compliance. The BMP helps the POTW personnel to monitor and control actual organic loading to the receiving stream (Arkansas River). The POTW has a good compliance history. Nonetheless, the City must develop new local limits for metals, cyanide, BOD<sub>5</sub>, TSS and ammonia or demonstrate that local limits for these pollutants are not necessary.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files & pretreatment records at the Boyd Point office adjacent to the treatment plant and site visits to five (5) of the industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachment(s) A through I.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. Section C includes recommendations to help improve the implementation and enforcement of Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including recommended/required adopted legal authorities, are outlined in Section D.

## B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in PBWU Pretreatment Program. The auditor has paraphrased with CFR citations the actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program. A narrative explanation of the finding will follow the citations.

1) Under **40 CFR 403.4** The City cannot have any local regulations (ordinance/code) that are *“less stringent than any set forth in National Pretreatment Standards, or any other requirements or prohibitions established under the Act...”*.

On October 14, 2005 EPA promulgated revisions to 40 CFR 403. These revisions are commonly referred to as the “Streamlining” revisions. Each POTW with an approved pretreatment program must review the local legal authority to ensure that local ordinances/codes are not less stringent than the Streamlining revisions. For national consistency, the Department decided to wait for EPA to develop guidance before reviewing ordinances and approving modifications to Arkansas approved pretreatment programs. In January 2007 EPA published a “Model Pretreatment Ordinance” with the recent Streamlining Revisions.

The City’s last revision to the legal authority and pretreatment program were incorporated into NPDES permit #AR0033316 on September 8, 1992. In reference to Part II (page 3) in the City’s NPDES permit (effective September 1, 2009), find in section 11.A, *“The Sewer Use Ordinance and the Pretreatment Program have not been modified to come into compliance with the current 40 CFR 403 regulations [Streamlining Revisions]. The permittee shall submit all necessary proposed modifications to ADEQ within twelve (12) months of the effective date of this permit.”* The City submitted the first draft of the proposed ordinance by email on August 16, 2010 and by US mail on August 17, 2010. The Department reviewed the draft ordinance and replied in a letter dated September 22, 2010. The Department expects the City to submit the adopted ordinance and an updated program narrative by **June 15, 2012**.

2) Under **40 CFR 403.5(c)(1)**, *“Each POTW developing a POTW Pretreatment Program...shall develop and enforce specific limits...Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits.”*

The current approved pretreatment program narrative has a local limit development for metals and cyanide (Section 28-102 in municipal codes). These limits are currently and legally in effect and enforceable. However, because the limits are relatively high in comparison to categorical standards, the limits are not effective at controlling toxic pollutant loadings to the POTW.

At a minimum the City must update the current local limits in conjunction with updating the program narrative to comply with the recent Streamlining revisions to 40 CFR 403. The City is currently applying local limits in some SIU permits (see Recommendation #8 below) which do not appear to have a firm technical basis and may not be enforceable.

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

1) Since PBWU is presently assessing the local limits, the auditor recommends that PBWU only reference a TBLL section in the proposed pretreatment narrative. PBWU can reserve the right to develop local limits from time to time based on the current MAHLs. PBWU may use the following language in the local limit section of the proposed narrative:

#### Local Limits

*To protect against pass through and interference, no Industrial User may discharge or cause to be discharged into the POTW any wastewater pollutant concentration exceeding the Technically Based Local Limits (TBLLs) developed from time to time by the Manager of Pine Bluff Wastewater Utility as required in City of Pine Bluff NPDES permits No. AR0033316, authorized by 40 CFR 403.5 (c) and approved by the Approval Authority. The TBLLs are based on calculated Maximum Allowable Industrial Loadings. At the discretion of the Manager, TBLLs may be imposed and shall apply at the "monitoring point" described in the individual industrial wastewater discharge permits. All concentration limits for metals shall be in terms of "total" metals unless otherwise indicated. At the discretion of the Manager, mass limitations may be imposed in addition to or in place of concentration based TBLLs. The Manager may also develop BMPs in individual wastewater discharge permits, to implement specific pollutant limitations. Such BMPs shall be considered Local Limits and Pretreatment Standards. When new Local Limits are implemented or revised, the Manager will provide individual notice to parties who have requested such notice and an opportunity to respond, as set forth by 40 CFR 403.5 (c) (3). This requirement of notice also applies when Local Limits are set on a case-by-case basis.*

2) Since PBWU is performing all monitoring, PBWU should remove paragraph D and F under "Reporting Requirements" in all permits. Paragraph F requires the CIUs to perform self-monitoring. Refer to attachment B-5/12 to view the language in Paragraph D and F.

3) Since PBWU is required to sample and analyze the effluent from Industrial Users independent of information supplied by the Industrial Users, PBWU should be capable of performing all monitoring without the assistance of the Industrial Users. In other words, PBWU should not depend on the SIUs to supply the City with dates and times when the City may sample. The City may elect to supply the SIUs with dates and times when the SIU can discharge. Hence, the City can make "unannounced" sampling visits to SIUs with batch discharges.

**Section C (con'd)**

4) PBWU should cite the legal authority on the Cover Page of each permit. PBWU may elect to amend the language on the Cover Page with this opening phrase:

*In accordance with the provisions of Ordinance #6381 as codified in Pine Bluff Codes [Chapter 28 Water, Sewers and Sewage Disposal; Article III. Sewers and Sewage Disposal; Division 3. Sewer Use Requirements and Restrictions]*

*Industrial User's Name  
Location address  
Mailing address (optional)*

*is hereby authorized to discharge...*

Normally, POTWs cite a specific ordinance. However, PBWU has recently elected to adopt EPA Model Pretreatment Ordinance (MPO). Since PBWU has elected to adopt the MPO and if the MPO has repealed all previous "pretreatment" ordinances, then PBWU may simply cite the MPO on the Cover Page of each permit. However, the Auditor recommends citing both the codes and ordinance as shown above.

5) PBWU should include a schematic drawing with each inspection report to show the types of flows (regulated and non-regulated) with respect to the sampling point.

6) PBWU may include in each IU inspection report both a review of the need to develop a slug plan and a review of the IU's slug plan (if applicable). Both objectives may be accomplished by inserting the following language in Section 4: COMPLIANCE INFORMATION:

*Were the Industry's slug control and prevention measures evaluated? Yes ☒ No ☐*

*Are adequate precautions being taken and proper procedures followed to prevent accidental spills and slug loads? Yes ☒ No ☐*

7) PBWU last hazardous waste notification to local industries was by a letter in 1991. Since two decades have elapsed since the last notification, PBWU should refresh the notification by sending a copy of the reporting requirements located in 40 CFR 403.12(j) & (p) to all SIUs and the hazardous waste generators shown on the ADEQ website at:

[http://www.adeq.state.ar.us/hazwaste/rcra2/facil\\_sum.asp#Display](http://www.adeq.state.ar.us/hazwaste/rcra2/facil_sum.asp#Display)

(Instructions: Enter "Pine Bluff" in the box next to the title "Location City" and click "Search" to see the list.)



- 8) Aramark's permit has limits for metals and organics. See Attachment E-3/3. These limits do not have a firm technical basis and were not approved by ADEQ. The City should either develop TBLLs for these parameters or remove them from Aramark's permit. In addition, these limits do not match the limits shown in Section 28-102 in the codes (please note that Ordinance #6381 should strike these limits from the codes and the ordinance also gives the City the authority to repeal these limits with ADEQ approval).
- 9) The City should require Arcelor to use the "Neutralization Tank" wastewater to control foam in the Parshall Flume instead of City water. The City Water is another "dilute stream" which must be considered when applying the Combined Wastestream Formula.
- 10). The City records indicated a zinc violation (8.07 mg/l) on March 7, 2012 while Arcelor records for the same date indicated compliance. Arcelor is sampling at the end of treatment in the plant while the City samples at a manhole. The two sampling points are connected by a 4" pipe about a ¼ mile long. Arcelor indicated that the line must occasionally be flushed to remove green algae. Green algae are capable of bioaccumulation of zinc. The City should continue to sample at the manhole and Arcelor should flush the line more often to avoid violations.
- 11) The City has inadvertently set a "local limit" for temperature. See Attachment B-3/12. Referring to paragraph (9), find a "*forty (40) degrees Celsius*" limit on the SIU discharges to the POTW. In 40 CFR 403.5(b)(5), find "*the temperature at the POTW Treatment Plant exceeds 40° C*". In other words, the temperature limit applies at the POTW headworks and not at the SIU point discharge. For the general and all specific prohibitions, the City should insert the exact language shown in 40 CFR 403.5 in each SIU's permit.
- 12) In reference to requirement 2 above, the City should sample influent lines A & C for BOD<sub>5</sub>, TSS and NH<sub>3</sub>-N. The sampling points should be at locations to avoid "contamination" for the aerated ponds. The City should also sample for metals and the conventional pollutants at domestic locations (manholes or lift stations with only residential wastewater).

**D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED  
PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM  
INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT  
REGULATORY REQUIREMENTS**

- I)** PBWU must comply with the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). PBWU must review the existing approved program narrative and make all necessary modifications to comply. The narrative is due by June 15, 2012.

\* \* \* \* \*

**E) CONCLUSIONS**

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.

# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

Section I: General Information ..... Pages 1- 4  
Section II: Pretreatment Program Analysis ..... Pages 5-17  
Section III: Industrial User File Evaluation ..... Pages 18-25

### SECTION I: GENERAL INFORMATION

#### A. GENERAL INFORMATION

Control Authority Name: City of Pine Bluff NPDES #: AR0033316  
Mailing address: 1520 S. Ohio Street  
Pine Bluff, AR 71601

Permit Signatory: Ken Johnson Title: Manager - PBWU  
Telephone: (870) 535-6603 FAX NUMBER: (870) 535-6243

Pretreatment Contact: Ken Johnson Title: Manager - PBWU  
Address: (Same)  
Telephone: (Same) E-Mail address: ken@pbwastewater.com

Pretreatment program approval date: 9/18/84

Dates of approval of any substantial modifications: 3/31/89 & 9/8/92

Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 3/1 to 2/29 Date(s) of Audit: 3/20 to 3/22/12  
(ASSESSMENT)

Inspector(s):

| <u>NAME</u>           | <u>TITLE/AFFILIATION</u> | <u>PHONE NUMBER</u>   |
|-----------------------|--------------------------|-----------------------|
| <u>Rufus Torrence</u> | <u>Engineer II</u>       | <u>(501) 682-0626</u> |

Control Authority representative(s):

| <u>NAME</u>            | <u>TITLE</u>                     | <u>PHONE NUMBER</u>   |
|------------------------|----------------------------------|-----------------------|
| <u>Ken Johnson</u>     | <u>Manager PBWU</u>              | <u>(870) 535-6603</u> |
| <u>*Vincent Miles</u>  | <u>Env Comp Supv/Pret Coord.</u> | <u>(870) 535-0828</u> |
| <u>Stacy Carpenter</u> | <u>Sr. Lab Tech</u>              | <u>(870) 535-0828</u> |
| <u>Jamie Kentle</u>    | <u>Secretary</u>                 | <u>(870) 535-0828</u> |

\* Program Primary Contact

Dates of Previous PCIs/Audits:

| <u>TYPE</u> | <u>DATE</u>     | <u>DEFICIENCIES NOTED</u>          |
|-------------|-----------------|------------------------------------|
| <u>PCI</u>  | <u>03-16-11</u> | <u>No Major Deficiencies Noted</u> |
|             |                 |                                    |
|             |                 |                                    |
|             |                 |                                    |

YES    NO

\_\_\_ ✓    Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action:

---

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\_\_\_ ✓    Is the Control Authority currently in SNC or RNC?

.....

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with a asterisk or footnote that tells that there is more explanatory information and where it can be found.

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## SECTION I: GENERAL INFORMATION

### B. TREATMENT PLANT INFORMATION

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

| NPDES<br>Permit No. | Name of Treatment Plant       | Effective<br>Date | Expiration<br>Date |
|---------------------|-------------------------------|-------------------|--------------------|
| *AR003316           | Boyd Point Treatment Facility | 07/31/2009        | 08/31/2014         |

\* Indicates the permit number/treatment plant under which the Pretreatment Program is tracked.

#### 2. Individual Treatment Plant Information

a. Name of Treatment Plant: Boyd Point Treatment Facility

Location Address: 900 Island Harbor Marina Road, Pine Bluff, AR 71602

Expiration Date of NPDES Permit: January 31, 2009

Treatment Plant Wastewater Flow: Design- 14 MGD; Actual (Average)- 9.64 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs 0

#### Industrial Contribution to this Treatment Plant

# of SIUs : 10 # of CIUs : 4  
Industrial Flow (mgd): 2.89

Industrial Flow (%) : 33 %

#### Level of Treatment

Primary           

Secondary   ✓  

Tertiary           

#### Type of Process(es):

490 Acres of aerated/polishing ponds

Method of Disinfection: Chlorine contact chamber

Dechlorination            YES   ✓   NO

#### Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C Arkansas River Basin

Receiving Stream Use: Primary Contact Recreational / Fishable / Swimmable

If effluent is disposed of to any location other than the receiving stream, please note: Not Applicable

#### Method of Sludge Disposal:

#### Quantity of Sludge:

|  |                                |
|--|--------------------------------|
| <u>          </u> Land Application                                 | <u>          </u> dry tons/yr. |
| <u>          </u> Incineration                                     | <u>          </u> dry tons/yr. |
| <u>          </u> Monofill   | <u>          </u> dry tons/yr. |
| <u>          </u> Mun. Solid Waste Landfill                        | <u>          </u> dry tons/yr. |
| <u>          </u> Public Distribution                              | <u>          </u> dry tons/yr. |
| <u>          </u> Lagoon Storage                                   | <u>          </u> dry tons/yr. |
| <u>  ✓  </u> Sludge is currently in an "Active Sewage Sludge Unit" |                                |

List of toxic pollutant limits in NPDES permit: (None)

## SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for  
Boyd Treatment Plant.)

YES NO Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: \_\_\_\_\_  
 Issuance Date: \_\_\_\_\_  
 Expiration Date: \_\_\_\_\_

List pollutants that are specified in current sludge permit: (Sludge is currently accumulating in an "Active Sewage Sludge Unit")

YES NO N/A  
☒ ☐ ☐ Has the Control Authority submitted results of whole effluent biological toxicity testing.  
☐ ☒ ☐ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?)

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

|               | Influent | Effluent | Sludge | Ambient |
|---------------|----------|----------|--------|---------|
| Metals *      | 4        | 4        | 4      |         |
| Priority **   | 1        | 1        | 0      |         |
| Biomonitoring | 0        | 4        | 2      |         |
| TCLP          |          |          |        |         |
| Other: _____  |          |          |        |         |

\* As identified at 40 CFR 122, Appendix D, Table III, \*\* As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

CA believes parameters stayed the same

YES NO N/A

☐ ☐ ☒ Has the POTW begun tracking the trends in the above samples?  
☒ ☐ ☐ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated  
Flow (3/09,1/10,2/10 & 9/10)

Cause(s)  
Improper Data Entry\*

\*These Flow Violations were reported by the POTW but the Env Compliance Supervisor claims no violations occurred but only improper data entry.

YES NO

☐ ☒ Has the treatment plant sludge violated the TCLP Test?

## SECTION I: GENERAL INFORMATION

C. Control Authority Pretreatment Program Modification [Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]]

YES NO

✓ Have any substantial modifications been made or requested to any pretreatment program components since the last audit?  
If yes, identify below.  
None but the CA will be required to perform a new MAHL calculation and update the program to comply with the new Streamlining rule.

### 1. Modifications:

| Date<br>Approved<br>by ADEQ | Ordinance Citation/<br>Nature of Modification   | Date<br>Incorporated<br>in NPDES<br>Permit |
|-----------------------------|---|--|
| <u>3/21/89</u>              | <u>Ord. #5301; definition changes; clarification of enforcement procedures; MAHL loading limits</u> | <u>3/21/89</u>                             |
| <u>9/8/92</u>               | <u>Ord. #5502; program and legal authority revisions</u>  | <u>9/8/92</u>                              |

### 2. Modifications in Progress:

| Date Requested  | Nature of Modification  |
|-----------------|---|
| <u>*8-17-10</u> | <u>Updating Program to comply with streamlining revisions</u> |

*\*Draft Ordinance submitted for review.*

YES NO

✓ Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

✓ Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

### D. Legal Authority [403.8(f)(1)]

Date of original Pretreatment Program approval: 9/18/84 [WENDB-PTIM]  
Date of most recent Ordinance approved by the Control authority: 8-1-05  
Date of most recent Pretreatment Program modification approval: 9-8-92

Does the Control Authority's legal authority enable it to:  
[403.8(f)(1)(i-vii)]

YES NO

|          |  |
|----------|--|
| <u>✓</u> | <u>Deny or condition pollutant discharges</u>                            |
| <u>✓</u> | <u>Require compliance with standards</u>                                 |
| <u>✓</u> | <u>Control discharges through permit or similar means</u>                |
| <u>✓</u> | <u>Require compliance schedules and IU reports</u>                       |
| <u>✓</u> | <u>Carry out inspection and monitoring activities</u>                    |
| <u>✓</u> | <u>Obtain remedies for noncompliance</u>                                 |
| <u>✓</u> | <u>Comply with confidentiality requirements</u>                          |
| <u>✓</u> | <u>Establish Pollution Prevention</u>                                    |
| <u>✓</u> | <u>Has the city developed and adopted a Pollution Prevention policy?</u> |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

\_\_\_ ☒ Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

- \_\_\_ No oversight authority
- \_\_\_ No inspection authority
- \_\_\_ No remedies for noncompliance
- \_\_\_ No "equivalent" standard
- \_\_\_ No clear delineation of responsibility for program implementation
- \_\_\_ Interjurisdictional agreements not entered into
- \_\_\_ Other, Specify: \_\_\_\_\_

☒ \_\_\_ Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:

☒ \_\_\_ Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions? See Audit Report dated April 17, 2009, attachment B.

☒ \_\_\_ Have provisions been made for the incorporation of Pollution Prevention (P<sup>2</sup>) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

\*See April 2009 Report, Attachment B-4/8, White Hall agrees to enact all of Pine Bluffs requirements (therefore, if PB develops a P2 plan, then White Hall will, too).

| Name of Jurisdiction  | Number of CIUs | Number of Other SIUs | Type of Agreement   |
|-----------------------|----------------|----------------------|---------------------|
| 1. City of White Hall | 0              | 0                    | Interjurisdictional |

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

### Problems

|   |       |
|---|-------|
| Updating industrial waste survey              | _____ |
| Notification of IUs                           | _____ |
| Permit issuance                               | _____ |
| Receipt and review of IU reports              | _____ |
| Inspection and sampling of IUs                | _____ |
| Assessment of IUs for P <sup>2</sup> activity | _____ |
| Analysis of samples                           | _____ |
| Enforcement                                   | _____ |
| Other:  | _____ |

Briefly describe other problems: \_\_\_\_\_

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

| IU Name | Problem | NPDES Permit Violation |    |
|---------|---------|------------------------|----|
|         |         | Yes                    | No |
| (None)  |         |                        |    |



## SECTION II: PROGRAM ANALYSIS AND PROFILE

### E. Industrial User Characterization [403.8(f)(2)(i)]

- YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
- ☒ ☐
- ☐ ☒ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?
- ☒ ☐ Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
- ☒ ☐ If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify?

What methods are used to update the IWS:

- ☒ Review of newspaper/phone book
- ☒ Review of plumbing/building permits
- ☒ Review of water billing records
- ☒ Permit reapplication requirements
- ☒ Onsite inspections
- ☐ Citizen involvement
- ☐ Other (specify) \_\_\_\_\_

How often is the survey to be updated? About three years

Are there any problems that the Control Authority has in identifying and categorizing SIUs: None

YES NO

☐ ☒ Have any new SIUs been identified within the last 12 months? If yes:

| Name of IU | Type of Industry | Is the IU Permitted? |
|------------|------------------|----------------------|
| _____      | _____            | _____                |
| _____      | _____            | _____                |
| _____      | _____            | _____                |

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

- a. 10 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 4 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 6 Noncategorical SIUs
- d. 19 Other regulated nonsignificant IUs (Describe) Small Commercial IUs
- 29 TOTAL of a. + d.

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- ☒ ☐ Has the POTW identified any IUs with Pollution Prevention opportunities?
- ☐ ☒ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)-(3)]

If not, the Control Authority has defined "significant industrial user" to mean:  
The CA has not updated its legal authority to comply with the recent streamlining rule change in the definition of "SIU".

### F. Control Mechanism Evaluation [403.8(f)(1)(iii)]

YES NO

- ☐ ☒ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?
- \*The City plans to include this BMP and P2 information in the application as part of the streamlining modification.

Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 5 years

- 0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

| IU NAME     | PERMIT<br>EXPIRATION<br>DATE |
|-------------|------------------------------|
| <u>None</u> |                              |

YES NO

- ☐ ☒ Does the Control Authority accept trucked septage wastes?
- ☒ ☐ Does the Control Authority accept other trucked wastes?
- ☒ ☐ Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

YES NO

- ☒ ☐ Does Control Mechanism designate a discharge point? [403.5(b)(8)]
- N/A Are all applicable categorical standards and local limits applied to trucked wastes?

List all pollutants and applicable limits, other than local limits and categorical standards applied to waste haulers:

| Pollutant | Limit |
|-----------|-------|
|           |       |

Describe the discharge point(s) (including security procedures):

Jefferson Industrial Park Pump Station (Disc Point)  
CA checks references & regulatory agencies records

- ☐ ☒ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?
- ☐ ☒ Does the Control Authority have a control mechanism for regulating wastes from UST sites?

List all pollutants and applicable limits, other than local limits and categorical standards applied to UST cleanup sites:

| Pollutant  | Limit |
|------------|-------|
| <u>N/A</u> |       |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### G. Application of Pretreatment Standards and Requirements

YES NO

✓        Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

1991      Date Notified      Letter      Method of Notification

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

|          |                     |          |                       |
|----------|---------------------|----------|-----------------------|
| <u>✓</u> | Federal Register    | <u>✓</u> | Journals, Newsletters |
| <u>✓</u> | Meetings, Training  | <u>✓</u> | Internet              |
| <u>✓</u> | Government Agencies | <u>✓</u> | Other <u>NACWA</u>    |

YES NO

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

If yes, complete the information below:

| Pollutant<br>Changed   | Old<br>Limit | New<br>Limit | Reason<br>for Change |
|--|--------------|--------------|----------------------|
| <u>Local Limits are currently under review by Approval Authority</u>                 |              |              |                      |
| <u>The Department has updated the TBLL spreadsheet dated August 29, 2003</u>         |              |              |                      |
| <u>New spreadsheets dated March 2009 &amp; April 2012 are available to the City.</u> |              |              |                      |

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

|                   | Headworks Analysis Completed? |    | Local Limits Needed? |    | MAHL Limits Adopted? |    | MAHC** Numerical Limit Adopted (mg/l) |
|-------------------|-------------------------------|----|----------------------|----|----------------------|----|---------------------------------------|
|                   | Yes                           | No | Yes                  | No | Yes                  | No |                                       |
| Arsenic (As)      | ✓                             |    |                      |    | ✓                    |    | 0.100                                 |
| Cadmium (Cd)      | ✓                             |    | Under                |    | ✓                    |    | 0.165                                 |
| Chromium-Total    | ✓                             |    | Review               |    | ✓                    |    | 1.000                                 |
| Copper (Cu)       | ✓                             |    |                      |    | ✓                    |    | 1.000                                 |
| Cyanide (CN)      | ✓                             |    |                      |    | ✓                    |    | 0.100                                 |
| Lead (Pb)         | ✓                             |    |                      |    | ✓                    |    | 0.513                                 |
| Mercury (Hg)      | ✓                             |    |                      |    | ✓                    |    | 0.0004                                |
| Molybdenum (Mo) * | ✓                             |    |                      |    | ✓                    |    | 0.200                                 |
| Nickel (Ni)       | ✓                             |    |                      |    | ✓                    |    | 1.000                                 |
| Selenium (Se) *   | ✓                             |    |                      |    | ✓                    |    | 0.116                                 |
| Silver (Ag)       | ✓                             |    |                      |    | ✓                    |    | 0.190                                 |
| Zinc (Zn)         | ✓                             |    |                      |    | ✓                    |    | 0.550                                 |

\* - If necessary for the sludge disposal option chosen

\*\* - MAHCs are based on April 2012 ADEQ TBLL Spreadsheet; "Old" MAHCs are shown in Section 28-102 of the codes.

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

☒ ☐

Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

| POLLUTANT      | Headworks Analysis Completed?  |    | Local Limits Needed? |    | Local Limits Adopted? |    | Numerical Limit Adopted (mg/l) |
|----------------|--|----|----------------------|----|-----------------------|----|--------------------------------|
|                | Yes  | No | Yes                  | No | Yes                   | No |                                |
|                |  |    |                      |    |                       |    |                                |
| <u>O&amp;G</u> | <u>CA currently implementing "BMPs" grease trap program at the food related businesses</u> |    |                      |    |                       |    |                                |
|                |  |    |                      |    |                       |    |                                |
|                |  |    |                      |    |                       |    |                                |
|                |  |    |                      |    |                       |    |                                |
|                |  |    |                      |    |                       |    |                                |

YES NO

N/A

Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?

What method of allocation was used for local limits for each pollutant that has a local limit in-place?

|                 | TYPE OF ALLOCATION*     |      |        |
|-----------------|-------------------------|------|--------|
|                 | Uniform Concentration** | Mass | Hybrid |
| Arsenic (As)    |                         |      |        |
| Cadmium (Cd)    |                         |      |        |
| Chromium-Total  |                         |      |        |
| Copper (Cu)     |                         |      |        |
| Cyanide (CN)    |                         |      |        |
| Lead (Pb)       |                         |      |        |
| Mercury (Hg)    |                         |      |        |
| Molybdenum (Mo) |                         |      |        |
| Nickel (Ni)     |                         |      |        |
| Selenium (Se)   |                         |      |        |
| Silver (Ag)     |                         |      |        |
| Zinc (Zn)       |                         |      |        |

\*The CA is currently reassessing the need for local limits.

\*\*"Old" Uniform Concentrations are shown in Sec 28-102 and must be removed when the new ordinance is codified.

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants?

N/A



## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- ✓ Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
40CFR136 & 20<sup>th</sup> Edition of Standard Methods

How much time normally elapses between sample collection and obtaining analytical results for:

5days Conventional  
1week Metals  
1week Organics

- ✓ Is there an established protocol clearly detailing sampling location and procedures?

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

If yes, explain:

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

YES NO

- ✓ Scheduled compliance monitoring  
✓ Unscheduled compliance monitoring  
✓ Demand monitoring for IU compliance  
✓ IU self-monitoring  
Other:

YES NO

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

### I. ENFORCEMENT

YES NO

- ✓ Is the Control Authority definition of SNC consistent with EPA's?  
[403.8(f)(2)(vii)] Updated per recent Streamlining rule

- ✓\* Does the Control Authority have a written enforcement response plan (ERP)?  
[403.8(f)(5)]. If yes, does the plan:

\*The City submitted the ERP in a 2005 program mod which was never approved by the Department.  
The ERP is part of the Streamlining mod now.

YES NO

- ✓ Describe how the Control Authority will investigate instances of noncompliance
- ✓ Describe the Control Authority's types of escalating enforcement responses and the periods for each response
- ✓ Identify by Title the Official(s) responsible for implementing each type of enforcement response
- ✓ Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

## SECTION II: PROGRAM ANALYSIS AND PROFILE

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

|  |   |
|--|---|
| <input checked="" type="checkbox"/> Notice or letter of violation  | <input checked="" type="checkbox"/> Administrative Order    |
| <input checked="" type="checkbox"/> Setting of compliance schedule | <input checked="" type="checkbox"/> Revocation of permit    |
| <input checked="" type="checkbox"/> Injunctive relief              | <input checked="" type="checkbox"/> Fines (maximum amount): |

|                |    |       |                |
|----------------|----|-------|----------------|
| civil          | \$ | _____ | /day/violation |
| criminal       | \$ | 1000  | /day/violation |
| administrative | \$ | *     | /day/violation |

\*CA plans to include language for administrative fines in the streamlining modification.

☐ Imprisonment

☒ Termination of Service

☒ Other: \_\_\_\_\_

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: \_\_\_\_\_

YES NO

☒ When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]

☒ Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].

Comment: CA performs all monitoring

☐ If no, does the Control Authority conduct all of the monitoring?

YES NO N/A

☒ Does the pattern of enforcement conform to the ERP?

Complete the following table for SIUs identified as SNC.

| SIU<br>Name | Date First<br>Identified<br>in SNC | Enforcement Action<br>Type | Action<br>Date | Return to Compliance? |    |
|-------------|------------------------------------|----------------------------|----------------|-----------------------|----|
|             |                                    |                            |                | Yes (Date)            | No |
|             |                                    |                            |                |                       |    |
|             |                                    |                            |                |                       |    |
|             |                                    |                            |                |                       |    |



## SECTION II: PROGRAM ANALYSIS AND PROFILE

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

| # | % |  |
|---|---|--|
| 0 | 0 | Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)                                     |
| 0 | 0 | Self-monitoring requirements [WENDB-MSNC]  |
| 0 | 0 | Reporting requirements [WENDB-PSNC]  |
| 0 | 0 | Pretreatment compliance schedule [WENDB-SSNC]  |
| 0 | 0 | How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN] |

YES NO

☒ Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. \_\_\_\_\_

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

|                                     |   |       |
|-------------------------------------|---|-------|
| <input checked="" type="checkbox"/> | Interference [WENDB]                              | _____ |
| <input checked="" type="checkbox"/> | Pass through [WENDB]                              | _____ |
| <input checked="" type="checkbox"/> | Fire or explosions?<br>(incl. flash point viol.)  | _____ |
| <input checked="" type="checkbox"/> | Corrosive structural damage?<br>(incl. pH <5.0).  | _____ |
| <input checked="" type="checkbox"/> | Flow obstructions?                                | _____ |
| <input checked="" type="checkbox"/> | Excessive flow<br>or pollutant<br>concentrations? | _____ |
| <input checked="" type="checkbox"/> | Heat problems?                                    | _____ |
| <input checked="" type="checkbox"/> | Interference due to oil<br>or grease?             | _____ |
| <input checked="" type="checkbox"/> | Toxic fumes?                                      | _____ |
| <input checked="" type="checkbox"/> | Illicit dumping of<br>hauled wastes?              | _____ |

YES NO

☒ Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

None How many SIUs are currently on compliance schedules?

☒ Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

|                | <u>Number</u> | <u>Amount</u> |
|----------------|---------------|---------------|
| Civil          | _____         | \$ _____      |
| Administrative | _____         | \$ _____      |
| Total          | <u>None</u>   | \$ 0          |

[WENDB-IUPN]

### SECTION III: INDUSTRIAL USER FILE REVIEW

#### J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

✓     Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES NO

✓     computerized

✓     hard copy

        OTHER: \_\_\_\_\_

Are the following files computerized:

YES NO

✓     Control Mechanism Issuance

✓     Inspection and Sampling schedule

✓     Monitoring Data

✓     IU Compliance Status Tracking

        Other: \_\_\_\_\_

Can IU monitoring data be retrieved by:

✓     Industry name

✓     Pollutant type

✓     Industrial category or type

✓     SIC Code

✓     IU discharge volume

    ✓ Geographic location

N/A     Receiving treatment plant (i.e. if > one plant in the system)

        Other (specify) \_\_\_\_\_

✓     Does the POTW have provisions to address claims of confidentiality?  
[403.8(f)(1)(vii)]

    ✓ Have IUs requested that data be held confidential?  
How is confidential information handled by the Control Authority?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

If yes, please explain: \_\_\_\_\_

\_\_\_\_\_

✓     Are all records maintained for at least 3 years?

## SECTION III: INDUSTRIAL USER FILE REVIEW

### K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] \* - FTE = Full Time Equivalent Employee

Mgr (Ken Johnson) . . . . . 0.2  
 Pret Coor (Vincent Miles) . . . . . 0.8  
 Lab Supv (Stacy Carpenter) . . . . . 0.6  
 Secretary (Jamie Kentle) . . . . . 0.5  
 Lab Tech (Najard) . . . . . 0.5  
 Monitoring Tech (Samatha) . . . . . 0.5  
 Full Time Equivalent Employees (FTE) = 3.1

YES NO

☒ Have any problems in program implementation been observed which appear to be related to inadequate funding?  
 If yes, describe and show below the source(s) of funding for the program:

|  | Percent of Total Funding |
|--|--------------------------|
| <input type="checkbox"/> POTW general operating fund | 100                      |
| <input type="checkbox"/> IU permit fees              | _____                    |
| <input type="checkbox"/> monitoring charges          | _____                    |
| <input type="checkbox"/> industry surcharges         | _____                    |
| <input type="checkbox"/> other (describe) _____      | _____                    |
| Total  | 100%                     |

☒ Is funding expected to continue near the current level? If no, will it: Increase \_\_\_\_\_ or Decrease ☒  
 If no, describe the nature of the changes:  
Decrease due to slow down in economy & lost of industries

Are an adequate number of personnel available for the following program areas:

YES NO

If no, explain

|                                     |                          |                      |       |
|-------------------------------------|--------------------------|----------------------|-------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Legal assistance     | _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Permitting           | _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | IU inspections       | _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Sample collection    | _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Sample analyses      | _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Data analysis,       | _____ |
|                                     | <input type="checkbox"/> | review and response  | _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Enforcement          | _____ |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Administration       | _____ |
|                                     | <input type="checkbox"/> | (inc. record keeping | _____ |
|                                     | <input type="checkbox"/> | /data management)    | _____ |

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

|                                     |                          |                      |  |
|-------------------------------------|--------------------------|----------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Sampling equipment   | <u>Isco samplers, etc</u>                    |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Safety equipment     | <u>Hard hats, eye protection, etc.</u>       |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Vehicles             | <u>Trucks with plans to purchase new van</u> |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Analytical equipment | <u>ICAP, GC, etc.</u>                        |

### SECTION III: INDUSTRIAL USER FILE REVIEW

#### I. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):  
Household hazardous waste collection; public school presentations;  
Plant tours; brochures sent out educating public about the collection  
system and brochures about keeping grease out of the system.
2. Has the source of any toxic pollutants been identified?  
If yes, what was found?  
None
3. Has the POTW implemented any kind of public education program? If yes, describe:  
See above
4. Does the POTW have any pollution prevention success stories for industrial users documented? No. If yes, please attach.
5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?  
No
6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No  
If yes, which of the "Guides to Pollution Prevention" were used?  
N/A

### SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Arcelor (aka TrefilARBED) File/ID No. 17  
Industry Address 5200 Industrial Park South 71602  
Industry Description Steel Wire Drawing for Belted Tires and Pressure Hoses  
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3315  
Maximum Flow (gpd) 241,254 Ave. Flow (gpd) 185,560

Industry visited during audit: YES

Comments: \_\_\_\_\_

FILE #: 2 Industry Name Tyson File/ID No. 5  
Industry Address 5505 N. Jefferson Pkwy  
Industry Description Cooked Poultry  
Industrial Category Not Applicable 40 CFR N/A SIC Code: 2015  
Maximum Flow (gpd) 2,219,665 Ave. Flow (gpd) 1,885,094

Industry visited during audit: YES

Comments: \_\_\_\_\_

FILE #: 3 Industry Name Aramark Uniform Svc File/ID No. 35  
Industry Address 5508 Jefferson Pkwy  
Industry Description Industrial Laundry  
Industrial Category Not Applicable 40 CFR N/A SIC Code: \_\_\_\_\_  
Maximum Flow (gpd) 48,700 Ave. Flow (gpd) 42,095

Industry visited during audit: YES

Comments: \_\_\_\_\_

FILE #: 4 Industry Name Stant Manufacturing, Inc File/ID No. 43  
Industry Address 5300 Jefferson Parkway  
Industry Description Manufacture Fuel and Radiator Caps for Automotive Industry  
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3471  
Maximum Flow (gpd) 30,523 Ave. Flow (gpd) 20,097

Industry visited during audit: YES

Comments: Stant has an ISO 14001 Certification

FILE #: 5 Industry Name Wheeling Machine File/ID No. 53  
Industry Address 5411 Industrial Drive South  
Industry Description Electroplating  
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3498  
Maximum Flow (gpd) 811,785 Ave. Flow (gpd) 561,000

Industry visited during audit: YES

Comments: \_\_\_\_\_

## SECTION III: INDUSTRIAL USER FILE REVIEW

### A. Industrial User Characterization

|  | <u>Arcelor</u> | <u>Tyson</u> | <u>Aramark</u> | <u>Stant</u> | <u>Wheeling</u> |
|--|----------------|--------------|----------------|--------------|-----------------|
|  | Y => Yes       | N => No      | N/A => Not     | Applicable   |                 |
| 1. Is the IU considered "significant" by the Control Authority?  | <u>Y</u>       | <u>Y</u>     | <u>Y</u>       | <u>Y</u>     | <u>Y</u>        |
| 2. Is the user subject to categorical pretreatment standards?    | <u>Y</u>       | <u>N</u>     | <u>N</u>       | <u>Y</u>     | <u>Y</u>        |
| a. New source or existing source (NS or ES)?                     | <u>NS</u>      | <u>N/A</u>   | <u>N/A</u>     | <u>ES</u>    | <u>ES</u>       |
| b. Is this IU one identified as having P <sup>2</sup> potential? | <u>Y</u>       | <u>Y</u>     | <u>Y</u>       | <u>Y</u>     | <u>Y</u>        |

Comments:

### B. Control Mechanism

|  | <u>Arcelor</u>       | <u>Tyson</u>         | <u>Aramark</u>  | <u>Stant</u>    | <u>Wheeling</u> |
|--|----------------------|----------------------|-----------------|-----------------|-----------------|
| 1. Does the file contain an application for a control mechanism? | <u>Y</u>             | <u>Y<sup>1</sup></u> | <u>Y</u>        | <u>Y</u>        | <u>Y</u>        |
| If yes, what is the application date?                            | <u>04-14-09</u>      | <u>07-08-08</u>      | <u>07-15-08</u> | <u>07-31-08</u> | <u>02-22-08</u> |
| Does it ask for Pollution Prevention information?                | <u>Y</u>             | <u>Y</u>             | <u>Y</u>        | <u>Y</u>        | <u>Y</u>        |
| 2. Does the file contain a permit?                               | <u>Y</u>             | <u>Y<sup>2</sup></u> | <u>Y</u>        | <u>Y</u>        | <u>Y</u>        |
| Permit Expiration Date?  | <u>06-10-14</u>      | <u>08-01-13</u>      | <u>08-15-13</u> | <u>09-01-13</u> | <u>08-28-13</u> |
| Is a fact sheet included?  | <u>Y<sup>3</sup></u> | <u>Y</u>             | <u>Y</u>        | <u>Y</u>        | <u>Y</u>        |

Comments: 1. See Tyson's application in Attachment A for an example.  
 2. See Tyson's permit in Attachment B for an example.  
 3. See Arcelor's fact sheet for the Combined Wastestream calculations for alternate limits in accordance with 40CFR403.6(e); refer to Attachment D-4/7.

## SECTION III: INDUSTRIAL USER FILE REVIEW

|   | <u>Arcelor</u>  | <u>Tyson</u>           | <u>Aramark</u>         | <u>Stant</u>           | <u>Wheeling</u>        |
|---|---|------------------------|------------------------|------------------------|------------------------|
|   | Y => Yes  | N => No                | N/A => Not Applicable  |                        |                        |
| 3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]      |   |                        |                        |                        |                        |
| a. Legal Authority Cite?  | <u>N<sup>4</sup></u>  | <u>N<sup>4</sup></u>   | <u>N<sup>4</sup></u>   | <u>N<sup>4</sup></u>   | <u>N<sup>4</sup></u>   |
| b. Expiration date?   | <u>Cover Pg</u>   | <u>Cover Pg</u>        | <u>Cover Pg</u>        | <u>Cover Pg</u>        | <u>Cover Pg</u>        |
| c. Statement of nontransferability?   | <u>Pg 8</u>   | <u>Pg 8</u>            | <u>Pg 8</u>            | <u>Pg 8</u>            | <u>Pg 8</u>            |
| d. Appropriate disc limits?   | <u>Y<sup>5</sup></u>  | <u>Y</u>               | <u>N<sup>6</sup></u>   | <u>Y</u>               | <u>Y</u>               |
| e. Appropriate self-monitoring requirements?  | <u>N/A<sup>7</sup></u>  | <u>N/A<sup>7</sup></u> | <u>N/A<sup>7</sup></u> | <u>N/A<sup>7</sup></u> | <u>N/A<sup>7</sup></u> |
| f. Sampling frequency?  | <u>Pg 2</u>   | <u>Pg 2</u>            | <u>Pg 2</u>            | <u>Pg 2</u>            | <u>Pg 2</u>            |
| g. Sampling locations?  | <u>Pg 6</u>   | <u>Pg 6</u>            | <u>Pg 6</u>            | <u>Pg 6</u>            | <u>Pg 6</u>            |
| h. Requirement for flow monitoring?   | <u>N<sup>6</sup></u>  | <u>N<sup>6</sup></u>   | <u>N<sup>6</sup></u>   | <u>N<sup>6</sup></u>   | <u>N<sup>6</sup></u>   |
| i. Types of samples (grab or composite) for self-monitoring?                              | <u>N/A<sup>7</sup></u>  | <u>N/A<sup>7</sup></u> | <u>N/A<sup>7</sup></u> | <u>N/A<sup>7</sup></u> | <u>N/A<sup>7</sup></u> |
| j. Applicable IU reporting requirements?  | <u>Pg 5</u>   | <u>Pg 5</u>            | <u>Pg 5</u>            | <u>Pg 5</u>            | <u>Pg 5</u>            |
| k. Standard conditions for:   |   |                        |                        |                        |                        |
| Right of Entry?   | <u>Pg 7</u>   | <u>Pg 7</u>            | <u>Pg 7</u>            | <u>Pg 7</u>            | <u>Pg 7</u>            |
| Records retention?  | <u>Pg 7</u>   | <u>Pg 7</u>            | <u>Pg 7</u>            | <u>Pg 7</u>            | <u>Pg 7</u>            |
| Criminal  |   |                        |                        |                        |                        |
| Penalty provisions?   | <u>Pg 10</u>  | <u>Pg 10</u>           | <u>Pg 10</u>           | <u>Pg 10</u>           | <u>Pg 10</u>           |
| Revocation of permit?   | <u>Pg 10</u>  | <u>Pg 10</u>           | <u>Pg 10</u>           | <u>Pg 10</u>           | <u>Pg 10</u>           |
| l. Compliance schedules/progress reports  | <u>N/A</u>  | <u>N/A</u>             | <u>N/A</u>             | <u>N/A</u>             | <u>N/A</u>             |
| m. General/Specific Prohibitions?   | <u>Pg 4</u>   | <u>Pg 3</u>            | <u>Pg 4</u>            | <u>Pg 4</u>            | <u>Pg 4</u>            |
| n. Where technologically and economically achievable, are P <sup>2</sup> aspect included? | <u>Pg 9</u>   | <u>Pg 9</u>            | <u>Pg 9</u>            | <u>Pg 9</u>            | <u>Pg 9</u>            |
| Comment:  | <p>4. PBWU permits do not specifically cite the legal authority of the City of Pine Bluff to operate a pretreatment program. PBWU should cite their legal authority (Pine Bluff City Code: Chapter 28 Water, Sewers and Sewage Disposal). Refer to Attachment B-1/12 for more details.</p> <p>5. The CIU is regulated by 40CFR433 with 40CFR403.6(e) alternative limits; see Attachment D-3/7.</p> <p>6. Aramark's permit contains local limits which do not have a firm technical basis; see Attachment E-3/3.</p> <p>7. PBWU performs all monitoring; therefore, paragraph D &amp; F under "Reporting Requirements" in all permits must be removed.</p> |                        |                        |                        |                        |

## SECTION III: INDUSTRIAL USER FILE REVIEW

### C. Application of Standards

|  | <u>Arcelor</u>       | <u>Tyson</u> | <u>Aramark</u>       | <u>Stant</u> | <u>Wheeling</u> |
|--|----------------------|--------------|----------------------|--------------|-----------------|
|  | Y => Yes             | N => No      | N/A => Not           | Applicable   |                 |
| 1. Has the IU been properly categorized?   | <u>Y</u>             | <u>Y</u>     | <u>Y</u>             | <u>Y</u>     | <u>Y</u>        |
| 2. Were both Categorical Standards and Local Limits properly applied?  | <u>Y</u>             | <u>N/A</u>   | <u>N<sup>9</sup></u> | <u>Y</u>     | <u>Y</u>        |
| 3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]  | <u>Y</u>             | <u>Y</u>     | <u>Y</u>             | <u>Y</u>     | <u>Y</u>        |
| 4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]                                       | <u>N/A</u>           | <u>N/A</u>   | <u>N/A</u>           | <u>N/A</u>   | <u>N/A</u>      |
| 5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)] | <u>Y<sup>9</sup></u> | <u>N/A</u>   | <u>N/A</u>           | <u>N/A</u>   | <u>N/A</u>      |
| 6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?   | <u>N/A</u>           | <u>N/A</u>   | <u>N/A</u>           | <u>N/A</u>   | <u>N/A</u>      |
| 7. Is the Control Authority applying a bypass provision to this IU?  | <u>N/A</u>           | <u>N/A</u>   | <u>N/A</u>           | <u>N/A</u>   | <u>N/A</u>      |

Comments: 8. Aramark's permit contains local limits which do not have a firm technical basis and were not approved by ADEQ.  
 9. PBWU is currently sampling Trefil/Arcelor total plant flow (regulated and nonregulated streams) and has correctly applied the CWF.  
 10. PBWU stores the current monitoring results in a cabinet.  
 11.



## SECTION III: INDUSTRIAL USER FILE REVIEW

### D. Compliance Monitoring Sampling

|   | <u>Arcelor</u>        | <u>Tyson</u>          | <u>Aramark</u>        | <u>Stant</u>          | <u>Wheeling</u>       |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
|   | Y => Yes              | N => No               | N/A => Not Applicable |                       |                       |
| 1. Does the file contain Control Authority sampling results for the industry?                                     | <u>Y<sup>10</sup></u> | <u>Y<sup>10</sup></u> | <u>Y<sup>10</sup></u> | <u>Y<sup>10</sup></u> | <u>Y<sup>10</sup></u> |
| 2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]       | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              |
| 3. Does the sampling report(s) include: [403.8(f) (2) (vii)]  |                       |                       |                       |                       |                       |
| a. Name of sampling personnel?  | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> |
| b. Sample date and time?  | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> |
| c. Sample type?   | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> |
| d. Wastewater flow at the time of sampling?   | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> |
| e. Sample preservation procedures?  | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> |
| f. Chain-of-custody records?  | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> | <u>Y<sup>11</sup></u> |
| g. Results for all parameters? SIUs & CIUs [403.12(g) (1) - CIUs]   | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              |
| 4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?     | <u>Y</u>              | <u>N/A</u>            | <u>N/A</u>            | <u>Y</u>              | <u>Y</u>              |
| 5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples? | <u>Timed</u>          | <u>Timed</u>          | <u>Timed</u>          | <u>Timed</u>          | <u>Timed</u>          |
| 6. Were 40 CFR 136 analytical methods used? [403.8(f) (2) (vi)]   | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              | <u>Y</u>              |

Comments: 11. See Attachment F-1/5  
 12. See Attachment C-1/10 for Tyson's Inspection Report  
 13.

## SECTION III: INDUSTRIAL USER FILE REVIEW

### Inspections

|   | <u>Arcelor</u>          | <u>Tyson</u>            | <u>Aramark</u>          | <u>Stant</u>            | <u>Wheeling</u>         |
|---|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
|   | Y => Yes                | N => No                 | N/A => Not Applicable   |                         |                         |
| 7. Does the IU file contain inspection reports?   | <u>Y</u>                | <u>Y<sup>12</sup></u>   | <u>Y</u>                | <u>Y</u>                | <u>Y</u>                |
| 8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)] | <u>Y</u>                | <u>Y</u>                | <u>Y</u>                | <u>Y</u>                | <u>Y</u>                |
| b. Date of last Inspection  | <u>07-26-11</u>         | <u>10-21-11</u>         | <u>02-23-11</u>         | <u>02-21-12</u>         | <u>02-10-11</u>         |
| 9. Does the inspection report(s) include: [403.8(f) (2) (vi)]   |                         |                         |                         |                         |                         |
| a. Inspector Name(s)  | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             |
| b. Inspection date and time?  | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             |
| c. Name and title of IU official contacted?   | <u>Pg 1</u>             | <u>Pg 1</u>             | <u>Pg 1</u>             | <u>Pg 1</u>             | <u>Pg 1</u>             |
| d. Verification of production rates?  | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              |
| e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?                                      | <u>N<sup>14</sup></u>   | <u>N<sup>14</sup></u>   | <u>N<sup>14</sup></u>   | <u>N<sup>14</sup></u>   | <u>N<sup>14</sup></u>   |
| f. Evaluation of pretreatment facilities?   | <u>Pg 6</u>             | <u>Pg 6</u>             | <u>Pg 6</u>             | <u>Pg 6</u>             | <u>Pg 6</u>             |
| g. Evaluation of self-monitoring equipment and techniques?  | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]   | <u>N<sup>16</sup></u>   | <u>N<sup>16</sup></u>   | <u>N<sup>16</sup></u>   | <u>N<sup>16</sup></u>   | <u>N<sup>16</sup></u>   |
| i. Manufacturing facilities?  | <u>Pg 1</u>             | <u>Pg 1</u>             | <u>Pg 1</u>             | <u>Pg 1</u>             | <u>Pg 1</u>             |
| j. Chemical handling and storage procedures?  | <u>Pg 8</u>             | <u>Pg 8</u>             | <u>Pg 8</u>             | <u>Pg 8</u>             | <u>Pg 8</u>             |
| k. Chemical spill prevention areas?   | <u>N</u>                | <u>N</u>                | <u>N</u>                | <u>N</u>                | <u>N</u>                |
| q. Hazardous waste storage areas and handling procedures?   | <u>Pg 8</u>             | <u>Pg 8</u>             | <u>Pg 8</u>             | <u>Pg 8</u>             | <u>Pg 8</u>             |
| m. Sampling procedures?   | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| n. Laboratory procedures?   | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| o. Monitoring records?  | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| p. Evaluation of Pollution Prevention opportunities?  | <u>N</u>                | <u>N</u>                | <u>N</u>                | <u>N</u>                | <u>N</u>                |
| q. Control Authority inspector signature?   | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             | <u>Pg 9</u>             |

## SECTION III: INDUSTRIAL USER FILE REVIEW

### IU Self-Monitoring and Reporting

|   | <u>Arcelor</u>          | <u>Tyson</u>            | <u>Aramark</u>          | <u>Stant</u>            | <u>Wheeling</u>         |
|---|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
|   | Y => Yes                | N => No                 | N/A => Not Applicable   |                         |                         |
| 10. Does the file contain self-monitoring reports?                  | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| 11. Does the file include:  |                         |                         |                         |                         |                         |
| a. BMR?   | <u>Archived</u>         | <u>N/A</u>              | <u>N/A</u>              | <u>Archived</u>         | <u>Archived</u>         |
| b. 90-Day Report?   | <u>Archived</u>         | <u>N/A</u>              | <u>N/A</u>              | <u>Archived</u>         | <u>Archived</u>         |
| c. All periodic reports?  | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              |
| d. Compliance schedule reports?                                     | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              |
| 12. Did the IU report on all required parameters?                   | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| 13. Did the IU comply with the required sampling frequency(s)?      | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| 14. Did the IU report flow?   | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| 15. Did the IU comply with the required reporting frequency(s)?     | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| 16. For all SIUs, are self-monitoring reports signed and certified? | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| 17. Did the IU report all changes in its discharge?<br>[403.12(j)]  | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              |

Comment: 14. The inspection report asks for only flow measurement. The auditor recommends that the inspection report include a schematic of flows.

15. PBWU performs all monitoring.

16. The inspection report (see attachment C-1/10) does not include (re-)evaluation of slug plans but the report does reference "Accidental Discharge Procedure.." on page 7 and in the comments on page 10 it asks for "Spill Prevention".

17. Stant has developed a "ONE PLAN" which contains a "Slug Discharge Prevention and Control Plan"; see attachment I-56/63 (March 2009 Audit) for details.

## SECTION III: INDUSTRIAL USER FILE REVIEW

|  | <u>Arcelor</u> | <u>Tyson</u> | <u>Aramark</u>        | <u>Stant</u>          | <u>Wheeling</u> |
|--|----------------|--------------|-----------------------|-----------------------|-----------------|
|  | Y => Yes       | N => No      | N/A => Not Applicable |                       |                 |
| 18. Has the IU developed a Slug Control and Prevention Plan?                           | <u>N</u>       | <u>N</u>     | <u>N</u>              | <u>Y<sup>17</sup></u> | <u>N</u>        |
| 19. Has the industry been responsible for spills or slug loads discharged to the POTW? | <u>N</u>       | <u>N</u>     | <u>N</u>              | <u>N</u>              | <u>N</u>        |
| If yes, does the file contain documentation regarding:                                 |                |              |                       |                       |                 |
| a. Did the spill cause Pass Through or Interference?                                   | <u>N/A</u>     | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| b. Did POTW respond to the spill?  | <u>N/A</u>     | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |

### E. Enforcement

|   |                         |                         |                         |                         |                         |
|---|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| 1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]                              |                         |                         |                         |                         |                         |
| a. Control Authority monitoring results?  | <u>Y</u>                | <u>N/A</u>              | <u>Y</u>                | <u>Y</u>                | <u>N/A</u>              |
| b. IU self-monitoring results?  | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |
| c. If NS CIU was it compliant within 90 days from commencement of discharge?                      | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              | <u>N/A</u>              |
| 2. How many reports submitted during the past reporting year indicated discharge violations?      | <u>1</u>                | <u>0</u>                | <u>7</u>                | <u>4</u>                | <u>0</u>                |
| 3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)? | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> | <u>N/A<sup>15</sup></u> |

Comments: 18. Most SIUs are sampled weekly whether a violation occurs or not.

# SECTION III: INDUSTRIAL USER FILE REVIEW

## E. Enforcement (continued)

|  | <u>Arcelor</u>        | <u>Tyson</u> | <u>Aramark</u>        | <u>Stant</u>          | <u>Wheeling</u> |
|--|-----------------------|--------------|-----------------------|-----------------------|-----------------|
|  | Y => Yes              | N => No      | N/A => Not Applicable |                       |                 |
| 4. Was additional monitoring conducted within 30 days after each discharge violation occurred? | <u>Y<sup>18</sup></u> | <u>N/A</u>   | <u>Y<sup>18</sup></u> | <u>Y<sup>18</sup></u> | <u>N/A</u>      |
| 5. Were all nondischarge violations identified in the file?                                    | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| 6. Was the IU notified of all violations?  | <u>Y</u>              | <u>N/A</u>   | <u>Y</u>              | <u>Y</u>              | <u>N/A</u>      |
| 7. Was follow-up enforcement action taken by the Control Authority?                            | <u>Y</u>              | <u>N/A</u>   | <u>Y</u>              | <u>Y</u>              | <u>N/A</u>      |
| 8. Did the Control Authority follow its approved ERP?  | <u>Y</u>              | <u>N/A</u>   | <u>Y</u>              | <u>Y</u>              | <u>N/A</u>      |
| 9. Did the Control Authority's enforcement action result in the IU achieving compliance?       | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| 10. Is there a compliance schedule?<br>If yes:   | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| 11. Were there any compliance schedule violations?   | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| 12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]             | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| During evaluation for SNC, did the CA consider each of the following criteria?                 |                       |              |                       |                       |                 |
| a. Chronic violations  | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| b. TRC   | <u>"</u>              | <u>"</u>     | <u>"</u>              | <u>"</u>              | <u>"</u>        |
| c. Pass through/Interference   | <u>"</u>              | <u>"</u>     | <u>"</u>              | <u>"</u>              | <u>"</u>        |
| d. Spill/slug loads  | <u>"</u>              | <u>"</u>     | <u>"</u>              | <u>"</u>              | <u>"</u>        |
| e. Reporting   | <u>"</u>              | <u>"</u>     | <u>"</u>              | <u>"</u>              | <u>"</u>        |
| f. Compliance schedule   | <u>"</u>              | <u>"</u>     | <u>"</u>              | <u>"</u>              | <u>"</u>        |
| g. others (specify)  | <u>"</u>              | <u>"</u>     | <u>"</u>              | <u>"</u>              | <u>"</u>        |
| 13. Was the SIU published for SNC?   | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |
| Date of publication.   | <u>N/A</u>            | <u>N/A</u>   | <u>N/A</u>            | <u>N/A</u>            | <u>N/A</u>      |

# REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: Pine Bluff WW Utility NPDES #: AR0033316

Date of Audit: 03/20-22/2012 Date entered into QNCR: 03/27/2012  
(ASSESSMENT)

|    |  | Level |
|----|--|-------|
| NO | Failure to enforce against pass through and/or interference                | I     |
| NO | Failure to submit required reports within 30 days                          | I     |
| NO | Failure to meet compliance schedule milestone date within 90 days          | I     |
| NO | Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months | II    |
| NO | Failure to inspect or sample 80% of SIUs within the last reporting year    | II    |
| NO | Failure to enforce pretreatment standards and reporting requirements       | II    |
| NO | Other violations of concern  | II    |

### SIGNIFICANT NONCOMPLIANCE (SNC)

- NO Is the Control Authority in SNC for violation of any Level I criterion.
- NO Is the Control Authority in SNC for violation of 2 or more Level II criterion.

<https://icis.epa.gov/icis/inspection/AddInspection.do?actionMethod=initiate&epaOrState=5&CMTtype=INS&fromICISM>

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google G

Go

Bookmarks

Popups okay

Check

Send to

Settings

ICIS NPDES: Add Inspection

## Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

\* State: AR

\* Compliance Monitoring Type:

AFO Defined  
AFO Designation  
Aerial Photography  
☒ Audit  
Audit (IU)

Compliance Monitoring Activity Name:

City of Pine Bluff

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

Program System Acronym Identifier

NPDES

AR 0133316

VALIDATE

\* Linked Facility

Facility Site Name

Address

FIR ID

## Compliance Monitoring Dates

Planned Start Date

Actual Start Date:

03/20/2012

Planned End Date

Actual End Date:

03/22/2012

## Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

\* Programs:

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

State Statute:

\* Compliance Monitoring Action Reason:

Agency Priority  
Citizen Complaint/Tip  
**Core Program**  
For Cause  
Random Inspection

\* Compliance Monitoring Agency Type:

State Contractor  
State - Using Federal Credential  
**State**  
Regional  
Other Federal

Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?:

No

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

State

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

Which party had the lead?

## Government Contacts

Affiliation Type

First Name

Last Name

Phone

Office

Organization

SIC Codes:

Codes

4952 Sewerage Systems

ADD / REMOVE

NAICS Codes:

ADD / REMOVE

## Media Monitored

Media

Monitored:

## Compliance Monitoring Media Indicator

Multi-media

Indicator:

## Priorities

OECA National Priority:

2009 - (CA Only) - Air Toxics - Flares  
2009 - (CA Only) - Air Toxics - LDAR  
2009 - (CA Only) - Air Toxics - Surface Coating  
2009 - (CA Only) - Financial Assurance  
2009 - (CA Only) - MP - Mining

Regional Priority:

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

## Compliance Monitoring Information

Number of Days Physically Conducting Activity:

3

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

No Violations

Compliance Monitoring Rating Code:

Satisfactory

Compliance Monitoring Comments:

## Compliance Monitoring Comments

005: Significant Industries Site Visits Conducted

## User Defined Fields

1: ☐

Trusted sites

100%



Integrated Compliance Information System

NPDES

HOME

HELP

LOGOUT

## Special Programs

Pretreatment

## Significant Industrial Users (SIUs)

SIUs: 10

SIUs Without Control Mechanism: 0

SIUs Not Inspected: 0

SIUs Not Sampled: 0

SIUs in SNC with Pretreatment Standards: 0

SIUs in SNC with Reporting Requirements: 0

SIUs in SNC with Pretreatment Schedule: 0

SIUs in SNC Published in Newspaper: 0

SIUs on Schedules: 0

Violation Notices Issued to SIUs: 12

Administrative Orders Issued to SIUs: 0

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

## Categorical Industrial Users (CIUs)

CIUs: 4

CIUs in SNC: 0

## Penalties

Dollar Amount of Penalties Collected: \$

Industrial Users (IUs) from which Penalties have been collected:

## Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator: No

Violation of IU Schedule for Remedial Measures: No

Formal Response to Violation of IU Schedule for Remedial Measures:

## Local Limits

Date of Most Recent Technical Evaluation for Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

POLLUTANTS

## Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval:

Removal Credits:

POLLUTANTS

## Acceptance of Waste

Acceptance of Hazardous Waste: No

Acceptance of Non-Hazardous Industrial Waste: No

Acceptance of Hauled Domestic Wastes: No

## Deficiencies

Deficiencies Identified During IU File Review: No

Control Mechanism Deficiencies: No

Legal Authority Deficiencies: No

Deficiencies in Data Management and Public Participation: No

Deficiencies in Interpretation and Application of Pretreatment Standards: No

Inadequacy of Sampling and Inspections: No

Adequacy of Pretreatment Resources: Yes

## Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling:

&lt;&lt; PREVIOUS

SAVE &amp; EXIT

SAVE &amp; CONTINUE

SAVE &amp; ADD ANOTHER

COPY &amp; CREATE NEW

CANCEL

EPA U.S. Environmental Protection Agency



# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:

Wheeling Machine Products  
5411 Industrial Drive South 71602 (870) 247-7175

Type of industry: Coating Steel Coupling/40CFR433 Metal Finisher  
(Include regulatory citation if CIU)

Date/Time of visit: 03/22/2012 @ 9:00 am

Industry contacts: Prentis N. Adams, Process Coordinator  
pnadams@uss.com

|   | Yes         | No          | N/A                  |
|---|-------------|-------------|----------------------|
| 1. Significant industrial user?                       | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 2. Classified correctly?                              | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 3. Pretreatment equipment or procedures?              | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 4. Pretreatment equipment maintained and operational? | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 5. Hazardous waste generated or stored?               | <u>    </u> | <u>✓</u>    | <u>    </u>          |
| 6. Proper solid waste disposal?                       | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 7. Solvent management/TTO control?                    | <u>    </u> | <u>    </u> | <u>✓<sup>1</sup></u> |
| 8. Suitable sampling location?                        | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 9. Appropriate self-monitoring procedures/equipment?  | <u>    </u> | <u>    </u> | <u>✓<sup>2</sup></u> |
| 10. Adequate spill prevention and control?            | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 11. Industrial familiar with limits and requirements? | <u>✓</u>    | <u>    </u> | <u>    </u>          |
| 12. Pollution Prevention activity                     | <u>✓</u>    | <u>    </u> | <u>    </u>          |

Comments: *1. PBWU samples for TTOs 2. PBWU performs all monitoring.*

Visit conducted by: Rufus Torrence & Vincent Miles Date Signed:           

\_\_\_\_\_  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Wheeling Machine Products

Comments:

Wheeling receives heavy wall steel tubing at its Pine Bluff location as raw feed stock. The tubing is feed through a wall of the main manufacturing area and cut to desired length and if necessary, the wall may be turned to reduce the wall thickness. The cut tubing is machined to create internal threads to create couplings for pipes used in the oil exploration industry. The couplings are coated in a phosphate bath to prepare them for painting. The finished couplings (API inspected-dye penetrant) are warehoused for eventual shipping.

Wheeling has 80 employees; Michael Cato is the wastewater operator. The lab checks the wastewater daily for Ni and Zn concentration before each batch discharges to the POTW.

Visit conducted by: Rufus Torrence & Vincent Miles

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

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:  
Arcelor (formerly TrefilARBED Arkansas, Inc.)  
5100 Industrial Drive South 71602 (870) 247-6229

Type of industry: Steel Wire Drawing and Plating / 40CFR433  
(Include regulatory citation if CIU)

Date/Time of visit: 03/21/2012 @ 3:00 pm

Industry contacts: Joe Gieringer, HSE Manager  
joe.gieringer@arcelor-pb.com

|   | Yes       | No        | N/A       |
|---|-----------|-----------|-----------|
| 1. Significant industrial user?                       | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 2. Classified correctly?                              | <u>1</u>  | <u>  </u> | <u>  </u> |
| 3. Pretreatment equipment or procedures?              | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 4. Pretreatment equipment maintained and operational? | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 5. Hazardous waste generated or stored?               | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 6. Proper solid waste disposal?                       | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 7. Solvent management/TTO control?                    | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 8. Suitable sampling location?                        | <u>  </u> | <u>2</u>  | <u>  </u> |
| 9. Appropriate self-monitoring procedures/equipment?  | <u>  </u> | <u>3</u>  | <u>  </u> |
| 10. Adequate spill prevention and control?            | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 11. Industrial familiar with limits and requirements? | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 12. Pollution Prevention activity                     | <u>✓</u>  | <u>  </u> | <u>  </u> |

Comments:

1. During the audit in 2005, the steel drawing operation was considered for correct classification but later dismissed.
2. Arcelor samples the regulated wastewater only; PBWU samples the entire plant discharge to include sanitary wastewater, too. Currently, both Arcelor and PBWU are sampling the CN stream before it mixes with other streams. Arcelor is "diluting" the regulated wastestream by using a spray (city water) to control foaming in the flume.
3. PBWU is using the Combined Wastestream Formula to determine alternative limits.

Visit conducted by: Rufus Torrence & Vincent Miles Date Signed:           

\_\_\_\_\_  
(signature of auditor conducting visit)

# **PRETREATMENT AUDIT**

## **(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

### **INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Arcelor

Additional comments: Trefil is French meaning "to draw". The facility receives 3/8" dia. Carbon steel rods and draws the rods to create wire for use in steel belted tires and reinforced high pressure hoses. Arcelor installed mechanical brushings to replace the sulfuric acid pickling used to remove scale/rust (one line still uses the sulfuric acid pickling). The rough drawn wire is sent through a caustic bath and water rinse prior to annealing. The wire is heated in a furnace and quenched in a molten lead bath and wiped in a carbon bed. The wire is pickled with HCL acid, rinsed, bath in caustic and then plated in a CN bath with Zn and Cu to produce a brass layer.

The wastewater is segregated by CN stream and metals stream prior to treatment. The treated CN combines with the other regulated streams prior to flowing to the pH/floc units where the metals are removed; the total treated regulated stream is metered through a parshall flume and the regulated stream flows to a lift station where it mixes with the sanitary streams. The PBWU samples the total flow from Arcelor at this lift station.

Arcelor has a ISO 14001 certification.

Visit conducted by: Rufus Torrence & Vincent Miles

# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:  
Stant Cor 5300 Jefferson Parkway (870) 247-5480

Type of industry: Fuel and Radiator Cap Mfg / 40CFR433  
(Include regulatory citation if CIU)

Date/Time of visit: 03/21/2012 @ 1:00 pm

Industry contacts: Stanley Orszulak, Divisional HSE Manager  
sorszulak@stantinc.com

|   | Yes       | No        | N/A       |
|---|-----------|-----------|-----------|
| 1. Significant industrial user?                       | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 2. Classified correctly?                              | <u>  </u> | <u>1</u>  | <u>  </u> |
| 3. Pretreatment equipment or procedures?              | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 4. Pretreatment equipment maintained and operational? | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 5. Hazardous waste generated or stored?               | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 6. Proper solid waste disposal?                       | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 7. Solvent management/TTO control?                    | <u>2</u>  | <u>  </u> | <u>  </u> |
| 8. Suitable sampling location?                        | <u>3</u>  | <u>  </u> | <u>  </u> |
| 9. Appropriate self-monitoring procedures/equipment?  | <u>  </u> | <u>  </u> | <u>4</u>  |
| 10. Adequate spill prevention and control?            | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 11. Industrial familiar with limits and requirements? | <u>✓</u>  | <u>  </u> | <u>  </u> |
| 12. Pollution Prevention activity                     | <u>✓</u>  | <u>  </u> | <u>  </u> |

#### Comments:

1. Stant has a 40CFR433 zinc plating process and a plastic molding operation, too; therefore, Stant must be listed as a 40CF463 CIU.
2. Even though PBWU performs all monitoring, Stant has developed a "ONE PLAN" which has a TOMP; see attachment I-1/63 in 2009 Audit Report.
3. PBWU is sampling at a manhole about ¼ of a mile from the treatment facility. Algae growth in the discharge line creates TSS which may contain zinc particles since green algae can bioaccumulate zinc.
4. PBWU performs all required monitoring

Visit conducted by: Rufus Torrence and Vincent Miles Date Signed:           

(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Stant

Additional comments:

Stant receives metal foils about 9" wide and 1/16 inch thick. Stant stamps shapes from the foils to produce metal parts for the caps. Stant receives plastic pellets and forces the pellets through an extruder to produce plastic parts for the caps. Some of the metal parts are zinc plated. Stant assembles the parts to make the finished radiator and fuel caps.

Stant has class I & II operators on site for the wastewater treatment system which is mainly a pit where appropriate chemicals are added to remove the zinc from the wastewater. Stant has imposed a 1.0 mg/l limit on itself and under routine conditions will not release wastewater to the POTW if this limit is exceeded.

Stant has an ISO 14001 certification.

Visit conducted by: Rufus Torrence and Vincent Miles



**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Tyson Food

Comments: Tyson is the largest single source of hydraulic loading to the POTW; the plant discharges over 2 Million gallons of wastewater each day.

The plant kills about 1.2 million birds a week and each bird weighs about 6 pounds. About 3 million pounds of whole birds are killed elsewhere and delivered to Tyson each week for cooking. Therefore, the plant processes (cooks) about 9.7 million pounds of birds each week.

Visit conducted by: Rufus Torrence & Vincent Miles



# PRETREATMENT AUDIT

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

### INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:

Aramark Uniform & Career Apparel, Llc  
5508 Jefferson Parkway (870) 247-5435

Type of industry: Industrial Laundry  
(Include regulatory citation if CIU)

Date/Time of visit: 03/22/2012 @ 10:30 am

Industry contacts: Mark Powell, General Manager  
mark.powell@uniform.aramark.com

|   | Yes        | No         | N/A        |
|---|------------|------------|------------|
| 1. Significant industrial user?                       | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 2. Classified correctly?                              | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 3. Pretreatment equipment or procedures?              | <u>1</u>   | <u>   </u> | <u>   </u> |
| 4. Pretreatment equipment maintained and operational? | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 5. Hazardous waste generated or stored?               | <u>   </u> | <u>✓</u>   | <u>   </u> |
| 6. Proper solid waste disposal?                       | <u>2</u>   | <u>   </u> | <u>   </u> |
| 7. Solvent management/TTO control?                    | <u>   </u> | <u>   </u> | <u>✓</u>   |
| 8. Suitable sampling location?                        | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 9. Appropriate self-monitoring procedures/equipment?  | <u>   </u> | <u>   </u> | <u>✓</u>   |
| 10. Adequate spill prevention and control?            | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 11. Industrial familiar with limits and requirements? | <u>✓</u>   | <u>   </u> | <u>   </u> |
| 12. Pollution Prevention activity                     | <u>✓</u>   | <u>   </u> | <u>   </u> |

Comments: 1. Treatment consists of a "shaker" to remove lint from the wastewater; the wastewater pH is adjusted between 6 & 11 before it is discharged to the POTW. 2. Since the solid waste is not hazardous, it is mixed with the trash and hauled to a landfill.

Visit conducted by: Rufus Torrence & Vincent Miles Date Signed:           

\_\_\_\_\_  
(signature of auditor conducting visit)

**PRETREATMENT AUDIT**  
**(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)**

**INDUSTRIAL SITE VISIT (CONTINUED)**

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Aramark Uniform & Career Apparel, Llc

Comments: Trucks from 32 routes deliver "soil bags" to the facility. The bags are emptied into industrial sized washers for cleaning and then placed in dryers. All uniforms are tagged so that workers can identify the correct route for loading onto trucks.

Visit conducted by: Rufus Torrence & Vincent Miles



## WASTEWATER DISCHARGE PERMIT APPLICATION

### I. GENERAL INFORMATION:

Company Name: Tyson Foods Inc.  
Location: 5505 Jefferson Parkway Pine Bluff, AR 71602  
Owner: Tyson Foods Inc. SIC Code: 2015  
Years of Establishment: 17 years  
Contact Official: Tommy Tooke

(Note: Contact Official is the individual designated by the Industry. Whose responsibilities, include but are not limited to, signing all reports, corresponding to the Wastewater Utility regarding compliance matters, and making operational changes as needed to meet compliance with the pretreatment program.)

Title: Complex Environmental Manager  
Number of Total Employees: 1686  
Days of Operation Per Week: 6  
Hours of Operation Per Day: 24

### II. FACILITY INFORMATION:

Describe your facility's manufacturing processes:

Poultry, kill and further processing plant.

Is your facility's manufacturing expected to expand within the following twelve (12) months? ( ) yes (X) no

If yes, please specify: \_\_\_\_\_

Number of Wastewater Treatment Operators or responsible personnel: 6

Name of the Operator(s) in charge during each shift:

|                                |                         |
|--------------------------------|-------------------------|
| <u>Gary Farrer - 1st - 2nd</u> | <u>Steve Shapps</u> 2nd |
| <u>Benny Ashcraft 1st</u>      | <u>Wayne Cox</u> 1st    |
| <u>Barbara Allen 1st - 2nd</u> | <u>Jim Gibson</u> 2nd   |

Does your facility currently have any pretreatment equipment in use?

(X)yes ( ) no

If yes, please explain the type of system and provide a brief description: (Note:

You may submit any factory specifications or diagrams for this area)

Four rotary screens, followed by two equalization tanks  
that hold around five hundred thousand gallons. The  
water is then treated by chemicals in three dissolved air  
floatation units.

Describe the location of the discharge area or sample collection point:

A concrete weir box in the northeast corner  
of the water treatment building.

(Note: Please include copy of your plumbing plans or schematic drawing  
depicting wastewater flow through your facility.)

Does your facility generate and dispose of Hazardous Wastes?

(X) yes ( ) no

(Note: Include copies of the last three (3) Waste Manifest Forms)

If yes, please explain disposal practices, and frequency of disposal:

All hazardous waste is removed by licensed disposal companies, as needed.

Is your facility regulated by other environmental control permits?

If yes, please specify: Air permit, stormwater permit  
Regulated storage tank permit

### III. WASTEWATER DISCHARGE INFORMATION:

|  |                  |             |
|--|------------------|-------------|
| Sanitary Sources                         | <u>5,000</u>     | gallons/day |
| Processes Sources                        | <u>2,500,000</u> | gallons/day |
| Other (please specify on separate sheet) | <u>0</u>         | gallons/day |
| List Total Flow                          | <u>2,505,000</u> | gallons/day |

Is your facility's wastewater discharge?

Continuous X

Batch \_\_\_\_\_

Other \_\_\_\_\_

Does your facility's wastewater fluctuate daily, monthly, or seasonally?

(X) yes ( ) no

If yes, when is flow the greatest? 1am until 6am

Please list any changes in your wastewater composition or flow since the last permit was issued.

---

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(Note: Place a check beside all suspected pollutants on the Attachment that will be discharged into the wastewater collection system from your facility)

**IV. COMPLIANCE HISTORY:**

Is your facility regulated by any federal Categorical Pretreatment Standard? (i.e., Electroplating-Metal Finishing, etc.) ☐ yes ☒ no

If yes, please explain: \_\_\_\_\_

Has your facility received any noncompliance or violation notices since your last permit was issued? ☐ yes ☒ no

If yes, please explain the reason for noncompliance:

---

---

Is your facility current under any compliance schedule or time period provided by the Wastewater Utility to meet compliance with the pretreatment program?

☐ yes ☒ no.

Other Comments:

---

---

---

Applicant's Signature: Tony Truho

Title: Complex Environmental Manager

Date: 7-8-2008

\*\*\*\*

PLEASE DO NOT WRITE BELOW THIS LINE

\*\*\*\*

Approved By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

# PINE BLUFF WASTEWATER UTILITY

1520 S. OHIO ST. • PINE BLUFF, ARKANSAS 71601-6055 • PHONE: (870) 535-6603 • FAX (870) 535-6243

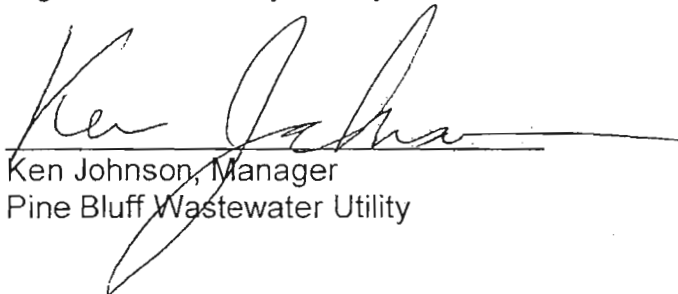
## WASTEWATER DISCHARGE PERMIT

TYSON FOODS, INC.  
5505 JEFFERSON PARKWAY  
PINE BLUFF, AR 71602

Permit No. 5

Is hereby authorized to discharge wastewater from the facility located at 5505 Jefferson Parkway, Pine Bluff, Arkansas 71602 into the Pine Bluff Wastewater System in accordance with the limitations set forth in this permit. This permit shall become effective on August 1, 2008 and shall expire at midnight on August 1, 2013.

Signed this 28<sup>th</sup> day of July 2008



Ken Johnson, Manager  
Pine Bluff Wastewater Utility



## LEGAL AUTHORITY

The Pine Bluff Wastewater Utility has the legal authority in accordance with 40 CFR 403.8 (f) (1) to implement a local industrial pretreatment program. The Utility shall operate pursuant to legal authority enforceable in Federal, State, or local courts, which authorizes or enables the Utility to apply and to enforce the requirements of Section 307 (b) and (c), and 402 (b)(8) of the Clean Water Act and any regulations implementing those sections.

Such authority may be contained in the Code of Ordinances, local ordinances, permits, contracts, or joint powers agreements which the Utility is authorized to enact, enter into, or implement, and which are authorized by State law.

## POLLUTANT LIMITATIONS AND MONITORING REQUIREMENTS

The Permittee will have its wastewater discharge monitored by the Wastewater Utility based on the requirements listed below. All associated monitoring costs will be billed to the Permittee on a monthly basis for payment. All analyses will be performed in accordance with 40 CFR, Part 136, and Standard Methods current edition.

The following pollutants with corresponding limits are the only pollutants permitted to be discharged into the wastewater collection system by the Permittee.

### CONCENTRATION LIMITATIONS

| PARAMETER                      | DAILY<br>MAXIMUM<br>LIMITS | MONITORING<br>FREQUENCY | SAMPLE TYPE              |
|--------------------------------|----------------------------|-------------------------|--------------------------|
| 1 Biochemical<br>Oxygen Demand | 300 mg/l                   | 4/Month                 | 24 hr.<br>Time Composite |
| 1 Total Suspended<br>Solids    | 300 mg/l                   | 4/Month                 | 24 hr.<br>Time Composite |
| 1 Oils and Grease              | 100 mg/l                   | 4/Month                 | Grab                     |
| 2 Flow                         |                            |                         | Water Consumption Data   |
| pH                             | 5.0 -11.0 s.u.             | 4/Month                 | Grab                     |

1 Values to be in accordance with local Sewer Use Ordinance 6146

2 Flow values will be monitored based on the water consumption data from United Water. If the flow values are expected to increase greater than 25 %, notice must be provided to the Wastewater Utility within 30 days of the anticipated increase.

## GENERAL DISCHARGE PROHIBITIONS

In accordance with the Code of Ordinances for the City of Pine Bluff, Section 28-101; no discharger shall contribute or cause to be discharged, directly or indirectly, any of the following described substances into the wastewater disposal system or otherwise to the facilities owned or operated by the City. No person shall discharge or cause to be discharged to a sewer line, manhole or other parts of the sewer system, either directly or indirectly:

- (1) Any liquids, solids or gases which by reason of their nature or quantity, are or may be, sufficient either alone or by interaction to cause fire or explosion or be injurious in any other way to the operation of the treatment plant.
- (2) Any waste or material that creates a stoppage, plugging, breakage, any reduction in sewer capacity, or any other damage to sewers or sewage facilities of the City. All additional maintenance expenses caused by such a discharge, or any other expenses attributable thereto will be charged to the discharger by the City.
- (3) Any wastewater having a pH less than 5.0 or higher than 11.0 s.u. or having other corrosive properties capable of causing damage or hazard to structures, or equipment of the system or personnel.
- (4) Any wastewater containing toxic pollutants in sufficient quantity, either singly or by interaction to injure or interfere with any wastewater treatment equipment or process, constitutes a hazard to human or animals or exceeds the limits set by the Wastewater Utility.
- (5) Any noxious or malodorous liquid, gas, or solid, which either singly or by interaction are capable of creating a public nuisance or hazard to life or are sufficient to prevent entry into the sewer for their maintenance and repair.
- (6) Any substances which will cause the Wastewater Utility effluent, treatment residues, sludges or scum to be unsuitable for conventional sludge use or disposal methods.
- (7) Any substance which will cause the Wastewater Utility to violate its NPDES permit and/or other disposal system permits.
- (8) Any substances with objectionable color not removed by the treatment process (i.e., dye waste, and vegetable tanning solutions).
- (9) Any wastewater having a temperature that will inhibit biological activity in the treatment plant resulting in interference; but in no case, wastewater with a temperature which exceeds forty (40) degrees Celsius is permitted to be discharged unless the system is designed to accommodate such temperatures.

- (10) Any slug load released in such volume or strength as to cause interference to the treatment facility.
- (11) Any unpolluted water, including but not limited to, noncontact cooling water.
- (12) Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration that exceeds limits established by applicable state or federal regulations.
- (13) Any water or wastes containing fats, wax, grease, or oils, either emulsified or not, in excess of one hundred (100) mg/l or containing substances which may solidify or become viscous at temperatures between zero (0) degrees Celsius and forty (40) degrees Celsius. All discharges with contain oils and grease over one hundred (100) mg/l are required to pay a specified surcharge as set by local ordinance.
- (14) Any water or wastes containing phenols or other taste or odor producing substances in such concentrations exceeding limits which may be established by the Wastewater Utility as necessary after treatment to meet the requirements of the state, federal, or other public agencies of jurisdiction for such discharge to the receiving waters.
- (15) Any materials that exert or cause unusual concentration of inert suspended solids.

#### FEES & MONITORING CHARGES

In accordance with requirements in Section 28 of the City of Pine Bluff Code of Ordinance and rates as amended by Ordinance 6146 dated August 1, 2005, the Permittee must pay a surcharge when wastewater exceeds the allowable base established in the ordinance and such surcharge shall be computed on the following formula:

|   |   |
|---|---|
| $\text{Surcharge} = V \times 8.34 [0.1325 (\text{BOD-300}) \text{ plus } 0.0404 (\text{TSS-300}) \text{ plus } 0.0675 (\text{O\&G-100})]$ |   |
| V   | = Volume of wastewater in million gallons per month |
| 8.34  | = Pounds per gallon of water                        |
| 0.1325  | = Unit charge for BOD in dollars per pound          |
| 0.0404  | = Unit charge for TSS in dollars per pound          |
| 0.0675  | = Unit charge for O&G in dollars per pound          |

In accordance with Sewer Use Ordinance 6146 the Permittee must pay a monitoring charge. This charge is based on the volume of wastewater discharged by the Permittee and the monitoring conducted during a month.

A **\$1,250** permit fee will be assessed to the Permittee. This fee does not include cost of reissuance of this permit due to revocation, wastewater service termination, or new ownership of a company.

The Industrial User shall not discharge any wastewater which could interfere or pass through the wastewater treatment facility and cause the facility to violate its NPDES permit.

#### MONITORING LOCATION

During the period beginning on the effective date of this permit and lasting until the date of expiration, the Permittee is authorized to collect wastewater from location number **Tyson Food #05** (*designated monitoring site*). All wastewater collected at this location must be pretreated at the industrial treatment facility prior to discharge into the Pine Bluff wastewater collection system. The sample collection point is situated by the designated effluent structure located at the pretreatment facility and marked as the designated "sampling point".

#### REPORTING REQUIREMENTS

A) The Industrial User is required to report to the Utility upon becoming aware of an upset condition which places it in a temporary state of noncompliance.

B) The Industrial User shall notify the Utility immediately upon an accidental spill or "slugload" discharged into the sanitary sewer as outlined in the Code of Ordinances, Section 28-103.

C) The Industrial User shall notify the Utility prior to the introduction of new wastewater or pollutants, or any change in the volume or characteristics of the wastewater being introduced into the sewer system from the User's facility.

D) Industrial Users conducting self-monitoring shall submit to the Utility, during the months of June and December, a periodic compliance report as indicated in Code of Ordinances Section 28-123.

E) The Industrial User must provide immediate notice to the Wastewater Utility upon discovering an unanticipated bypass of its discharge location.

F) Industrial Users subjected to categorical Pretreatment Standards are required to self-monitor its discharge at least once per month. All self-monitoring reports are to be submitted to the Utility by the 25th of each month following self-monitoring.

G) Within 30 days after receipt of a Report of Noncompliance, the Industrial User shall respond in writing to the Utility, stating the suspected reason for the noncompliance incident, and what will be done to mitigate recurrence.

H) Within 10 days after receipt of a Notice of Violation, the Industrial User shall respond in writing to the Utility advising of its position with respect to the allegations. The response shall include but are not limited to the information regarding the reason for violation, steps taken to prevent further violations, and the period the violation is expected to continue.

I) All significant industries are required to notify the Wastewater Utility in writing of any discharge into the wastewater system of a substance which, if otherwise disposed of would be a hazardous waste under 40 CFR Part 261.

J) Industrial Users are required to submit any additional reports, records, or data pertinent to pretreatment requirements, or to the Utility's interest within the time specified for such submission.

K) All reports (including written and oral notifications) required by this permit shall be submitted to the following address:

Vincent Miles, Env. Compliance Supervisor  
Pine Bluff Wastewater Utility  
1520 S. Ohio St.  
Pine Bluff, AR 71601-6055  
Phone: 870/535-6603  
E-Mail: [vincent@pbwastewater.com](mailto:vincent@pbwastewater.com)

L) All reports are to be signed by the duly authorized representative designated by the Permittee, provided the representative is responsible for the overall operation of the facility from which the discharge originates.

M) The Discharger is also required to comply with the conditions established in the Code of Ordinances and local ordinances while discharging into the wastewater collection system.

N) The Industrial User must provide immediate notice to the Wastewater Utility upon discovering an unanticipated bypass of its discharge location. A bypass is the intentional diversion of waste streams from any portion of an industrial user's treatment facility. The permittee is required to comply with the bypass conditions listed in 40 CFR 403.17.

O) All reports are to be signed by the duly authorized representative designated by the Permittee, provided the representative is responsible for the overall operation of the facility from which the discharge originates.

HAZARDOUS WASTE DISCHARGE NOTIFICATION

All user are required to notify the Wastewater Utility, the Environmental Protection Agency, and the Arkansas Department of Pollution Control and Ecology of any discharge of substance which otherwise disposed of, would be a hazardous waste under 40 CFR part 261.

#### RIGHT TO ENTER

The Utility may inspect the monitoring facility or structure of any Industrial User to determine compliance with the pretreatment requirements. The Industrial User shall allow the Utility's personnel, upon presentation of credentials or identification to enter the premises of the Industrial User for the purpose of inspection, sampling, or record examination. The Wastewater Utility will conduct at least one (1) inspection visit annually.

#### RECORD RETENTION

The Industrial User shall retain all records, reports, and pertinent information regarding pretreatment requirements for a period of three (3) years.

Information and data furnished to the Utility concerning wastewater characteristics and discharge shall be available to the public or governmental agencies without restriction unless the Industrial User specifically requests that the release of such information would divulge information, processes or methods of production entitled to protection as trade secrets, or proprietary information of the User.

#### DILUTION

No Industrial User shall increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

#### PROPER DISPOSAL OF SLUDGES AND SPENT CHEMICALS

The disposal of sludges and spent chemicals generated by industrial manufacturing or treatment processes shall be in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

#### LIMITATION OF PERMIT TRANSFER

Wastewater discharge permits are issued to a specific user for a specific operation and are not assignable to another user or transferable to any other location without the prior written approval of the Utility.

#### MONITORING FACILITIES

The Industrial User shall provide and operate at his expense a monitoring location for sampling, inspection, and flow monitoring of the wastewater discharge. This monitoring structure must be situated whereby it will only convey wastewater from the Industrial User's facility.

#### FALSIFYING INFORMATION OR TAMPERING WITH MONITORING EQUIPMENT

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, may result in punishment under the criminal laws of the City, as well as being subjected to civil penalties and relief.

#### MODIFICATION OR REVISION OF THE PERMIT

A) The terms and conditions of this permit may be subjected to modification by the Utility at any time, as limitations or requirements as identified by the City Ordinances are modified, or when other just cause exists.

B) This permit may also be modified to incorporate special conditions resulting from the issuance of a special order.

C) The terms and conditions may be modified as a result of EPA promulgation of new federal pretreatment regulations and guidelines.

D) Any permit modifications which result in new conditions in the permit shall include a reasonable time schedule for compliance, as necessary.

E) The industrial user is required to notify the Wastewater Utility within 30 days of changes involving construction to the wastewater treatment facility, or changes in the operation of the system .

#### SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

#### FEDERAL LAWS

Nothing in this permit precludes more stringent federal regulation of any activity governed by this permit.

### PROPERTY RIGHTS

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of Federal, State or Local regulations.

### POLLUTION PREVENTION

The Pollution Prevention Act of 1990 defines source reduction as any practice that reduces the amount any hazardous substance, pollutant, or contaminant entering any waste stream prior to recycling, treatment, or disposal, and that reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants. The Act declares that governments, business, and industries prevent or reduce pollution at its source wherever feasible. Where source reductions cannot be achieved, the Act advocates that responsible parties reuse and recycle to reduce the quantity of hazardous waste requiring treatment. If there are no feasible pollution prevention alternatives, environmentally sound treatment should be applied with disposal used only as a last resort. The permittee is encouraged to adopt a pollution prevention program and incorporate techniques to reduce the transfer of pollutants from one medium to another without a reduction in the quantity and toxicity of hazardous constituents.

### SIGNIFICANT VIOLATION CRITERIA

A Permittee is in significant violation when it meets one of more of the following criteria;

A) Chronic violation of wastewater discharge limits, defined here as those in which sixty-six (66) percent or more of all of the measurements taken during a six (6) month period exceed (by any magnitude) the daily maximum limit or the average limit of the same pollutant parameter.

B) Technical Review criteria (TRC) violations, defined here as those in which thirty-three (33) percent or more of all of the measurements for each pollutant parameter taken during a six (6) month period exceed or equal the product of the daily maximum limit or the average limit multiplied by the applicable TRC (1.2 for all pollutants except pH, BOD, TSS, fats, oil and grease).



C) Any other violation of a pretreatment effluent limits (daily maximum or long-term average) that the Wastewater Utility determines has caused, alone or in combination with other discharges, interference, or pass through (including endangering the health of the POTW personnel or the general public).

D) Any discharge of a pollutant that has resulted in the Wastewater Utility exercising its emergency authority to halt or prevent such a discharge.

E) The discharge or disposal of any unapproved trucked-hauled waste or illegal connection to the wastewater collection system.

F) Any noncompliance which has remained uncorrected for 45 days or more and/or a discharge which has demonstrated a pattern of noncompliance during the previous 12 months.

#### PENALTIES

Any Industrial User who has failed to comply with any provision of this permit or governing ordinance shall be guilty of a misdemeanor. When found guilty of such violation, the person shall be fined the maximum sum of \$1,000.00 dollars per day per violation or be imprisoned for not more than one (1) year or both. Each violation and each day shall constitute a separate offense.

#### PERMIT TERMINATION

As a condition of this permit, Section 28-127 of the Code of Ordinances gives the Utility the right to suspend wastewater service to a discharger when it appears that an actual or life threatening discharge presents or poses imminent or danger to the health or welfare of a person; danger to the environment; interferes with the operation of the wastewater treatment facility; violates any limits imposed by the ordinance or State and Federal Laws; or the discharger refuses to submit required reports and documents on time as requested by the Utility. Any Discharger notified of the suspension of the City's wastewater treatment service shall within a reasonable period of time, as determined by the Wastewater Utility, cease all discharges. In the event of failure of the Discharger to comply voluntarily with the suspension order within the specified time, the Utility shall commence judicial proceedings immediately thereafter to compel the Dischargers' compliance with such order. The Wastewater Utility shall reinstate the wastewater treatment service and terminate judicial proceedings pending proof by the Discharger of the elimination of the noncomplying discharge or conditions creating the threat of imminent or danger as set forth above. The Pine Bluff Wastewater Utility may:

- (1) Require a discharger to pretreat their waste to an acceptable level before the waste is discharged into a sanitary sewer.
- (2) Require the discharger to control the quantities and rates of a discharge.

- (3) Require payment to cover the added cost of handling and treating waste not covered by existing taxes or sewer charges.

In accordance with the Code of Ordinance, Section 28-128, the Wastewater Utility may seek to terminate the wastewater treatment services to any discharger which fails to:

- (1) Factually report the wastewater constituents and characteristics of its discharges.
- (2) Report to the Wastewater Utility significant change in wastewater constituents or characteristics, thirty (30) days prior to such change.
- (3) Allow access to the discharger's premises by representatives of the Wastewater Utility for the purpose of inspection or monitoring.
- (4) Failure to submit requested reports to the Wastewater Utility in the times required.
- (5) Follow the provisions of this division or any other order entered with respect thereto.

#### RIGHT TO APPEAL

The Permittee has the right to request in writing an interpretation or ruling by the Wastewater Utility on any matter regarding this permit or wastewater disposal. In the event that such inquiry is made by a Permittee and deals with matters of performance or compliance for which enforcement activity relating to an alleged violation is the subject, receipt of a Permittee's request shall stay all enforcement proceeding pending receipt of the written reply. Appeal of any final judicial order entered pursuant to this division may be taken in accordance with state and local law.

#### JUDICIAL PROCEEDINGS

Following the authorization of such action by the Utility, the Attorney for the Utility may commence an action for appropriate legal and/or equitable relief in the appropriate local court.

#### MONITORING CONTROVERSIES

The Industrial User reserves the right to conduct self-monitoring and contract a private laboratory acceptable to perform the required analyses when discrepancies arise concerning sample results. The laboratory must meet the acceptance of the Utility. All reports regarding test results shall be made in writing to the Wastewater Utility by the laboratory.

Tyson Foods  
5505 N. Jefferson Parkway  
Pine Bluff, AR 71602

Issued 8/1/2008

Mr. Tommy Tooke  
Contact Official  
(870) 247-9127

### PERMIT RENEWAL

The Industrial User's permit is active for a period of five (5) years from the date of issuance.

# PINE BLUFF WASTEWATER UTILITY

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## INDUSTRIAL INSPECTION REPORT

### SECTION 1: GENERAL INFORMATION

Name of Industry TYSON (INDUSTRIAL PARK) SIC 2015

Street Address 5505 JEFFERSON PARKWAY

City, State PINE BLUFF, AR Established 1991

List the Name and Position of Contact Official:

TOMMY TOOKE, COMPLEX ENVIRONMENTAL MANAGER

List the name of Corporate Officials (Company President or Chief Operating Officer)

BOB LEGROW

Address: \_\_\_\_\_

City: CLARKSVILLE

State: AR

Describe the Manufacturing Operation

SLAUGHTERING AND FURTHER PROCESING

1st SHIFT 6:00 A.M.-4:30 P.M.

2ND SHIFT 4:00 P.M.-12:00 A.M.

SANITATION SHIFT 12:00 A.M. - 6:00 A.M.

Production Data (if categorical pretreatment standard require this i.e. Iron & Steel Categorical Pretreatment Standard)

N/A tons/ day

N/A tons/year

Number of Shifts 3 2 Production, 1 Sanitary

Overall Employee Count 2,150

Employees per shift

900  
1<sup>st</sup>

900  
2<sup>nd</sup>

350  
3<sup>rd</sup>

C-1/10

Comments:

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## SECTION 2: REPORTING REQUIREMENTS

Is Industry governed by a Categorical Pretreatment Standard?

☐ Yes ☒ No If yes, please specify which standard(s):

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Does Industry have an current Industrial Discharge Permit?

☒ Yes ☐ No Permit Number 05

Expiration Date AUGUST 01, 2013

Does Industry have copies of Ordinance 4942, 5301, 5557?

☒ Yes ☐ No

Is self-monitoring conducted in accordance with the required frequency listed in the permit?

☐ Yes ☐ No N/A

Which parameter(s) are analyzed as part of the self-monitoring program?

N/A

|       |       |       |
|-------|-------|-------|
| <hr/> | <hr/> | <hr/> |
| <hr/> | <hr/> | <hr/> |
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Are samples split with Utility personnel when requested?

(X) Yes ( ) No

Please describe the Chain-of-Custody features for samples which are conducted for routine self-monitoring below:

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List the name and address of the Lab which conducts self-monitoring for you.

N/A

Is the Lab currently certified by the State of Arkansas Department of Environmental Quality?

( ) Yes ( ) No N/A

List the number of reports which the Industry has on file as a part of their record keeping requirements.

|                                     |                                       |
|-------------------------------------|---------------------------------------|
| Wastewater Analytical Report        | <u>N/A</u>                            |
| Wastewater Discharge Permit         | <u>1</u>                              |
| Self-Monitoring Reports             | <u>N/A</u>                            |
| Chain of Custody Reports            | <u>51</u> October 2010 - October 2011 |
| Baseline Monitoring Report          | <u>N/A</u> (For Categorical Users)    |
| Toxic Organic Management Plan       | <u>N/A</u> (For Categorical Users)    |
| Solvent Management Plan             | <u>1</u> Revised 9-16-2011            |
| Hazardous Waste Manifest            | <u>1</u>                              |
| Notices of Noncompliance/Violations | <u>0</u>                              |
| Specific Enforcement Actions        | <u>N/A</u>                            |

Are there plumbing plans or maps which adequately describes the current layout of the facility?

(X) Yes ( ) No

Is flow measured at your industry?

☒ Yes      ☐ No      If yes, describe how flow is measured?

Where are these maps kept?

IN THE COMPLEX ENVIRONMENTAL MANAGER'S OFFICE (CEM) AT THE INDUSTRIAL PARK  
LOCATION.

Has the wastewater pretreatment facility been modified since the last reporting period?

☐ Yes      ☒ No

*If yes, please provide a short summary of the modification and flow diagram with this  
inspection report.*

### SECTION 3: WASTE MINIMIZATION

Describe any steps or technique which have been utilized at the Industry to minimize waste.  
PLANT RECYCLES CARDBOARD. BIG DRIVE TO DOWN WATER USAGE.

What is the estimated quantity which has been minimized during the last year?

N/A

Is there a formal waste reduction program at the Industry? If so, can a copy of this program be obtained by the Wastewater Utility?

☐ Yes      ☒ No

Please describe any future advancements or changes at the industry which will result in a decrease in waste that is generated.

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SECTION 4: COMPLIANCE INFORMATION

Is the Industry currently under any type of compliance schedule?

( ) Yes      (X) No

If yes, please provide a description below:

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Has the industry had to appear before the Wastewater Utility for compliance action during the last year?

( ) Yes      (X) No

What appears to be the most frequent reason(s) for noncompliance incidents?

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Has there been any changes in the Industry's manufacturing activities or wastewater flows during the previous year?

( ) Yes      (X) No

What has caused this change to come about?

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Is there any pretreatment technology or system installed at the Industry?

( X ) Yes

( ) No

KILL WATER IS SCREENED IN THE KILL SIDE OFF HAUL AND IS PUMPED TO THE E.Q. TANK. FURTHER PROCESSING IS SCREENED TO OFF HAUL-PUMPED TO THE PRIMARY PIT PUMPED TO ANOTHER PIT AND INTO E.Q. TANK. pH IS CONTROLLED WITH H<sub>2</sub>SO<sub>4</sub> ACID -PUMPED DAF UNITS DEPENDING ON FLOW. POLYMERS ARE ADDED TO CAUSE SOLIDS TO FLOCK AND THEY ARE FLOATED OUT OF THE DAF UNIT. EFFLUENT IS COLLECTED IN THE SMALL WEIR WHERE PINE BLUFF WASTEWATER SAMPLES.

*(please try to obtain a copy of the system operational manual or specific details concerning the system and review any operational logs or records on the system)*

Has there been any incident(s) of upsets, by-pass, spills, or major equipment malfunction which would have allowed non-process wastewater to enter the collection system?

( ) Yes

( X ) No

Please Explain with specific dates, time, and all factors concerning this problem:

List the names of people who are responsible for the day to day operation and compliance with the Industrial Pretreatment Program.

*Name*

*Title*

TOMMY TOOKE

COMPLEX ENVIRONMENTAL MANAGER

GARY FARRER

WASTEWATER SUPERVISOR

STEPHEN SHUPPS

NIGHT SHIFT

BENNY ASHCRAFT

DAY SHIFT

TONY MILLER

NIGHT SHIFT

JIM GIBSON

DAY SHIFT

BARBARA ALLEN

NIGHT OR DAY SHIFT

Please describe the training each person in charge of the wastewater treatment system must undertake to operate the system.

BASICALLY ALL EMPLOYEES ARE TRAINED ON THE JOB BY EMPLOYEES THAT ARE ALREADY TRAINED.

Review the Toxic Organic Management Plan and describe the steps contained in the plan to ensure that they are being followed. *(list basic steps below)*

N/A

#### SECTION 5: PLANT OBSERVATION

Are there Material Safety Data Sheets for each chemical used?

☒ (X) Yes                      ☐ ( ) No

How is this information kept?

3-RING BINDER THROUGHOUT PLANT

Are there placards listing hazardous areas to the employees?

☒ (X) Yes                      ☐ ( ) No

Are there "Accidental Discharge Procedures Placards" placed in conspicuous places throughout the Industry?

☒ (X) Yes                      ☐ ( ) No

Are there any solvents used at the facility which may have the potential to enter the wastewater system?

☐ ( ) Yes                      ☒ (X) No

List solvents below:

|       |       |
|-------|-------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

In the Chemical Storage Area, are the following visible?

|  |           |          |
|--|-----------|----------|
| Floor Drain with access to sewer                     | ( X ) Yes | ( ) No   |
| Leaks from Chemical Storage Tanks                    | ( ) Yes   | ( X ) No |
| Stacks of Used Chemical Storage Tanks                | ( ) Yes   | ( ) No   |
| Spills, or Corrosion in the<br>Chemical Storage Area | ( ) Yes   | ( X ) No |

How often are Chemicals used or disposed of?  
DAILY- COD VIALS ARE USED 1/WEEK

Does the Industry store any Hazardous Waste?

( X ) Yes                      ( ) No

Briefly describe how this waste is handled?

COD VIALS ARE KEPT IN A BUCKET IN THE LAB OFFICE OF THE TREATMENT PLANT UNTIL IT IS  
PICKED UP.

How often are Hazardous Wastes Disposed of ?

WHENEVER THEY NEED TO DISPOSE.

List latest Disposal Date and Company receiving this waste:

Date: 5/17/11

Company Name: POLLUTION MANAGEMENT

Address: 3512 S. SHACKLEFORD RD.

City, State, Zip LITTLE ROCK, AR 72205

PBWU ENVIRONMENTAL INSPECTOR: VINCENT MILES

Vincent Miles

DATE & TIME: 10/21/11; 1300 HRS

COMPANY OFFICIALS PRESENT DURING INSPECTION:

| Name               | Title                        | Signature                |
|--------------------|------------------------------|--------------------------|
| <u>GARY FARRER</u> | <u>WASTEWATER SUPERVISOR</u> | <u>SIGNATURE ON FILE</u> |
| <u>JIM GIBSON</u>  | <u>WASTEWATER OPERATOR</u>   | <u>SIGNATURE ON FILE</u> |

SECTION 6: RECOMMENDATIONS AND ACTIONS NEEDED

Section 1: General Information

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Section 2: Reporting Requirements

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Section 3: Waste Minimization

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Section 4: Compliance Information

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Section 5: Plant Observation

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Other Comments:

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# PINE BLUFF WASTEWATER UTILITY

1520 S. OHIO ST. PINE BLUFF, ARKANSAS 71601-6055 PHONE: (870) 535-6603 FAX (870) 535-6243

## WASTEWATER DISCHARGE PERMIT

**ARCELOR**

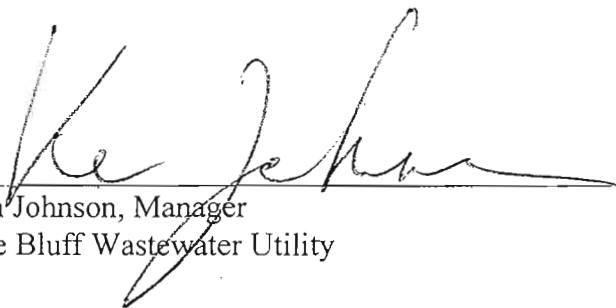
**Permit No. 17**

**5100 Industrial Dr. South**

**Pine Bluff, AR 71602**

Is hereby authorized to discharge wastewater from the facility located at 5100 Industrial Drive South, Pine Bluff, Arkansas 71602 into the Pine Bluff Wastewater System in accordance with the limitations set forth in this permit. This permit shall become effective on June 18, 2009 and shall expire at midnight on June 18, 2014.

Signed this 12th day of June, 2009



Ken Johnson, Manager  
Pine Bluff Wastewater Utility

### MISSION

*We are committed to providing our customers with efficient, reliable service while protecting the public health and maintaining a clean environment.*

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### **Legal Authority**

The Pine Bluff Wastewater Utility has the legal authority in accordance with 40 CFR 403.8 (f) (10 to implement a local industrial pretreatment program. The Utility shall operate pursuant to legal authority enforceable in Federal, State, or local courts, which authorizes or enables the Utility to apply and to enforce the requirements of Section 307 (b) and (c ), and 402 (b) (8) of the Clean Water Act and any regulations implementing those sections.

Such authority may be contained in the Code of Ordinances, local ordinances, permits, contracts, or joint powers agreements which the Utility is authorized to enact, enter into, or implement, and which are authorized by State law.

### **POLLUTANT LIMITATIONS AND MONITORING REQUIREMENTS**

The Permittee will have its wastewater discharge monitored by the Wastewater Utility based on the requirements listed below. All associated monitoring costs will be billed to the Permittee on a monthly basis for payment. All analyses will be performed in accordance with 40 CFR, Part 136, and the current edition of Standard Methods for Examination of Water and Wastewater.

The following pollutants with corresponding limits are the only pollutants permitted to be discharged into the wastewater collection system by the Permittee.

| <b>Parameter</b> | <b>Daily<br/>MaximumLimits</b> | <b>Monthly<br/>Average<br/>Limitation</b> | <b>Monitoring<br/>Requirement</b> | <b>Sample Type</b>          |
|------------------|--------------------------------|---|-----------------------------------|-----------------------------|
| Total Flow       | 222,250 gpd                    | N/A                                       | 4/Month                           | Daily<br>Totalizer<br>Meter |
| Process Flow     | 173,733 gpd                    | N/A                                       | 4/Month                           |                             |
| TSS              | 300 mg/l                       | N/A                                       | 4/Month                           | 24 hr. Time<br>Composite    |
| pH               | 5.0 – 11.0 s.u.                | N/A                                       | 4/Month                           | Grab                        |
| BOD <sub>5</sub> | 300 mg/l                       | N/A                                       | 4/Month                           | 24 hr. Time<br>Composite    |
| O& G             | 100 mg/l                       | N/A                                       | 4/Month                           | Grab                        |

| Parameter     | Daily Maximum Limitations | Monthly Average Limitations | Monitoring Requirements | Sample Type            |
|---------------|---------------------------|-----------------------------|-------------------------|------------------------|
| Cadmium       | 0.55 mg/l<br>0.91 lbs/dy  | 0.21 mg/l<br>0.35 lbs/dy    | 4/month                 | 24 hour time Composite |
| Chromium      | 2.22 mg/l<br>3.70 lbs/dy  | 1.37 mg/l<br>2.28 lbs./dy   | 4/month                 | 24 hour time Composite |
| Copper        | 2.70 mg/l<br>4.50 lbs./dy | 1.66 mg/l<br>2.77 lbs./dy   | 4/month                 | 24 hour time Composite |
| Total Cyanide | 0.48 mg/l<br>0.80 lbs./dy | 0.26 mg/l<br>0.43 lbs./dy   | 4/month                 | Grab                   |
| Lead          | 0.55 mg/l<br>0.92 lbs./dy | 0.34 mg/l<br>0.57 lbs./dy   | 4/month                 | 24 hour time Composite |
| Nickel        | 3.18 mg/l<br>5.30 lbs/dy  | 1.90 mg/l<br>3.17 lbs/dy    | 4/month                 | 24 hour time Composite |
| Silver        | 0.34 mg/l<br>0.57 lbs/dy  | 0.19 mg/l<br>0.32 lbs/dy    | 4/month                 | 24 hour time Composite |
| Zinc          | 2.09 mg/l<br>3.49 lbs./dy | 1.18 mg/l<br>1.97 lbs./dy   | 4/month                 | 24 hour time Composite |
| TTO           | 2.13 mg/l                 |                             | 1/Year                  | Grab                   |

*Total Toxic Organics (TTOs) - must be controlled by a TTO management plan approved by the Wastewater Utility. However in no case shall the daily discharge of TTOs exceed the sum of 2.13 mg/l.*

*Should the total flow exceed the daily maximum limit by 10 % (total or process), the Permittee must notify the Wastewater Utility immediately but no later than five (5) working days from becoming aware of this condition.*

*Note: (The limitations established in this permit are calculated based on the Metal Finishing Category for new sources with wastestream the combined formula for process and sanitary flows).*

*Grab samples could not be taken following cyanide treatment and prior to being mixed with other wastestreams. The cyanide limit will apply to the specific location following treatment with the combined wastestream formula for process and sanitary flows.*

Values to be surcharged in accordance with local Sewer Use Ordinance 6146.



Average Daily Wastewater Flow by Year

| Year | Sanitary | Process | Total  |
|------|----------|---------|--------|
| 2008 | 48517    | 173733  | 222250 |
| 2007 | 46718    | 171637  | 218355 |
| 2006 | 42904    | 168303  | 211207 |
| 2005 | 48882    | 172141  | 221023 |
| 2004 | 49604    | 162587  | 212191 |

System average  $169680 \div 217005 = 0.78$

CFR Limit  $\times$  (Reg Flow / Total Flow)  
 $169680 / 217005 = 0.8$

2008 = 0.78

2007 = 0.79

2006 = 0.80

2005 = 0.78

2004 =  $\frac{0.77}{0.78}$

CN = CFR Limit  $\times$  (CN best pract unit flow / Reg Flow)  
 $70,000 / 169680 = 0.4$

# PINE BLUFF WASTEWATER UTILITY

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max for any 1 day

monthly average

|          |                                      |                                      |
|----------|--------------------------------------|--------------------------------------|
| Cadmium  | $0.69 \times .8 = 0.55 \text{ mg/L}$ | $0.26 \times .8 = 0.21 \text{ mg/L}$ |
| Chromium | $2.77 \times .8 = 2.22 \text{ mg/L}$ | $1.71 \times .8 = 1.37 \text{ mg/L}$ |
| Copper   | $3.38 \times .8 = 2.70 \text{ mg/L}$ | $2.07 \times .8 = 1.66 \text{ mg/L}$ |
| Lead     | $0.64 \times .8 = 0.55 \text{ mg/L}$ | $0.43 \times .8 = 0.34 \text{ mg/L}$ |
| Nickel   | $3.98 \times .8 = 3.18 \text{ mg/L}$ | $2.28 \times .8 = 1.90 \text{ mg/L}$ |
| Silver   | $0.43 \times .8 = 0.34 \text{ mg/L}$ | $0.24 \times .8 = 0.19 \text{ mg/L}$ |
| Zinc     | $2.61 \times .8 = 2.09 \text{ mg/L}$ | $1.48 \times .8 = 1.18 \text{ mg/L}$ |
| Cyanide  | $1.20 \times .4 = 0.48 \text{ mg/L}$ | $0.65 \times .4 = 0.26 \text{ mg/L}$ |

|          |  |  |
|----------|--|--|
| Cadmium  | $0.55 \times 8.34 \times 0.2 = 0.91 \text{ lb/dy}$ | $0.21 \times 8.34 \times 0.2 = 0.35 \text{ lb/dy}$ |
| Chromium | $2.22 \times 8.34 \times 0.2 = 3.70 \text{ lb/dy}$ | $1.37 \times 8.34 \times 0.2 = 2.28 \text{ lb/dy}$ |
| Copper   | $2.70 \times 8.34 \times 0.2 = 4.50 \text{ lb/dy}$ | $1.66 \times 8.34 \times 0.2 = 2.77 \text{ lb/dy}$ |
| Lead     | $0.55 \times 8.34 \times 0.2 = 0.92 \text{ lb/dy}$ | $0.34 \times 8.34 \times 0.2 = 0.57 \text{ lb/dy}$ |
| Nickel   | $3.18 \times 8.34 \times 0.2 = 5.30 \text{ lb/dy}$ | $1.90 \times 8.34 \times 0.2 = 3.17 \text{ lb/dy}$ |
| Silver   | $0.34 \times 8.34 \times 0.2 = 0.57 \text{ lb/dy}$ | $0.19 \times 8.34 \times 0.2 = 0.32 \text{ lb/dy}$ |
| Zinc     | $2.09 \times 8.34 \times 0.2 = 3.49 \text{ lb/dy}$ | $1.18 \times 8.34 \times 0.2 = 1.97 \text{ lb/dy}$ |
| Cyanide  | $0.48 \times 8.34 \times 0.2 = 0.80 \text{ lb/dy}$ | $0.26 \times 8.34 \times 0.2 = 0.43 \text{ lb/dy}$ |

## Vincent Miles

---

**From:** Mike Barrett [mike.barrett@arcelor-pb.com]  
**Sent:** Wednesday, June 03, 2009 3:26 PM  
**To:** Vincent Miles  
**Subject:** RE: Arcelor Mittal Requested data

Approximately 40%  
That would equate to an average of about 70,000/GPD

**Mike BARRETT** | Safety & Environmental  
ArcelorMittal Pine Bluff | Wire Solutions

5100 Industrial Drive South  
Pine Bluff AR 71602

T +870 247 2444 | F +870 247 1622 | M +870 692 5144 | [www.arcelormittal.com](http://www.arcelormittal.com)



Help conserve the environment. Please think before you print this e-mail. Thank you

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**From:** Vincent Miles [mailto:Vincent@pbwastewater.com]  
**Sent:** Wednesday, June 03, 2009 2:09 PM  
**To:** Mike Barrett  
**Subject:** RE: Arcelor Mittal Requested data

Thanks Mike. This is very useful in determining the limits that may be applied to your permit. If you don't mind, can you possibly see if you and your staff can get an estimate of the flow that you have at the cyanide destruct units?

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**From:** Mike Barrett [mailto:mike.barrett@arcelor-pb.com]  
**Sent:** Wednesday, June 03, 2009 9:44 AM  
**To:** Vincent Miles  
**Subject:** Arcelor Mittal Requested data

Hello Vincent  
As requested, I have attached the following information  
Photos of labeled sampling points and labeled totalizer controls  
WW plumbing drawings  
Daily Average WW flows for the past 5 years by source

**Mike BARRETT** | Safety & Environmental  
ArcelorMittal Pine Bluff | Wire Solutions

5100 Industrial Drive South  
Pine Bluff AR 71602

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# PINE BLUFF WASTEWATER UTILITY

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## WASTEWATER DISCHARGE PERMIT

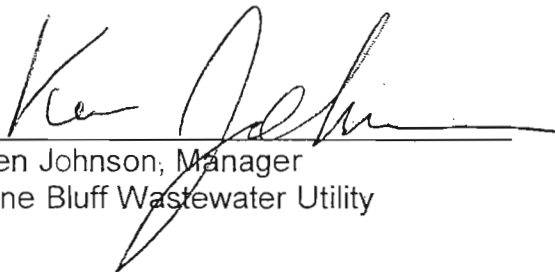
**ARAMARK**

**Permit No. ARM #35**

**5508 Jefferson Parkway  
Pine Bluff, AR 71611**

Is hereby authorized to discharge wastewater from the facility located at 5508 Jefferson Parkway, Pine Bluff, Arkansas 71611 into the Pine Bluff Wastewater System in accordance with the limitations set forth in this permit. This permit shall become effective on August 15, 2008 and shall expire at midnight on August 15, 2013.

Signed this 8th day of August , 2008.



Ken Johnson, Manager  
Pine Bluff Wastewater Utility

## LEGAL AUTHORITY

The Pine Bluff Wastewater Utility has the legal authority in accordance with 40 CFR 403.8 (f) (1) to implement a local industrial pretreatment program. The Utility shall operate pursuant to legal authority enforceable in Federal, State, or local courts, which authorizes or enables the Utility to apply and to enforce the requirements of Section 307 (b) and (c), and 402 (b)(8) of the Clean Water Act and any regulations implementing those sections.

Such authority may be contained in the Code of Ordinances, local ordinances, permits, contracts, or joint powers agreements which the Utility is authorized to enact, enter into, or implement, and which are authorized by State law.

## POLLUTANT LIMITATIONS AND MONITORING REQUIREMENTS

The Permittee will have its wastewater discharge monitored by the Wastewater Utility based on the requirements listed below. All associated monitoring costs will be billed to the Permittee on a monthly basis for payment. All analyses will be performed in accordance with 40 CFR, Part 136, and Standard Methods current edition.

The following pollutants with corresponding limits are the only pollutants permitted to be discharged into the wastewater collection system by the Permittee.

### CONCENTRATION LIMITATIONS

| PARAMETER                  | DAILY MAXIMUM LIMITS | MONITORING FREQUENCY | SAMPLE TYPE           |
|----------------------------|----------------------|----------------------|-----------------------|
| 1Biochemical Oxygen Demand | 300 mg/l             | 3/Month              | 24 hr. Time Composite |
| 1Total Suspended Solids    | 300 mg/l             | 3/Month              | 24 hr. Time Composite |
| 1Oils and Grease           | 100 mg/l             | 3/Month              | Grab                  |

| Parameter             | Daily Maximum Limitation | Monitoring Frequency | Sample Type           |
|-----------------------|--------------------------|----------------------|-----------------------|
| Barium                | 2.00 mg/l                | 3/Month              | 24 hr. Time Composite |
| Molybdenum            | 1.50 mg/l                | 3/Month              | 24 hr. Time Composite |
| 2Total Toxic Organics | 2.13 mg/l                | 1/Year               | Grab                  |
| Zinc                  | 5.00 mg/l                | 3/Month              | 24 hr. Time Composite |
| Chromium              | 0.50 mg/l                | 3/Month              | 24 hr. Time Composite |
| Nickel                | 0.50 mg/l                | 3/Month              | 24 hr. Time Composite |
| pH                    | 5.0 – 11.0 s.u.          | 3/Month              | Grab                  |

1Values to be surcharged in accordance with local Sewer Use Ordinance 6146

2 Required to implement a Toxic Organic Management Plan and at no time shall the sum of TTOs exceed 2.13 mg/l

### GENERAL DISCHARGE PROHIBITIONS

In accordance with the Code of Ordinances for the City of Pine Bluff, Section 28-101; no discharger shall contribute or cause to be discharged, directly or indirectly, any of the following described substances into the wastewater disposal system or otherwise to the facilities owned or operated by the City. No person shall discharge or cause to be discharged to a sewer line, manhole or other parts of the sewer system, either directly or indirectly:

- (1) Any liquids, solids or gases which by reason of their nature or quantity, are or may be, sufficient either alone or by interaction to cause fire or explosion or be injurious in any other way to the operation of the treatment plant.
- (2) Any waste or material that creates a stoppage, plugging, breakage, any reduction in sewer capacity, or any other damage to sewers or sewage facilities of the City. All additional maintenance expenses caused by such a discharge, or any other expenses attributable thereto will be charged to the discharger by the City.



# PINE BLUFF WASTEWATER UTILITY

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## SAMPLE CUSTODY FORM

COMPANY NAME: Tyson Ind. Parkway

SAMPLE IDENTIFICATION: ZIP

SAMPLE COLLECTION POINT: Discharge pipe in treatment plant

SAMPLE TYPE: 7-comp

DATE & TIME MONITORING STARTED: 2-1-12 : 1050 HRS.

DATE & TIME SAMPLE COLLECTED: 2-2-12 : 0950 HRS.

SAMPLE COLLECTED BY: [Signature]

DATE & TIME SAMPLE RECEIVED: 2-2-12 : 9:55 AM HRS.

Barbara Allen  
(SIGNATURE OF INDUSTRIAL OFFICIAL)

HAVE RECEIVED SPLIT SAMPLE FROM  
PINE BLUFF WASTEWATER UTILITY.  
I FIND THIS SAMPLE IS ADEQUATE  
UPON RECEIPT AND THEREBY SUITABLE  
FOR LABORATORY ANALYSIS.

| COMMENT: | <u>Final</u>  | <u>Initial</u> | <u>Total</u>  |
|----------|---------------|----------------|---------------|
| Daf1     | <u>0.0340</u> | <u>0.0110</u>  | <u>0.023</u>  |
| Daf2     | <u>2.5731</u> | <u>1.5904</u>  | <u>0.9827</u> |
| Daf3     | <u>3.6108</u> | <u>2.6103</u>  | <u>1.0005</u> |
|          |               |                | <u>2.0062</u> |

[ALL RECORDS ARE TO BE RETAINED FOR A PERIOD OF AT LEAST THREE YEARS]

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# INDUSTRIAL MONITORING FIELD DATA RECORD

|                            |   |                    |           |
|----------------------------|---|--------------------|-----------|
| COMPANY ID:                | TIP   |                    |           |
| REPRESENTATIVE             | Tommy Tooke   |                    |           |
| SAMPLING POINT             | DISCHARGE PIPE IN TREATMENT PLANT   |                    |           |
|                            | <input checked="" type="checkbox"/> END OF PIPE <input type="checkbox"/> END OF PROCESS <input type="checkbox"/> OTHER  |                    |           |
| SAMPLER NUMBER:            | 21A   | NUMBER OF SAMPLES: | 3         |
| TYPE OF SAMPLE             | <input checked="" type="checkbox"/> GRAB <input checked="" type="checkbox"/> 24 HR TIMED. COMP <input type="checkbox"/> DISCRETE<br><input type="checkbox"/> FLOW PROPORTIONAL COMP<br><input type="checkbox"/> OTHER |                    |           |
| TYPE OF MONITORING         | <input type="checkbox"/> SCHEDULED <input checked="" type="checkbox"/> UNSCHEDULED<br><input type="checkbox"/> DEMAND <input type="checkbox"/> SPECIAL SAMPLE   |                    |           |
| WASTEWATER CHARACTERISTICS | COLOR: <i>cloudy</i><br>ODOR: <i>mild</i>   |                    |           |
| FLOW STATUS                | <input checked="" type="checkbox"/> CONTINUOUS <input type="checkbox"/> BATCH <input type="checkbox"/> NO DISCHARGE   |                    |           |
| AUTO. SAMPLER              | 300   | (mL) Per           | 60 (min.) |
| FLOW MONITOR (GAL/DAY)     | INITIAL FLOW (GAL): N/A    FINAL FLOW (GAL): N/A<br>TOTAL FLOW (GAL/DAY): N/A   |                    |           |
| CALIBR.                    | CALIBRATION DATE & TIME: 2-1-12 ; 0900 (HRS)<br>ANALYST: <i>[Signature]</i> (signature)   |                    |           |
| PH                         | pH4 (S.U.) 4.01    pH7 (S.U.) 7.02    pH10 (S.U.) 10.06<br>BUFFER TEMP. (°C) 22.1    % SLOPE 100, 2   |                    |           |
| ANALYSTS                   | ANALYZE DATE & TIME: 2-1-12 ; 1051 (HRS)<br>pH(S.U.) 6.06    TEMP (°C): 27.7  |                    |           |
| SAMPLING TECH              | <i>[Signature]</i> (signature)  |                    |           |
| DATE & TIME MONI           | 2-1-12 ; 1050 (HRS)   |                    |           |
| DATE & TIME COLI           | 2-2-12 ; 0950 (HRS)   |                    |           |
| SAMPLE CUSTODY REQUIRED    |   |                    |           |

| FLOW DATA           |              |        |        |
|---------------------|--------------|--------|--------|
|                     | INITIAL      | FINAL  | TOTAL  |
| (FLOW METERS X 100) | DAF 1 0.0110 | 0.0340 | 0.023  |
|                     | DAF 2 1.5904 | 2.5731 | 0.9827 |
|                     | DAF 3 2.6103 | 3.6108 | 1.0005 |
|                     |              |        | 2.0062 |

pH 7.00 BUFFER :                      S.U. @                      °C @                      HRS

COMMENTS:

F-2/4

# TOTAL SUSPENDED SOLID (TSS)

|                              |            |              |
|------------------------------|------------|--------------|
| DATE & TIME ANALYZED: 2-3-12 | 0950 (hrs) | ANALYST: SRS |
|------------------------------|------------|--------------|

DRYING OVEN TEMP (Deg. C): 1<sup>st</sup> 105 2<sup>nd</sup> 105 3<sup>rd</sup> 4<sup>th</sup> 5<sup>th</sup>

|   |           |        |        |        |        |  |  |
|---|-----------|--------|--------|--------|--------|--|--|
| Sample ID   | BLANK     | ARC    | JRMC   | TIP    | TIP    |  |  |
| Sample Type   |           | Tcomp  | Tcomp  | Tcomp  | Tcomp  |  |  |
| Collection Date   |           | 2-1-12 | 2-1-12 | 2-1-12 | 2-1-12 |  |  |
| Collection Time (hrs)                                     |           | 1130   | 1205   | 1050   | 1050   |  |  |
| Filter ID   |           | 110    | 501    | 50     | 19     |  |  |
| mL-Sample Filtered  | 100mL-H2O | 100    | 50     | 50     | 50     |  |  |
| 1 <sup>st</sup> Wt. of Filter + Residue (gram)            |           | 1.2750 | 1.2678 | 1.3044 | 1.2836 |  |  |
| 2 <sup>nd</sup> Wt. of Filter + Residue (gram)            |           | 1.2750 | 1.2678 | 1.3040 | 1.2834 |  |  |
| Wt. Difference [1 <sup>st</sup> -2 <sup>nd</sup> ] (gram) |           | 0      | 0      | 0.0004 | 0.0002 |  |  |
| 3 <sup>rd</sup> Wt. of Filter + Residue (gram)            |           |        |        |        |        |  |  |
| Wt. Difference [2 <sup>nd</sup> -3 <sup>rd</sup> ] (gram) |           |        |        |        |        |  |  |
| 4 <sup>th</sup> Wt. of Filter + Residue (gram)            |           |        |        |        |        |  |  |
| Wt. Difference [3 <sup>rd</sup> -4 <sup>th</sup> ] (gram) |           |        |        |        |        |  |  |
| 5 <sup>th</sup> Wt. of Filter + Residue (gram)            |           |        |        |        |        |  |  |
| Wt. Difference [4 <sup>th</sup> -5 <sup>th</sup> ] (gram) |           |        |        |        |        |  |  |
| Final Wt. of Filter + Residue (gram)                      |           | 1.2750 | 1.2678 | 1.3040 | 1.2834 |  |  |
| Wt. of Filter (gram)                                      |           | 1.2723 | 1.2562 | 1.2853 | 1.2650 |  |  |
| Final Wt.-Filter Wt. (gram)                               |           | 0.0027 | 0.0116 | 0.0187 | 0.0184 |  |  |

|                 |  |    |     |     |     |  |  |
|-----------------|--|----|-----|-----|-----|--|--|
| TSS (mg/L)      |  | 27 | 232 | 374 | 368 |  |  |
| Ave. TSS (mg/L) |  |    |     |     |     |  |  |

(371) 1.6% diff

TSS (mg/L)  $\frac{[(\text{Final Wt. of Filter + Residue}) - (\text{Wt. of Filter})] \times 1,000,000}{\text{Volume of Sample Filtered (ml)}}$

Comment \_\_\_\_\_

Comment \_\_\_\_\_

TEST PROCEDURES ARE ACCORDING TO STANDARD METHODS 20<sup>TH</sup> EDITION PART 2540 D.

# BIOCHEMICAL OXYGEN DEMAND (BOD) CARBONACEOUS BIOCHEMICAL OXYGEN DEMAND (CBOD)

DATE & TIME EXAMINED

AL DO: 2-3-12 1500 (hrs) ANALYST: SRS TEMP OF INCUB.: [A0,B0,C0]: 19.5 (Deg.C)  
DO: 2-8-12 0835 (hrs) ANALYST: SRS TEMP OF INCUB.: [A0,B0,C0]: 19.0 (Deg.C)

| SAMPLE ID  | SAMPLE TYPE | SEED ADD (mL) | BOTTLE NUMBER | SAMPLE VOLUME (mL) | DILUTION FACTOR | INITIAL DO (mg/L) | FINAL DO (mg/L) | DO DEPLETION (mg/L) | BOD/CBOD (mg/L) | AVERAGE BOD/CBOD (mg/L) |
|------------|-------------|---------------|---------------|--------------------|-----------------|-------------------|-----------------|---------------------|-----------------|-------------------------|
| ANK        | N/A         | 0             | 78            | 300                | 1               | 8.58              | 8.58            | 0.00                | 0.00            | 0.00                    |
| ANK        | N/A         | 0             | 176           | 300                | 1               | 8.58              | 8.58            | 0.00                | 0.00            |                         |
| TIP<br>2-1 | [X]Comp     | 3             | 92            | 0.9                | 0.003           | 8.35              | 5.71            | 2.64                | 749.70          | 735.48                  |
|            |             | 3             | 96A           | 1.5                | 0.005           | 8.32              | 4.07            | 4.25                | 771.82          |                         |
|            | [ ]Grab     | 3             | 76            | 3                  | 0.01            | 8.27              | 1.03            | 7.24                | 684.91          |                         |
| TIP<br>2-1 | [X]Comp     | 3             | 153B          | 0.9                | 0.003           | 8.35              | 5.64            | 2.71                | 773.03          | 753.43<br><u>744.46</u> |
|            |             | 3             | 151           | 1.5                | 0.005           | 8.31              | 4.25            | 4.06                | 733.82          |                         |
|            | [ ]Grab     | 3             | 48B           | 3                  | 0.01            | 8.26              | 1.00            | —                   | —               |                         |
|            | [ ]Comp     |               |               |                    |                 |                   |                 |                     |                 |                         |
|            | [ ]Grab     |               |               |                    |                 |                   |                 |                     |                 |                         |
|            | [ ]Comp     |               |               |                    |                 |                   |                 |                     |                 |                         |
|            | [ ]Grab     |               |               |                    |                 |                   |                 |                     |                 |                         |
|            | [ ]Comp     |               |               |                    |                 |                   |                 |                     |                 |                         |
|            | [ ]Grab     |               |               |                    |                 |                   |                 |                     |                 |                         |
|            | [ ]Comp     |               |               |                    |                 |                   |                 |                     |                 |                         |
|            | [ ]Grab     |               |               |                    |                 |                   |                 |                     |                 |                         |
| SEED       |             | 90            | 15            | 0.05               | 8.35            | 5.89              | 2.46            | 49.20               | 39.09           |                         |
|            |             | 157           | 18            | 0.06               | 8.35            | 5.88              | 2.47            | 41.17               |                 |                         |
|            |             | 106           | 21            | 0.07               | 8.34            | 5.75              | 2.59            | 37.00               |                 |                         |

SEED FACTOR (3mL): 0.3909

DILUTION FACTOR = SAMPLE VOLUME (mL) / 300 (mL)  
BOD/CBOD of UNSEEDDED SAMPLE = (INITIAL DO - Final DO) / DILUTION FACTOR  
SEED FACTOR = (BCD/CBOD OF SEED X mL-SEED ADD TO SAMPLE) / 300  
mg/L BOD/CBOD of SEEDDED SAMPLE = (INITIAL DO - FINAL DO) · SEED FACTOR / DILUTION FACTOR

SCARD  
RESULT

OV: OFF VALUE  
DP: DO DEPLETION < 2 mg/L

DPB: DO DEPLETION OF BLANK > 0.2 mg/L  
FD: FINAL DO < 1 mg/L

F-4/5 5-DAY BOD/CBOD TEST

# OIL AND GREASE (O&G): N-HEXANE METHOD 1664

|                            |         |      |       |                     |
|----------------------------|---------|------|-------|---------------------|
| & TIME ANALYZED:           | 2-3-12  | 1400 | (hrs) | ANALYST: <i>z</i>   |
| & TIME BALANCE CALIBRATED: | 2-3-12  | 0815 | (hrs) | ANALYST: <i>z</i>   |
| & TIME BALANCE CALIBRATED: | 2/10/12 | 0910 | (hrs) | ANALYST: <i>SRS</i> |
| R BATH TEMP:               | 85 °C   | MS   | MSD   |                     |

| SAMPLE ID                 | BLANK                   | ALL     | ALL     | ALL     | WMA618 D | JRMC    | 77P     |
|---------------------------|-------------------------|---------|---------|---------|----------|---------|---------|
| SAMPLE TYPE               |                         | GRAB    | GRAB    | GRAB    | GRAB     | GRAB    | GRAB    |
| COLLECTION DATE           |                         | 2-1     | 2-1     | 2-1     | 2-1      | 2-1     | 2-1     |
| COLLECTION TIME           |                         | 1130    | 1130    | 1130    |          | 1205    | 1050    |
| FUNNEL NUMBER             | 1                       | 2       | 3       | 4       | 5        | 6       | 7       |
| FLASK NUMBER              | 125                     | 89      | A1      | DW      | B        | 700     | 1000    |
| SAMPLE VOL. (mL)          | 100 mL H <sub>2</sub> O | 100     | 100.5   | 100.5   | 700      | 750     | 657     |
| of Flask + Residue (gram) | 69.6019                 | 52.6831 | 48.0022 | 49.4550 | 51.2633  | 59.6824 | 59.7962 |
| Flask WT. (gram)          | 69.6019                 | 52.6806 | 47.9995 | 49.4530 | 51.2580  | 59.6681 | 59.7869 |
| Residue WT. (gram)        | 0.0000                  | 0.0025  | 0.0027  | 0.0020  | 0.0053   | 0.0143  | 0.0093  |
| IL & GREASE (mg/L)        | 0                       | 25      | 26.87   | 19.90   | 7.57     | 19.07   | 14.16   |

| SAMPLE ID                 | WMA618 E | STD     | EFF     | INFC    | INFA    |      |      |
|---------------------------|----------|---------|---------|---------|---------|------|------|
| SAMPLE TYPE               | GRAB     | GRAB    | GRAB    | GRAB    | GRAB    | GRAB | GRAB |
| COLLECTION DATE           | 2-3      |         | 1-31    | 1-31    | 1-31    |      |      |
| COLLECTION TIME           | 0910     |         | 0905    | 0815    | 0825    |      |      |
| FUNNEL NUMBER             | 8        | 9       | 0 10    | 11      | 12      | 13   | 14   |
| FLASK NUMBER              | C24      | W       | M2      | 2       | V       |      |      |
| SAMPLE VOL. (mL)          | 700      |         | 800     | 850     | 857     |      |      |
| of Flask + Residue (gram) | 61.8697  | 51.8240 | 63.1518 | 52.0804 | 48.3456 |      |      |
| Flask WT. (gram)          | 61.8647  | 51.5713 | 63.1496 | 52.0803 | 48.3356 |      |      |
| Residue WT. (gram)        | 0.0050   | 0.2527  | 0.0022  | 0.0061  | 0.0100  |      |      |
| IL & GREASE (mg/L)        | 7.14     | 93.00   | 2.75    | 7.18    | 11.67   |      |      |

$$\text{IL \& GREASE (mg/L)} = \frac{[\text{SAMPLE RESIDUE WT. (gram)} - \text{BLANK RESIDUE WT. (gram)}] \times 1,000,000}{\text{SAMPLE VOLUME (mL)}}$$

WT. OF STD OIL / % RECOVERY: *0.2717 193%*      % DIFF FOR MS & MSD: \_\_\_\_\_

REMARKS: *0.5mls of Std added to ms & msd*