ADEQ

ARKANSAS
Department of Environmental Quality

August 29, 2016

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

Re: Pine Bluff (NPDES #AR0033316) Pretreatment Program Audit/Municipal Pollution Prevention Assessment

Dear Mr. Johnson,

Please find enclosed the finished report for the audit/assessment conducted May 24th through the 26th, 2016. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the recommendations and required actions. Please submit a written response within thirty (30) days from the date on this correspondence describing the corrective action that will be taken to resolve the deficiencies discovered during the Audit.

The City appears to have personnel knowledgeable and interested in the Pretreatment Program, but not as much so integrating Pollution Prevention activities. Many of the audit/assessment recommendations are meant to aide your Programs to further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment.

It was a pleasure working with you and your staff during the audit and becoming more familiar with Pine Bluff, its industries and Pretreatment Program. If there are further questions, please feel free to contact this office.

Sincerely,

Allen Gilliam

Allen Gilliam
ADEQ State Pretreatment Coordinator
(501) 682.0625

Encl: Audit/Assessment Checklist

ec: Richard Healey, Enforcement Branch Manager
Jason Bolenbaugh, Inspector Supervisor
Rudy Molina, EPA 6W-PO

E/NPDES/NPDES/Pretreatment/Reports

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

PINE BLUFF, ARKANSAS

NPDES PERMIT #AR003316

August 29, 2016

PREPARED BY: ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ADEQ

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LIST OF ATTACHMENTS

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) now integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

An audit/assessment was performed May 24th through May 26th, 2016, of the Pretreatment Program implemented by City of Pine Bluff, Arkansas. Participants included:

Allen Gilliam	ADEQ/Pretreatment Coordinator
Vincent Miles	City/Env. Compliance Supervisor & Pretreatment Coordinator
Stacy Carpenter	City/Stacy Carpenter, Laboratory Supervisor

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City of Pine Bluff's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;

* 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 and;

* 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's Pretreatment Program was originally approved 9/18/84. Modifications were submitted and approved on 1/31/89 and 9/8/92 to be current with the PIRT and DSS Pretreatment revisions. Once again the City submitted modifications to meet the October 2005 Pretreatment Streamlining Rule's revisions which were subsequently approved on 4/4/13.

The City's treatment process consists of two parallel trains: one aerated lagoon and one primary pond in series with optional chlorination. The two parallel trains combine into the first pond which runs in series with the second polishing pond. The entire system is approximately 490 acres and discharges into segment 3C of the Arkansas River.

There has been neither lethality nor sublethality shown to either species over the last 5 years (13 tests) for the water flea/fathead minnow.

The plant's design flow is 14 MGD and averages about 13.3 MGD with approximately 2.57 MGD being contributed by 10 significant industrial users.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of four (4) industrial user files, pretreatment records and site visits to three (3) 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.

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 their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its 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 the City of Pine Bluff's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1) Under ***40 CFR 403.8(f)(2),*** "The POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to: (i) Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users [IUs] made under this paragraph shall be made available to [ADEQ] upon request; and (ii) Identify the character and volume of pollutants contributed to the POTW by the Industrial Users identified under paragraph (f)(2)(i) of this section. This information shall be made available to [ADEQ] upon request."

During the checklist review an index, inventory or compilation of IUs could neither be produced nor documented when the last IU survey was conducted.

The City must conduct an industrial user/business survey to all non-domestic wastewater dischargers and create an index or compilation from each survey's pertinent information. See EPA's "Guidance Manual for POTW Pretreatment Program Development" at https://www3.epa.gov/npdes/pubs/owm0003.pdf, Chapter 2 for details summarizing these surveys and Tables 1 and 2 for example IUs' pertinent information to be compiled/summarized.

Include screen printers, auto body repair/paint shops, hospitals, hospices, long term care facilities, dentists, chiropractors, schools (toxic/haz waste lab chemicals?), car/truck washes, machine shops, etc. Pertinent information then can be gleaned from each surveyed and digested into a spreadsheet

showing which are sanitary only and those that are discharging or have the potential to discharge toxic pollutants into the City via floor drains or simply pouring their wastewater into a sink or toilet.

These survey questionnaires should be tailored to "fit" each business sector's operations and include Pollution Prevention (P2) questions regarding source reduction, waste minimization, energy and/or water conservation.

2) Under ***40 CFR 403.6(e)***, "*Combined wastestream formula* (CWF). Where process effluent is mixed prior to treatment with wastewaters other than those generated by the regulated process, fixed alternative discharge limits may be derived by the [City]...These alternative limits shall be applied to the mixed effluent. When deriving alternative categorical limits, the [City] shall calculate both an alternative daily maximum value using the daily maximum value(s) specified in the appropriate categorical Pretreatment Standard(s) and an alternative consecutive sampling day average value using the monthly average value(s) specified in the appropriate categorical Pretreatment Standard(s)."

[Although in this case, the City is taking samples after treated process wastewater is mixed with sanitary sewage, it is clear from Section 3 of EPA's Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula (PDF) the CWF is to be used.]

During the file review it was discovered Kiswire's TTO limit had not been adjusted using the CWF to reflect an alternative concentration limit (see Attchs. A-2c & A-4d). This TTO limit must be revised using the same dilution factor used for the IU's other Metal Finishing standards.

3) Under ***40 CFR 403.8(f)(1)(B)***, "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: ***(3)*** Effluent limits...based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law.

(a) It was discovered during the file review Kiswire's Metal Finishing permit limits were based on Pretreatment standard for existing sources. Kiswire is a new source (and is even noted as such on the footnote on Attch. A-2c), but included the Cd (alternative) existing source limit (see Attch. A-4d). The Cd limit must be revised to reflect the new source standard (using the existing dilution factor).

(b) It was discovered during Aramark's (industrial laundry) file review its permit included a TTO limit (see Attch. A-5c). City representatives indicated all of its permitted IUs had the same TTO daily maximum limit of 2.13 mg/L (the Metal Finishing category in 40 CFR 433 is the only effluent guideline with Pretreatment standards subject to this limit).

There is no technically based local limit for TTO, or subset thereof in the City's approved Pretreatment Program.

Aramark is not a Metal Finisher. The City must define the toxic organics of concern being discharged from Aramark (and its other non-Categorical IUs), develop technically based local limits for them before implementing a blanket "unknown" TTO limit; OR completely remove the TTO limit in its non-categorical IU permits.

4) Under ***40 CFR 433.12(a)***, "In lieu of requiring monitoring for TTO, the [City]... may allow dischargers to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation...for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report.

(b) In requesting the certification alternative, a discharger shall submit a solvent management plan (TOMP) that specifies to the satisfaction of the [City] the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater..."

During the file review all Metal Finishers had submitted some form of a TOMP (see Attch.A-7 for a vague TOMP). No documentation from the City to its Metal Finishers approving their TOMPs could be produced.

Without documentation of approvable TOMPs from the City to its Metal Finishers, the City must conduct two (2) TTO scans/yr (one/six month period) instead of just one/yr as their permits require (see Attch. A-2c) because the City conducts all the monitoring for its industries.

5) Under ***40 CFR 403.5(c)***, "...When specific limits (technically based local limits – TBLL) must be developed by POTW...Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits." OR under ***40 CFR 403.8(f)(4)***, "The POTW shall develop local limits as required in §403.5(c)(1), or demonstrate that they are not necessary."

During the file review Aramark's permit included limits for various parameters that could not be explained by the City representatives and their basis could not be produced.

Section 9.3 of the City's current "approved" Pretreatment Program states, "The City of Pine Bluff elects not to implement [technically based] local limits. Based on information provided in this report, the Control Authority believes that implementing local limits would have little value in preventing pass through or interference or protecting sludge quality...The Control Authority will track the loading allocated to each IU and compare the allocated total to the MAIL [Max. Allowable Industrial Loading]".

The City must have TBLLs established before they can implement and enforce them in their non-Categorical IUs' permits. If the non-conventional pollutants are of concern to the City, a

"Report Only" clause may be used, but not a limit that has no technical basis and not legally defensible.

The conventional parameters (BOD_5, TSS and O&G) "limits" title should be renamed "Surcharge Levels" as they too are not TBLLs, but as footnoted in the permit (see Attach. A-5c), "Values are surcharged in accordance with Local Sewer Use Ordinance 6146 [should be changed to 6381] if the values exceed the ~~limitations~~ [levels] noted in this permit."

6) Under ***40 CFR 403.12(p)***, "The Industrial User shall notify the POTW, the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261…"

During the checklist review it was not evident the City had notified its hazardous waste generators of this reporting requirement since 1991. With frequent movement of hazardous waste generating companies throughout the State, the City must notify these IUs/businesses of their reporting requirements.

The most current ADEQ generated hazardous waste generators list (with Pine Bluff addresses) was supplied to the City's Pretreatment representatives during the audit. Hospitals, long term health care and oncology clinics should also be sent their notification requirement because it is known that these type facilities generate acute hazardous waste.

7) Under ***40 CFR 403.8(f)(2)(vi)***, "Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users [SIUs] identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006…"

During the file review it was determined a slug potential evaluation had not been documented by the City for each of its SIUs. The City must evaluate/document and DATE each of its SIUs for the potential of a slug discharge of toxic pollutants.

It was discussed that the SIUs were asked to fill out their own slug potential evaluations. A vague "Sludge" Control Plan can be seen on Attch. A-7b which does not meet the requirements per 40 CFR 403.8(f)(2)(vi)(A-D).

8) Under ***40 CFR 403.8(f)(2)(viii)***, "***(A)*** Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, <u>including instantaneous limits</u>, as defined by 40 CFR 403.3(l); and
(B) Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement <u>including instantaneous limits</u>, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC = 1.4

for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH)..."

During the file review it was discovered the definition of significant non-compliance in the City's IU permits was not current with the Pretreatment Regulations. The City must revise its definition to include the above underlined revision (see Attch. A-5j).

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

1) Strongly recommend revising and dating existing fact sheet(s) in each IU file updating/including pertinent information such as: existing permit's effective/expiration dates, comprehensive narrative of all process/manufacturing operations, comprehensive wastewater flow schematics with directional arrows of flow to the sampling point clearly marked, basis for permit limits, facility's authorized representative, main IU representative's contact information, monitoring frequency, parameters monitored for, picture of actual sampling point, chronological history (start-up date, compliance history, e.g.) and Pollution Prevention activities.

As discussed during the audit, the basic information contained in a comprehensive IU inspection provides the bulk of a good fact sheet. These fact sheets should be sent to each knowledgeable IU representative to review and update as necessary. Inspections can reference "process/manufacturing operations", "wastewater schematics", etc. as "can be located in City's IU file".

2) Strongly recommend the City send its Metal Finishers the EPA's guidance manual "hotlink" for implementing Total Toxic Organics (TTO) @ Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards (PDF) asking them to consider submitting an approvable toxic organic management plan (TOMP).

3) Recommend including in the City's Pretreatment Program standard operating procedures for the day-to-day activities of the City Pretreatment Coordinator (sampling, inspections, paperwork processing/storage, e.g.). This would be invaluable for training personnel new to the Program.

4) Strongly recommend revising the City's current IU inspection form (Attch. A-6). During the file review it was discovered the inspections lacked information on the IUs' processes and pretreatment tanks, plumbing, valves, etc. (leaks, rusting, scale build-up, good/bad preventive maintenance, concrete floor etching etc.); had vague chemical/haz waste storage and nothing regarding chemical handling procedures. The City should add a few more paragraphs to include these particular areas to "evaluate" during an inspection. See "Audit Checklist's IU File Review, Section 9.a. through 9.q."

If the above inspection Checklist items were to have been adequately addressed and documented, the City's inspections would have been deemed more than adequate. It was suggested to complete such a comprehensive inspection and use a copy of it during subsequent inspections to use as a

work copy to update any changes made at the IU. One of the first questions that should be asked at the beginning of an inspection should be, "Has there been any process, raw material or chemistry changes made since the last inspection?" Any changes could be "red-inked" on the work copy, then updating their base inspection form for use in future inspections.

It is also recommended to include questions asking about P2 practices: source reduction, waste reduction, in-situ chemical/water recovery, in-house Best Management Practices (BMPs), ISO 140001 certified, water and/or energy conservation measures.

5) Recognizing the City conducts all monitoring for its IUs, it's strongly recommended the City notify any of its permitted IUs within 24 hours of becoming aware of a permit limit violation. ***40 CFR 403.12(g)(2)*** states, "If sampling performed by an Industrial User indicates a violation, the User shall notify the [City] within 24 hours of becoming aware of the violation."

It makes common sense the City does the same in return so the IU may quickly identify what might have caused the violation and produce a corrective action to prevent further excursions.

6) Strongly advise the City revise its IUs' permit language dealing with "Penalties" (see Attch. A-2k). It appears from that language any IU who has failed to comply with any provision of the permit…"shall be guilty of a misdemeanor…"

Section 7.3 of the City Pretreatment Program (Enforcement Response Plan and Guide) shows several enforcement options available before declaring the IU "guilty of a misdemeanor" including a simple phone call if the violation is minor and can be addressed/corrected in this manner.

Similar less forceful enforcement options are also outlined in Section 10 of the City's Pretreatment Ordinance # 6381.

Under ***40 CFR 403.8(f)(1)(B)***, "…individual control mechanisms must be enforceable and contain, at a minimum, the following conditions: ***(5)*** [A] Statement of applicable civil and criminal penalties for violation of Pretreatment Standards and requirements…" This does not mean any IU permit violation has to be met with civil or criminal penalties. It's meant to make the IUs aware egregious violations can be met with those civil or criminal penalties (of $1,000) if necessary. That notice should replace what the City currently has.

7) Recommend incorporating the above P2 questions on all permit applications requiring the City's IUs to submit their P2 activities and success stories in chronological order. Kiswire has numerous P2 activities not documented anywhere.

8) Recommend sending out fliers or submitting public service notices to the City's local newspaper regarding proper disposal of pharmaceuticals, grease and non-dispersibles (wet wipes, e.g.).

9) Recommend stamping received date initializing ALL correspondence sent in by any

non-domestic user. In some cases, this received date may be the "start date" for future enforcement actions if necessary.

10) Recommend including a more descriptive location of each IU's sampling point in their permit. It is advised to refer to it in feet from a fixed reference point, e.g. In Aramark's permit "from location number ARM#35" (see Attch. A-5e) may not be recognized by an EPA or ADEQ authorized inspector to covertly sample their wastewater for compliance.

11) Recommend including in each IU permit the bypass provisions found in ***40 CFR 403.17***.

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

1) The City's Program section dealing with technically based local limits (TBLLs) must be expanded to include more narrative explaining how it has demonstrated TBLLs are not necessary per ***40 CFR 403.8(f)(4)***.

The statement in the City's Program, Section 9.3, "The City elects not to implement local limits." is confusing at best in the context of ***40 CFR 403.5(c)***, "...Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits. OR in ***40 CFR 403.8(f)(4)***, "The POTW shall develop local limits as required in §403.5(c)(1), or demonstrate that they are not necessary."

R. Torrence's 2012 maximum allowable industrial loadings (MAIL) spreadsheets sent to you on 7/7/16 clearly show TBLLs are not necessary at this time for Pine Bluff. These spreadsheets should be included in your TBLL Development Section. A compilation of the City's IUs' loadings compared to each pollutant of concern's MAIL should show more than adequate safety factors for all pollutants of concern. Various Cities in the State have shown this graphically and with charts.

2) Include in the City's Pretreatment Program's Enforcement Response Plan's Enforcement Response Guide a series of enforcement options for violations of Best Management Practices (BMPs).

* * * * * * * *

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

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
email: ken@pbwastewater.com
Pretreatment Contact: Vincent Miles Title: Environmental Compliance
Address: 900 Island Harbor Marina Road 71601
Telephone: c-870.692.8955 email: vincent@pbwastewater.com

Pretreatment program approval date: 9/18/84

Dates of approval of any substantial modifications: 3/31/89, 9/8/92 & 4/4/13

Month Annual Pretreatment Report Due: March
Pretreatment Year Dates: 3/1 to 2/29 Date(s) of Audit: 5/24 to 5/26/16
(ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	State Pret. Coord./ADEQ	501.682.0625

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
*Vincent Miles	Env Comp Supv/Pret Coor.	870.692.8955
Stacy Carpenter	Lab Supervisor	870.535.0828
Ken Johnson	Manager PBWU	870.535.6603

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	12/9/14	No deficiencies noted
PCI	12/12/12	" "

SECTION I: GENERAL INFORMATION

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:
___	✓	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.

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR003316	Boyd Point Treatment Facility	7/1/15	6/30/20

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Boyd Point Treatment Facility

Location Address: 900 Island Harbor Marina Road, Pine Bluff, AR 71601

Expiration Date of NPDES Permit: 6/30/20

Treatment Plant Wastewater Flow: Design: 14 MGD w/background flow of <5000 cfs and 30 MGD w/background flow of >5,000 cfs; Actual (Avg)-13.26 MGD

Sewer System: 100 % # of SSOs due to grease blockages: 0

Industrial Contribution to this Treatment Plant

# of SIUs: 10 # of CIUs: 4
Industrial Flow (mgd): 2.57 Industrial Flow (%): 21 %

Level of Treatment	Type of Process(es):
Primary	Two parallel trains of 1 aerated lagoon and one
Secondary ✓	primary pond in series w/chlorine disinfection. The 2 parallel trains combine into the 1st polishing pond which runs in series with the 2nd polishing pond, then to optional disinfection via chlorination.
Tertiary	

Method of Disinfection: Chlorine contact chamber (optional)
Dechlorination: ____ YES ✓ NO

Effluent Discharge
Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3C Arkansas River Basin
Receiving Stream Use: Primary & secondary contact recreational, raw water source for domestic, industrial & AG water supplies, propagation of desirable species of fish

If effluent is disposed of to any location other than the receiving stream, please note: N/A

Method of Sludge Disposal:	Quantity of Sludge:
____ Land Application	____ dry tons/yr.
____ Monofill	____ dry tons/yr.
____ Mun. Solid Waste Landfill	____ dry tons/yr.
____ Public Distribution	____ dry tons/yr.
____ Lagoon Storage	____ dry tons/yr.
✓ Sludge is currently in an "Active Sewage Sludge Unit"	

List of toxic pollutant limits in NPDES permit: NH3-N, DO, TRC

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for
___Boyd Point__ 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?) there has been no lethality nor sublethality shown to either species over the last 5 years (13 tests) for the water flea/fathead minnow.

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	0	_____
TCLP	_____	_____	_____	_____

* 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 have stayed about the same.

YES NO N/A

___ ___ ✓ Has the POTW begun tracking the trends in the above samples?

___ ✓ & ✓ Has the POTW violated its 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	Cause(s)
none	

YES NO

___ ✓ Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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.
The City submitted a "Streamlined" Pretreatment Program on 4/4/13 and was approved the same day.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ 6381 Nature of Modification	Date Incorporated in NPDES Permit
4/4/13	Complete Program mod rec'd 4/4/13 to be current with the Streamlining mods to the CFR 403 National Pretreatment Regulations.	???

2. Modifications in Progress:

Date Requested	Nature of Modification
n/a	

YES NO

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

n/a 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
Date of most recent Ordinance approved by the Control authority: 2/21/12
Date of most recent Pretreatment Program modification approval: 4/4/13

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

YES	NO	
✓	___	Deny or condition pollutant discharges
✓	___	Require compliance with standards
✓	___	Control discharges through permit or similar means
✓	___	Require compliance schedules and IU reports
✓	___	Carry out inspection and monitoring activities
✓	___	Obtain remedies for noncompliance
✓	___	Comply with confidentiality requirements
___	✓	Establish Pollution Prevention
___	✓	Has the city developed and adopted a Pollution Prevention policy?

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?

✓ ___ Have provisions been made for the incorporation of Pollution Prevention (P^2) 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:

	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^2 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)] *no documentation of anything recent
	✓	If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 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^2 activity and the distribution of P^2 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.	4	Other regulated nonsignificant IUs (Describe) Porta-potties, landfill leachate
	14	TOTAL of a. + d.

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: n/a

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?

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 EXPIRATION DATE
None	

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: *(*waste authorization form, see Attch. A-1 for example)*

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 (discharge 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
N/A	

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

No documentation produced indicating a more recent one had been sent to haz. Waste generators.

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

✓	Federal Register	✓	Journals, Newsletters
✓	Meetings, Training	✓	Internet
✓	Government Agencies	✓	Other NACWA

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 Changed	Old Limit	New Limit	Reason for Change
section in Program only says, "The City…elects not to implement local limits".			

YES NO

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

	Headworks Analysis Completed? Yes	No	Local Limits Needed? Yes	No	MAHL Limits Adopted? Yes	No	MAHC**/MAIL mg/l / lb/day
Arsenic (As)	✓			✓		✓	0.100/5.52
Cadmium (Cd)	✓			✓		✓	0.165/9.48
Chromium-Total	✓			✓		✓	1.000/57.57
Copper (Cu)	✓			✓		✓	1.000/55.09
Cyanide (CN)	✓			✓		✓	0.100/5.28
Lead (Pb)	✓			✓		✓	0.513/29.31
Mercury (Hg)	✓			✓		✓	0.0004/0.01
Molybdenum (Mo) *	✓			✓		✓	0.200/11.5
Nickel (Ni)	✓			✓		✓	1.000/55.61
Selenium (Se) *	✓			✓		✓	0.116/6.54
Silver (Ag)	✓			✓		✓	0.190/10.9
Zinc (Zn)	✓			✓		✓	0.550/25.16

* - If necessary for the sludge disposal option chosen
** - MAHCs are based on April 2012 ADEQ TBLL Spreadsheet

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? Yes	Headworks Analysis Completed? No	Local Limits Needed? Yes	Local Limits Needed? No	Local Limits Adopted? Yes	Local Limits Adopted? No	Numerical Limit Adopted (mg/l)
_____	_____	---	---	---	---	____	--------
_____	---	____	---	---	---	---	---------

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 *[None mentioned in Program]*		
	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)	_____	_____	_____
_____	_____	_____	_____

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

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1/yr	1/year	
Other SIUs	1/yr	1/year	
Sampling:			
CIUs	12/yr	1/year	Approved Program shows monthly
Other SIUs	12/yr	1/year	for all CIUs & SIUs on page 23
Reporting:			
CIUs	2/yr	2/year	
Other SIUs	2/yr	2/year	
Self-Monitoring:			
CIUs	0/yr*	2/year	*City conducts these
Other SIUs	0/yr*	2/year	" "

#	%	
0	0	Not sampled at least once in the past reporting year?
0	0	Not inspected at least once in the past Pretreatment reporting year?
0	0	Not inspected or not sampled at least once in the past reporting year ? [NOIN] - [403.8(f)(2)(v)]

* NOIN- this is a count of SIUs that are either not inspected OR not sampled in the past 12 months. This is NOT a count of SIUs that were both not sampled and not inspected. Do not count repetitive SIU names more than once.

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected. *n/a*

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
✓		If requested?
		To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

	Analytical Method *	Name of Laboratory
Metals	ICP (200.7)	In-house
Cyanide	Spectrophotometric	In-house
Organics	GC/MS	American Interplex
Other	WET testing	Waypoint

Were all wastewater samples analyzed by 40 CFR 136 methods? YES

* Enter the type of Analytical Method used for each group of pollutants. (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe:
They follow 40 CFR 136 & 21st Edition of Standard Methods

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

5 days Conventionals
1week Metals
10 days Organics

✓* ___ Is there an established protocol clearly detailing sampling location and procedures? * Lab tech. has a manual w/each IU's sampling 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:

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)]

✓	Notice or letter of violation	✓	Administrative Order
✓	Setting of compliance schedule	✓	Termination of permit
✓	Injunctive relief	✓	Fines (maximum amount):

civil	$ 1000	/day/violation
criminal	$ 1000	/day/violation
administrative	$ 1000	/day/violation

✓ Imprisonment
✓ Termination of Service
✓ Other: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: None apparent

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: _____
✓		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 Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	No
n/a					

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 (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements
0	0	Reporting requirements
0	0	Pretreatment compliance schedule
0	0	How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled?

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
	✓	Interference?	_____
	✓	Pass through?	_____
	✓	Fire or explosions? (incl. flash point viol.)	_____
	✓	Corrosive structural damage? (incl. pH <5.0)?	_____
	✓	Flow obstructions?	_____
	✓	Excessive flow? or pollutant concentrations?	_____
	✓	Heat problems?	_____
	✓	Interference due to oil or grease?	_____
	✓	Toxic fumes?	_____
	✓	Illicit dumping of 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)]
0		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:

	Number	Amount
Civil		$ 0
Administrative		$ 0
Total	None	$ 0

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES	NO	
✓ &	✓*	Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

Could be better segregated/tabbed per documents' main issue.

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? "would be kept in locked file"
___	✓	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 II: PROGRAM ANALYSIS AND PROFILE

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:
~1.5 FTEs

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
✓		POTW general operating fund (GOF)	100
✓		IU permit fees (back to GOF)	
✓		monitoring charges (")	
✓		industry surcharges (")	
___		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:	

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

YES	NO		If no, explain
✓	___	Legal assistance	
✓	___	Permitting	
✓	___	IU inspections	
✓	___	Sample collection	
✓	___	Sample analyses	
✓	___	Data analysis, review and response	
✓	___	Enforcement	
✓	___	Administration (inc. record keeping /data management)	

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	Isco samplers, etc
✓	___	Safety equipment	Hard hats, eye protection, etc.
✓	___	Vehicles	3 Trucks
✓	___	Analytical equipment	Standard conventionals' & ICAP

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. 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.):
   Infomercials; 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 Evaluation

FILE #: 1 Industry Name: Kiswire File/ID No. 17
Industry Address: 5100 Industrial Park South 71602
Industry Description: Steel Wire Drawing for Belted Tires and Pressure Hoses
Industrial Category: Metal Finisher 40 CFR 433 SIC/NAICS Codes: 3315/314994
Avg. Total Flow (gpd) 225,250 Avg. Process Flow (gpd) 173,700

Industry visited during audit: YES

Comments: _____

FILE #: 2 Industry Name: Aramark Uniform Svc File/ID No. 35
Industry Address: 5508 Jefferson Pkwy
Industry Description: Industrial Laundry
Industrial Category: N/A 40 CFR N/A SIC/NAICS Codes: 7218/812332
Avg. Total Flow (gpd) 49,050 Avg. Process Flow (gpd) _____

Industry visited during audit: YES

Comments: _____

FILE #: 3 Industry Name: Stant Manufacturing, Inc File/ID No. 43
Industry Address: 5300 Jefferson Parkway
Industry Description: Mfg Fuel and Radiator Caps for Automotive Industry
Industrial Category: Metal Finisher 40 CFR 433 SIC Code/NAICS codes: 3471/336390
Avg. Total Flow (gpd): 17,000 Avg. Process Flow (gpd) 9,000 (batch)

Industry visited during audit: YES

Comments: _____

FILE #: 4 Industry Name: U.S. Steel File/ID No. 5
Industry Address: 5505 N. Jefferson Pkwy
Industry Description: Electroplating & mfg steel pipe fittings
Industrial Category: Metal Finishing 40 CFR 433 SIC/NAICS Codes: 3498/332996
Avg. Total Flow (gpd): 15,400 Avg. Process Flow (gpd): 2,300 (batch)

Industry visited during audit: NO

Comments: _____

Section III: Industrial User File Evaluation

A. Industrial User Characterization

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	
2. Is the user subject to categorical pretreatment standards?	✓	no	✓	✓	
a. New source or existing source (NS or ES)?	NS	n/a	ES	ES	
b. Is this IU one identified as having P^2 potential?	no	no	no	no	

B. Control Mechanism *(see Attch. A-2 for example)*

1. Does the file contain an *(see Attch. A-3 for example)* application for a control mechanism?	✓	✓	✓	✓	
If yes, what is the application date?	6/14	8/13	8/13	8/13	
Does it ask for Pollution Prevention information?	no	no	no	no	
2. Does the file contain a permit?	✓	✓	✓	✓	
Permit Expiration Date?	6/19	9/18	9/18	9/18	
Is a fact sheet included? *(see Attch. A-4 for example)*	1	1	1	1	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	1, 4	3	1	1	
e. Appropriate self-monitoring requirements?	2	2	2	2	
f. Sampling frequency?	✓	✓	✓	✓	

Comments: 1) These IUs are New source (PSNS) Metal Finishers, but have PSES permit limits; 2) City does all IU self-monitoring; 3) IU is not subject to Fed. TTO limits but a TTO limit appears in permit (see Attch. A-5c); and 4) IU's Cd limit is wrong & its TTO limit is not adjusted for the CWF (see Attch. A-2c).

Section III: Industrial User File Evaluation

		File 1	File 2	File 3	File 4	File 5
g.	Sampling locations?	2	2	2	2	
h.	Requirement for flow monitoring?	1	no	1	1	
i.	Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j.	Applicable IU reporting requirements?	✓	✓	✓	✓	
k.	Standard conditions for:					
	Right of Entry?	✓	✓	✓	✓	
	Records retention?	✓	✓	✓	✓	
	Civil and Criminal Penalty provisions?	3	3	3	3	
	Revocation of permit?	4	4	4	4	
l.	Compliance schedules/ progress reports	n/a	n/a	n/a	n/a	
m.	General/Specific Prohibitions?	✓	✓	✓	✓	
n.	Where technologically and economically achievable, are P^2 aspect included?	no	no	no	no	

C. Application of Standards

1.	Has the IU been properly categorized?	✓	✓	✓	✓	
2.	Were both Categorical Standards and Local Limits properly applied?	no	no	no	no	
3.	Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	
4.	For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	n/a	n/a	n/a	

Comments: 1) City does all monitoring and recording of flow; 2) Vague sampling point description; needs footages from fixed reference points; 3) Penalty provisions need to be revised as current IU permit language jumps straight to "guilty of a misdemeanor" (see Attch A-2k). The City's own Program's ERP's ERG gives various (less harsh) enforcement options in the case of low level permit violations; and 4) City uses the term "Termination of permit" in place of "Revocation…"

Section III: Industrial User File Evaluation

	File 1	File 2	File 3	File 4	File 5
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	1	n/a	n/a	n/a	
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	
7. Is the Control Authority applying a bypass provision to this IU?	no	no	no	no	
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?					
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	

Comments: 1) IU's TTO limit was not adjusted to take into account the dilution factor using the combined wastestream formula (see Attch. A-2c).

Section III: Industrial User File Evaluation

	File 1	File 2	File 3	File 4	File 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	2	1	2	2	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	✓	✓	✓	✓	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections *(See Attch. A-6 for example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	8/15	5/15	3/16	5/16	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	no	no	no	no	
g. Evaluation of self-monitoring equipment and techniques?	n/a	n/a	n/a	n/a	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	3 no	no	no	no	

Comments: 1) IU has a TTO limit which is not applicable (see Attch. A-5c); 2) All Metal Finishers have submitted questionable TOMPs (see Attch. A-7) with no approval letter found from the City. The City is only sampling their TTOs 1/yr; 3) See Attch. A-7b for a vague "sludge" control plan.

Section III: Industrial User File Evaluation

	File 1	File 2	File 3	File 4	File 5
f. Evaluation of pretreatment facilities?	1	1	1	1	
i. Manufacturing/processing facilities?	no	no	no	no	
j. Chemical handling and storage procedures?	2	2	2	2	
k. Chemical spill prevention areas?	3	3	3	3	
l. Hazardous waste storage areas and handling procedures?	✓	✓	✓	✓	
m. Sampling procedures?	n/a	n/a	n/a	n/a	
n. Laboratory procedures?	n/a	n/a	n/a	n/a	
o. Monitoring records?	n/a	n/a	n/a	n/a	
p. Evaluation of Pollution Prevention opportunities?	5	5	5	5	
q. Control Authority inspector signature?	✓	✓	✓	✓	
10. Does the file contain self-monitoring reports?	4 n/a	n/a	n/a	n/a	
11. Does the file include:					
a. BMR?	Arch.	n/a	Arch.	Arch.	
b. 90-Day Report?	Arch.	n/a	Arch.	Arch.	
c. All periodic reports?	4 n/a	n/a	n/a	n/a	
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	
12. Did the IU report on all required parameters?	n/a	n/a	n/a	n/a	
IU Self-Monitoring and Reporting					
13. Did the IU comply with the required sampling frequency(s)?	n/a	n/a	n/a	n/a	
14. Did the IU report flow?	n/a	n/a	n/a	n/a	
15. Did the IU comply with the required reporting frequency(s)?	n/a	n/a	n/a	n/a	

Comments: 1) Vague, should include more narrative on conditions of equipment, leaks, standard operating procedures, etc.; 2) Needs to have more discussion on chem handling procedures; 3) Could be more comprehensive; 4) City does all IU monitoring; 5) Waste Minimization only section close to P2 "opportunities and it was blank.

Section III: Industrial User File Evaluation

	File 1	File 2	File 3	File 4	File 5
16. For all SIUs, are self-monitoring reports signed and certified?	n/a	n/a	n/a	n/a	
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	
18. Has the IU developed a Slug Control and Prevention Plan?	no	no	✓	no	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	n/a	n/a	n/a	n/a	
b. Did POTW respond to the spill?	n/a	n/a	n/a	n/a	

. **Enforcement**

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	✓	✓	✓	✓	
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	✓	n/a	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	3	0	2	0	
3. Did the City notify the IU within 24 hours of becoming aware of the violation(s)?	no	n/a	no	n/a	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	✓	n/a	✓	n/a	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	

Section III: Industrial User File Evaluation

	File 1	File 2	File 3	File 4	File 5
6. Was the IU notified of all violations?	1	n/a	1	n/a	
7. Was follow-up enforcement action taken by the Control Authority?	nn	nn	nn	nn	
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	✓	--	✓	--	
10. Is there a compliance schedule? If yes:	n/a	n/a	n/a	n/a	
11. Were there any compliance schedule violations?	n/a	n/a	n/a	n/a	
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	✓	✓	✓	
g. others (specify)	--	--	--	--	
13. Was the SIU published for SNC?	no	no	no	no	
Date of publication.	n/a	n/a	n/a	n/a	

Comments: 1) Not within 24 hrs of becoming aware of IU's violation.

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: Pine Bluff WW Utility NPDES #: AR0033316

Date of Audit: 5/24-26/16 Date entered into ICIS: 8/29/16
(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
YES	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.

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316
Name, address and phone number of industry: Kiswire, 5100 Industrial Drive, 870.247.2444
Type of industry: Mfg and plating of steel wire for tires and reinforced high pressure rubber hose / 40 CFR 433.17
(Include regulatory citation if CIU)

Date/Time of visit: 5/25/16 / 10:30 a.m.

Industry contacts: Mike Barrett, HSE Manager

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

Comments: The industry's primary raw material is 5.5 mm carbon (mostly "80") steel rod which is drawn to create wire for use in steel belted tires and reinforced high pressure hoses. Wire is drawn down to a 0.33 mm diameter final product in some cases through at least 10 drawing blocks.
It is first mechanically descaled, electrochemically pickled (sulfuric acid), rinsed, borax coated and dried (to facilitate lubrication through their 10 stage wire drawing operation). The clean wire is pre-cleaned in NaOH. The "bright" pre-drawn wire is rinsed and dried prior to austenitizing in a patenting furnace then sent through a Pb bath quench process. After quenching, the pre-drawn wire is mechanically cleaned by pulling the wire through anthracite coal. Next, the pre-drawn wire is cooled in a hot water bath. The wire is further air quenched at room temperature, pickled with hydrochloric acid, and rinsed (7 of them). The wire is further rinsed with a sodium hydroxide solution. The cleaned wire is then "thermally diffused" by running drawn wire through a Cu pyrophosphate plating bath, water rinsed, sent through the Zn plating bath and then physically melted onto the steel wire to form the brass plated product.

Visit conducted by: Gilliam/Miles/Carpenter Date Signed: 5/25/16

Allen Gilliam

(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: Kiswire

Additional comments: It is then rinsed and dried prior to final drawing. The final product is stranded and cabled on spools for shipment.

The bead wire is produced in the same manner. This is the steel (bronze [tin & Cu] plated) wire that strengthens a tire's "structure" next to the rim.

The IU self-samples the regulated wastewater only.

The City is using the Combined Wastestream Formula to determine alternative limits.

The mainly rinse wastewater is treated by standard chemical precipitation, pH/floc, clarifier and sand filtration units where the metals are removed then filter pressed. 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 [questions about the IU diluting the regulated wastestream by using a city water spray to control foaming in the flume.].

The IU has a flow totalizer on its process flow and one on its total (to City) flow.

The City samples the total flow from the IU at this lift station.

Various P2 practices are in operation: air knives, wet air scrubbers, counter-current flows to mention a few.

Centrifuges are used to treat the paraffin based lubricating emulsions for re-use and longevity.

[1]The IU developed a very general TOMP, but no "approval" letter could be located.

Time constraints did not allow for a most comprehensive site visit write-up; therefore, the above may not be totally accurate, but should be supplemented by the IU for the City's file constituting a comprehensive narrative process description.

Visit conducted by: Gilliam/Miles/Carpenter Date Signed: 5/25/16

Allen Gilliam

(signature of auditor conducting visit)

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 Services, 5508 Jefferson Parkway, 800.633.8345
Type of industry: Industrial Laundry
(Include regulatory citation if CIU)
Date/Time of visit: 5/25/16 / 1:45 p.m.

Industry contacts: Dewey Holland, Chief Engineer

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

Comments: Trucks from ~32 routes deliver "soil bags" to the facility in the amount of about 20,000 specifically numbered items to identify owners. IU washes/dries about 50 different items ranging from hotel linens, bar towels, floor rubber mats, micro-fiber towels to blue jeans into nine industrial sized washers (250 lb, 675 lb to 900 lb) for cleaning and then placed in one of five driers (4 are 450 lb and one is 600 lb capacity). 330 items hung/hr/employee is expected.

Visit conducted by: Gilliam/Miles/Carpenter Date Signed: 5/25/16

Allen Gilliam

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:

Wastewater is sent to an outside pit then pumped through a heat exchange system; pumped to an overhead "shaker" to remove lint from the wastewater. Lime (floc?) is added to help remove any metals as the wastestream is sent through two cyclones to further remove small fibers. From there, the WW is sent to a tank where pH is adjusted (sulfuric acid) and is discharged to the City. Adequate sampling point.

Since the solid waste is not hazardous, it is mixed with the trash and hauled to a landfill.

The most prevalent pollution prevention practice this IU has is its heat exchange system transferring heat from its driers to pre-heat its wash waters. They estimate they recover about 30% of its heat by using this system.

Visit conducted by: Gilliam/Miles/Carpenter Date Signed: 5/25/16

Allen Gilliam

(signature of auditor conducting visit)

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, 5300 Jefferson Parkway, 870.247.5480 x-281
Type of industry: Mfg fuel, radiator caps and vehicle thermostats/ 40 CFR 433
(Include regulatory citation if CIU)

Date/Time of visit: 5/26/16 / 10:10 a.m.

Industry contacts: Sandra Robinson, HSE Manager & Jared Langston, Metals Supv,

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

Comments: [1]The IU developed a very general TOMP, but no "approval" letter could be located.
Raw material consists mainly of cold rolled steel, SS, brass and bronze in various width and thickness strips in coils fed to their first machining ops
The first machining ops include mainly stamping (21 press machines), forming and machining (processing ~600,000 pieces/day). Thickness can vary from 80 thousandths to 8 thousandths of an inch (used in diaphragms).
A drawing compound is rolled on to reduce friction during the progressive stamping process.
IU runs a three barrel soap cleaning process and a 16 barrel plating process. There are a total of 33 various tanks used in the cleaning/plating/rinsing processes. Time constraints did not allow a comprehensive site visit. The IU's process description may not be accurate to a point as only general processes and treatment were discussed.

Visit conducted by: Gilliam/Miles/Carpenter Date Signed: 5/26/16

(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:

The IU produces auto gas and radiator caps and thermostats receiving plastic pellets forcing the pellets through an extruder to produce plastic parts for the caps/thermostats.

Some of the metal parts are zinc plated. The IU assembles the parts to make the final products. According to the process tank schematic supplied during the site visit, there are 33 tanks filled with various fluids from SS cleaners, chrome sealant, chromate, soak cleaners, electro soak cleaners, pickle tank, zinc bath and numerous rinses. Workpiece flow cannot be shown on the schematic as different pieces may skip several tanks or return to a specific tank depending on the end product's necessary properties. This whole system uses two hoists with a total of 16 barrels.

IU also occasionally uses 3 vibratory tumblers from which its wastewater flows to the below grade pit in "pretreatment"

IU rep indicated all rinse overflows go directly to pretreatment which is separated into treatment tanks for the soak, acid and Zn rinses.

Pretreatment is typical chemical precipitation with pH adjustment, flocculants, clarifier followed by a filter press with supernatant being transferred back to the main below grade 32,000 gallon pit.

IU is ISO 14001 certified and an internal EMS (environmental management system).

Adequate sampling site. IU rep more than willing to exchange information regarding all processes.

Overall housekeeping looked in good order.

Visit conducted by: Gilliam/Miles/Carpenter Date Signed: 5/26/16

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

PINE BLUFF WASTEWATER UTILITY

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

AUTHORIZATION FOR DISPOSAL OF LIQUID WASTE

Brenda's Portable Toilets does hereby certify that it will dispose of only domestic (portable toilet) waste into the Pine Bluff Wastewater Utility's (PBWU) collection system. This authorization only provides for the disposal of portable toilet waste. Any gravel, grit, sand, grease trap and sludge wastes are not permitted for disposal as required by City Ordinance.

I agree to dispose of wastes at the Industrial Park Pump Station located at N. Hutchison Street in Jefferson Industrial Park. The cost for this disposal is $200.00 dollars per month. There is a $250.00 permit authorization fee based on an annual basis. I further understand that I am not permitted to dispose of other wastes including grease traps, septic tank, or any hazardous wastes. I further understand that Pine Bluff Wastewater Utility reserves the right to randomly sample the hauled waste to determine that it is acceptable for disposal. If samples reveal that the hauled waste is unacceptable, I will be required to cease discharge immediately and pursue some other disposal alternative acceptable by the *Arkansas Department of Environmental Quality.*

Additionally, Pine Bluff Wastewater Utility reserves the right to check references and regulatory agencies records concerning my company's history. If this information indicates that my company may have caused or has the potential to cause a problem in the PBWU collection system then this authorization may be rejected. If requested, I will immediately provide any information regard the origin of any waste (manifest forms, etc.) disposed of into the wastewater collection system. Any deviation or refusal to comply with the requirements stated in this certification, local ordinances, or directive issued by Pine Bluff Wastewater Utility will result in the immediate termination of disposal privileges into the collection system.

List other requirements or conditions regarding this authorization below:

This authorization is effective upon the signatures of authorized representatives of both Brenda's Portable Toilets and Pine Bluff Wastewater Utility.

Murphy Trammell, Brenda's Portable Toilets — Date: 5-13-16

Pine Bluff Wastewater Utility — Date: 5/10/16

Expiration Date: May 27, 2017

PLEASE RETURN SIGNED CONTRACT TO PINE BLUFF WASTEWATER UTILITY

Attachment A-2

PINE BLUFF WASTEWATER UTILITY

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

WASTEWATER DISCHARGE PERMIT

Kiswire
5100 Industrial Dr. South
Pine Bluff, AR 71602

Permit No. 17

Is hereby authorized to discharge wastewater into the Pine Bluff Wastewater System in accordance with the limitations set forth in this permit. 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].

This permit shall become effective on June 24, 2014 and shall expire at midnight on June 24, 2019.

Signed this 20th day of June, 2014.

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) (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.

Parameter	**Daily MaximumLimits**	**Monthly Average Limitation**	**Monitoring Requirement**	**Sample Type**
Total Flow	225,250 gpd	N/A	4/Month	Daily Totalizer Meter
Process Flow	173,733 gpd	N/A	4/Month	
TSS	300 mg/l	N/A	4/Month	24 hr. Time Composite
pH	5.0 – 11.0 s.u.	N/A	4/Month	Grab
BOD5	300 mg/l	N/A	4/Month	24 hr. Time Composite
O& G	100 mg/l	N/A	4/Month	Grab

A-2b

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

A-2c

FLOW MONITORING EQUIPMENT

The flow meter at the discharge location (KW#17) must be calibrated at least once daily and recorded in the facility's log book. Additionally, flow recordings must be made daily on the process wastewater discharge prior to entering the lift station at the facility.

All information must be made available to the Wastewater Utility at our requests. Flow from both the final discharge location and the process locations must be maintained within the volume limits contained in this permit.

All flow monitoring data must be submitted on the permittee's standard report and submitted to the Wastewater Utility by the first of each month.

MALFUNCTION OF EQUIPMENT

The Wastewater Utility must be notified if any equipment at Kiswire malfunctions or become inoperative preventing compliance to meet your permit. Notification must be provided within 24 hours or becoming aware of such malfunction or inoperable condition.

Any pretreatment device, including the flow meter or sampling equipment, which malfunctions and prevents the industrial user from obtaining data regarding compliance with its permit will be reported. A determination of flow volume discharged at Kiswire must be made available to the Wastewater Utility should the effluent recording flow meter malfunctions. This determination will be made by taking Kiswire's daily water consumption multiplying it by the concentration of each parameter times 8.34 (lbs./gal or water) to calculate a loading limit. A comparison will be made to the loading limitation listed in the permit to determining if full compliance is achieved.

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:

Surcharge =	V X 8.34 [0.1325 (BOD-300) plus 0.0404 (TSS-300) plus 0.0675 (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 must be paid in full prior to the issuance of this permit. 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 **KW #17** All process wastewater collected must be pretreated at the pretreatment facility located on site prior to discharge into the Pine Bluff Wastewater Collection System. This designated discharge point is located at the lift station *(marked designated discharge location)* which conveys all process and sanitary wastewater from the facility into the Pine Bluff Wastewater Collection System.

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. 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.

F) Industrial Users subjected to categorical Pretreatment Standards may be 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) 535-0821
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 international diversion of waste streams from any portion of a industrial user's treatment facility. The permittee is required to comply with the bypass conditions list in 403.17.

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.

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.

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 contaminates. 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.

PERMIT RENEWAL

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

Attachment A-3

Pine Bluff Wastewater Utility

"Serving Our Community while Protecting the Environment"

Pine Bluff Wastewater Utility
1520 South Ohio Street
Pine Bluff, AR 71601
Phone (870) 535-6603
Fax (870) 535-6243

APPLICATION FOR INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

Type of IWP Permit

☐ New
☑ Renewal
☐ Modification

NOTE:
- Unless stated otherwise, all items are to be filled out completely. Your Application will not be considered complete unless every question is answered on this form. If an item is not applicable, indicate by noting "NA" to show that you considered the question.
- Depending upon the adequacy of the data submitted for determining issuance of a permit, additional information may be required. Please read all questions and attached information prior to completing this application.
- If you would like to receive a draft copy of this permit prior to permit issuance please indicate here: ☑ Yes ☐ No

IWP PERMIT NUMBER: 17

PART A: APPLICANT ADDRESS AND CONTACT(S)

► FACILITY/OPERATION

1. Facility Name: Kiswire Pine Bluff, Inc.
2. Mailing Address: 5100 Industrial Drive South

City:	County:	State:	Zip Code:
Pine Bluff	Jefferson	AR	71602

3. Facility Phone Number: 870-247-2444
4. Facility E-mail Address (optional):
5. Address of Operation: Same

City:	State:	Zip Code:

► DESIGNATED FACILITY CONTACT PERSON

6. Designated Contact Name (first, last): Mike Barnett
7. Title: EHS Manager
8. Mailing Address: Same

City:	State:	Zip Code:

9. Phone Number: 870-247-2444 x 792
10. E-mail Address (optional): mike.barrett@Kiswire.com

► DESIGNATED SIGNATORY AUTHORITY

NOTE: Signatory Authorization is defined in 327 IAC 5-16-5(b)

11. Designated Signatory Authority Name (first, last): Charley Chen
12. Title: Plant Manager
13. Address: Same

City:	State:	Zip Code:

14. Phone Number: 870-247-2444 ext. 701
15. E-mail Address (optional): Charley.Chen@Kiswire.com

(Continued on page 2)

► **RECEIVING POTW:** Boyd Point Wastewater Facility		
16. Contact Name: Vincent Miles	**17.** Title: Environmental Compliance Supervisor	
18. Address: 900 Island Harbor Marina Road		
City: Pine Bluff	State: Arkansas	Zip Code: 71602-9543
19. Phone Number: (870) 535-0821	**20.** E-mail Address (optional):	Vincent@pbwastewater.com

PART B: OPERATION SCHEDULE

► **SHIFT INFORMATION**

21. Days of operation (check all that apply): ✓Mon. ✓Tue. ✓Wed. ✓Thu. ✓Fri. ✓Sat. ✓Sun.

22. Hours per day of operation: 24

23. Number of shifts per day: 2

24. Total number of employees per shift: 230

► **YEARS OF ESTABLISHMENT**

25. Date that facility began (or will begin) operation (mm/dd/yyyy): 10-1-91

► **FACILITY INFORMATION**

28. Is your facility's manufacturing expected to expand within the following twelve months? ☐ Yes ☒ No

29. If yes specify: _____

a. Number of Wastewater Treatment Operators or responsible personnel? 5

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

A shift Tim Anderson, B shift Shawn Noriega
C shift Jon Topping D shift Eddie Withers
Alex Weaver - wastewater manager

30. Does your facility currently have any pretreatment equipment in use? ☑ 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)

Continous flow system - Cyanide batch treatment tank, 2 CN Reactors tanks, 1, Alkaline tank, 1, Acid tank, 2 General Rinse tanks & Final Rinse tank & sludge thickner - electronically controlled & set to alarm if problems occur

33. Is facility regulated by other environmental control permits? ☑ Yes ☐ No

If yes, please specify: Air & Storm water

(Continued on page 3)

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PART C: WASTEWATER DISCHARGE INFORMATION

34. Sanitary Sources 51,517 gallons/day

Processes Sources 173,733 gallons/day

Other (please specify on separate sheet) _____ gallons/day

List Total Flow 225,250 gallons/day

35. Is your facility's wastewater discharge?

Continuous ✓

Batch _____

Other _____

36. Does your facility's wastewater fluctuate daily, monthly, or seasonally? ☐ Yes ☒ No

If yes, when is flow the greatest? _____

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

NONE

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

PART D: COMPLIANCE HISTORY

38. Is your facility regulated by any federal Categorical Pretreatment Standard? (i.e., Electroplating-Metal Finishing, etc.)

☑ Yes ☐ No

If yes, please explain: Electroplating - Metal finishing

39. 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:

3-5-14 process tank drain valve open on Acid TANK, killed flocin system → sludge overflow & caustic line frozen causing pH Neutralization problems

40. Is your facility currently under any compliance schedule or time period provided by the Wastewater Utility to meet compliance With the pretreatment program? ☑ Yes ☐ No

(Continued on page 4)

A-3c

PART E: SPILL PREVENTION

41. Do you have chemical storage containers, bins, or ponds at your facility?	☑ Yes	☐ No
42. Do you have floor drains in your manufacturing or chemical storage area(s)?	☑ Yes	☐ No

If yes, identify where they discharge to:

Waste water Basement - Pretreatment

PART F: AUTHORIZED REPRESENTATIVE STATEMENT

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

Charley CHEN Plant manager

~~Mike Barrett EHS manager~~

Name/Title

6-6-14

Date (mm/dd/yyyy

~~M A Barrett~~

Signature

870-247-2444 ext ~~292~~ 701

Phone# ((xxx-xxx-xxxx)

****** PLEASE DO NOT WRITE BELOW THIS LINE ******

Approved By: D. Miles

Title: E.I. Supervisor

Date: June 16, 2014

(Continued on page 5)

A-3d

ATTACHMENT: POLLUTANTS OF CONCERN

PRIORITY POLLUTANTS LIST
(40 CFR 403, APENDIX B)

	HEAVY METALS AND INORGANICS
	Antimony (Sb) md
	Arsenic (As)
	Beryllium (Be)
	Cadmium (Cd)
	Chromium (Cr)
	Copper (Cu)
	Cyanides (CN)
	Lead (Pb)
	Mercury (Hg)
	Nickel (Ni)
	Selenium (Se)
	Silver (Ag)
	Thallium (Tl)
	Zinc (Zn)

	TOXIC ORGANICS: ETHERS
	Ether, bis (2-chloroethyl)
	Ether, bis (2-chloroisopropyl)
	Ether, 2-chloroethyl vinyl
	Ether, 4-chlorophenyl phenyl
	Ether, 4-bromophenyl phenyl
	Bis (2-chloroethoxy) methane

	TOXIC ORGANICS: PHTHALATES
	Phthalate, dimethyl; DMP
	Phthalate, diethyl, DEP
	Phthalate, di-n-butyl; DBP
	Phthalate, di-n-octyl; DOP
	Phthalate, bis (2-ethylhexyl); DEHP
	Phthalate, butyl benzyl; BBP

	TOXIC ORGANICS: NITROGEN COMPOUNDS
	Nitrosamine, dimethyl
	Nitrosamine, diphenyl
	Nitrosamine, di-n-propyl
	Benzidine
	Benezidine, 3,3'-dichloro
	Hydrazine, 1,2-diphenyl
	Acrylonitrile

	TOXIC ORGANICS: PHENOLS
	Phenol
	Phenol, 2-chloro
	Phenol, 2,4-dichloro-2,4-DCP
	Phenol, 2,4,6-trichloro
	Phenol, pentachloro-; PCP
	Phenol, 2-nitro
	Phenol, 4-nitro
	Phenol, 2,4-dinitro-;2,4-DNP
	Phenol, 2,4-dimethyl
	m-Cresol, p-chloro
	o-Cresol, 4-6-dinitro-;DNOC

	TOXIC ORGANICS: AROMATICS
	Benzene
	Benzene, chloro
	Benzene, 1,2-dichloro
	Benzene, 1,3-dichloro
	Benzene, 1,4-dichloro
	Benzene, hexachloro-;HCB
	Benzene, ethyl
	Benzene, nitro
	Toluene
	Toluene, 2,4-dinitro-;DNT
	Toluene, 2,6-dinitro
	Benzene, 1,2,4-trichloro

	TOXIC ORGANIC: POLYNUCLEAR AROMATIC HYDROCARBONS (PAHs)
	2-Chloronaphthalene
	Benzo (a) anthracene
	Benzo (b) fluoranthene; B (b) F
	Benzo (k) fluoranthene; b (k) F
	Benzo (a) pyrene; B (a) P
	Ideno (1,2,3-cd) pyrene; IP
	Dibenzo (a,h) anthracene; DBA
	Benzo (ghi) perylene
	Acenaphthene
	Acenaphthylene
	Anthracene
	Chrysene
	Fluoranthene
	Fluorene
	Naphthalene
	Phenanthrene
	Pyrene

	TOXIC ORGANICS: PCB's
	PCB- 1016; Aroclor 1016
	PCB- 1221; Aroclor 1221
	PCB-1232; Aroclor 1232
	PCB-1242; Aroclor 1242
	PCB- 1248; Aroclor 1248
	PCB- 1254; Aroclor 1254
	PCB- 1260; Aroclor 1260

	TOXIC ORGANICS : HALOGENATED ALIPHATIC HYDROCARBONS
	Methane, chloro-; methyl chloride
	Methane, dichloro-; Methylene chloride
	Methane, trichloro-; chloroform
	Methane, tetrachloro-; Carbon tetrachloride
	Methane, bromo-; methyl bromide
	Methane, dichlorbromo
	Methane, chlorodibromom
	Methane, tribromo-; bromoform
	Ethane, chloro

A-3e

(Continued on page 6)

ATTACHMENT: POLLUTANTS OF CONCERNS (CONTINUED)	
TOXIC ORGANICS: HALOGENATED ALIPHATIC HYDROCARBONS	**TOXIC ORGANICS: PESTICIDES**
☐ Ethane, 1,1-dichloro	☐ alpha-Endosulfan
☐ Ethane, 1,2-dichloro	☐ Endosulfan
☐ Ethane, 1,1,1-trichloro	☐ Sulfate beta-
☐ Ethane, 1,1,2-trichloro	☐ cyclohexanes:
☐ Ethane, 1,1,2,2-tetrachloro	☐ alpha-BHC
☐ Ethane, hexachloro	☐ beta-BHC
☐ Ethylene, chloro-; Vinyl Chloride	☐ gamma-BHC
☐ Ethylene, 1,1-dichloro-; 1,1-DCE	☐ Delta-BHC
☐ Ethylene, 1,2-trans-dichloro	☐ Linane Aldrin
☐ Ethylene, trichloro-;TCE	☐ HEOD 4,4'
☐ Ethylene, tetrachloro-; Perchloroethylene	☐ EDDT;p,p'-DDT
☐ Propane, 1,2-dichloro	☐ 4,4'-DDD; pp'-DDD; pp'-TDE
☐ Propylene, 1,3-dichloro	☐ Endrin
☐ Butadiene, hexachloro-; HCBD	☐ Endrin
☐ Cyclopentadiene, hexachloro-; HCCPD	☐ aldehyde
	☐ epoxide Chlordane
TOXIC ORGANICS: OXYGENATED COMPOUNDS	☐ Toxaphene
☐ Acrolein	☐
TOXIC ORGANICS: MISCELLANEOUS	
☐ Isophorone	
☐ 2,3,7-8-tetrachlorodibenzo-p-dioxin; TCDD; dioxin	

A-3f

Attachment A 4

PINE BLUFF WASTEWATER UTILITY

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

PERMIT FACT SHEET

Industry Name: Kiswire Pine Bluff, Inc.

Industry Address: 5100 Industrial Drive South

Contact Person: Mike Barrett

Categorical User (X) Yes ( ) No

New Permit ( ) Permit Renewal (X) Permit Modification ( )

Has Permit fee been paid ( ) Yes (X) No

Effective Date:

Categorical Type

(X) Metal Finishing

(X) Electroplating

( ) Iron/ Steel

( ) Transportation/ Equipment Cleaning

( ) Metal Products & Machinery

Estimated Flow: 225,250 gpd (total Flow)
51,517 gpd (sanitary) 173,733 gpd (process)

Discharge Location: Pump Station located at Kiswire Pine Bluff, Inc. on the North side of the building.

Documentation:

1. Permit Application
2. Flow Description and map of pretreatment system
3. Hazardous Waste Manifest Report (3)
4. Calculation sheet for metal limits

Process Description: Manufacture steel cord for steel belted radial tires and hose wire for high pressure hoses.

The combined wastestream formula was used to calculate the limits for the permit. Calculations are provided to Industrial User to review if there are any questions on the following pages....

CWF $\frac{T - D}{T}$ = $\frac{199100 - 40791}{199100}$ = .79

Average Daily Wastewater Flows by year

Year	Sanitary D	Process	Total T
2009	42675	168986	211661
2010	41275	161746	203021
2011	40968	156571	197539
2012	41275	149664	190939
2013	39856	153569	193425
2014	38698	159259	197957

40791 Avg

158299 ÷ 199093 = 0.79

1194542/6 Avg = .1991 MGD

CFR Limit × (Sanitary Flow / Total Flow)

158299 / 199093 = 0.8

2009 = 0.79
2010 = 0.79
2011 = 0.79
2012 = 0.78
2013 = 0.79
2014 = 0.80

0.79

~~CWF CFR Limit × (Sanitary Flow / Avg Flow)~~

70000 / 159299 = 0.44

A 4c

PINE BLUFF WASTEWATER UTILITY

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

	Max for any 1 day (PSES ~~AL~~)			Monthly average (PSES ~~AL~~)		
Cadmium	0.69	X 0.8	= 0.55 mg/l	0.26	X 0.8	= 0.21 mg/l
Chromium	2.77	X 0.8	= 2.22 mg/l	1.71	X 0.8	= 1.37 mg/l
Copper	3.38	X 0.8	= 2.70 mg/l	2.07	X 0.8	= 1.66 mg/l
Lead	0.69	X 0.8	= 0.55 mg/l	0.43	X 0.8	= 0.34 mg/l
Nickel	3.98	X 0.8	= 3.18 mg/l	2.38	X 0.8	= 1.90 mg/l
Silver	0.43	X 0.8	= 0.34 mg/l	0.24	X 0.8	= 0.19 mg/l
Zinc	2.61	X 0.8	= 2.09 mg/l	1.48	X 0.8	= 1.18 mg/l
Cyanide	1.20	X 0.4	= 0.48 mg/l	0.65	X 0.4	= 0.26 mg/l

Cadmium	0.55	X 8.34	X 0.2	= 0.91 lb/day	0.21	X 8.34	X 0.2	= 0.35 lb/day
Chromium	2.22	X 8.34	X 0.2	= 3.70 lb/day	1.37	X 8.34	X 0.2	= 2.28 lb/day
Copper	2.70	X 8.34	X 0.2	= 4.50 lb/day	1.66	X 8.34	X 0.2	= 2.77 lb/day
Lead	0.55	X 8.34	X 0.2	= 0.92 lb/day	0.34	X 8.34	X 0.2	= 0.57 lb/day
Nickel	3.18	X 8.34	X 0.2	= 5.30 lb/day	1.90	X 8.34	X 0.2	= 3.17 lb/day
Silver	0.34	X 8.34	X 0.2	= 0.57 lb/day	0.19	X 8.34	X 0.2	= 0.32 lb/day
Zinc	2.09	X 8.34	X 0.2	= 3.49 lb/day	1.18	X 8.34	X 0.2	= 1.97 lb/day
Cyanide	0.48	X 8.34	X 0.2	= 0.80 lb/day	0.26	X 8.34	X 0.2	= 0.43 lb/day

Attachment A-5

PINE BLUFF WASTEWATER UTILITY

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

WASTEWATER DISCHARGE PERMIT

Aramark
5508 Jefferson Parkway
Pine Bluff, AR 71602

Permit No. 35

Is hereby authorized to discharge wastewater into the Pine Bluff Wastewater System in accordance with the limitations set forth in this permit. 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].

This permit shall become effective on September 3, 2013 and shall expire at midnight on September 3, 2018.

Signed this 28th day of August, 2013.

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

A-5b

Parameter	Daily Maximum Limitation	Monitoring Frequency	Sample Type
Barium	5.00 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

1. Values are surcharged in accordance with local Sewer Use Ordinance 6146 if the values exceed the limitations noted in this permit.

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.

(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 following formula:

Surcharge =	V X 8.34 [0.1325 (BOD-300) plus 0.0404 (TSS-300) plus 0.0675 (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 the month.

A **$1,250** permit fee will be assessed to the Permittee. This fee must be paid in full prior to the issuance of this permit. 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 ARM#35. All process wastewater collected must pretreated at the pretreatment facility located on site prior to discharge into the Pine Bluff Wastewater Collection

System. The sampling location is marked as the designated "sampling point" for routine monitoring by the Pine Bluff Wastewater Utility.

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

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.

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.

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.

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 contaminates 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.

PERMIT RENEWAL

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

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Attachment A-6

PINE BLUFF WASTEWATER UTILITY

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

INDUSTRIAL INSPECTION REPORT

SECTION 1: GENERAL INFORMATION

Name of Industry KISWIRE SIC 3315

Street Address 5100 INDUSTRIAL DRIVE SOUTH

City, State PINE BLUFF, AR 71602 Established 1990

List the Name and Position of Contact Official:
MIKE BARRETT, EHS MANAGER

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

GREG SCHREFF - PLANT MANAGER Address: 205 GRIZZLY BEARS

City: WHITE HALL

State: ARKANSAS 71602

Describe the Manufacturing Operation
MANUFACTURE STEEL CORDS FOR STEEL BELTED RADIALS. THE OTHER PRODUCT IS HOSE WIRE FOR HIGH PRESSURE HOSES.

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

105 tons/ day 40,000 tons/year

Number of Shifts 4

Overall Employee Count 320

Employees per shift	56	56	56	56
	1st	2nd	3rd	4th

Comments:

1ST 6:00 A.M. - 6:00 P.M	1ST WEEK -WORK 2 DAYS; OFF 3DAYS
2ND 6:00 P.M. - 6:00 A.M.	2ND WEEK - WORK 3 DAYS; OFF 2 DAYS
DAY SHIFT 6:00 A.M. - 2:30 P.M.	MAINTENANCE

SECTION 2: REPORTING REQUIREMENTS

Is Industry governed by a Categorical Pretreatment Standard?

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

METAL FINISHING- ELECTROPLATING

Does Industry have an current Industrial Discharge Permit?

(X) Yes ( ) No Permit Number 17

Expiration Date JUNE 24, 2019

Does Industry have copies of Ordinance 4942, 5174, 5557 and 5502?

(X) Yes ( ) No

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

(X) Yes ( ) No

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

TOTAL FLOW	LEAD
pH	ZINC
PROCESS FLOW	TOTAL CYANIDE
COPPER	

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:

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

AMERICAN INTERPLEX, 8600 KANIS ROAD LITTLE ROCK, AR 72204

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

(X) Yes ( ) No

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

Wastewater Analytical Report	43	(July 2014 - June 2015)
Wastewater Discharge Permit	1	
Self-Monitoring Reports	54	
Chain of Custody Reports	108	(July 2014 - July 2015)
Baseline Monitoring Report	NA	*(For Categorical Users)*
Toxic Organic Management Plan	1	*(For Categorical Users*
Solvent Management Plan	1	
Hazardous Waste Manifest	67	(July 2013 - June 2014)
Notices of Noncompliance/Violations	0	
Specific Enforcement Actions	0	

Are their plumbing plans or maps, which adequately describe the current layout of the facility?

(X) Yes ( ) No

Where are these maps kept?
MAINTENANCE OFFICE

Is flow measured at your industry?

(X) Yes ( ) No If yes, describe how flow is measured?

MAIN SEWER LIFT IS A DOPPLER TOTALIZER

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

(X) Yes ( ) No

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

SECTION 3: WASTE MINIMIZATION

Describe any steps or techniques, which have been utilized at the Industry to minimize waste.

ELIMINATED CYANIDE FROM WASTE STREAM. DELISTED WASTEWATER TREATMENT SLUDGE RECYCLING WASTE MATERIAL. 20 DRUM PER YEAR OF COPPER SLUDGE. ALSO RECYCLED PLASTIC AND CARDBOARD PRODUCTS.

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

10% copper sludge

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

(X) Yes ( ) No (ISO 14001 - THICK BOOK, HAVE COPY ON FILE)

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

N/A

SECTION 4: COMPLIANCE INFORMATION

Is the Industry currently under any type of compliance schedule?

( ) Yes (X) No

If yes, please provide a description below:

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?

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?

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

(X) Yes ( ) No

THEY HAVE CONTINUOUS FLOW SYSTEM CONSISTING OF COLLECTION POINTS FOR ACIDIC WASTE. THEY HAVE NEUTRALIZATION AND METAL PRECIPITATION TANKS. THEY HAVE FLOCULATION EQUIPMENT. THE SYSTEM ALSO HAS SLUDGE SEPERATION AND HANDLING EQUIPMENT INCLUDING 2 CLARIFIERS, SLUDGE THICKNER AND A FILTER PRESS. INSTALLED BRAND NEW SYSTEM THIS MONTH.

(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*
MIKE BARRETT	*ENVIRONMENTAL/SAFETY MANAGER*
RANDY WHITESIDE	*QUALITY CONTROL LAB SUPERVISOR*
EDDIE WITHERS	*WASTEWATER OPERATOR*
SHAWN NORIEGA	WASTEWATER OPERATOR
JOHN RUDDER	*WASTEWATER OPERATOSR*
MIKE REED	MAINTENANCE/WASTEWATER MANAGER
TIM ANDERSON	*WASTEWATER TECH OPERATOR*
JON TOPPING	*WASTEWATER OPERATOR*

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

ON THE JOB TRAINING. THEY ARE REQUIRED TO ATTEND RCRA TRAINING HAZMAT, SHIPPER OF HAZARDOUS TRAINING AND INDUSTRIAL WASTEWATER LICENSE.

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)*

SECTION 5: PLANT OBSERVATION

Are there Material Safety Data Sheets for each chemical used?

(X) Yes ( ) No

How is this information kept?

ELECTRONICALLY STORED ON COMPUTER. ADDITIONAL COPIES OF PERTINENT MSDS ARE KEPT MSDS ARE KEPT THROUGHOUT THE PLANT.

Are their 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	( ) Yes	(X) No
Leaks from Chemical Storage Tanks	( ) Yes	(X) No
Stacks of Used Chemical Storage Tanks	(X) Yes	( ) No
Spills, or Corrosion in the Chemical Storage Area	( ) Yes	(X) No

How often are Chemicals used or disposed of?
USED CHEMICALS DAILY/ DISPOSED CHEMICALS BI-MONTHLY.

Does the Industry store any Hazardous Waste?

(X) Yes ( ) No

Briefly describe how this waste is handled?
STORED IN 20 YRD. ROLL OFF HAMPER, TRANSPORTED TO AN EPA APPROVED LANDFILL.

How often are Hazardous Wastes Disposed of ?

2 TIMES/WEEK

List latest Disposal Date and Company receiving this waste:

Date: AUGUST 21, 2015

Company Name: CLEAN HARBORS LONE MOUNTAIN LLC

Address: ROUTE 2 BOX 170

City, State, Zip WAYNOKA, OK 73860

Phone # (580) 697-3500

PBWU ENVIRONMENTAL INSPECTOR: Stacy Carpenter Stacy J Carpenter

DATE & TIME: 09/18/15; 1000 HRS

COMPANY OFFICIALS PRESENT DURING INSPECTION:

Name	Title	Signature
MIKE BARRETT	EHS MANAGER	SIGNATURE ON FILE

SECTION 6: RECOMMENDATIONS AND ACTIONS NEEDED

Section 1: General Information

Section 2: Reporting Requirements

Section 3: Waste Minimization

Section 4: Compliance Information

Section 5: Plant Observation

Other Comments:

Attachment A-7

EMS
Rev 01
9-18-15

Attachment A

Total Toxic Organics & Solvent Management Plan

Process: High carbon wire drawing, heat-treating, brass plating, fine drawing, twisting and cabling of steel cord for the automotive tire and hydraulic hose industry.

To/Solvents Used: Various paints, adhesive, lubricants, cleaner/remover, plastics, hardener, and products.

Method of Disposing:

Most of the TO/Solvents used in our facility evaporate or harden during use. All waste and remnants are contracted (NO. 1-236009) by Safety-Kleen with a certificate of assurance and indemnification to transport store, recycle, reclaim, and dispose of material s from our facility in accordance with all applicable state and federal laws and regulations.

Containment steps to prevent TO/Solvents from entering Municipal wastewater system:

- The use of TO/Solvent products are in small, controllable quantities
- Restricted use of TO/Solvent products in areas associated with the municipal waste collection system (wastewater treatment system, sewer lift, etc.)
- If a TO/Solvent product is spilled or released, the Emergency Response and Contingency Plan will be implemented and trained /authorized HAZMAT employees will contain /clean –up spill or release immediately. These contained waste materials will then be disposed of according to state and federal regulation
- Good housekeeping in areas associated with municipal wastewater system.

Emergency contact information if an accidental spill occurs

Mike Barrett Office 870-247-2444 ext 792

Cell 870-692-5144

Alternate contact

Mike Reed Office 870-247-2444 ext 747

Cell 870-267-3014

Kiswire Pine Bluff Sludge Control Plan

According to 40 CFR 403.8(f)(2)(v), POTW's are required to evaluate each Significant Industrial User (SIU) at least once every two years to determine if a plan to control slug discharges is needed. Under this requirement a slug discharge is defined as "any discharge of a non-customary batch discharge." Any discharge, which would violate the prohibitions in 40 CFR 403.5(b) is also considered a slug discharge.

Wastewater is treated, by chemical neutralization; the majority of the waste water being treated is acidic in nature with low pH. Hydrochloric acid, sulfuric acid, copper pyrophosphate, and zinc sulfide "rinses water's" are treated with a flocculent that separates any metals and then uses sodium hydroxide to raise the pH for neutralization. All solids & sludge's are settled out in the clarifier and filtered through the filter press. A turbity meter detects any sludge's after the clarifier and shuts down the waste water system if detected. Sand filters are installed as a secondary filter system to prevent sludge overflows to the local POTW. All non-routine discharges such as floor sweeping are also treated through our wastewater system. All other waste water discharge is typical sanitary sewer.

All process discharges are contained within piping or trench work and collected in the wastewater basement. This waste is then pumped into storage tanks besides the wastewater building for treatment. The bulk storage tanks are protected with secondary containment. All bulk chemical storage tanks are protected with secondary containment as well.

Notification:
In the event that an accidental sludge overflow occurs, the wastewater operator is to immediately shut down the wastewater system and notify the following;

Pine Bluff Wastewater Utility	870-535-6603 (main office) 870-535-7209 (alternate) 870-535-0821 (lab)
Mike Barrett	870-692-5144
Mike Reed	870-267-3014

Alternate contact numbers if PBWU cannot be reached

Pine Bluff Fire Department	911

Immediately following an accidental sludge overflow, an incident report must be completed by both the wastewater operator and shift manager. The EHS manager will submit this report with corrective actions to Pine Bluff Wastewater Utility, 1520 South Ohio Street, Pine Bluff AR, 71601. Within 24 hours of event.