ADEQ

ARKANSAS
Department of Environmental Quality

NPDES PERMIT FILE
NPDES # AR0033316
AFIN # 35-00149
Permit PN
Correspondence
Technical Backup
4/23/09 Date Scanned

April 23, 2009

Ken Johnson, Manager
Pine Bluff Wastewater Utility
1520 South Ohio Street
Pine Bluff, Arkansas 71601

Re: City of Pine Bluff (NPDES #AR0033316) Pretreatment Program
Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Johnson:

Please find enclosed the finished report for the audit/assessment conducted March 25 through March 27, 2009. The report should be made available for review to appropriate industrial officials. Your staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

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

Please do not hesitate to contact my office if you or any of your staff have questions or concerns in the future.

Sincerely,

Rufus J. Torrence, NPDES Pretreatment Engineer

Encl: Audit/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)
Eric Flemings / ADEQ Technical Assistant Mgr-Field Services (w/o attmt)
Cindy Garner / ADEQ Technical Assistant Mgr-Enforcement (w/o attmt)

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

PINE BLUFF, ARKANSAS

NPDES PERMIT #AR0033316

APRIL 17, 2009

PREPARED BY: RUFUS TORRENCE

NPDES ENGINEER II

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

An audit/assessment was performed March 25 through March 27, 2009, on the Pretreatment Program implemented by the Pine Bluff Wastewater Utility (PBWU). Participants included:

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

The goals of the audit/assessment were:

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

* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges

* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements

* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof

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

The auditor appreciates the special efforts of Stacey and her pretreatment monitoring personnel. PBWU pretreatment personnel monitor and sample some of the CIUs on a weekly basis.

When the auditor was making plans to select site visits, the auditor noted that Tyson had a "White Hall" address. PBWU has an interjurisdictional agreement (see attachment B) with White Hall to control Significant Industrial Users (SIUs) within White Hall. Upon examination of an official photograph with Pine Bluff city boundaries, the auditor noted that Tyson is actually within the City limits of Pine Bluff. Attachment A shows the location of Tyson with respect to the adjacent White Hall city limits.

The POTW design flow is 14 MGD and the average flow is 11.5 MGD. Ten (10) significant industrial users (SIUs) discharge approximately 3 MGD to the POTW. Four (4) of the SIUs are also categorical industrial users. The POTW consists of two (2) aerated lagoons followed by two (2) primary ponds and, finally, followed by two (2) polishing ponds. The entire system covers approximately 490 acres. After the wastewater exists the polishing ponds, it enters a chlorine contact chamber before it is discharged to the Arkansas River. Presently, the effluent is exhibiting no toxicity to aquatic life. The sludge is accumulating in the lagoons.

The primary goal of the pretreatment program is to ensure that PBWU complies with all limits in its NPDES permit. The POTW has a good compliance history. The national pretreatment program stresses Pollution Prevention to reduce the amount of wastewater discharged to the POTW and local limits to control loadings to the POTW.

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

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

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

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

Under ***40 CFR 403.8(f)(1)(iii)*** The POTW shall "*Control through permit...the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards...*" Paragraph B continues with permits "*must be enforceable and contain...*[paragraph (3) continues with] "*Effluent limits...based on applicable...categorical Pretreatment Standards...*"

During the file review, the auditor noted that some permits issued to Categorical Industrial Users (CIUs) contained only the average effluent limits. Referring to attachment D-3/12, Wheeling permit contains only average effluent categorical limits. The column labeled "Daily Maximum Limits" does not contain the published maximum limits for CIUs regulated by 40 CFR 433 but this column repeats the limits in the "Monthly Average Limits" column. PBWU must revise all permits issued to CIUs to show the published *"applicable...categorical Pretreatment Standards...[both maximum and average effluent limitations]"* if any applicable local limits are not more stringent.

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

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

Local Limits

To protect against pass through and interference, no Industrial User may discharge or cause to be discharged into the POTW any wastewater pollutant concentration exceeding the Technically Based Local Limits (TBLLs) developed from time to time by the Manager of City of _____ Utilities as required by Part III in City of _____ NPDES permits No. AR00_____, authorized by 40 CFR 403.5 (c) and approved by the Approval Authority. TBLLs based on calculated Maximum Allowable Industrial Loadings are located in the City's Pretreatment Program, Section ____. At the discretion of the Manager, TBLLs may be imposed and shall apply at the "monitoring point" described in the individual industrial wastewater discharge permits. All concentration limits for metals shall be in terms of "total" metals unless otherwise indicated. At the discretion of the Manager, mass limitations may be imposed in addition to or in place of concentration based TBLLs. The Manager may also develop BMPs in individual wastewater discharge permits, to implement specific pollutant limitations. Such BMPs shall be considered Local Limits and Pretreatment Standards. When new Local Limits are implemented or revised, the Manager will provide individual notice to parties who have requested such notice and an opportunity to respond, as set forth by 40 CFR 403.5 (c) (3). This requirement of notice also applies when Local Limits are set on a case-by-case basis.

2) PBWU should attach the fact sheet to the appropriate permit before the permit is issued to the SIUs. Currently, PBWU is employing fact sheets but they are kept onsite in PBWU records and the SIUs do not have the fact sheets at their place of business.

3) Since PBWU is performing all monitoring, PBWU should remove paragraph F under "Reporting Requirements" in all permits. Paragraph F requires the SIU to perform self-monitoring. Refer to attachment D-6/12 to view the language in Paragraph F.

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

Section C (con'd)

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

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

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

is hereby authorized to discharge...

Normally, POTWs cite a specific ordinance. However, PBWU has not elected to adopt EPA Model Pretreatment Ordinance (MPO). The current legal authority to operate the pretreatment program is based on a series of ordinances with the first ordinance enacted on March 20, 1989. The first ordinance was subsequently amended by several additional ordinances. If PBWU elects to adopt the MPO and if the MPO repeals all previous "pretreatment" ordinances, then PBWU must simply cite the MPO on the Cover Page of each permit.

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

7) PBWU may include either a review of the IU's slug plan or a review of the need to develop a slug plan in each IU inspection report.

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) PBWU may sample Arcelor's wastewater at any convenient location. All published pretreatment categorical standards apply to only regulated streams. In accordance with 40CFR433.12(c) monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams if the published standards for cyanide appear in Arcelor's permit. If the published standards for the metals appear in Arcelor's permit, PBWU must monitor for metals at a sampling point (parshall flume) that includes only regulated streams before dilution with other streams. Presently, PBWU is sampling the total flow (regulated and sanitary) from Arcelor at a lift station. PBWU may continue to sample at this location but all published standards must be adjusted in accordance to 40CFR403.6(e) Combined Wastestream Formula (CWF). Note that PBWU may also sample for Cyanide at the lift station where the non-cyanide bearing "regulated streams" must be considered as "dilute" streams. In conclusion, if PBWU continues to sample at the lift station, PBWU must use the CWF to adjust permit limits based on categorical pretreatment standards. If PBWU elects to sample only regulated streams, PBWU must list the applicable categorical pretreatment standards in the permit.

2) PBWU must comply with the most recent changes to 40 CFR 403 (commonly referred to as the "Streamlining Rule Changes" promulgated on October 14, 2005). PBWU must review the existing approved program and make all necessary modifications to comply. The streamlining changes include thirteen (13) main elements. PBWU should note that some of the elements may not be applicable to PBWU's approved program. Some of the streamlining changes are less stringent then the previous pretreatment regulations and PBWU may at its option elect to include these changes in the program modification. However, thirteen (13) elements are more stringent than the previous pretreatment regulations and PBWU must ensure that the approved program contains all applicable more stringent streamlining changes.

Section D (con'd)

The auditor has made a cursory review of PBWU program and at this time the following summary of the seven required elements appears to be applicable to PBWU existing program. Note that PBWU has the option to include elements in the new program which are presently not applicable:

1. *Updated removal credits provisions relating to Overflows [§ 403.7(h)]*

   At this time PBWU is not granting removal credits so this element is not applicable.

2. *Slug control requirements must be included in SIU control mechanisms [§ 403.8(f)(1)(iii)(B)(6)]*

   The existing permits do not contain slug control requirements. Even though paragraph B under REPORTING REQUIREMENTS (see attachment D-6/12) requires the users to notify, the permits do not require the users to develop a slug plan nor is a plan included in the permits. PBWU must update the permits to include this requirement in each SIU permit where PBWU has determined that a slug control plan is necessary. If a plan is not necessary, PBWU may state in the fact sheet that "Upon review and evaluation by PBWU, [SIU name] is not required to develop a Slug Control Plan."

3. *SIUs must be evaluated for the need for a plan or other action to control slug discharges within a year from the final rule's effective date or from becoming an SIU [§ 403.8(f)(2)(vi)].*

   PBWU appears to have satisfied this element. Each SIU has been checked for the need to have a slug plan. PBWU performs this requirement annually during each SIU inspection. See attachment I-1/63 for Stant's slug control plan included in the "One Plan".

4. *SIUs are required to notify the POTW immediately of any changes at its facility affecting the potential for a slug discharge [§ 403.8(f)(2)(vi)].*

   The permits issued by PBWU do not specifically contain this requirement. Presently, the permits require only the notification of a spill or slug (see paragraph B under REPORTING REQUIREMENTS on attachment D-6/12). PBWU must update the program to implement this requirement.

5. *Expand SNC to include additional types of Pretreatment Standards and Requirements [§ 403.8(f)(2)(viii)(A-C)]*

   PBWU must expand the definition of SNC (Significant Non-Compliance) in the approved program (section 28-132) to include the additional types. The additional types include the specific prohibitions in 40 CFR 403.5, local limits and others.

Section D (con'd)

6. *SIU reports must include BMP compliance information [§ 403.12(b), (e), (h)]*

   PBWU ordinance (codes) and program do not address BMPs. PBWU must update the program to properly address BMP requirements.

7. *SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law [403.8(f)(1)(iii)(B)(3)]*

   PBWU ordinance (codes) and program do not address BMPs. PBWU must update the program to properly address BMP requirements.

8. *Documentation of compliance with BMP requirements must be maintained as part of the SIU's and POTW's record-keeping requirements [§ 403.12(o)].*

   PBWU ordinance (codes) and program do not address BMPs. PBWU must update the program to properly address BMP requirements.

9. *Control Authorities which perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation [§ 403.12(g)(2)].*

   Since PBWU performs all sampling for SIUs and PBWU samples each SIU at least monthly (and in some cases weekly), PBWU appears to be satisfying this element.

10. *Require periodic compliance reports to comply with sampling requirements, require Control Authority to specify the number of grab samples necessary in periodic and non-categorical SIU reports, and require non-categorical SIUs to report all monitoring results [§ 403.12(g)(3),(4), (6)]*

    PBWU appears to have satisfied this requirement. 40 CFR 403.12(h) states that *"This sampling and analysis may be performed by the Control Authority in lieu of the significant non-categorical Industrial User."* PBWU performs all monitoring. Therefore, this element is not applicable to PBWU.

11. *Non-Categorical SIUs are required to provide representative samples in their periodic monitoring reports [§403.12(g)(3)]*

    PBWU appears to have satisfied this requirement. 40 CFR 403.12(h) states that *"This sampling and analysis may be performed by the Control Authority in lieu of the significant non-categorical Industrial User."* PBWU performs all monitoring. Therefore, this element is not applicable to PBWU.

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*

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

Pretreatment program approval date: *9/18/84*

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

Month Annual Pretreatment Report Due: *March*

Pretreatment Year Dates: *3/1 to 2/29* Date(s) of Audit: *3/25 to 3/27/09* (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Rufus Torrence	*Engineer II*	*(501) 682-0626*

Control Authority representative(s):

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

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*01-11-06*	*No Major Deficiencies Noted*
PCI	*03-21-07*	*No Major Deficiencies Noted*
PCI	*12-03-07*	*No Major Deficiencies Noted*

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*	*2/01/04*	*1/31/09*

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: *Boyd Point Treatment Facility*

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

Expiration Date of NPDES Permit: *January 31, 2009*

Treatment Plant Wastewater Flow: Design- *14* MGD; Actual (Average)- *13.5* MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : *10* # of CIUs : *4*
Industrial Flow (mgd): *3* Industrial Flow (%) : *25* %

Level of Treatment		Type of Process(es):
Primary		
Secondary	✓	*490 Acres of aerated/polishing ponds*
Tertiary		

Method of Disinfection: *Chlorine contact chamber*

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: *Arkansas River*

Receiving Stream Classification: *Segment 3C Arkansas River Basin*

Receiving Stream Use: *Primary Contact Recreational / Fishable / Swimmable*

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

Method of Sludge Disposal:		Quantity of Sludge:
____	Land Application	____ dry tons/yr.
____	Incineration	____ 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: *(None)*

SECTION I: GENERAL INFORMATION

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

YES NO

___ ✓ Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: _____
Issuance Date: _____
Expiration Date: _____

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

YES NO N/A

✓ ___ ___ Has the Control Authority submitted results of whole effluent biological toxicity testing.

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?)

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

	Influent	Effluent	Sludge	Ambient
Metals *	24	24	4	
Priority **	1	1	0	
Biomonitoring	0	2	0	
TCLP				
Other: _____				

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

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

YES NO N/A

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

✓ ___ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
CBOD 8/31/08	High TSS in Influent
Flow 3/31/08	PBWU reported the flow on the wrong DMR*

**PBWU is allowed to discharge 30MGD when the river flow is >5000 MGD*

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
*2-10-05	Updating ERP and demonstrating no need for TBLLs

**Letter in Prog Mod from Ken Johnson to Allen Gilliam dated 2-10-05.*

YES NO

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

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

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

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

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

YES	NO	
✓	___	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? *See attachment B.*

✓* ___ 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:
**See Attachment B-4/8; White Hall agrees to enact all of Pine Bluffs requirements.*

	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)]
	✓	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? At least every three years

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

YES	NO	
	✓	Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Has the POTW identified any IUs with Pollution Prevention opportunities?

___ ✓ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(v)(1)-(3)]

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

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

YES NO

___ ✓ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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:

YES NO

✓ ___ Does Control Mechanism designate a discharge point? [403.5(b)(8)]

N/A Are all applicable categorical standards and local limits applied to trucked wastes ?

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

Pollutant	Limit

Describe the discharge point(s) (including security procedures):
Jefferson Industrial Park Pump Station (Disc Point)
CA checks references & regulatory agencies records

___ ✓ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

___ ✓ Does the Control Authority have a control mechanism for regulating wastes from UST sites?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

Pollutant	Limit
N/A	

G. Application of Pretreatment Standards and Requirements

YES	NO	
✓		Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

1991 Date Notified *Letter* Method of Notification

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

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

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
Local Limits are currently under review by Approval Authority			

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		MAHL Limits Adopted?		MAHC Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓				✓		*0.06*
Cadmium (Cd)	✓		*Under*		✓		*0.01*
Chromium-Total	✓		*Review*		✓		*0.9*
Copper (Cu)	✓				✓		*0.13*
Cyanide (CN)	✓				✓		*0.14*
Lead (Pb)	✓				✓		*0.12*
Mercury (Hg)	✓				✓		*0.02*
Molybdenum (Mo) *	✓				✓		*0.27*
Nickel (Ni)	✓				✓		*0.18*
Selenium (Se) *	✓				✓		*0.03*
Silver (Ag)	✓				✓		*0.13*
Zinc (Zn)	✓				✓		*0.37*

** - If necessary for the sludge disposal option chosen*

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	No	Local Limits Needed? Yes	No	Local Limits Adopted? Yes	No	Numerical Limit Adopted (mg/l)
O&G		*CA currently implementing "BMPs" grease trap program at the food related businesses*					

YES NO

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

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

	TYPE OF ALLOCATION*		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)			
Cadmium (Cd)			
Chromium-Total	*(Not Applicable)*		
Copper (Cu)			
Cyanide (CN)			
Lead (Pb)			
Mercury (Hg)			
Molybdenum (Mo)			
Nickel (Ni)			
Selenium (Se)			
Silver (Ag)			
Zinc (Zn)			

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

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 (*Refer to Attachment C-1/1*)

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1/yr	1/year	Approved program references
Other SIUs	1/yr	1/year	federal requirement on page 39
Sampling:			
CIUs	12/yr	1/year	Approved Program shows monthly
Other SIUs	12/yr	1/year	for all CIUs & SIUs on page 22
Reporting:			
CIUs	2/yr	2/year	40 CFR 403.12(e) Semi-Annual
Other SIUs	2/yr	2/year	Code Sec 28-123
Self-Monitoring:			
CIUs	2/yr	2/year	Ditto
Other SIUs	2/yr	2/year	Ditto

#	%	
		How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
0		Not sampled at least once in the past reporting year?
0		Not inspected at least once in the past Pretreatment reporting year?
0		Not inspected or not sampled at least once in the past reporting year ? [WENDB-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.

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	In-house
Cyanide	Spectrophotometric	In-house
Organics	GC/MS	In-house
Other	pH, DO & BOD Meters	In-house

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:
40CFR136 & 20th Edition of Standard Methods

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

5days Conventionals
1week Metals
1week Organics

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

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

If yes, explain: _____

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

YES	NO	
✓	___	Scheduled compliance monitoring
✓	___	Unscheduled compliance monitoring
✓	___	Demand monitoring for IU compliance
✓	___	IU self-monitoring
___	___	Other:

YES NO

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

I. ENFORCEMENT

YES NO

___ ✓ Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] *Update 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	✓	Revocation of permit
✓	Injunctive relief	✓	Fines (maximum amount):

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

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

____	Imprisonment
✓	Termination of Service
✓	Other: _____

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

YES	NO	
✓	___	When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
___	✓	Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)]. Comment: *CA performs all monitoring*
___	___	If no, does the Control Authority conduct all of the monitoring?

YES	NO	N/A	
✓	___	___	Does the pattern of enforcement conform to the ERP?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

YES	NO	
___	✓	Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. ___

Has the Control Authority experienced any of the following:

YES	NO		EXPLAIN and ID Industrial User
___	✓	Interference [WENDB]	___
___	✓	Pass through [WENDB]	___
___	✓	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)]
None		How many SIUs are currently on compliance schedules?
___	✓	Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

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

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

[WENDB-IUPN]

SECTION III: INDUSTRIAL USER FILE REVIEW

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

YES	NO	
✓		computerized
✓		hard copy
		OTHER: _____

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
✓		Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking
		Other: _____

Can IU monitoring data can be retrieved by:

✓		Industry name
✓		Pollutant type
✓		Industrial category or type
✓		SIC Code
✓		IU discharge volume
	✓	Geographic location
N/A		Receiving treatment plant (i.e.if > one plant in the system)
		Other (specify) _____

✓		Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
	✓	Have IUs requested that data be held confidential? How is confidential information handled by the Control Authority? _____ _____ _____
	✓	Are there significant public or community issues impacting the POTW's pretreatment program? If yes, please explain: _____ _____
✓		Are all records maintained for at least 3 years?

SECTION III: INDUSTRIAL USER FILE REVIEW

K. RESOURCES

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

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

YES NO

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

		Percent of Total Funding
_____	POTW general operating fund	100
_____	IU permit fees	
_____	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:
Decrease due to slow down in economy

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	*Trucks with plans to purchase new van*
✓	___	Analytical equipment	*ICAP, GC, etc.*

SECTION III: INDUSTRIAL USER FILE REVIEW

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.):
   Household hazardous waste collection; public school presentations; Plant tours; brochures sent out educating public about the collection system and brochures about keeping grease out of the system.

2. Has the source of any toxic pollutants been identified?
   If yes, what was found?
   None

3. Has the POTW implemented any kind of public education program? If yes, describe:
   See above

4. Does the POTW have any pollution prevention success stories for industrial users documented? No . If yes, please attach.

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?
   No

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No
   If yes, which of the "Guides to Pollution Prevention" were used?
   N/A

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Arcelor (aka TrefilARBED) File/ID No. 17
Industry Address 5200 Industrial Park South 71602
Industry Description Steel Wire Drawing for Belted Tires and Pressure Hoses
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3315
Ave. Total Flow (gpd) 172,101 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name Tyson File/ID No. 5
Industry Address 5505 N. Jefferson Pkwy
Industry Description Cooked Poultry
Industrial Category Not Applicable 40 CFR N/A SIC Code:
Ave. Total Flow (gpd) 2,147,148 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name Aramark Unifrom Svc File/ID No. 35
Industry Address 5508 Jefferson Pkwy
Industry Description Industrial Laundry
Industrial Category Not Applicable 40 CFR N/A SIC Code:
Ave. Total Flow (gpd) 49,050 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name Stant Manufacturing, Inc File/ID No. 43
Industry Address 5300 Jefferson Parkway
Industry Description Manufacture Fuel and Radiator Caps for Automotive Industry
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3471
Ave. Total Flow (gpd) 20,824 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments: Stant has an ISO 14001 Certification

FILE #: 5 Industry Name Wheeling Machine File/ID No. 53
Industry Address 5411 Industrial Drive South
Industry Description Electroplating
Industrial Category Metal Finishing 40 CFR 433 SIC Code:
Ave. Total Flow (gpd) 638,435 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

Comments:

B. Control Mechanism

	Arcelor	Tyson	Aramark	Stant	Wheeling
1. Does the file contain an application for a control mechanism?	Y	Y	Y	Y	Y
If yes, what is the application date?	5/24/04[1]	7/8/08	7/15/08	8/21/08	2/22/08
Does it ask for Pollution Prevention information?	Y	Y	Y	Y	Y
2. Does the file contain a permit?	Y	Y	Y	Y	Y
Permit Expiration Date?	6/18/09	8/1/13	8/15/13	9/1/13	8/28/13
Is a fact sheet included?	N	N	N	Y[2]	N

Comments: 1. *The application in the Arcelor file is about 5 years old; Arcelor is currently submitting a new application for a permit renewal. See Attachment G-1/7 for an example.*

2. Stant permit file contained a fact sheet but it was not attached to the permit that was issued to Stant; see attachment E-1/2. PBWU agreed to attach the fact sheet to the permits in the future.

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => No N/A => Not Applicable

		Arcelor	Tyson	Aramark	Stant	Wheeling
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a.	Legal Authority Cite?	N[3]	N[3]	N[3]	N[3]	N[3]
b.	Expiration date?	Cover Pg	Cover Pg	Cover Pg	Cover Pg	Cover Pg
c.	Statement of nontransferability?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
d.	Appropriate disc limits?	N[4]	Y	Y	N[4]	N[4]
e.	Appropriate self-monitoring requirements?	N[5]	Y	Y	N[5]	N[5]
f.	Sampling frequency?	Pg 2	Pg 2	Pg 2	Pg 2	Pg 2
g.	Sampling locations?	Pg 6	Pg 6	Pg 6	Pg 6	Pg 6
h.	Requirement for flow monitoring?	N[6]	N[6]	N[6]	N[6]	N[6]
i.	Types of samples (grab or composite) for self-monitoring?	N/A[7]	N/A[7]	N/A[7]	N/A[7]	N/A[7]
j.	Applicable IU reporting requirements?	Pg 6	Pg 6	Pg 6	Pg 6	Pg 6
k.	Standard conditions for:					
	Right of Entry?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
	Records retention?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
	Criminal Penalty provisions?	Pg 10	Pg 10	Pg 10	Pg 10	Pg 10
	Revocation of permit?	Pg 10	Pg 10	Pg 10	Pg 10	Pg 10
l.	Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	N/A
m.	General/Specific Prohibitions?	Pg 4	Pg 4	Pg 4	Pg 4	Pg 4
n.	Where technologically and economically achievable, are P[2] aspect included?	Pg 12	Pg 12	Pg 12	Pg 12	Pg 12

Comment: *3. PBWU permits do not specifically cite the legal authority of the City of Pine Bluff to operate a pretreatment program. PBWU should cite their legal authority (Pine Bluff City Code: Chapter 28 Water, Sewers and Sewage Disposal). Refer to Attachment D-2/12 for more details. 4. The CIUs regulated by 40CFR433 do not have the correct "Daily Max Limits"; see attachment D-3/12. 5. Paragraph F under REPORTING REQUIREMENTS (Attachment D-6/12) requires the SIUs to self-monitor; PBWU has agreed to remove this paragraph. 6. PBWU relies on United Water.*

SECTION III: INDUSTRIAL USER FILE REVIEW

C. Application of Standards

	Arcelor	Tyson	Aramark	Stant	Wheeling
	Y => Yes	N => No	N/A => Not Applicable		
1. Has the IU been properly categorized?	Y	Y	Y	Y	Y
2. Were both Categorical Standards and Local Limits properly applied?	N[8]	N/A	N/A	N[8]	N[8]
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	Y	Y	Y	Y	Y
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	N/A
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	N[9]	N/A	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	N/A
7. Is the Control Authority applying a bypass provision to this IU?	N/A	N/A	N/A	N/A	N/A

Comments: *7. PBWU performs all monitoring but the permits do show sample type; refer to Attachment D-2/12. 8. PBWU applied only categorical limits to CIUs since the current local limits are not applicable. PBWU will update the local limits to comply with current water quality standards and streamlining updates. 9. PBWU is currently sampling Trefil/Arcelor total plant flow (regulated and nonregulated streams) but the permit contains "published" 40CFR433 limits. PBWU has agreed to sample all and ONLY regulated wastewater at Arcelor. 10. All sampling results are stored electronically in computerized records.*

SECTION III: INDUSTRIAL USER FILE REVIEW

D. Compliance Monitoring Sampling

Y => Yes N => No N/A => Not Applicable

	Arcelor	Tyson	Aramark	Stant	Wheeling
1. Does the file contain Control Authority sampling results for the industry?	Y[10]	Y[10]	Y[10]	Y[10]	Y[10]
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y
3. Does the sampling report(s) include: [403.8(f)(2)(vii)]					
a. Name of sampling personnel?	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
b. Sample date and time?	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
c. Sample type?	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
d. Wastewater flow at the time of sampling?	N	N	N	N	N
e. Sample preservation procedures?	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
f. Chain-of-custody records?	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	Y[12]	N/A	N/A	Y[12]	Y[12]
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Timed	Timed	Timed	Timed	Timed
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	Y	Y	Y	Y	Y

Comments: 11. See Attachment F-1/1 12. CIUs regulated by 40CFR433 are given the option to develop a TOMP but PBWU currently samples all CIUs for the 110 Toxic Organics. 13. See Attachment H-1/10 for an example of an Inspection Report.

SECTION III: INDUSTRIAL USER FILE REVIEW

Inspections

	Arcelor	Tyson	Aramark	Stant	Wheeling
	Y => Yes N => No N/A => Not Applicable				
7. Does the IU file contain inspection reports?	Y[13]	Y[13]	Y[13]	Y[13]	Y[13]
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y
b. Date of last Inspection	6/9/08	11/4/08	2/24/08	2/10/09	5/2/08
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	Pg 9	Pg 9	Pg 9	Pg 9	Pg 9
b. Inspection date and time?	Pg 9	Pg 9	Pg 9	Pg 9	Pg 9
c. Name and title of IU official contacted?	Pg 1	Pg 1	Pg 1	Pg 1	Pg 1
d. Verification of production rates?	N/A	N/A	N/A	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	N[14]	N[14]	N[14]	N[14]	N[14]
f. Evaluation of pretreatment facilities?	Pg 6	Pg 6	Pg 6	Pg 6	Pg 6
g. Evaluation of self-monitoring equipment and techniques?	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	N[16]	N[16]	N[16]	N[16]	N[16]
i. Manufacturing facilities?	Pg 1	Pg 1	Pg 1	Pg 1	Pg 1
j. Chemical handling and storage procedures?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
k. Chemical spill prevention areas?	N	N	N	N	N
q. Hazardous waste storage areas and handling procedures?	Pg 8	Pg 8	Pg 8	Pg 8	Pg 8
m. Sampling procedures?	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
n. Laboratory procedures?	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
o. Monitoring records?	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
p. Evaluation of Pollution Prevention opportunities?	N	N	N	N	N
q. Control Authority inspector signature?	Pg 9	Pg 9	Pg 9	Pg 9	Pg 9

SECTION III: INDUSTRIAL USER FILE REVIEW

IU Self-Monitoring and Reporting

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

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

15. PBWU performs all monitoring.

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

	Arcelor	Tyson	Aramark	Stant	Wheeling
	Y => Yes	N => No	N/A => Not Applicable		
18. Has the IU developed a Slug Control and Prevention Plan?	N	N	N	Y[17]	N
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	N	N	N	N	N
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	N/A
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	N/A

E. Enforcement

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement (continued)

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

SECTION III: INDUSTRIAL USER FILE REVIEW

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: Pine Bluff WW Utility NPDES #: AR0033316

Date of Audit: 03/25-27/2009 Date entered into QNCR: 04/02/09
(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddInspection.do?actionMethod=initiate&epaOrState=S&CMType=INS&fromICIS

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: City of Pine Bluff

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

* Compliance Monitoring Type: AFO Defined, AFO Designation, Aerial Photography, **Audit**, Audit (IU)

* Linked Facility

FACILITIES

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0033316	VALIDATE		

Compliance Monitoring Dates

Planned Start Date: 03/25/2009

Planned End Date: 03/27/2009

Actual Start Date: 03/25/2009

Actual End Date: 03/27/2009

Statutes and Sections Information

Federal Statutes : CWA - Clean Water Act

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

State Statute:

* Compliance Monitoring Action Reason: Agency Priority, Citizen Complaint/Tip, **Core Program**, For Cause, Random Inspection

* Compliance Monitoring Agency Type: State Contractor, State - Using Federal Credential, **State**, Regional, Other Federal

Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: No

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

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

Which party had the lead?:

Government Contacts

CONTACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes: 4952 Sewerage Systems

ADD / REMOVE

NAICS Codes:

ADD / REMOVE

Priorities

OECA National Priority: 2009 - (CA Only) - Air Toxics - Flares, 2009 - (CA Only) - Air Toxics - LDAR, 2009 - (CA Only) - Air Toxics - Surface Coating, 2009 - (CA Only) - Financial Assurance, 2009 - (CA Only) - MP - Mining

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

Media Monitored

Media Monitored:

Compliance Monitoring Media Indicator

Multimedia Indicator: ☐

Compliance Monitoring Information

Number of Days Physically Conducting Activity: 3

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome: No Violations

Compliance Monitoring Rating Code: Satisfactory

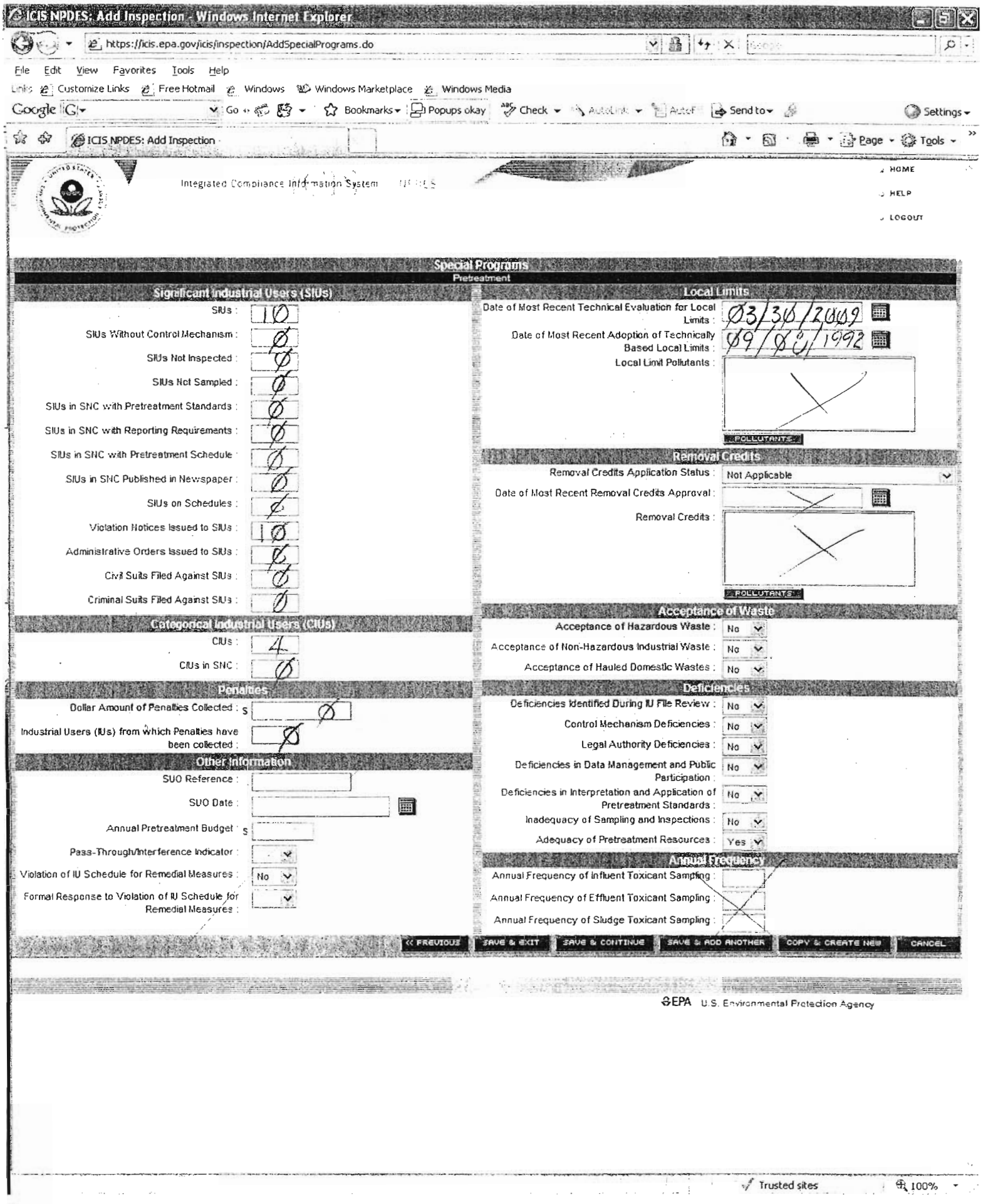
Compliance Monitoring Comments

Compliance Monitoring Comments: 005: Significant Industries Site Visits conducted

User Defined Fields

1: ☐

Trusted sites 100%


ICIS NPDES: Add Inspection - Windows Internet Explorer
https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do
File Edit View Favorites Tools Help
Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media
Google Go Bookmarks Popups okay Check AutoLink AutoFill Send to Settings
ICIS NPDES: Add Inspection
Page Tools
Integrated Compliance Information System
HOME
HELP
LOGOUT
Special Programs
Pretreatment
Significant Industrial Users (SIUs)
SIUs : 10
SIUs Without Control Mechanism : 0
SIUs Not Inspected : 0
SIUs Not Sampled : 0
SIUs in SNC with Pretreatment Standards : 0
SIUs in SNC with Reporting Requirements : 0
SIUs in SNC with Pretreatment Schedule : 0
SIUs in SNC Published in Newspaper : 0
SIUs on Schedules : 4
Violation Notices Issued to SIUs : 10
Administrative Orders Issued to SIUs : 0
Civil Suits Filed Against SIUs : 0
Criminal Suits Filed Against SIUs : 0
Categorical Industrial Users (CIUs)
CIUs : 4
CIUs in SNC : 0
Penalties
Dollar Amount of Penalties Collected : $ 0
Industrial Users (IUs) from which Penalties have been collected : 0
Other Information
SUO Reference :
SUO Date :
Annual Pretreatment Budget : $
Pass-Through/Interference Indicator :
Violation of IU Schedule for Remedial Measures : No
Formal Response to Violation of IU Schedule for Remedial Measures :
Local Limits
Date of Most Recent Technical Evaluation for Local Limits : 03/30/2009
Date of Most Recent Adoption of Technically Based Local Limits : 09/01/1992
Local Limit Pollutants :
POLLUTANTS
Removal Credits
Removal Credits Application Status : Not Applicable
Date of Most Recent Removal Credits Approval :
Removal Credits :
POLLUTANTS
Acceptance of Waste
Acceptance of Hazardous Waste : No
Acceptance of Non-Hazardous Industrial Waste : No
Acceptance of Hauled Domestic Wastes : No
Deficiencies
Deficiencies Identified During IU File Review : No
Control Mechanism Deficiencies : No
Legal Authority Deficiencies : No
Deficiencies in Data Management and Public Participation : No
Deficiencies in Interpretation and Application of Pretreatment Standards : No
Inadequacy of Sampling and Inspections : No
Adequacy of Pretreatment Resources : Yes
Annual Frequency
Annual Frequency of Influent Toxicant Sampling :
Annual Frequency of Effluent Toxicant Sampling :
Annual Frequency of Sludge Toxicant Sampling :
« PREVIOUS
SAVE & EXIT
SAVE & CONTINUE
SAVE & ADD ANOTHER
COPY & CREATE NEW
CANCEL
EPA U.S. Environmental Protection Agency
Trusted sites
100%

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:
Tyson Foods, Inc
5505 Jefferson Parkway 71602 (870) 247-6089

Type of industry: Poultry Kill Plant/Poultry Cooked Products
(Include regulatory citation if CIU)

Date/Time of visit: 03/26/2009 @ 9:02 am

Industry contacts: Gary Farrer, Waste Water Supervisor
Tommy Tooke,

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓[1]		
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: *1. Tyson has three (3) DAFs in parallel*

2. Solid waste is land applied by TRS (Terra Renewal Services)

Visit conducted by: Rufus Torrence & Vincent Miles Date Signed: 4-2-09

(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: Tyson Food

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

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

Visit conducted by: Rufus Torrence & Vincent Miles

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:
Wheeling Machine Products
5411 Industrial Drive South 71602 (870) 247-5945

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

Date/Time of visit: 03/26/2009 @ 11:45 am

Industry contacts: Nick Wallace, Safety & Industrial Hygiene

	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?			✓[2]
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

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

Visit conducted by: Rufus Torrence & Vincent Miles Date Signed: 4-2-09

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Wheeling Machine Products

Comments:

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

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

Visit conducted by: Rufus Torrence & Vincent Miles

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:
Aramark Uniform & Career Apparel, Llc
5508 Jefferson Parkway (870) 247-5435

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

Date/Time of visit: 03/26/2009 @ 1:50 pm

Industry contacts: Richard Davison, Plant Maintenance Mgr

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	1		
4. Pretreatment equipment maintained and operational?	✓		
5. Hazardous waste generated or stored?		✓	
6. Proper solid waste disposal?	2		
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: 1. Treatment consists of a "shaker" to remove lint from the wastewater; the wastewater pH is adjusted between 6 & 11 before it is discharged to the POTW. 2. Since the solid waste is not hazardous, it is mixed with the trash and hauled to a landfill.

Visit conducted by: Rufus Torrence & Vincent Miles Date Signed: 4-2-09

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Aramark Uniform & Career Apparel, Llc

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

Visit conducted by: Rufus Torrence & Vincent Miles

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

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

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

Date/Time of visit: 03/26/2009 @ 2:55 pm

Industry contacts: Dennis Chapman, Supv Press Room, Plating, and Wastetreatment

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?		1	
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?	2		
8. Suitable sampling location?	✓		
9. Appropriate self-monitoring procedures/equipment?			3
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Comments: 1. Stant has a 40CFR433 zinc plating process and a plastic molding operation too; therefore, Stant must be listed as a 40CF463 CIU.
2. Even though PBWU performs all monitoring, Stant has developed a "ONE PLAN" which has a TOMP; see attachment I-1/63.
3. PBWU performs all required monitoring

Visit conducted by: Rufus Torrence and Vincent Miles Date Signed: 4-02-09

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Stant

Additional comments:

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

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

Stant has an ISO 14001 certification.

Visit conducted by: Rufus Torrence and Vincent Miles

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Pine Bluff NPDES #: AR0033316

Name, address and phone number of industry:
Arcelor (formerly TrefilARBED Arkansas, Inc.)
5100 Industrial Drive South 71602 (870) 247-2444

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

Date/Time of visit: 03/26/2009 @ 3:50 pm

Industry contacts: Mike Barrett, Env Coor

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	1		
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?		2	
9. Appropriate self-monitoring procedures/equipment?		3	
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Comments:

1. During the last audit in 2005, the steel drawing operation was considered for correct classification but later dismissed.
2. Arcelor samples the regulated wastewater only; PBWU samples the entire plant discharge to include sanitary wastewater, too. Currently, both Arcelor and PBWU are not sampling the CN stream before it mixes with other streams.
3. Neither Arcelor nor PBWU is using the Combined Wastestream Formula to determine alternative limits. PBWU has agreed to sample all and ONLY regulated wastewater and to sample the CN stream before it mixes with the other regulated streams.

Visit conducted by: Rufus Torrence & Vincent Miles Date Signed: 4-2-09

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Pine Bluff NPDES #: AR0033316

Industry name: Arcelor

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

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

Visit conducted by: Rufus Torrence & Vincent Miles


White Hall
Boundary Line
Tyson
Pine Bluff

PINE BLUFF WASTEWATER UTILITY & WHITE HALL

WASTEWATER TREATMENT AGREEMENT

THIS AGREEMENT made on this 21st day of October 2008 by and between the City of Pine Bluff, Arkansas, the Utility Commission, and Pine Bluff Wastewater Utility (hereinafter collectively referred to as "Pine Bluff"), and the City of White Hall and White Hall Sewer Committee (both hereinafter collectively referred to as "White Hall", user, or permittee);

WHEREAS, White Hall desires to connect into the existing sewer system owned by the City of Pine Bluff and operated by the Pine Bluff Wastewater Utility (the "Utility" or "PBWU"); and

WHEREAS, Pine Bluff desires to enter into an agreement permitting White Hall to connect with the sewer system of Pine Bluff, upon certain terms and conditions as herein specifically set forth, and to provide service for all present and future customers of the City of White Hall who are or will be connected to the White Hall sewer system;

NOW, THEREFORE, in consideration of the mutual benefits to be derived herefrom by all parties hereto, it is hereby agreed by and between the parties:

1. Connection by White Hall to the Sewer System of the City of Pine Bluff

Pine Bluff, as Owner, hereby agrees to permit White Hall to connect to the sewer system of Pine Bluff under the terms of the agreement as necessary ordinances have been adopted as referred to herein, including those approving this agreement pursuant to A.C.A. Statute No. 14-235-212 by the governing authorities of Pine Bluff Wastewater Utility and City of White Hall; and White Hall hereby agrees, at its expense, to make such connection in a manner and at a location as approved by the Utility, and in accordance with the terms and provisions of this agreement and all applicable laws and regulations.

2. Wastewater Discharge Flow Measuring Meter

The connection to the Pine Bluff facilities shall include the furnishing and installation of a wastewater discharge flow meter and pump station equipment owned and operated by White Hall and all expenses in connection therewith shall be borne by White Hall. The flow meter shall be of a type and installation as approved by the Utility. The function of the meter shall be to measure and accurately record all flows discharged into the Pine Bluff sewer facilities by White Hall. Flow and discharges from other locations within the City of White Hall may not be segregated from the wastewater discharge flow measuring meter. The City of White Hall agrees to maintain this meter to

insure its reliability and accuracy. This meter shall be calibrated once per year by a qualified meter calibration vendor and a copy of the calibration records sent to PBWU.

3. Sewer Services, Charges and Collections

White Hall agrees to pay the Utility a monthly sewer service charge and said charge shall be promptly billed after the first day of each month for the services provided by this agreement. The monthly sewer service charge shall be computed from the total flow registered by the Wastewater Discharge Flow Measuring Meter, including all infiltration and inflow, at the rates set by the Pine Bluff City Council for wholesale sewer service outside the city limits of Pine Bluff, Arkansas. The City of White Hall agrees to establish and charge rates for all classes of customers at a rate, no less than, those established in the City of Pine Bluff. The monthly statement for the charge shall be based upon flow meter readings conducted by the Utility and verified by the City of White Hall; however, in the event of flow meter malfunction, the Utility may estimate the reading based on the Wastewater Utility's policy and procedures. All charges for sewer service provided to White Hall shall be billed so that White Hall can make timely remittance payments for these charges within 30 days of the invoice date.

4. Penalties for Non-Payment

A penalty of 5% of the total payment amount due shall be added to such invoice should the full payment not be made to PBWU within 30 days of their invoice date. Payment beyond 45 days of invoice date may result in immediate termination of this agreement. Additional administrative charges may be imposed toward efforts to collect on past due invoices. White Hall shall collect from its users all sums which may be due in connection with the service extended. Pine Bluff Wastewater Utility (for the use and benefit of the City of Pine Bluff) shall have all rights to effect such collection of all sums owed to Pine Bluff pursuant to Arkansas law, including but not limited to, those provisions contained in A.C.A. Statute No. 14-235-223; and White Hall agrees to hold harmless the Pine Bluff Wastewater Utility for all losses, costs and expenses as may be sustained by Pine Bluff in connection with the payment of such sewer service.

5. Monitoring Charges and Fees

In accordance with rates as amended by Ordinance 6146 dated August 1, 2005, the City of White Hall 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

** Note: These unit charges may change should a rate increase occur during the period of time this agreement is in effect.*

In accordance with Sewer Use Ordinance 6146, the City of White Hall must, also, pay a monitoring charge. This charge is based on the volume of wastewater discharged by the City of White Hall and the wastewater monitoring conducted during the billing month. This charge is to recover the cost for the testing and analyses required by the federal NPDES permit for Pine Bluff Wastewater Utility. A **$1,250** fee will be assessed to the City of White Hall for this agreement permitting all discharge into the Wastewater Utility's sewer system. This fee must be paid in full prior to the issuance of this agreement. This fee does not include cost of reissuance of this agreement due to revocation or wastewater service termination. The City of White Hall shall not discharge any wastewater pollutants, contaminants or any other wastes (that are specifically prohibited by local the City of Pine Bluff Ordinances) which could interfere or pass through the wastewater treatment facility and cause the facility to violate its NPDES permit. Any other fees required for compliance purpose, related to wastewater discharge from the City of White Hall and mandated by the Arkansas Department of Environmental Quality (ADEQ) or the federal Environmental Protection Agency (EPA), may be imposed on the City of White Hall. However, this agreement does not obligate PBWU for any regulatory compliance requirements for the City of White Hall (i.e. sanitary sewer overflows, etc.) as promulgated by ADEQ or the federal EPA.

6. Application of City of Pine Bluff Sewer Ordinances

The provisions of all existing and future rate ordinances enacted by the City of Pine Bluff relating to wholesale customers shall apply to the City of White Hall. It is agreed that the wholesale rate for White Hall will not be increased by a greater percentage than any increase set for residential customers in Pine Bluff. The provisions of these ordinances shall be binding on the parties hereto, including the rates as may from time to time be specified; and White Hall covenants that it will (at all times) comply with said ordinances. White Hall, further, agrees to hold harmless the Utility Commission from all losses, damages, expenses or liabilities of nature incurred by the Utility Commission as a consequence of any acts, omissions or any conduct by any authorized representative or employee of White Hall, its customers or citizens arising out of any violations of said ordinance or any provision of this agreement or relating to the sewer service furnished as a consequence thereof.

7. Future Connections with the Sewer System of White Hall

White Hall agrees not to extend any sewer services to any area outside the incorporated area of White Hall. No hauled waste must be permitted to be dumped or discharged into the City of White Hall's system without approval of the Wastewater Utility.

8. Future Extensions of Service

The Utility Commission shall not be obligated for and assumes no liability for any future extension of service not specifically set forth herein, and White Hall agrees that no such extension shall be made without the prior written approval of the Utility Commission. This agreement does not take into consideration the maintenance and upkeep of the collection system and associated lift stations owned by the City of White Hall. This agreement anticipates an average volume of one (1) million gallons per day (M.G.D.) from White Hall during the term of this agreement. This average volume is not to be exceeded without written approval from Pine Bluff Wastewater Utility.

9. White Hall Sewer Use Ordinance

A. Both parties recognize that Pine Bluff must implement and enforce a pretreatment program to control industrial waste under 40 CFR Part 403.

B. White Hall will adopt a sewer use ordinance or equal which contains pretreatment requirements and pollutant limitations no less stringent and as broad in scope as the Code of Ordinances for the City of Pine Bluff.

C. Whenever Pine Bluff amends its sewer use ordinance, it will forward a copy of such amendments to White Hall. White Hall will enact amendments at least as stringent as those adopted by Pine Bluff within [30] business days from the time Pine Bluff enacts the amendments.

D. The Parties will periodically review their respective sewer use ordinances to jointly draft and adopt amendments (which are equivalent in scope and stringency) to their respective sewer use ordinances when deemed necessary for the effective administration and operation of the pretreatment program.

E. White Hall will adopt and diligently enforce local limits which address, at least, the same pollutant parameters and are, at least, as stringent as the local limits enacted by Pine Bluff. If any revision or additions are made to Pine Bluff's local limits, Pine Bluff will forward to White Hall a copy of any such revisions or additions to the local limits with [14] business days of the enactment thereof. White Hall agrees to adopt any revisions or additions made to Pine Bluff's local limits within 30 business days.

F. White Hall designates Pine Bluff as the agent of White Hall for the purposes of implementation and enforcement of White Hall's pretreatment program against users located in White Hall.

G. Pine Bluff, on behalf of and as an agent for White Hall, will perform technical and administrative duties necessary to implement and enforce White Hall's

pretreatment program. Pine Bluff will, on at least, an annual basis: (1) update the industrial listing of significant industrial users; (2) provide all users, required to obtain a permit, with applicable local limits and requirements; (3) conduct inspections, sampling, and analyses; (4) take all appropriate enforcement action as outlined in Pine Bluff's Sewer Use Ordinance; (5) exercise the right to enter any industrial user's premises to determine compliance with pretreatment requirements; and (6) perform any other technical or administrative duties the parties to this agreement deem appropriate. In addition, Pine Bluff may, as an agent of White Hall, take emergency action to stop or prevent any discharge which present or poses an imminent danger to the health or welfare of humans which reasonably appears to threaten the environment, threatens to cause interference, pass through, sludge contamination, or threatens to cause damage to the sewer collection system.

H. Pine Bluff will be responsible for all costs associated with the Industrial Pretreatment Program (including labor, equipment, attorney's fees, etc.) incurred in implementing and enforcing White Hall's sewer use ordinance on behalf of White Hall; however, PBWU will bill all appropriate White Hall industrial dischargers in accordance with the same charges and fees set forth for Pine Bluff significant industrial users.

I. Before any commercial or industrial user with a flow of 25,000 gpd or greater (having met the PBWU's Pretreatment Program within the jurisdictional boundaries of White Hall) is allowed to discharge, the Utility must issue a permit to the new user. Such permit shall be substantially equivalent to the Agreement and must be fully secured prior to a discharge from any user in or outside the White Hall area or jurisdiction.

J. All haulers including temporary haulers must have a written authorization from the Pine Bluff Wastewater Utility prior to any discharge in the City of White Hall system.

K. This Agreement will be reviewed and revised to ensure compliance with the Federal Clean Water Act (42 U.S.C. Statute No. 1251 et seq.) and the rules and regulations (see 40 CFR Part 403) issued thereunder, as necessary.

10. Title and Maintenance Responsibility for Sewer Facilities Owned and Operated by White Hall Title to and maintenance responsibility for any and all sewer facilities or facilities of any nature whatsoever (located within the incorporated city limits of White Hall) including but not

limited to each customer's public facilities to the public sewer line, shall remain with White Hall or its citizens. Pine Bluff shall have no liability or responsibility for the operating or maintenance of said sewer system located within the incorporated city limits of White Hall or any future connections as may from time to time be permitted.

11. Terms of Agreement

Unless terminated earlier, the term of this agreement shall be for a period of five (5) years from the date hereof at which time it will expire. This agreement may be extended by the agreement of the parties hereto upon notice given by either party prior to the end of the term and adoption, thereafter, or approving ordinances by the contracting parties hereto.

12. Assignment of Transfer

This agreement and the rights hereunder shall not be assigned or transferred by White Hall to any private or public entity which may manage the system on behalf of White Hall. This agreement is in full effect and the terms implementable only with regards to the City of White Hall and Pine Bluff Wastewater Utility.

13. Taxes

White Hall covenants and agrees to pay any and all taxes levied by the United States and the State of Arkansas for the services provided and treatment of sewage pursuant to this contract, and shall comply with all federal, state, county and municipal laws, ordinance, rules and regulations by the employees or authorized representative of White Hall. A copy of the annual financial audit information from the City of White Hall as it relates to water and sewer customers will be provided annually to Pine Bluff Wastewater Utility.

14. Termination

This agreement may be terminated by either party if the other party fails to fully comply with any of the terms and provisions of this agreement. Termination of this agreement may occur only after actual written notice is given. In the event of the termination of this agreement, all obligations of Pine Bluff to treat the sewage under the agreement shall cease and White Hall shall immediately remove the sewer connection provided herein, it being the intention of the parties hereto that White Hall shall be solely responsible for the treatment of its sewage upon termination of this agreement. Failing which, Pine Bluff shall be entitled to recover from White Hall all damages (of any nature whatsoever) sustained by Pine Bluff proximately caused by White Hall's violation of any provision(s) of this agreement, including but not limited to, White Hall's failure to remove said sewer connection and failure to treat said sewage.

15. Notices

All notices hereunder shall be in writing and shall be deemed to have been duly given when sent by registered or certified mail with postage prepaid as follows:

If to Pine Bluff:

Pine Bluff Wastewater Utility
1520 S. Ohio Street
Pine Bluff, AR 71601
Attention: Manager

If to White Hall:

City of White Hall
101 Parkway Drive
White Hall, AR 71602
Attention: Mayor

16. Update of Regulations

White Hall agrees to abide by the rules and regulations published from time to time concerning the treatment of sewage by Pine Bluff, and all applicable federal, state, county and municipal regulations concerning construction, operating, maintenance, pretreatment and protection of treatment of sewage pursuant to this agreement. Pine Bluff shall have the right, if it deems necessary or appropriate, to inspect all industrial and commercial connections to the White Hall sewage system at any time.

17. Governmental Function

The parties recognize that treatment of sewage pursuant to this agreement is a governmental function and the Agreement shall be performed by the parties hereto in their respective governmental capacities.

18. Agreement Legally Binding

All parties to the agreement agree to the terms contained herein and represent to each other that the terms of this agreement have been dully accepted and approved by the authorized representatives of the parties hereto; and all parties covenant to each other that all action required by law has been taken to make this agreement legally binding and enforceable and that the parties hereto shall have all of the rights and remedies under the law of Arkansas to enforce the terms of this agreement. This agreement supersedes any and all past agreements and other related correspondences or directives. The parties agree that in the event any paragraph, sentence, clause or word(s) of this agreement shall be held to be invalid, illegal or unenforceable, all other terms and provisions of this agreement shall remain in full force and effect, and this agreement shall be construed as if not containing the particular provision or provisions held to be invalid.

==========

Dated this 20 day of October, 2008.

CITY OF WHITE HALL, ARKANSAS

BY: _____
James "Jitters" Morgan, Mayor

ATTEST:

_____
City Clerk, City of White Hall

PINE BLUFF WASTEWATER UTILITY

BY: _____
Ken Johnson, General Manager

Approved by the UTILITY COMMISSION

Dated this 21st day of September, 2008

BY: _____
Tena Rodgers, Chairperson

ATTEST:

_____
City Clerk, City of Pine Bluff

B-8/8

2008 DAILY AVERAGE WATER CONSUMPTION

SIGNIFICANT INDUSTRIES

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	DAILY AVERAGE
ARM	49,174.97	56,340.43	52,070.45	54,080.40	47,630.71	44,979.73	44,180.26	47,196.39	46,949.47	51,780.90	43,309.20	50,912.26	49,050.43
ATC-A	16,431.87	23,161.29	17,734.84	16,755.20	19,423.87	17,952.00	17,807.23	11,533.68	5,335.73	3,064.39	0.00	0.00	12,433.34
CMT-B	56,703.23	77,979.00	80,397.94	68,342.27	75,137.81	82,379.73	64,159.10	91,304.26	89,560.53	63,917.81	68,766.13	86,936.90	75,466.39
PCO	19,134.32	7,106.00	10,509.81	10,846.00	4,946.45	27,326.93	33,515.23	40,898.71	29,196.93	14,911.74	22,564.67	10,882.19	19,344.92
JRMC	75,330.84	83,882.86	123,154.58	90,906.93	69,974.19	109,332.67	100,111.35	102,910.32	107,288.13	84,717.03	95,993.33	121,562.06	97,097.03
UP	20,027.10	22,306.43	18,796.52	19,223.60	30,161.29	33,734.80	24,297.94	24,056.65	31,391.07	22,970.84	22,365.20	26,204.13	24,627.96
ST	14,718.71	16,856.71	16,069.94	24,858.53	23,356.90	27,426.67	28,882.45	19,086.06	19,971.60	31,391.87	15,184.40	12,088.65	20,824.37
ARC	156,525.03	178,050.71	163,353.55	154,935.73	178,144.65	184,032.93	178,916.77	196,699.87	174,682.93	177,396.65	161,293.73	161,181.94	172,101.21
TYSON-IP	2,104,244.65	2,416,467.43	2,229,981.03	2,349,941.73	2,261,662.45	2,209,168.13	1,915,217.81	2,136,022.58	2,022,741.60	2,025,029.03	1,892,564.67	2,202,739.35	2,147,148.37
WM	7,648.90	10,578.86	9,193.16	9,923.47	10,689.16	10,472.00	12,571.23	8,614.06	9,050.80	10,206.58	11,070.40	17,107.48	10,593.84
ATC-B	868.65	3,018.71	337.81	2,293.87	1,689.03	2,219.07	2,340.52	1,737.29	872.67	554.97	0.00	0.00	1,327.71
ATC-C	7,841.94	11,754.29	7,938.45	10,746.27	9,989.42	11,145.20	11,026.97	8,445.16	3,091.73	1,351.23	0.00	0.00	6,944.22
WH	527,548.39	738,785.71	658,548.39	1,148,400.00	701,000.00	479,533.33	430,516.13	561,032.26	614,166.67	545,806.45	522,666.67	733,225.81	638,435.82
TOTAL	3,056,198.58	3,646,288.43	3,388,386.45	3,961,254.00	3,433,805.94	3,239,703.20	2,863,542.97	3,249,537.29	3,154,299.87	3,033,099.48	2,855,778.40	3,422,840.77	3,275,394.61

INDUSTRIAL MONITORING

Less than 5,000 gpd, monitored once per month...$73.87
Between 5,001 to 25,000 gpd, monitored twice per month...$214.33
Between 25,001 to 100,000 gpd, monitored three times per month...$416.75
Greater than 100,000 gpd, monitored four times per month...$510.60

PINE BLUFF WASTEWATER UTILITY

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

WASTEWATER DISCHARGE PERMIT

Wheeling Machine Products
5411 Industrial Drive S.
Pine Bluff, AR 71602

Permit No. 53

Is hereby authorized to discharge wastewater from the facility located at 5411 Industrial Drive South Pine Bluff, Arkansas 71602 into the Pine Bluff Wastewater System in accordance with the limitations set forth in this permit. This permit shall become effective on August 28, 2008 and shall expire at midnight on August 28, 2013.

Signed this 25th day of August 2008.

Ken Johnson, Manager
Pine Bluff Wastewater Utility

D-1/12

Wheeling Machine #53
5411 Industrial Drive South
Pine Bluff, AR 71602

Effective 8/28/08

Mr. Craig Powell
Contact Official
(870) 247-7119

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	MONTHLY AVERAGE LIMITS	MONITORING FREQUENCY	SAMPLE TYPE
1Biochemical Oxygen Demand	*300 mg/l*	*N/A*	*2/Month*	*24 hr. Time Composite*
1Total Suspended Solids	*300 mg/l*	*N/A*	*2/Month*	*24 hr. Time Composite*
1Oils and Grease	*100 mg/l*	*N/A*	*2/Month*	*Grab*
pH	*5.0 - 11.0 s.u.*	*N/A*	*2/Month*	*Grab*

D 2/12

Wheeling Machine #53
5411 Industrial Drive South
Pine Bluff, AR 71602

Effective 8/28/08

Mr. Craig Powell
Contact Official
(870) 247-7119

PARAMETER	DAILY MAXIMUM LIMITS	MONTHLY AVERAGE LIMITS	MONITORING FREQUENCY	SAMPLE TYPE
Silver	*0.24 mg/l*	*0.24 mg/l*	*2/Month*	*24 hr. Time Composite*
Copper	*0.50 mg/l*	*0.50 mg/l*	*2/Month*	*24 hr. Time Composite*
Lead	*0.43 mg/l*	*0.43 mg/l*	*2/Month*	*24 hr. Time Composite*
[2]Total Toxic Organics	*2.13 mg/l*	*2.13 mg/l*	*1/Year*	*Grab*
Zinc	*1.48 mg/l*	*1.48 mg/l*	*2/Month*	*24 hr. Time Composite*
Chromium	*0.25 mg/l*	*0.25 mg/l*	*2/Month*	*24 hr. Time Composite*
Cyanide	*1.20 mg/l*	*1.20 mg/l*	*2/Month*	*Grab*
Cadmium	*0.10 mg/l*	*0.10 mg/l*	*2/Month*	*24 hr. Time Composite*
Nickel	*2.38 mg/l*	*2.38 mg/l*	*2/Month*	*24 hr. Time Composite*

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

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

Wheeling Machine is to comply with the provisions of the Metal Finishing Pretreatment Standard, 40 CFR 433)

Wheeling Machine is also required to ensure their spill prevention plan to the Wastewater is updated on a regular basis should changes occur.

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 **$1,250.00** 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 **WM #53** effluent discharge location from the wastewater pretreatment facility *(Marked Sampling Location)*. All process wastewater collected must pretreated at the pretreatment facility located on site prior to discharge 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.

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:

L) 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.

M) 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.

N) 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.

Vincent Miles
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.

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.

PINE BLUFF WASTEWATER UTILITY

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

PERMIT FACT & INFORMATION SHEET

Industry Name: Stant Manufacturing

Industry Address: 5300 Jefferson Parkway
Pine Bluff, AR 71602

Permit # 43

Contact Person: Tim McKee

Categorical User: (x) Yes ( ) No

New Permit: (x) Permit Renewal Permit Modification ( )
( ) Change in Ownership New Permit ( )

Has Permit fee been paid?: ( ) Yes (x) No

Effective Date: September 1, 2008 – September 1, 2013

Categorical Type:

(x) Metal Finishing - 40 CFR 433 Metal Finishing Point Source Category

( ) Electroplating

( ) Iron/ Steel

( ) Transportation/ Equipment Cleaning

( ) Metal Products & Machinery

( ) Not Applicable

Estimated Flow:

24,500 gallons/day

Discharge Location:

Manhole Southeast of plant

Documentation:

Suspected pollutants checklist, (3) Hazardous waste shipments, explanation and description of pretreatment, diagram/schematic of facility.

Process Description:

Metal stamping, zinc plating, chrome emersion coating, plastic injection molding and automated assembly to manufacture gasoline and radiator caps and molded plastic component parts.

120158

2008 SAMPLE CUSTODY REPORT

PINE BLUFF WASTEWATER UTILITY
1520 SOUTH OHIO STREET
PINE BLUFF, AR 71601-6055

PBWWU LAB. TEL. (870) 535 0821 PBWWU LAB. FAX NUMBER: (870) 535 0822

P.O. NUMBER: 12430 MONTH: JUNE

SAMPLE ID	BP-EFF-0608	BP-EFF-0608
COMPANY IDENTIFICATION	PINE BLUFF WASTEWATER	PINE BLUFF WASTEWATER
SAMPLING POINT	BOYD POINT EFFLUENT	BOYD POINT EFFLUENT
SAMPLE TYPE	24 HRS TIME COMP	24 HRS TIME COMP
COLLECTION DAY	6/9/2008	6/9/2008
COLLECTION TIME	0900 HRS	0900 HRS
PARAMETER	METAL-PPS FORM	METAL-PPS FORM
SAMPLE COLLECTOR	SJC/NMJ	SJC/NMJ
PRESERVATION	HNO3;pH<2	HNO3;pH<2

ANALYSIS PERFORMED BY:	AMERICAN INTERPLEX CORPORATION	
SAMPLE TRANSPORT BY:	Jeanette Hampton	
SAMPLE TRANSPORT DATE & TIME:	6-10-08 : 1325	(hrs)

I Eugene Hampton , HAVE RECEIVED WASTEWATER SAMPLE(S) FROM PINE BLUFF WASTEWATER UTILITY AND DO HEREBY FIND THESE SAMPLE(S) TO BE ADEQUATE UPON RECEIPT AND THEREBY SUITABLE FOR LABORATORY ANALYSIS.

PLEASE INCLUDE A P.O. NUMBER WITH THE PINE BLUFF WASTEWATER INVOICE

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

SEND INVOICE TO : DEBORAH BASS, CONTROLLER

SEND ANALYTICAL RESULTS TO : VINCENT MILES, LABORATORY SUPERVISOR

E 1/1

PINE BLUFF WASTEWATER UTILITY
1520 S. Ohio Street • Pine Bluff, Arkansas 71601-6055 • 870-535-6603 • FAX 870-535-6243

WASTEWATER DISCHARGE PERMIT APPLICATION

I. GENERAL INFORMATION:

Company Name: Wheeling Machine Products a Division of United States Steel Tubular, Inc.

Location: 5411 Industrial Drive South, Pine Bluff, AR 71602

Owner: U.S.S. Tubular, Inc. SIC Code: 3498

Years of Establishment: 1982

Contact Official: Alan Schmidt

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

Title: Plant Manager

Number of Total Employees: 102

Days of Operation Per Week: 7

Hours of Operation Per Day: 24

II. FACILITY INFORMATION:

Describe your facility's manufacturing processes:

Manufacture of pipe couplings for the oil & gas industry, by cutting 40' pipe to length, machining internal pipe threads, applying protective zinc phosphate plating and external paint.

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

If yes, please specify: N/A

Number of Wastewater Treatment Operators or responsible personnel: 2

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

Ricky Howington (first shift)

Jeff Via (backup)

Does your facility currently have any pretreatment equipment in use?

(X)yes ( ) no

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

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

Batch treatment in multiple stages with direct operator control: pH adjustment, addition of coagulant, flocculent, clarification to settle solids, filter pressing sludge, batches of treated water are held pending testing prior to discharge.

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

"WM #53" effluent discharge drain, near filter press.

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

G-2/7

Does your facility generate and dispose of Hazardous Wastes?

(X) yes ( ) no (Note: Include copies of the last three (3) Waste Manifest Forms)

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

Drummed waste paint-related material is shipped about annually.

Is your facility regulated by other environmental control permits?

If yes, please specify: Air: #1117-AR-1, Stormwater: ARR00B685

III. WASTEWATER DISCHARGE INFORMATION:

Sanitary Sources	5,100	gallons/day
Processes Sources	2,300	gallons/day
Other (please specify on separate sheet)	N/A	gallons/day
List Total Flow	7,400	gallons/day

Is your facility's wastewater discharge?

Continuous	
Batch	X
Other	

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

( ) yes (X) no

If yes, when is flow the greatest? N/A

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

N/A

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

IV. COMPLIANCE HISTORY:

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

If yes, please explain: 433 Metal Finishing

Has your facility received any noncompliance or violation notices since your last permit was issued? ( ) yes (X) no

If yes, please explain the reason for noncompliance:

N/A

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

( ) yes (X) no.

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Other Comments:

Water consumption estimated at 10,354 gpd average.

Applicant's Signature: Alan D Schmidt

Title: Plant Manager

Date: 2/22/2008

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

Approved By: V. Mills

Title: E.C. Supervisor

Date: August 22, 2008

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Wheeling Machine Products
Division of United States Steel
5411 Industrial Drive South
Pine Bluff, AR 71602
Phone #:870-247-5945
Fax#: 870-247-5421

February 22, 2008

Vincent Miles
Pine Bluff Wastewater Utility
1520 S. Ohio St.
Pine Bluff, AR 71601-6055

Re: Wastewater Permit No. 53 Renewal Application
Notice of Change-of-Ownership
Notice of Point-of-Contact change

Mr. Miles,

Attached is Wheeling Machine Products' application to renew wastewater discharge permit #53 (expires 8/22/08). This letter also serves as formal notification of the recent change-of-ownership to United States Steel Tubular Products, Inc.

The designated point-of-contact for technical/regulatory questions or additional information regarding the discharge permit is now Craig Powell at 870-247-7119.

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 upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Alan D. Schmidt

Alan Schmidt
Plant Manager

Attachments

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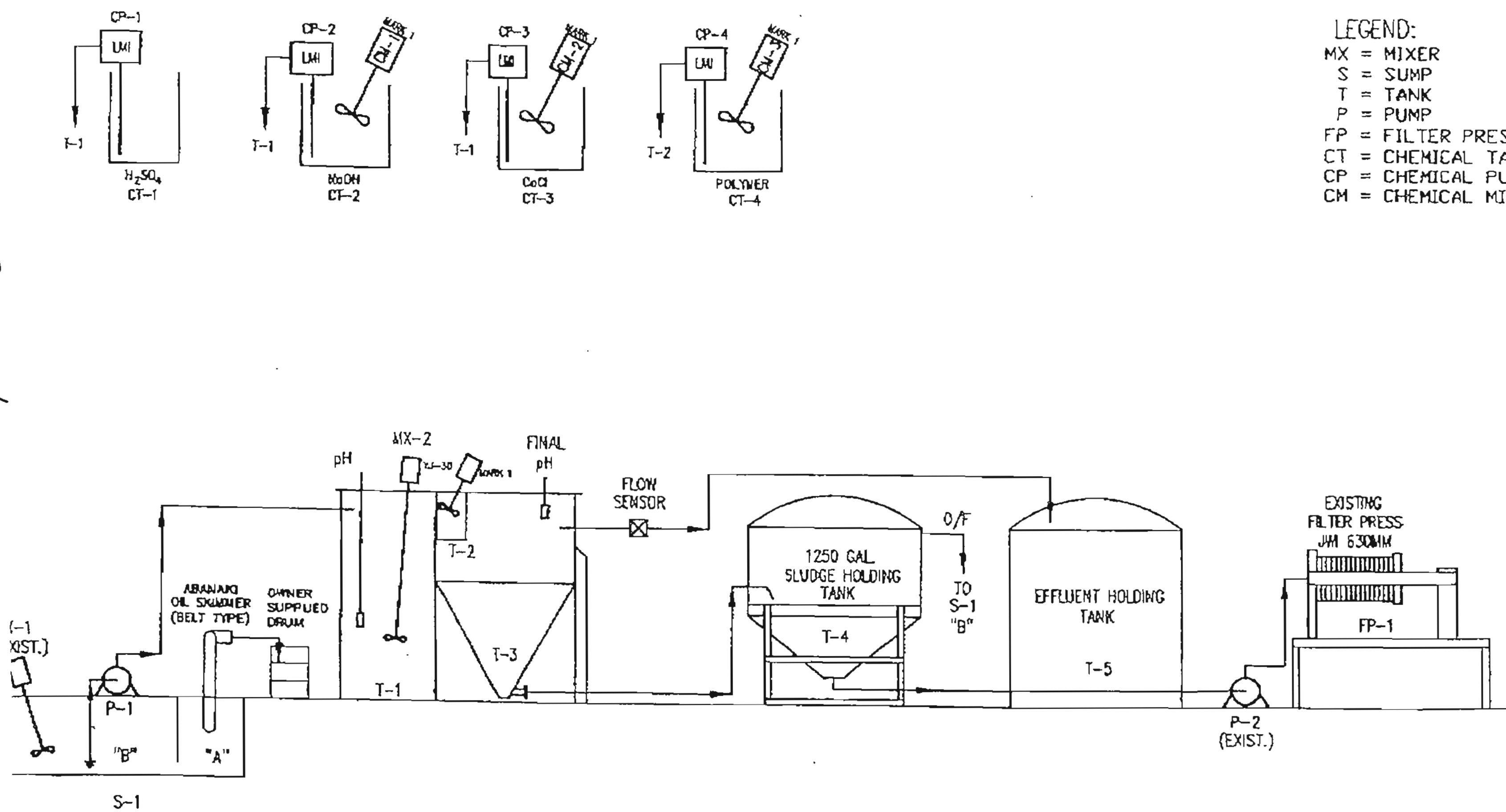
WASTEWATER TREATMENT SYSTEM

LEGEND:
MX = MIXER
S = SUMP
T = TANK
P = PUMP
FP = FILTER PRESS
CT = CHEMICAL TANK
CP = CHEMICAL PUMP
CM = CHEMICAL MIXER



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PINE BLUFF WASTEWATER UTILITY

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

INDUSTRIAL INSPECTION REPORT

SECTION 1: GENERAL INFORMATION

Name of Industry WHEELING MACHINE PRODUCTS, LLP SIC 3498

Street Address 5411 INDUSTRIAL DRIVE

City, State PINE BLUFF, AR 71602 Established 1982

List the Name and Position of Contact Official:
CRAIG POWELL - QUALITY ENGINEER II

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

ALAN SCHMIDT

PRESIDENT

Address: 5411 INDUSTRIAL DRIVE

City: PINE BLUFF

State: ARKANSAS 71602

Describe the Manufacturing Operation
MACHINING AND PAINTING OF STEEL PIPE COUPLINGS FOR THE OIL AND GAS INDUSTRY. THE INDUSTRY CUTS 40' STEEL PIPE VARIOUS LENGTHS. THE PIPE IS THREADED INSIDE, ZINC PHOSPHATE COATED, AND PAINTED EXTERNALLY

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

_____ tons/ day _____ tons/year

Number of Shifts 2

Overall Employee Count 125

Employees per shift 65 (1st) __ (2nd) 55 (3rd)

19 Salary

Comments:

Revised: 11/2003

H - 1/10

1ST SHIFT = 7:00 A.M. - 5:30 P.M.

3rd SHIFT = 9:00 P.M. - 7:30 A.M.

SECTION 2: REPORTING REQUIREMENTS

Is Industry governed by a Categorical Pretreatment Standard?

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

METAL FINISHING

Does Industry have a current Industrial Discharge Permit?

(X) Yes ( ) No Permit Number 53

Expiration Date AUGUST 22, 2008

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

(X) Yes ( ) No

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

( ) Yes (X) No

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

NO LONGER REQUIRED

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:

THE CHAIN -OF-CUSTODY IS PART OF THE WASTE TREATMENT DAILY LOG WHICH IS UPDATED PRIOR TO EACH DISCHARGE

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

N/A

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

( ) Yes ( ) No N/A

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

Wastewater Analytical Report	24 (APRIL 2007 - APRIL 2008)	
Wastewater Discharge Permit	1	
Self-Monitoring Reports	NO LONGER REQUIRED	
Chain of Custody Reports	26 (APRIL 2007 - APRIL 2008)	
Baseline Monitoring Report	N/A	*(For Categorical Users)*
Toxic Organic Management Plan	_	*(For Categorical Users)*
Solvent Management Plan	_	SEPTEMBER 2002
Hazardous Waste Manifest	_	
Notices of Noncompliance/Violations	2	
Specific Enforcement Actions	0	

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

( ) Yes ( ) No

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Where are these maps kept?
THE MAPS/DIAGRAM THAT I REVIEWED WERE KEPT IN THE OFFICE OF CRAIG POWELL AND RICHARD HILL.

Is flow measured at your industry?

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

THERE IS AN INLINE FLOWMETER USED AT THE END OF DISCHARGE LINE. HOWEVER, IT IS NOT USED FOR MONITORING PURPOSES.

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

( ) Yes (X) No

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

SECTION 3: WASTE MINIMIZATION

Describe any steps or technique which have been utilized at the Industry to minimize waste.
N/A

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

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

( ) Yes (X) No

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?
N/A

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?
N/A

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

(X) Yes ( ) No

THERE ARE BASICALLY FIVE STAGES INVOLVED. THE WASTEWATER ENTERS THE FIRST TANK WHERE THE pH IS ADJUSTED AND THE COAGULANT IS ADDED. THE FLOCCULATE IS ADDED IN THE THIRD TANK. THE FIFTH TANK IS UTILIZED AS THE SETTLING TANK. THE SETTLING TANK IS TRANSFERRED TO ONE OF TWO BATCH TANKS WHERE THE WASTEWATER IS CHECKED PRIOR TO RELEASE.

(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*
RICKEY HOWINGTON	WASTE TREATMENT OPERATOR, CLASS II
JEFF VIA	LEAD PLATER, CLASS I

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

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?

3-RING BINDER

Are there placards listing hazardous areas to the employees?

(X) Yes ( ) No

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

(X) Yes ( ) No

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

( ) Yes (X) No

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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?
DAILY

Does the Industry store any Hazardous Waste?

(X) Yes ( ) No

Briefly describe how this waste is handled?

How often are Hazardous Wastes Disposed of?

AVERAGE 1 OR 2 PER YEAR.

List latest Disposal Date and Company receiving this waste:

Date: 4/22/08

Company Name: GIANT RESOURCE RECOVERY - ATTALLA, INC.

Address: 1229 VALLEY DRIVE

City, State, Zip ATTALLA, AL 35954

PBWU ENVIRONMENTAL INSPECTOR: VINCENT MILES V. Miles

DATE & TIME: MAY 2, 2008; 14255 HRS.

COMPANY OFFICIALS PRESENT DURING INSPECTION:

Name	Title	Signature
CRAIG POWELL	QUALITY ENGINEER	(SIGNATURE ON FILE)
RICHARD HILL	QUALITY ENGINEER I	(SIGNATURE ON FILE)

SECTION 6: RECOMMENDATIONS AND ACTIONS NEEDED

Section 1: General Information

Section 2: Reporting Requirements

1. DURING THE INSPECTION, I WAS GIVEN A DOCUMENT IN WHICH I WILL REVIEW TO SEE IF IT SATISFIES THE REQUIREMENT OF THE TOXIC ORGANIC MANAGEMENT PLAN.

2. DURING THE INSPECTION, I WAS GIVEN A MAP/DIAGRAM. HOWEVER, I AM REQUESTING ONE THAT WILL MORE ADEQUATELY DESCRIBE THE CURRENT LAYOUT OF THE FACILITY.

Section 3: Waste Minimization

Section 4: Compliance Information

Section 5: Plant Observation

Other Comments:

REQUEST MORE UPDATED FLOW DIAGRAM.
REQUEST SPILL PREVENTION.

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STANT MANUFACTURING PINE BLUFF

ONE PLAN

Combines the requirements of the following into one emergency management plan:

EMPLOYEE EMERGENCY ACTION PLANS
STORMWATER POLLUTION PREVENTION PLAN
OIL SPILL CONTINGENCY PLAN
SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN
HAZARDOUS WASTE CONTINGENCY PLAN
FIRE PREVENTION PLAN
SLUG DISCHARGE PREVENTION AND CONTROL PLAN
SOLVENT AND TOTAL TOXIC ORGANIC MANAGEMENT PLAN

Stant®

Pine Bluff Facility
5300 Jefferson Parkway
Pine Bluff, AR 71602
Tel – (870) 247-5480

APPROVE BY:

SIGNATURE: (on File) DATE: 11/9/07
Mr. Timothy McKee
Division EHS Engineer

SIX-MONTH REVIEWS BY (per 40 CFR 112.7):

NAME	TITLE	DATE	SIGNATURE	CHANGE NO.	ITEM CHANGED

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TABLE OF CONENTS

TABLE OF CONENTS – (continued)

SECTION I
CERTIFICATIONS

SPCC Plan Certification: I hereby certify that I have visited and examined the facility, and being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with accepted and sound industry practices and standards, and with the requirements of that part. I certify that Procedures for required inspections and testing have been established; The Plan is being fully implemented; The facility meets the qualification criteria set forth under §112.3(g); The Plan does not deviate from any requirement of this part as allowed by §§112.7(a)(2) and 112.7(d), except as provided in paragraph (c) of this section; and The Plan and individual(s) responsible for implementing the Plan have the full approval of management and the facility owner or operator has committed the necessary resources to fully implement the Plan.

SWPPP Certification: "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 directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

SWPPP ARR000000 Part III.A.4.c.vii Certification: I certify that the discharge has been tested or evaluated for the presence of non-storm water discharges. This evaluation was used to develop the descriptions of non-storm water discharges and identified pollutants that are described in this plan. The method for evaluating these discharges include review of facility layout plans, material specifications and handling procedures, as well as interviews with those directly responsible. All non-storm water discharges are identified in the section "Allowable Non-Storm Water Discharges."

Slug Load Prevention Plan: Based on my inquiry of the person or persons directly responsible for managing compliance with the slug control measures in the Slug Control Plan, I certify that, to the best of my knowledge and belief, this facility is implementing the Slug Control Plan submitted to the Pine Bluff POTW. I certify that the slug prevention and control equipment installed by the industry will provide adequate protection form slug loading when used and maintained properly.

Mark Smith, Manufacturing Director, Stant Manufacturing Inc.

SIGNATURE: (on file)

DATE: 11/9/07

I-4/63

SECTION II
GENERAL INSTRUCTIONS

DESCRIPTION OF FACILITY

The Stant Pine Bluff Facility, a Tomkins Company, is engaged in the manufacture of gas caps and radiator caps. The Company's operations are classified under Standard Industrial Classification (SIC) Code 3714. Stant MFG, Inc. is situated on a 19-acre site and the plant contains approximately 235,000 square feet of building space. The plant is located at 5300 Jefferson Parkway, Pine Bluff AR, 71602 and is shown on the Locus Map in Figure 1-1.

The facility is comprised of two detached buildings including the following:

- Main Plant
- Building & Grounds Maintenance Storage Shed (Previously for storage of hazardous and non-hazardous virgin materials- Discontinued in 2007)

The above buildings are show on the Facility Layout Plan in Figure 1-2.

The Company's level of employment ranges from 290 to 300 employees. The facility typically works three 8-hour production shifts Monday through Friday. Production is scheduled on weekends on a swing shift in Plastics as well as on an as needed basis in other areas. Employees staff the plant 24 hrs/day, 7 days/week. The facility is manned 24 hrs/day seven days per week with either production personnel or a security guard.

Stant MFG, Inc. has submitted notification of its hazardous waste activity to the EPA and to the DEP. EPA Identification Number ARD096674213 identifies the plant.

Stant MFG, Inc. qualifies as a large quantity hazardous waste generator. The facility stores its own wastes in accordance with applicable regulations and does not store hazardous waste on site for more than 90 days. As a result, the facility is not classified as a hazardous waste storage facility under the regulations.

Stant MFG has submitted the required NOI and has been granted coverage under Arkansas General Permit ARR000000 for Operators of Facilities Discharging Storm Water Associated With Industrial Activity. This permit became effective on April 1, 2004 and will expire at midnight, March 31, 2009.

Arkansas General Permit ARR000000 Part II.B.1 SARA Title III, Section 313 Facilities: Pine Bluff reported releases of Zinc Compounds as required in its annual Form R Report. Per the Definition of "Section 313 Water Priority Chemical" found on Page 53 of Part III of the Permit, Zinc is a Water Priority Chemical. Pine Bluff is required to monitor storm water discharged from the facility that comes into contact with: 1) any equipment, tank, container, or other vessel used for storage or application of a Section 313 water priority chemical; and/or 2) any equipment, tank, container, or other vessel located at a truck, rail car, or air strip loading or unloading area where a Section 313 water priority chemical is handled. The initial assessment of the facility and grounds reveal that no Storm Water exposure exists in relation to the SARA Title III materials reported for this plant. This potential for exposure will be re-assessed during each annual comprehensive site compliance evaluation

STORM WATER DRAINAGE

Site storm water discharges primarily as sheet runoff. This site does discharge from one point source outfall (Outfall #1) collecting water from the Plant Receiving Area. All storm water collects into the Jefferson Parkway Spillway which ultimately discharges to the Arkansas River. The Arkansas River has an established TMDL, this site does not discharge pollutants listed in the TMDL. See Facility Layout Plan in Figure 1-2.

AUTHORIZED NON STORM WATER DISCHARGES

The following are the **ONLY ALLOWABLE NON-STORM WATER DISCHARGES AT STANT MFG**:

(**Note:** Allowable Non Storm Water Discharge means water, other than storm water, allowed by our permit to enter storm water systems or otherwise be discharged to the ground)

1. Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but NOT intentional discharges from the cooling tower (e.g., "piped" cooling tower blowdown or drains)
2. Emergency fire fighting activities.
3. Fire hydrant flushing's.
4. Lawn watering.
5. Uncontaminated air conditioning condensate.
6. Routine external building washing that does not use detergents.
7. Pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used.
8. Uncontaminated non-contact once through cooling water.
9. Foundation or footing drains where flows are not contaminated with process materials such as solvents.

SUBSTANTIAL HARM CRITERIA

Facility specific information was compared to 40 CFR 112 Appendix C – Substantial Harm Criteria. Based upon the information in Attachment C-1, the facility does not pose a risk of substantial harm. Appendix B contains the certification for the applicability of the substantial harm criteria for Stant MFG, Inc.

SPILL RELEASE AND RESPONSE HISTORY

Stant MFG, Inc. has maintained compliance with Federal, State and Local hazardous waste requirements and regulations since the facility began operations. Detailed records will be maintained of all incidents where hazardous material releases have occurred onsite. To date there have been no reportable spills.

DOCUMENTATION OF PERMIT ELIGIBILITY RELATED TO TOTAL MAXIMUM DAILY LOADS (TMDLs)

Point source storm water discharges from Outfall #1 enters the Arkansas River via the Jefferson Parkway Storm Water Spillway. The Arkansas River has established TMDLs for Lead, Silver, Ammonia, Chlorine Residual, Silver, and Fecal. Pollutants discharged from the facility through this point source discharge are not identified in a TMDL for this water body.

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Exception: In the event of an emergency spill, associated with Ammonia or Chlorine being received into the facility, a discharge is possible. Under no other situation would these pollutants be present in the storm water discharge for the plant.

PLAN REVIEW / AMENDMENTS

Revisions to this document are controlled following TS16949 802 - Document Control Procedure. Document retention is controlled following TS16949 803 - Records Retention Procedure

This plan is to be REVIEWED every 6 months, and AMENDED if necessary, whenever:

- Applicable regulations are amended
- The plan fails in an emergency
- The facility changes in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes in the emergency response
- The list of emergency coordinators changes, or
- The list of emergency equipment changes.

The reviewer(s) will sign on the cover of the control copy to document each review until the plan is AMENDED.

This plan is amended at least every 5 years with subsequent review by the Corporate HSE Department and, if required, a licensed Professional Engineer. When updated, the plan must be signed by the Plant Manager and submitted to the appropriate agencies.

PLAN AVAILABILITY

This plan shall be available to all associates by posting on the Company Global Directory at:
P:Global/TS16949/Procedures/0900 Environmental Health and Safety/ISO14001/Pine Bluff/Programs.
Dated, uncontrolled copies shall be distributed to the following groups:

- Local Police Department
- Fire Department with the responsibility for the Facility
- Closest Hospital
- Arkansas Emergency Response Commission
- Local Emergency Response Team
- City of Pine Bluff Engineering Department
- Contracted Spill Clean-up Company (if applicable)

RECORDS RETENTION

Records of regularly scheduled inspections (equipment and spill containment facilities), environmental incidence reports (spills and leaks) and all incidents which have resulted in the release of toxic or hazardous pollutants to the streams of Jefferson County and the State of Arkansas are to be retained for a minimum of three (3) years.

PERSONNEL RESPONSIBILITIES

Stant MFG, Inc. has designated an Emergency Coordinator (EC) to oversee and direct response actions during emergency situations at the facility. The EC has the authority to commit the necessary resources to implement requirements of this Plan. Stant MFG, Inc. has also designated Assistant Emergency Coordinators (AECs) to provide support to the EC in emergency situations, as required. The EC is a Maintenance Manager and Alternate ECs have direct knowledge and experience with

materials used in their areas and as such 40 Hour OSHA Emergency Responder training is not required. Both positions will receive training that includes 8 hour supervisory training at a minimum.

In the event of hazardous incident that could threaten human health or the environment, the Emergency Coordinator (or the alternate EC) will take appropriate action to minimize the threat and notify the appropriate agencies/organizations. The EC and the AECs shall be familiar with this Plan, with the facility, and its operations. Their responsibilities include the following:

- Knowing the locations and characteristics of all hazardous materials and hazardous wastes stored, handled or used onsite
- Knowing the facility layout
- Knowing the location of emergency response and spill clean up equipment
- Knowing the location of Material Safety Data sheets (MSDS) and other records used for identifying hazards associated with particular materials or wastes.
- Ensuring that all aspects of this plan are reviewed and implemented.
- The Emergency Coordinator and all Supervision will develop methods of preventing fires and procedures to be followed in case of fires.
- Taking immediate action to limit the threat to human health and/or the environment.
- Notification of personnel of the hazard and evacuate the danger area as appropriate.
- Notifying the appropriate emergency response organizations.

Plant personnel are directed to immediately contact the EC or an AEC in emergency situations. Appendix A contains the names and telephone numbers of the EC and AECs. This appendix will be revised and updated whenever there is a change in the names or telephone numbers of any of these agencies or individuals.

EMERGENCY COORDINATOR and ALTERNATE EMERGENCY COORDINATOR

Mr. Bill Havens shall be the Emergency Coordinator (EC) and the official company-reporting agent. All spills shall be reported to the EC at phone number (870) 540-9109 (direct line) or by calling (870) 247-5480 during the normal day shift – 7:30 AM to 4:00 PM.

After hours 4:00 PM to 7:30 AM the Plant Superintendent and HR Manager will be the alternate Emergency Coordinators and should be notified.

When a spill or other emergency situation occurs, the EC or Alternate EC will, take immediate action within the scope of this plan to respond. The EC and/or Alternate EC will then notify the Division EHS Engineer and Plant Manager who will assist in preparing the coordinator for any required external notifications. The Division EHS Engineer will notify the Tomkins Legal Department. **All written responses to external parties concerning emergencies covered by this plan must be reviewed by Div. EHS Engineer and Tomkins Legal Department prior to submittal. Any written documentation received from external parties concerning emergencies covered by this plan must be forwarded to Div EHS and Tomkins Legal within 24 hours of receipt.** If the Division EHS Engineer is unavailable, the EC or Alternate EC will notify the Tomkins Legal Department for guidance on reporting required in response to the spill.

TRAINING

Emergency Evacuation:

All employees will be trained on emergency evacuation procedures during their initial new employee orientation within 1 week of their start date. Area supervisors will be responsible for informing employees on alternate evacuation routes and their designated area to reassemble following the

evacuation. Emergency evacuation drills will be held annually to ensure that each employee fully understands the evacuation process.
All personnel involved in manufacturing and cleanup activities receive instruction in the proper handling and disposal of chemicals and cleanup of materials in their area in order to keep regulated material out of industrial wastewater. New employees and job transfers will be trained in these procedures as part of New Employee Orientation and/or on the job initial training. All personnel working on spill or emergency response must be familiar with and follow this plan.

Fire Extinguisher Training:
Fire extinguisher training will be offered once each calendar year. All maintenance employees and production supervisors must attend this training. All other associates are encouraged to attend. Only associates having received this training are authorized to attack small fires following the procedures contained in this plan.

Spill Prevention Briefings:
The emergency coordinator should schedule and conduct spill prevention briefings for operating associates at intervals frequent enough to insure their understanding of the SPCC and of any known spill events, failure of the plan and recently developed precautionary measures. (40 CFR 112.7 (e) (10). These briefings will be documented with the date, the person's name, title, identification number and the topic of the briefing.

FOR ADDITIONAL INFORMATION:
Contact the Emergency Coordinator, Alternate Emergency Coordinators, Safety Representative, Environmental Representative, Plant Manager, Manufacturing Director, or Division EHS Engineer for additional information concerning any part of these emergency plans.

ARRANGEMENT WITH LOCAL AUTHORITIES
The plant emergency coordinator must attempt to make arrangements with local police and fire departments, hospitals, emergency contractors (Spill Removal Organizations) and State and Local emergency response teams for provision of emergency services. The Emergency Coordinator will also take steps to familiarize the police and fire departments with the following:

:

- Review pertinent areas of this plan
- Review a facility layout and plot plan
- Locate potentially hazardous materials
- Locate areas occupied by people
- Identify properties/hazards of potentially hazardous materials
- Discuss Emergency access to facility and buildings
- Discuss Evacuation routes
- Discuss authority of specific organizations for emergency activities (Fire, injuries, spills, evacuation, area access, etc.).

The local Hospital is being offered an opportunity to familiarize their personnel with the properties of hazardous materials and hazardous wastes handled at Stant MFG, Inc. and with the types of injuries or illnesses which could be expected to result from fires, explosions or releases at the facility.

Appendix A shows the agencies and organizations that would provide assistance in the event of an actual emergency. Each of these agencies has been provided with a copy of this contingency plan. A

listing of emergency response telephone numbers will be kept posted at the facility. The emergency response telephone numbers will be posted in the main lobby, guardhouse and near supervisors telephones in every department. Additionally, the EC/AEC will be provided with a copy of the emergency numbers for their use in the event of an emergency

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SECTION III

SPILL PREVENTION, RISK AREA DESCRIPTIONS and BEST MANAGEMENT PRACTICES (BMPs)

SPILL RISK AREA DESCRIPTIONS

This section identifies areas of the plant having the greatest potential for spills or releases. For each section there is a description of the materials, potential pollutants, risk of spill or release, preventive measures and practices. Appendix E summarizes the information in this section and adds BMPs for additional areas posing lees substantial risk of release.

AREA #1: Building & Grounds Shed

Note: This area was previously used for storage of Flammable Chemicals and Wastes. In 2007 this practice was prohibited. This section will remain included in the plan as required by the permit in Part III.4.B.

Spill Experience - No significant spills have occurred in this area.

Area Description - This area was used to store containers of raw materials for use in plant operations and maintenance. The area is bermed so as to contain any material spills.

Spill Potential - The spill potential for this area was minimal. A total of 15-20 drums were stored here at any given time. Transport of materials to this area was supervised. The highest risk activity associated with this area was the transfer of materials to and from the plant. During this activity, there existed the potential for exposure to precipitation if there was a spill. In 2007 this practice was prohibited.

Potential Pollutants: Past potential pollutants included TCE, MEK, Paints and Thinner. Potential pollutants today: none.

Responsible Personnel - Mr. Bill Havens, the EC is responsible for this area.

Material Unloaded (April 2001 to 2007)–ammonium hydroxide, zinc plating chemicals, sodium hydroxide, alkali cleaners, oil lubricants, dibasic ester, trichloroethylene (TCE), methylethylketone (MEK), VD thinner, cooling tower chemicals, welding and cutting gasses, Hazardous Waste solvents and paints.

Annual Throughput - None

Average Load - None

Area Storage Tank - None

Protective Features: The area has a concrete floor and berm so as to cont: ı any material spills. No electricity is provided to this building. Pathways to and from the main plant are concrete to minimize the likelihood of spills during material handling.

Handling/Unloading Procedures – Material handlers now move oil/chemicals from receiving to either point of use or storage locations within the plant.

Oil Sorbent Materials – The following sorbent materials were available for use: Pigs, sorbent, shovels, salvage drums, and speedy dry.
Inspection – No inspections are performed as hazardous materials are no longer stored or accumulated in this area.

Spill Containment – A structural spill containment berm is provided.

Best Management Practice(s): Outdoor Transportation and Storage of hazardous chemicals by plant personnel is prohibited.

Annual comprehensive site compliance evaluation will conducted to verify compliance with the material ban associated with this area described in Appendix E Best Management Practices.

AREA #2: HAZARDOUS WASTE STORAGE

Spill Experience - No significant spills have occurred in this area. This area is completely contained within the main plant with no exposure to precipitation or release pathway other than in the event of emergency situations occurring during shipping.

Area Description - Fenced area directly east of wastewater treatment within the main plant.

Spill Potential - The spill potential for this area is minimal. A total of 8-10 drums are stored here at any given time. This area is completely contained within the main plant with no exposure to precipitation or release pathway other than in the event of emergency situations occurring during shipping.

Potential Pollutants: Chrome, Zinc, Oil & Grease.

Responsible Personnel - Mr. Bill Havens, the EC is responsible for this area.

Type Of Waste Stored –metal hydroxide sludge (F006), waste dibasic ester impacted with inks and thinners, oily/dibasic ester debris, electronic waste, universal waste.

Annual Throughput - A total of 0-10 fifty-five gallon drums are stored here at any given time. A total of 550 gallons. Material is shipped within 90 days of generation.

Average Load - Approximately 8 fifty-five gallon drums (440 gallons) of waste are present in any given month.

Area Storage Tank - None

Protective Features: Area is inspected weekly, has a fence (unlocked) to demark the area, with warnings posted for authorized personnel only. Spill response materials and fire extinguishers are present in the area.

Handling/Unloading Procedures – Only personnel trained to handle hazardous waste are allowed to move waste oil/chemicals within this area. Any waste chemical/oil that is delivered will be stored in

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this storage area using proper equipment (i.e. forklift, drum truck). See EMP-013-PB Hazardous Waste Procedure for more details concerning the handling and storage of these materials.

Oil Sorbent Materials – The following sorbent materials are available for use: Pigs, sorbent, shovels, salvage drums, and speedy dry.

Inspections - Weekly inspections. Any storage nonconformities will be logged and acted on immediately according with the TS 16949 corrective action procedure 102.

Spill Containment – This area is very low risk for spills, a spill containment berm is not provided. Emergency spill equipment is available. Any spills of a hazardous waste, anywhere on the premises are to be reported to the Environmental Representative IMMEDIATELY for appropriate response.

Best Management Practice(s):

1. Maintain a fire extinguisher in the area for flammable liquids.
2. Maintain appropriate spill containment and clean up equipment consisting of; pigs, shovel, speedy dry, over pack drum, leak repair kit and drum up ender.
3. Ensure all containers are in good condition, closed, labeled, in rows, and accounted for on the appropriate inventory log.
4. Separate incompatible materials (acids from bases, acids from organics).
5. Report and mitigate all spills in this area immediately.

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

AREA #3: TRANSFORMER PADS

Spill Experience - No significant spills have occurred in this area.

Area Description – Fenced in transformer pads located outdoors and east of the main office area.

Spill Potential - The spill potential is minimal. Highest risk for spill or release occurs when coolant is changed (extremely rare), in response to an emergency situation, or due to equipment deterioration.

Potential Pollutants: Oil & Grease.

Responsible Personnel - Mr. Bill Havens, the EC is responsible for this area.

Material Unloaded - Not applicable

Annual Throughput - Not applicable

Average Load - Not applicable

Area Storage Tank - Not applicable

Protective Features: Area has a stone and gravel floor and a security wall down grade. Any spills would tend to stay in the area and not migrate with storm water. Area is fenced and secured to prevent unauthorized access.

Handling/Unloading Procedures – Not applicable

Oil Sorbent Materials – The Following sorbent materials are available for use: Pigs, sorbent, shovels, salvage drums, and speedy dry.

Inspection – Inspections will be performed quarterly.
Spill Containment – No spill containment is provided for these transformer pads.

Best Management Practice(s):

1. Complete required preventive maintenance and repairs
2. Inspect quarterly
3. Post Emergency Procedures in Maintenance Area

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

AREA #4: SHIPPING AND RECIEVING

Spill Experience - No significant spills have occurred in this area.

Area Description - This area is used to unload incoming materials/chemicals into the facility.

Spill Potential - The spill potential here is higher due to the fact that all oil, chemicals and hazardous waste passes through these areas. This spill potential remains minimal with proper container management practices and housekeeping. This area poses a risk to storm water only in the event of an emergency or spill. No materials in this area are otherwise exposed to precipitation.

Potential Pollutants: oil & grease, chemicals (chromium, zinc, acids, bases, flammable solvents) and hazardous waste.

Responsible Personnel - Mr. Bill Havens, the EC, is responsible for this area.

Material Unloaded – Manufacturing process materials, chemicals, and wastes.

Protective Features: Area has a skirt to protect from exposure to precipitation and spill response materials available.

Handling/Unloading Procedures – See Appendix C

Oil Sorbent Materials – The following items are stored Pigs, Speedy dry, Shovels, Salvage drum, and storm drain cover.

Inspections - Inspections of this area will be performed Quarterly.

Spill Containment – No spill containment for this area is provided.

Material Loaded/Unloaded – sulfuric acid, hydrochloric acid, 150 lb chlorine cylinder, ammonium hydroxide, zinc plating chemicals, sodium hydroxide, alkali cleaners, oil lubricants, dibasic ester, welding and cutting gasses, waste materials. One bay in shipping has a trailer stationed for storage of scrap metal generated from stamping, plastics, and machining operations as well as non-conforming product scrap.

Drainage Area: Precipitation collected in the area surrounding the Receiving Docks drains into a storm trench and directed to Outfall #1 (see Figure 1-2). Under normal situations, due to lack of material exposure, there will be minimal pollutants from industrial activity associated with this discharge. Precipitation in the area surrounding the shipping docks flows as sheet runoff as described in Figure 1-2.

Best Management Practice(s):

1. Inspect the drums and containers of chemicals or raw materials to be unloaded.
2. Do not unload if the integrity of the drums or containers appears to be compromised.
3. If drums or containers are or become compromised, immediately call the EC so that the appropriate course of action can be taken.
4. All chemicals and raw materials delivered will be put in the proper storage areas by the end of the work shift.
5. Maintain a fire extinguisher in the area for flammable liquids.
6. Maintain appropriate spill containment and clean up equipment consisting of; pigs, shovel, speedy dry, over pack drum, leak repair kit and drum up ender.
7. Prepare to block drain at grate, collection transfer basin, or end of pipe for Outfall #1
8. Perform quarterly inspections.

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

AREA #5: SCRAP METAL STORAGE

Spill Experience - No significant spills have occurred in this area.

Area Description - This area is used to store scrap metal generated by stamping and maintenance operations.

Spill Potential - The spill potential is minimal because the roll off container is water tight and covered to minimize potential exposure to precipitation. The potential for release will increase depending on housekeeping, spills during loading and shipping, not maintaining the roll off cover, or deterioration of the roll off container. Some out of service equipment and some stock maintenance steel is stored under a permanent steel lean to shelter to prevent contact with precipitation. This material is to be free of liquids and oils before being stored in this location.

Potential Pollutants: oil & grease

Responsible Personnel - Mr. Bill Havens, the EC, is responsible for this area.

Protective Features: Water tight roll off container and canopy style rain cover.

Handling/Unloading Procedures – Scrap metal stampings are drained of oil and placed in cardboard containers prior to loading on a semi trailer for storage prior to shipping. Steel scrap is loaded drained of oil and placed in a water tight roll-off container. This container is covered to prevent contact with precipitation.

Oil Sorbent Materials – The following items are available: Speedy dry, Shovels, Salvage drum.

Inspections - Inspections of this area will be performed quarterly.

Spill Containment – No spill containment for this area is provided.

Best Management Practice(s):

1. All scrap metal must be drained of oils and lubricants and other liquids;
2. Containers must not be leaking and should be free of contamination before being placed in storage.
3. All equipment must be drained of all fluids and cleaned before it goes out for storage.
4. All items stored outside will be first cleaned and covered until final disposal.
5. No outdoor storage will be allowed without prior approval of the EC and Environmental Representative.

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

AREA #6: TRASH COMPACTOR

Spill Experience - No significant spills have occurred in this area.

Area Description - This area contains a 30 cubic yard general trash compactor/container and is used to store containers containing off spec plastic pellets and plastic regrind.

Spill Potential – This area has a minimal spill risk since liquids are prohibited from being placed in this area. Small spills of used absorbent, trash, and plastic is possible due to normal material handling. Larger spills of hydraulic oil and the above materials are possible, though unlikely, as a result of emergency situations.

Potential Pollutants: oil & grease, plastic resin beads, trash

Responsible Personnel - Mr. Bill Havens, the EC, is responsible for this area.

Protective Features: Drainage from the trench style storm basin is plumbed to a collection/transfer basin located in the northwest corner of the property before flowing to Outfall #1. This basin should trap most solid materials from being discharged with storm water.

Inspections - Inspections of this area will be performed Quarterly.

Spill Containment – No spill containment for this area is provided.

Drainage Area: Precipitation collected in the area surrounding the Receiving Docks drains into a storm trench and directed to Outfall #1 (see Figure 1-2). Under normal situations, due to lack of material exposure, there will be minimal pollutants from industrial activity associated with this discharge.

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Best Management Practice(s):

1. Employ good housekeeping practices.
2. Regularly clean-up any dropped materials.
3. Inspect Quarterly.

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

Area #7: New and Used Oil Storage

Spill Experience - No significant spills have occurred in this area.

Area Description - This area is used to store new and used oil.

Spill Potential - The spill potential is minimal, because containers are placed on secondary containment and stored in a location inside the plant, away from all drains and exposure pathways.

Potential Pollutants: oil & grease

Responsible Personnel - Mr. Bill Havens, the EC is responsible for this area.

Material Handled – Hydraulic and lubricating oils, mold cleaner, mold release agents, stamping lubricant and used oil.

Annual Throughput – 2,000 gallons per year

Average Storage Volume on hand – 275 gallon used oil tote, up to 5 drums used oil, 2 drums hydraulic oil, 2 drums Way Lube, 3 drums Gear Oil, 1 drum Vanishing Oil, 2-4 drums different grade lubricating oil. Total storage capacity = 1,210 gallons.

Protective Features: All containers are on secondary containment, stored within the plant behind plating. No drains are in this area. Spill response materials are available.

Unloading Procedures – Only personnel trained to EMP-005-PB Chemical handling procedure and EMP-014-PB used oil procedure are allowed to move waste oil/chemicals within this area. Any waste chemical/oil that is delivered will be stored in this storage area using proper equipment (i.e. forklift, drum truck).

Oil Sorbent Materials - The following items are stored in the boiler room; Pigs, Speedy Dry, drum over pack.

Inspections – Inspection of this area will be performed Weekly.

Spill Containment – Spill containment for this area is provided.

Best Management Practice(s):

1. Employ secondary containment for all containers $\geq$ 55 gallons.

2. Maintain appropriate spill containment and clean up equipment consisting of: pigs, shovel, speedy dry, over pack drum, leak repair kit and drum up ender.
3. Keep containers closed unless adding to or dispensing from;
4. Report and mitigate all spills in this area immediately.
5. Inspect Monthly.

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

Area #8: Used Oil and Mop Water Storage

Spill Experience - No significant spills have occurred in this area.

Area Description - This area is used to store used oil and mop water from stamping operations.

Spill Potential - The spill potential is minimal, because the tank is fully contained in a concrete pit sealed with coal tar and lined with a chemical resistant liner.

Potential Pollutants: oil & grease

Responsible Personnel – The plating/stamping manager is responsible for this area.

Material Handled – Used hydraulic oil and water soluble stamping lubricant captured as overspray and from floor cleaning in the stamping area.

Annual Throughput – 1,000 gallons per month

Average Storage Volume on hand – 500 gallon used oil tank

Protective Features: The tank is fully contained in a concrete pit sealed with coal tar and lined with a chemical resistant liner. Spill response materials are available.

Handling/Unloading Procedures – Only personnel trained to EMP-005-PB Chemical handling procedure and EMP-014-PB used oil procedure are allowed to add waste oil to this container. Any waste chemical/oil that is delivered will be stored in this storage area prior to shipping via tank truck for disposal.

Oil Sorbent Materials - The following items are stored in the boiler room; Pigs, Speedy Dry, drum over pack.

Inspections – Inspection of this area will be performed Monthly.

Spill Containment – Spill containment for this area is provided.

Best Management Practice(s):
1. Maintain secondary containment through preventive maintenance and annual inspection.
2. Maintain appropriate spill containment and clean up equipment consisting of: pigs, shovel, speedy dry, leak repair kit and transfer pump.

3. Do not overfill tank;
4. Report and mitigate all spills in this area immediately.
5. Inspect Monthly.
6. Plug storm drain or have cover available if spill during tank clean out.

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

Area #9: Chlorination

Spill Experience - No significant spills have occurred in this area.

Area Description - This area is used to store chemicals used in the chlorination process.

Spill Potential - The spill potential is minimal, because the chemical storage area has secondary containment. The Chlorination process has a line purge built into each cycle. This purge releases very small quantities of chlorine gas through a vent tube. This gas, when in contact with precipitation forms a dilute hydrochloric acid solution. Most significant risk is release of a large quantity of chlorine gas to the environment or plant. This risk is minimized by securing the chlorine tanks in the chlorine shed and by completing preventive maintenance on system alarms and controls.

Potential Pollutants: Chlorine gas, Ammonium Hydroxide and hydrochloric acid

Responsible Personnel – The plating/stamping manager is responsible for this area.

Material Handled – Chlorine Gas, Ammonium Hydroxide, bleach, and hydrochloric acid.

Annual Throughput – 50 lbs Chlorine per month, 110 gallons (each) Ammonium Hydroxide, bleach, and hydrochloric acid

Average Storage Volume on hand – 55 gallon (each) Ammonium Hydroxide, bleach, and hydrochloric acid, two 150 lb Chlorine cylinders.

Protective Features: Chlorine Tanks are fully contained in an isolated and sealed steel storage shed that is designed for this purpose. All valves are fail safe, and chlorine alarms are present in the process, in the process area, and in the Chlorine cabinet. Employees use the buddy system and employ full face respirators with chlorine gas filters whenever entering the chlorine cabinet.

Handling/Unloading Procedures – Only trained personnel who have successfully passed an annual pulmonary physical and who are wearing full face respirators are allowed to handle and set up chlorine tanks.

Oil Sorbent Materials - The following items are stored in the boiler room; Pigs, Speedy Dry, drum over pack.

Inspections – Inspection of this area will be performed Monthly.

Spill Containment – Spill containment for this area is provided.

Best Management Practice(s):

1. Chlorine cabinet vent should be raised at least 10' above roof level or vent into a 5 gallon pail of water to absorb or dissipate vented gas.
2. Look for signs of chlorine release (visible or olfactory) and report to supervisor immediately.
3. Maintain secondary containment.
4. Maintain appropriate spill containment, personal protective equipment and clean up equipment consisting of: pigs, shovel, speedy dry, leak repair kit and transfer pump.
5. Follow manufacturers instructions for system operation;
6. Report any chlorine gas smell or alarm immediately.
7. Report and mitigate all spills in this area immediately.
8. Inspect Monthly.

This area will be included in an annual comprehensive site compliance evaluation described in Appendix E Best Management Practices.

SECTION IV
EMERGENCY RESPONSE

It is important to recognize that there are potential hazards that may be associated with the various materials and wastes at Stant MFG, Inc. It is also important to recognize, however, that these substances do not pose a high risk of hazard when they are properly handled and stored. Additionally, the response measures that are outlined in this plan will minimize the risk of hazard that may be posed by a fire, explosion or release involving these substances. By following proper emergency response procedures, the hazards are greatly reduced.

This plan has been developed and organized in such a way as to afford maximum guidance in preparing for and responding to an incident. The EC and AECs are to be thoroughly familiar with this plan as it applies to their particular departments or areas of operation (particularly evacuation procedures) and are to follow the prescribed procedures in the event of any emergency.

EMERGENCY EQUIPMENT

Emergency equipment to extinguish fires or contain spills is dispersed throughout the plant. This equipment is inspected and tested to ensure that emergency response equipment, personnel protective gear and first aid supplies are readily available for use in the event of an emergency. Inspections and testing is performed by outside contractors, the plant safety committee or maintenance personnel, and annual Property Protection Department plant surveys. Documentation of required inspections and required testing is maintained for three years.

1. Alarm System: Any telephone can be used to activate the internal paging system. This internal communications or alarm system is used for providing immediate emergency instruction (voice or signal) to facility personnel. The alarm sounds once for five seconds and is followed by an announcement over the public address system as to the nature of the emergency and action to be taken. Telephones are located in close proximity to each Spill Risk Area.

2. Emergency Communications: Most telephones can also be used to access an outside telephone line to summon emergency assistance from local police departments, fire departments, or State or Local emergency response teams.

3. Fire Suppression Equipment: 20-pound dry chemical fire extinguishers are distributed throughout the plant such that employees will not need to travel more than 75 feet to reach a fire extinguisher. One such extinguisher is in each located at the hazardous waste accumulation area. These extinguishers are appropriate for any major fire hazards present at the plant.

4. Stant MFG is equipped with a water sprinkler system. The sprinkler heads activate automatically in response to heat. A separate fire main feeds the sprinkler system. Any flow through the fire main will activate an alarm, which is tied to the local fire department. Water for fire fighting purposes is supplied through dedicated water force mains that enter the facility.

5. Spill Control Materials: Bulk floor dry sorbent material, soda ash, salvage drums, shovels, squeegees, brooms and Hazardous Material Spill Kits are available from plant material stores. Additional spill response materials are available as outlined in the spill risk area descriptions of the previous section.

6. Employees who work in areas of potential chemical exposure are supplied with sets of personal protective equipment for their use in performing their duties. Depending on the potential chemical exposure hazards faced, employees will have available: face shields, safety glasses or goggles, gloves, aprons, boots and in some cases respirators. Supplies are maintained in the facilities manager's office, in the plating department, and in the laboratory. These supplies are available for use in emergencies.

7. Emergency eye wash/showers are located in all areas where wet chemical processes are located. A number of first aid kits are available for use in the various plant departments. Fully maintained basic first aid kits are kept in the maintenance department and the nurses' office.

GENERAL RESPONSE PROCEDURES (ALL EMPLOYEES)

INITIAL NOTIFICATION AND RESPONSE

The following initial series of events should take place in the event of any emergency:

1. In the event of a fire, explosion or release involving a hazardous substance, Plant Personnel at the scene are to keep themselves and others a safe distance away from the threat.
2. In the event of hazardous incident that threatens human health, Employees may contact the fire department, police department, or emergency medical services by dialing 911 from an outside line at any phone.
3. Notify the Emergency Coordinator or his/her Alternate. The EC/AEC is identified in Appendix A. The operator should also be notified by dialing "0" on any company phone, to assist with further notifications of personnel identified in this plan.
4. In the event of hazardous incident that could threaten human health or the environment, the Emergency Coordinator (or the alternate EC) will take appropriate action to minimize the threat and notify the appropriate agencies/organizations.

   IMPORTANT: Stant personnel must not respond to an emergency or attempt to contain or clean up any spill that would expose them to a level of risk they have not been trained to handle.

5. After the EC/AEC and operator have been contacted, plant personnel not trained to participate in the response shall evacuate the area, as required. They shall only resume work when recalled by their Supervisor in accordance with the return to normal operations section below.

DETERMINE NATURE AND EXTENT OF THE EMERGENCY

1. The EC/AEC will determine the nature of the emergency and identify whether hazardous materials are or may become involved. This can be done by observation or by referencing facility emergency diagrams, container labels, shipping papers, manifests, material data safety sheets (MSDA), or any other available information.

2. The EC/AEC will determine the approximate quantity of material released, and or potential for release.

3. The EC/AEC will determine whether the emergency poses an immediate, imminent or potential hazard to personnel inside the facility and determine the scope of the facility affected by this hazard.

4. If a health hazard is posed, implement a call for evacuation of all personnel from the affected area.

5. The EC/AEC will determine whether the emergency poses an immediate, imminent or potential hazard to personnel outside the facility and determine the scope of the local area affected by this hazard.

6. If the assessment indicates that the release poses a hazard to human health outside the facility, **Immediately** make the following notifications:

   a. Dial 911;
   b. Contact the appropriate local emergency response agencies, using the telephone numbers supplied by Appendix A.
   c. Contact the Division EHS Engineer.
      Note: The EC will assist the local authorities and determining if the evacuation of neighboring area is necessary.

7. The EC/AEC will then determine the potential for the release of materials to storm drains, sanitary sewers, receiving streams, nearby surface waters, to otherwise leave the property or impact land onsite.

8. If the assessment indicates that the release (other than to sanitary sewers) is in excess of a reportable quantity, document the required information in Section VI and make the following notifications within one hour:

   Within 1 Hour Notify the:
   a. Division EHS Engineer;
   b. Arkansas Department of Emergency Management (ADEM);
   c. National Response Center and the Local Emergency Response Commission, as required.
   d. Advise each agency of the information contained in Section VI:
      i. The name, address and telephone number of the owner or operator
      ii. The name, address and telephone number of the facility
      iii. The date, time and type of incident
      iv. The name and quantity of materials involved
      v. The extent of any injuries

vi. An assessment of the actual or potential hazards to human health or the environment
vii. The estimated quantity and the disposition of any recovered material that resulted from the incident
viii. Methods employed to remediate the hazard.

9. In the event a hazardous substance has accessed a sanitary sewer, the EC/AEC, Environmental Representative, Plant Wastewater Treatment Supervisor or Plant Wastewater Treatment Operators will notify the Pine Bluff Wastewater Treatment Works. This notification shall be made following the Slug Discharge Prevention and Control Plan in Appendix H.

10. The EC/AEC will then assess immediate and potential hazards that personnel responding to the emergency will face. These include fire hazard, explosion, electrocution, asphyxiation hazard, potential for inhalation of toxic fumes, etc.

11. The EC/AEC will determine if in house personnel are qualified to and can safely respond to the incident. If not, an emergency response agent shall be contacted for services. Note: This may have already been done above.

12. While awaiting the arrival of outside emergency services, the EC/AEC will determine the potential for the release to migrate and impact areas not already in danger. If safe for internal personnel to perform, actions shall be taken to minimize out of plant or offsite migration of the release.

13. Upon arrival of outside emergency response personnel, the EC/AEC shall designate to them the primary authority for further response actions. The EC/AEC shall inform the emergency personnel of the current and potential known hazards posed to human health and the environment by the emergency, and support them as required.

14. The EC/AEC shall ensure that all appropriate emergency response notification procedures are followed.

SPILL RESPONSE PROCEDURE

NOTE: The following procedure is to be implemented only if it has been determined that in-house personnel are properly trained and can respond to the incident without undo risk of hazard. The EC/AEC shall determine for each incident whether these response measures are appropriate, or whether an alternate response action should be taken.

Determine if internal or external response will be implemented:

1. The EC/AEC will determine whether or not it is required or appropriate to contact outside emergency services to notify them of the release.

2. The EC/AEC will determine whether or not internal personnel will provide initial spill response actions.

3. The EC/AEC may inform outside emergency services that in-house personnel are responding to the incident, however, their services may become necessary.

After Nature and Extent of Spill have been determined and Spill Response Notifications are initiated:

1. The EC/AEC shall take prompt action to restrict unauthorized access to the affected area;

2. The EC/AEC shall take prompt action to eliminate possible ignition sources from the affected area if the released substance is ignitable, combustible, or reactive and position fire extinguishers in the area of the release.

3. Personnel responding to the incident shall wear appropriate personal protective equipment, as directed by the EC/AEC.

4. Personnel shall secure all drains and pathways to the environment (ie. Doorways, loading docks, contact with external walls).

5. Personnel shall take action to identify and eliminate the source of the leak, spill, or release (ie. Close valve, upend overturned container, elevate punctured container, etc).

6. Personnel should take action to contain spilled material using industrial absorbent or spill containment booms, as required. Special efforts shall be taken to prevent the spilled material from entering catch basins, storm drains, sewer systems or other conduits.

7. Raw material will be reclaimed if at all possible.

8. All contaminated materials (spilled product, absorbent, rags, pads, clean-up materials, etc.) shall be collected and placed into compatible recovery drums.

9. All impacted soils will be removed and placed in a compatible recovery drum. For external spills, samples of the excavated area should be taken and sent for testing to verify all material has been effectively remediated.

10. Decontaminate or appropriately discard all tools and equipment used in responding to the incident, as appropriate. Thoroughly clean and inspect respiratory equipment, and return it to its proper location.

11. The Environmental Representative will ensure all waste appropriately characterized, packaged, labeled, and disposed of as required by governing regulations.

12. All materials equipment, working surfaces, etc., contaminated by the spill must be properly cleaned and inspected prior to granting authorization for returning that area/device to work.

13. The EC/AEC shall ensure that all emergency response notifications are made in accordance with State and Federal Regulations.

Additional Information Based on Type of Material Spilled:

Type of Spill	**PPE**	**Absorbent**	**Comments**
Oils, greases and Animal Fats	Nitrile gloves, safety glasses, and Nitrile Boots	General Absorbents	
Flammable Solvents	Nitrile Gloves, Safety Goggles, Nitrile boots or foot covers, Face Shields	Spark Proof Tools (incl. shovels drum handling equipment)	Eliminate sources of ignition and ensure air quality before approaching
Acids	Neoprene Gloves, Safety goggles, Face Shield, Neoprene foot covers or boots, acid rated spill suits	Use an acid neutralizing absorbent for safer handling, contain in a plastic drum	After clean-up, wash area with plenty of water. Verify there is no corrosive residue
Bases/Caustic/Alkaline	Neoprene Gloves, Safety goggles, Face Shield, Neoprene foot covers or boots, caustic rated spill suits	Use a caustic neutralizing absorbent for safer handling, contain in a plastic drum	After clean-up, wash area with plenty of water. Verify there is no corrosive residue
Ammonium Hydroxide	Nitrile Gloves, Safety Goggles, Nitrile boots or foot covers, Face Shields	Use a caustic neutralizing absorbent for safer handling, contain in a plastic drum	After clean-up, wash area with plenty of water. Verify there is no corrosive residue
Chlorine Gas	Full Face Respirator	Water to absorb released gas and maximize ventilation	Immediate evacuation of all unprotected employees to upwind area

FIRE RESPONSE PROCEDURE

Procedure:

1. In the event of discovering a small fire immediately notify either the EC, AEC, Supervisor, Plant Manager, any Maintenance Associate, and/or Any person known to have received fire extinguisher training.

2. Notify the Fire Department;

3. Immediately implement the evacuation procedure found in the following section;

4. If you have received fire extinguisher training, implement the limited response procedure of the following section.

5. If you have not received fire extinguisher training, immediately evacuate the area by following the emergency evacuation procedure contained in the following section

This section outlines the limited response our employees may take in the event of a fire:

1. **This procedure is directed only at small discovered fires that can be extinguished by trained employees. If the contents of one extinguisher will not control the blaze, the fire is uncontrollable and immediate evacuation should be made.**

2. **The following procedure is to be implemented only if it has been determined that in-house personnel are properly trained and can respond to the incident without undo risk of hazard. The EC/AEC shall determine for each incident whether these response measures are appropriate, or whether an alternate response action should be taken.**

3. **If you have not received fire extinguisher training do not attempt to attack the fire. Immediately implement the emergency evacuation procedures in the next section.**

4. **Identify any hazardous materials in the area that could pose an immediate threat if released due to the fire. If these are present DO NOT ATTACK THE FIRE but immediately implement emergency evacuation procedures contained in the next section.**

5. **Always keep two means of escape and unobstructed pathway from the fire before attempting to respond to the fire. If this cannot be done, immediately evacuate the area following the evacuation procedures in the next section.**

6. **NEVER ACT ALONE! If you are alone and no one knows of the emergency. DO NOT ATTACK THE FIRE but immediately evacuate the area or building until others can be notified and assist.**

7. **If you feel safe, initial notifications have been made, help is on the way, there are two means of escape, no hazardous materials in the area, you have the prerequisite training, and you can most likely put out the fire with one extinguisher THEN, immediately attempt to put the fire out.**

8. **If the fire does not come under control, immediately evacuate the area following the evacuation procedures in the next section.**

Remember:

Fight the fire ONLY if

1. The fire department has been notified of the fire, AND
2. The fire is small and confined to its area of origin, AND
3. You have a way out and can fight the fire with your back to the exit, AND
4. You have the proper extinguisher, in good working order, AND know how to use it.

If your are not sure of your ability or the fire extinguisher's capacity to contain the fire, leave the area

EMERGENCY EVACUATION (DEPARTMENT & PLANT)

Evacuate the facility and notify the proper response authorities in the event of a fire, explosion or release that endangers human health or safety. The decision to evacuate will be the primary responsibility of the EC/AEC or the local authorities, but can be made by any individual as is proper based on the severity or type of emergency situation. The evacuation notification can be given using the internal telephone and PA system to evacuate the entire facility. The operator, EC, AEC, Supervisor or other associate will dial the emergency tone, let it play for about five seconds, hang up and then dial the all page number to announce the evacuation instructions over the plant's intercom system. In the event that the plant's telephone/intercom system is rendered inoperable, runners will be appointed to announce the evacuation to the employees.

The Safety Department has appointed several employees to assist with the evacuation of disabled employees. In each case, a primary employee and an alternate has been appointed to assist each disabled employee during an evacuation. A list of disabled employees and appointed assistants is included as Appendix IV at the end of this document.

EVACUATION PROCEDURE

1. Notification:

If the emergency coordinator or other associate makes a determination to evacuate a certain area or all of the plant, and time allows, he must contact the immediate supervisor(s) of the area involved to explain the nature of the emergency, identify the specific area(s) involved, and instruct the supervisor(s) to begin evacuation. The emergency coordinators should then proceed to advise upper management as required.

If the situation warrants a more immediate response, the Safety Coordinator, Emergency Coordinator, Alternate Emergency Coordinator, Supervisor, Plant Manager, Operator, or Associate will issue the emergency tone and then address the facility over the intercom. During the announcement, special instructions will be given depending on the nature of the emergency.

If necessary, home telephone numbers of those who need to be contacted after normal business hours are available in the Human Resources Office and in all Supervisor areas. A list of the home telephone numbers of those who may need to be contacted after normal business hours is included in Appendix A.

2. Supervisor Responsibilities:

Upon notification of an emergency requiring evacuation, the area supervisor(s) will:

1. Quickly contact all employees in the area(s) being evacuated;
2. Instruct them to reassemble in a designated location outside of the evacuation area to await further instruction;
3. Check isolated areas in which employees may be working to assure evacuation;
4. Proceed to the designated meeting area to account for all employees after the evacuation.

3. Employee Responsibilities:

Upon hearing the evacuation announcement, all employees in the area(s) designated for evacuation (except emergency coordinators and those designated to assist handicapped employees) should evacuate the plant. Employees who must stay behind to maintain critical plant operations must adhere to procedures set forth in Section 7 of this Chapter. Under no circumstances are individuals to re-enter the plant without the prior permission or approval of the EC or AEC. All other employees must follow these procedures:

1. Stop working immediately.

2. Shut off all machinery or equipment.

3. Leave the evacuated area (Walk, don't run), and reassemble in the location designated by the supervisor to await further instructions.

4. Hilo, electric or hand jack, or other mobile equipment operators will move the equipment to the side of the aisle or into a storage area, shut down and leave equipment.

4. Maintenance Responsibilities:

Upon notification, maintenance personnel in their respected areas shall:

1. Shut off the main power to all equipment;

2. Plastics maintenance in the event of any fire shall throw the main breaker located on the east wall of plastics department. (This will minimize the risk of fire spreading due to hydraulic oil.)

3. Maintenance Supervisor shall shut off gas at the main if it can be performed safely.

5. Rescue and Medical Responsibilities

No employee shall attempt rescue or perform any duties unless they have been trained and have the appropriate personal protection and first notify the EC or AEC. First responders shall provide medical response in the reassembly locations according to their training.

6. Evacuation Routes

The Plant Emergency Evacuation Plan Diagram (Appendix D) is posted in several locations throughout the plant. Employees should be made aware of their designated evacuation route and at least one alternate means of egress. Below is a summary of general evacuation routes and assembly areas for each area of the Plant. Each supervisor, after ensuring their area is clear of personnel should go to their personnel's assembly area to account for all personnel. Assembly Areas should be away from the exit discharge doors to avoid hampering emergency operations.

General Evacuation Routes:

Main Building	Assembly Area
A. **Receiving**: Exit to the West or South	West Lot
B. **Shipping** : Exit to the East or West	East Lot
C. **Assembly**: Exit to the East or South	East Lot
D. **Tool Room**: Exit to the West or East	West Lot
E. **Break Room**: Exit to the North or South	East Lot
F. **Inventory Area**: Exit to the East or West	West Lot
G. **Plastics**: Exit to the North or West	Admin Lot
H. **Office**: Exit to the North, East, or West	Admin Lot
I. **Press Room**: Exit to the West or South	West Lot
J. **Waste Water Treatment**: Exit West or South	West Lot
K. **Plating**: Exit West or South	West Lot
L. **Machine Development**: Exit West or East	West Lot
M. **Maintenance Crib South**: Exit West or South	West Lot
N. **Maintenance Crib Plastics**: Exit North or West	West Lot
O. After-market Shipping: Exit South or East	East Lot

7. Critical Plant Operations

In the event of a total plant evacuation, it may be necessary for certain employees to remain in their work area to maintain critical plant operations. These operations include Emergency Coordinator functions during the evacuation. The Emergency Coordinator will be responsible for instructing critical personnel in what measures must be taken during an emergency. These personnel should only evacuate when instructed to do so, or if they are in a situation of grave danger when total and immediate evacuation is necessary. In the case of a total evacuation, the plant will be dependent upon local rescue and medical services for emergency response.

8. Take Cover – Tornado Alert

In the event of a tornado report or sighting which may endanger the Plant, the Emergency Coordinator or Alternate Emergency Coordinators will issue an alarm tone and verbal notification over the Intercom System.

Instructions for Employees:

1. Shut off all power to machines, equipment, and conveyors.

2. Drivers of vehicles pull to the side of the aisle and shut off engine. Liquid propane gas fuel tanks on vehicles should also be shut off.

CATION REQUIREMENTS IN THE EVENT OF AN EMERGENCY REQUIRING RARY PLANT CLOSURE

vent of an emergency that requires the plant to temporarily suspend its operations, the EC tify the EPA and appropriate local authorities that the facility is in compliance before plant ns are resumed.

shall note in the facility's SPCC Plan Implementation Record the time, date and details of any that required implementing the contingency plan. The EC shall also submit a written report of dent to the appropriate regulatory agencies in the required notification period.

emergency response procedures outlined in the plan fail to prove satisfactory during an ncy incident, the EC shall make appropriate revisions to the plan to provide for improved se measures in the future. All changes to the plan shall be reviewed and approved by the EC, anager and Division EHS Engineer.

of the completed National Response Center Initial Notification Form will be maintained in the ng record of the plant.

SECTION V

REPORTING OBLIGATIONS UNDER THIS PLAN

REPORTING

Oil spills that enter storm runoff ditches, storm sewer lines, or other watercourses, must be reported to Arkansas Department of Emergency Management (ADEM) and U.S.E.P.A. Hazardous Waste or Hazardous Material spills at greater than "RQ" (reportable quantity) must also be reported to these agencies. Spills or Slug Discharges to the sanitary sewer must be reported to the City of Pine Bluff POTW following the Slug Discharge Prevention and Control Plan contained in Appendix H.

When a spill or other emergency situation occurs, the EC or Alternate EC will, take immediate action within the scope of this plan to respond. The EC and/or Alternate EC will then notify the Division EHS Engineer and Plant Manager who will assist in preparing the coordinator for any required external notifications. The Division EHS Engineer will notify the Tomkins Legal Department. **All written responses to external parties concerning emergencies covered by this plan must be reviewed by Div. EHS Engineer and Tomkins Legal Department prior to submittal. Any written documentation received from external parties concerning emergencies covered by this plan must be forwarded to Div EHS and Tomkins Legal Department within 24 hours of receipt (NO EXCEPTIONS).**

If the Division EHS Engineer is unavailable, the EC or Alternate EC will notify the Tomkins Legal Department for guidance on reporting required in response to the spill.

SECTION VI

EPA REFERENCE REGULATIONS

- 40 CFR 112 – Spill Prevention Control & Countermeasure Plan
- 40 CFR 109 – Oil Spill Contingency Plan
- 40 CFR 265.50 – 265.56 – Hazardous Waste Contingency Plan and Emergency Procedures
- 40 CFR 122 – Storm Water Pollution Prevention (Permit #AR000000)
- 29CFR 1917.30 – Employee Emergency Action Plan
- 29CFR1910.37 – Fire Prevention Plan
- 40CFR 264.50-56 Hazardous Waste Contingency Plan
- 40CFR 433.12 Metal Finishing Point Source Category Monitoring Requirements: TTO Certification and Solvent Management Plan
- Wastewater Discharge Permit 43

SECTION VII

NATIONAL RESPONSE CENTER INITIAL NOTIFICATION FORM

PHONE REPORT TO THE NATIONAL RESPONSE CENTER - (800) 424-8802

Name of Reporter: _____
Telephone Number: _____
Name and Address of Facility: Stant Manufacturing
5300 Jefferson Parkway
Pine Bluff, Arkansas 71602

Incident Specific Information: Date: _____ Time: _____ (AM/PM)

Type of Incident: Fire _____ Explosion _____ Release_____ Other_____

Material(s) Involved (Add additional information on back or attach):

Name_____ Quantity_____Units_____

Estimated_____ Actual _____

Probable Hazard(s) related to these materials:

_____
_____
_____

Injuries: Number_____ Extent of Injuries_____

Possible Hazards to personnel or the environment outside the facility (If known)***:***

_____

Does the emergency impact: Surface Water:_____ City Sewer:_____ Air:_____ Soil:_____

The estimated quantity and the disposition of any recovered material that resulted from the incident: _____
_____
_____

Methods employed to remediate the hazard.

_____
_____
_____
_____

Comments: (continue on back or attach as needed)

_____
_____

SECTION VIII
DISTRIBUTION LIST

- Pine Bluff Wastewater Utility, Ken Johnson, Manager, 1520 S. Ohio St, Pine Bluff, AR 71601-6055, (870) 534-8123

- Pine Bluff Fire Department: 200 East 8th Ave., Suite 204, Pine Bluff, AR 71601 (870) 543-5150

- Pine Bluff Police Department: 200 East 8th Ave., Pine Bluff, AR 71601 (870) 543-5105 Chief John Howell

- Local Emergency Planning Commission : Wally Hunt, Jefferson Co. Office of Emergency Management, 101 East Barraque St., Pine Bluff, AR 71601, (870) 541-5470

- Arkansas Department of Emergency Management: ADEM, Attn: Kenny Harmon, Building #9501, Camp Joseph T. Robinson, North Little Rock, AR 72199-9600 1-800-322-4012 (Incident/Disaster Coordination)

- Jefferson Regional Medical Center: 1600 West 40th Avenue, Pine Bluff, Arkansas 71603 (840) 541-7100

Note: ADEM is the State Emergency Response Commission. ADEM stated that submitting the plan to them satisfies any requirement to also submit to the State EPA.

IN CASE OF EMERGENCY REMAIN CALM

EMERGENCY PHONE #'S

EMERGENCY CORDINATOR
BILL HAVENS – (870) 540-9109

ALTERNATE EMERGENCY CORDINATOR
MARK BRADSHAW – 870-692-3101
LANITA PLUNKETT - (870) 550-1053

NATIONAL RESPONSE CENTER
(800) 424-8802 (Only Emergency Coordinator or Environmental Representative)

PINE BLUFF FIRE DEPARTMENT, POLICE, OR EMERGENCY SERVICES
911

ARKANSAS DEPARTMENT OF EMERGENCY MANAGEMENT ADEM *
(800) 322-4012 (Only Emergency Coordinator or Environmental Representative)

EPA IDENTIFICATION #
ARD096674213

*** IF ADEQ IS CLOSED REFER TO EMERGENCY RESPONSE BOOK**

Key Personnel Contact List

Name	Extension	Home Number
Mark Smith – Manufacturing Director	214	
Mark Bradshaw – Plant Superintendent	296	870-692-3101
Bill Havens – Emergency Coordinator	327	870-540-9109

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APPENDIX B
CERTIFICATION OF APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

OIL POLLUTION ACT (1990)
Certification of the Applicability of the Substantial Harm Criteria

Facility Name: Stant Manufacturing

Facility Address: 5300 Jefferson Parkway, Pine Bluff, AR

1. Does the Facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
   YES _____ NO _X___

2. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within an aboveground oil storage tank area?
   YES _____ NO __X__

3. Does the Facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this Appendix or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensible Environments" (see Appendix E to this part, section 10, for availability) and the applicable Area Contingency Plan.
   YES _____ NO __X__

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this Appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]?
   YES _____ NO __X__

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?
   YES _____ NO __X__

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate and complete.

_____
Signature

Mark Smith
Name (please type or print)

Manufacturing Director
Title

_____
Date

[1] If a comparable formula is used documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2 (c).

APPENDIX C
MISCELLANEOUS FORMS

1. **Monthly inspections** will be documented on ISO14001 F-0141 Oil, Flammable, Combustible Liquid Storage Checklist and on The Table Below (Potential Pollutant Sources and Best Management Practices)
2. **Annual Comprehensive Site Compliance Evaluation** will be documented on F-0116 SWPPP Comprehensive Site Compliance Evaluation and on the Table Below (Potential Pollutant Sources and Best Management Practices)
3. **Quarterly inspections** will be documented on the Table Below (Potential Pollutant Sources and Best Management Practices).
4. **Weekly inspections of the Hazardous Waste Storage Areas** (including Satellite Accumulation Areas) will be documented on F-0140 Hazardous Waste Satellite and Storage area Check Sheet. This inspection to be performed only by individuals having received Hazardous Waste Manager Training.

For all inspections, attach details describing any discrepancies or concerns identified.

Training Requirements are documented on See ISO Form F-0111 (Environmental Training Matrix)

APPENDIX D
Plant Plot Plans and Drawings

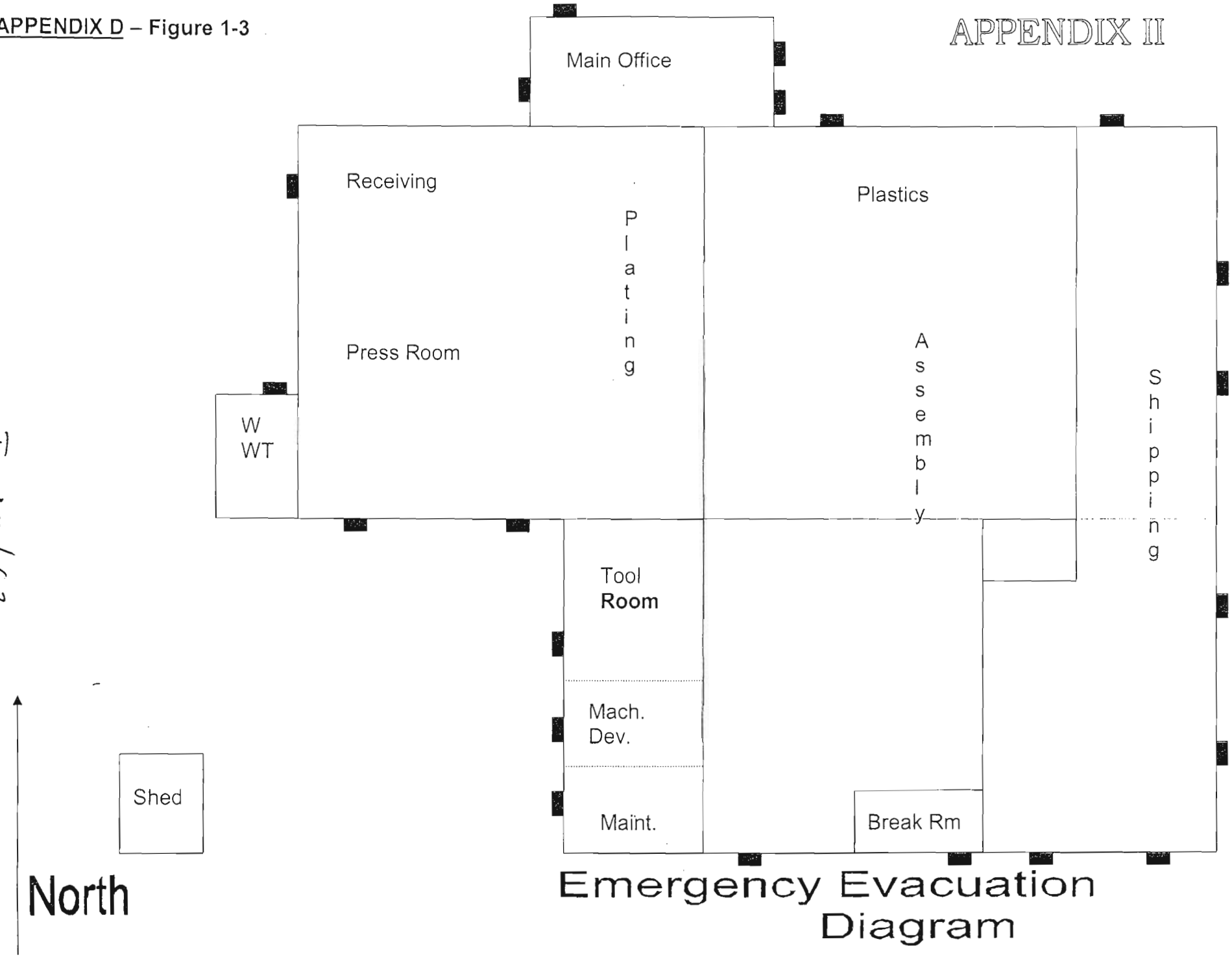
Figure 1-1 Facility Plot Plan

Figure 1-2 Facility Site Map

Figure 1-3 Facility Emergency Evacuation Diagram

APPENDIX D – Figure 1-3

APPENDIX II



Emergency Evacuation Diagram

APPENDIX E
SUMMARY OF BEST MANAGEMENT PRACTICES (BMPs)

The following Table summarizes the best management practices described within this Plan. This section also describes how periodic inspections and corrective actions will be documented and managed.

Inspections of containers will be conducted to ensure:

1. Container integrity is sound (intact, no leaks, no visible deterioration, no staining of the ground in the area);
2. Container is compatible with the material being stored in it;
3. Container has adequate secondary containment with enough capacity to collect 110% of the volume of the largest container placed on it.
4. Container is located away from doorways, drains, high traffic locations, and potential sources of ignition.
5. Container is not encroaching on an aisle way, overhanging it's secondary containment, or in other ways placed to increase the chances of a spill or accident leading to a spill.
6. If container is outdoors, it must be covered to prevent contact with precipitation.

Documentation:

5. Monthly inspections will be documented on ISO14001 F-0141 Oil, Flammable, Combustible Liquid Storage Checklist and on The Table Below (Potential Pollutant Sources and Best Management Practices)
6. Annual Comprehensive Site Compliance Evaluation will be documented on F-0116 SWPPP Comprehensive Site Compliance Evaluation and on the Table Below (Potential Pollutant Sources and Best Management Practices)
7. Quarterly inspections will be documented on the Table Below (Potential Pollutant Sources and Best Management Practices).
8. Weekly inspections of the Hazardous Waste Storage Areas (including Satellite Accumulation Areas) will be documented on F-0140 Hazardous Waste Satellite and Storage area Check Sheet. This inspection to be performed only by individuals having received Hazardous Waste Manager Training.

For all inspections, attach details describing any discrepancies or concerns identified.

Any discrepancies identified during an inspection will be documented on the inspection form and a corrective action request (CAR) made in the ISO14001 system following TS16949 102 Corrective Action Procedure. Reference to this CAR will be made on the inspection form to show the issue was tracked to completion.

Copies of inspection forms should be sent to the Environmental Representative who will retain them for a period of at least 3 years.

Name of Individual Performing Visual Inspection:_____ Date of Inspection:_____

Appendix E – Potential Pollutant Sources and Best Management Practices

Examples of Non-Structural BMPs:

- Good Housekeeping
- Minimizing Exposure
- Preventive Maintenance
- Spill Prevention and Response Measures
- Routine Facility Inspections
- Employee Training

Examples of Structural BMPs:

- Sediment and Erosion Control
- Run-off Control
- Permanent Storage Structures

Location	Description	Potential Pollutant(s)	BMP(s)	Inspection Frequency	Responsibility	Periodic Visual Inspection Results:
All Exterior	building roofs & grounds	Emissions From Stacks, Cooling Towers and Chillers	1. Visual check for evidence of staining or deterioration	**Quarterly**	**Env Rep**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
All Exterior	CHLORINE SHED	Chlorine gas and Hydrochloric Acid Residue	1. Structural: Discharge vent pipe above roof line 2. Temporary: Discharge vent into closed container of water 3. Change water container weekly to manage acid levels	**Weekly until can install elevated vent then quarterly**	**Env. Rep.**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
All Exterior	COOLING TOWERS	Water impacted with bactericide and other treatment chemicals	1. Legionella and bacteria testing 2. Must be discharged to sanitary drain or removed as waste.	**Monthly Bacteria Dip Slide** Semi-annual Legionella Testing	**Facilities Maintenance Manager**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)

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Location	Description	Potential Pollutant(s)	BMP(s)	Inspection Frequency	Responsibility	Periodic Visual Inspection Results:
All Exterior	gravel & asphalt lots & paved areas	Oil leaks, Residue from containers, potential for spills	1. post E-response procedures in Maintenance area	**Quarterly**	**Env Rep**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
All Exterior	PROPANE CYLINDER STORAGE AREA		**Post E Procedures in Area**	**Quarterly**	**Env Rep**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
All Exterior	Re-usable container storage		**Keep closed and covered.** **No washing or rinsing outdoors**	**Quarterly**	**Env Rep**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
All Exterior	Used Pallets	Spilled Chemicals/Oils	**Do not store outdoors if contaminated from spills**	**Quarterly**	**Env Rep**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
All Exterior & Area #1 Building & Grounds Shed	Outdoor transportation of chemicals & Storage in Bldg & Grnds Shed	Spilled Chemicals/Oils	**Transportation and Storage of chemicals outdoors is prohibited**	**Quarterly**	**Env Rep**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Area #2 Hazardous Waste Storage	HAZARDOUS WASTE STORAGE AREA EAST OF WWT	Metal Hydroxide Sludge (Zn, Cr), Dibasic Esther, Misc. Chemical Waste, Spill Debris	1. Maintain Fire Extinguisher 2. Spill Containment Mtrls. 3. Container Mgt, Inventory & Housekeeping. 4. Separate incompatible materials. 5. Report Spills	**Weekly** (HW Mgt Program)	**Env Rep**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)

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Location	Description	Potential Pollutant(s)	BMP(s)	Inspection Frequency	Responsibility	Periodic Visual Inspection Results:
Area #3 Transformer Pad(s)	TRANSFORMERS	Oil (non-PCB)	1. Complete Required PMs; 2. Post E-procedures in maintenance;	**Quarterly**	**Facilities Maintenance Manager**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Area #4 Shipping and Receiving (Area #4 Cont)	LOADING/ UNLOADING DOCKS	Oil & Grease; Chemicals (Cr, Zn, acids, bases, flammable solvents) and Hazardous Waste	1. Visually Inspect Containers 2. If damaged/leaking, do not move & call EC 3. Deliver received chemicals to storage area by end of shift 4. Fire Extinguisher in area. 5. Spill Materials in area; 6. Position covers near catch basins. 7. Post E-procedures	**Quarterly**	**Shipping Supervisor**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Area #5 Scrap Metal Storage	SCRAP METAL ROLL-OFF STORAGE	Oil & Grease	1. Drain off all liquids 2. No Leaking Containers 3. Clean equip before placing outdoors 4. Cover Roll-Offs & Equipment 5. Store on pavement to visually inspect for leaks or releases.	**Quarterly**	**Facilities Maintenance Manager**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Area #6 Trash Compactor	TRASH COMPACTOR	Oil & Grease, Plastic Resin Beads, Trash,	1. Good Housekeeping 2. Clean up all spills	**Monthly**	**Receiving Supervisor**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Area #7 New and Used Oil Storage (Behind Plating Line)	Oil and Used Oil storage areas	Oil & Grease	1. Secondary Containment all containers ≥ 55 gals 2. Spill Containment in Area 3. Keep containers closed 4. Report & Clean-up spills immediately	**Monthly**	**Facilities Maintenance Manager**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)

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Location	Description	Potential Pollutant(s)	BMP(s)	Inspection Frequency	Responsibility	Periodic Visual Inspection Results:
Area #8 Used Oil & Mop Water Storage	Stamping Coolant	Oil & Grease	1. Complete PM 2. Spill Containment in Area 3. Do not overfill tank 4. Plug Storm drain or have cover ready during tank clean out (tanker truck). 5. Report & Clean-up spills immediately	**Monthly**	**Plating Supervisor**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Compressor Rooms	Compressors	Oil & Water discharge to Sanitary	1. Secondary Containment all containers ≥ 55 gals 2. Spill Containment in Area 3. Keep containers closed 4. Report & Clean-up spills immediately	**Monthly**	**Plating Supervisor**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Stamping Area	Stamping Area	Alkaline cleaner and water soluble oils Hydraulic Oil	1. Complete PM 2. Spill Containment in Area 3. Do not overfill tanks 4. Report & Clean-up spills immediately 5. Visually Inspect overhead piping in addition to tanks.	**Monthly**	**Plating Supervisor**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)
Waste Water Treatment	WASTEWATER TREATMENT	Zinc, Chromium, acids and caustics	1. Structural: a berm or trench should be installed around the treatment works. 2. Spill Kit In Area 3. High level alarms on equalization tank. 4. Isolate incompatible chemicals. 5. Store Containers & Empty Containers away from drains & doorways 6. Post E Procedures in area	**Monthly**	**WW Supervisor**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)

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Location	Description	Potential Pollutant(s)	BMP(s)	Inspection Frequency	Responsibility	Periodic Visual Inspection Results:
Area #9: Chlorinator	CHLORINATOR SYSTEM	Chlorine Gas, Waste Hydrochloric Acid,	1. Emergency Venting of Chlorine Cabinet to either 10' Above roof line or into water to remove residual Chlorine 2. Water should be managed as an acid and neutralized in waste water treatment 3. Look for signs of Chlorine release (dead spots in grass, extreme corrosion on metal) 4. Perform PM on all controls & alarms	**Monthly**	**WW Supervisor**	☐ Satisfactory ☐ Requires Corrective Action ☐ Requires Additional BMP(s) (Attach details)

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APPENDIX F
MAJOR FIRE HAZARDS, HANDLING & STORAGE PROCEDURES, POTENTIAL IGNITION SOURCES AND THEIR CONTROL, RELATED FIRE PROTECTION EQUIPMENT

Stant Manufacturing, Pine Bluff Plant

Major Fire Hazard	Handling and Storage Procedures	Potential Ignition Sources	Control of Ignition Source	Fire Protection Equipment
Transformers	N/A	Arcing, Break-Down of Oil	Regular PM	Fire Department
Electrical Bus Ducts and Primary Switch Gear	N/A	Arcing	Regular PM	Sprinkler system
Air Compressors and Dryers	N/A	Excessive Heat Build-up	Do not store combustible or flammable materials in area	Sprinkler system, ABC rated fire extinguishers
Solvent Cleaning Stations (Maintenance and Plastics and Stamping Die Cleaning)	EMP-005 PB Chemical handling procedure	Electrical arcing, static discharge, open flames, excessive heat	No open flames or sparks in area, Ensure proper grounding, keep closed when not in use.	Sprinkler system, BC rated fire extinguishers
Maintenance Paint and Solvent Storage Area(s)	EMP-005 PB Chemical handling procedure	Build-up of flammable/ combustible fumes and vapors	No open flames or sparks in area, Ensure proper grounding, keep closed when not in use.	Sprinkler system, BC rated fire extinguishers
Plastic Storage Area(s)	Lean Management	Will burn vigorously when ignited	No open flames or sparks in area, Keep closed when not in use.	Sprinkler system, BC rated fire extinguishers
Oil Storage Area	EMP-005 PB Chemical handling procedure, EMP-014 PB used oil procedure, P-003 One Plan	May cause fire to spread quickly	No open flames or sparks in area, Keep closed when not in use, use secondary containment	Sprinkler system, BC fire extinguishers
Calibration Fuel Usage/Storage Area(s)	EMP-005 PB Chemical handling procedure	Electrical arcing, static discharge, open flames, excessive heat	No open flames or sparks in area, ensure proper grounding, keep closed when not in use, use secondary containment	Sprinkler system, BC fire extinguishers

Major Fire Hazard	Handling and Storage Procedures	Potential Ignition Sources	Control of Ignition Source	Fire Protection Equipment
Natural Gas Fired Unit/Package Heaters	N/A	Open flame from Pilots and Burners	Regular PM, do not store combustible or flammable materials in area	Sprinkler system
Maintenance Welding and Cutting	N/A	Electrical Arc, and gas torch	Regular PM, hot work permit program	Sprinkler system, BC rated fire extinguishers
Production Laser and Welding Equipment	N/A	Electric Arc, Laser	Regular PM and use according to equipment specifications	Sprinkler system, fire extinguishers
Plastic Extrusion Stations	N/A	Heating elements	Prevent plastic build-up around heating elements	Sprinkler system, fire extinguishers
Fuel Storage & Dispensing Area(s) (Very Rare- Usually performed in Connersville)	EMP-005 PB Chemical handling procedure, EMP-015-PB Audit lab fuel procedure, P-003 One Plan	Electrical arcing, static discharge, open flames, excessive heat	No open flames or sparks in area, ensure proper grounding, keep closed when not in use, use secondary containment	Sprinkler system, BC fire extinguishers
Propane Tank and Refilling	EMP-005 PB Chemical handling procedure, EMP-009-PB Propane tank filling, P-003 One Plan	Electrical arcing, static discharge, open flames, excessive heat	No open flames or sparks in area, ensure proper grounding, keep all valves closed when not in use, Do not overfill tanks, PM of all valves and pressure gauges	BC fire extinguishers
Hazardous Waste Satellite Areas	EMP-005 PB Chemical handling procedure, EMP-013 PB Hazardous waste procedure, EMP-015-PB Audit lab fuel procedure, EMP-008-PB Pad Print Procedure, P-003 One Plan	Electrical arcing, static discharge, open flames, excessive heat	No open flames or sparks in area, ensure proper grounding, keep closed when not in use, use secondary containment	Sprinkler system, BC fire extinguishers

Major Fire Hazard	Handling and Storage Procedures	Potential Ignition Sources	Control of Ignition Source	Fire Protection Equipment
Hazardous Waste Storage Area(s)	EMP-005 PB Chemical handling procedure, EMP-013 PB Hazardous waste procedure, EMP-008-PB Pad Print Procedure, P-003 One Plan	Electrical arcing, static discharge, open flames, excessive heat	No open flames or sparks in area, ensure proper grounding, keep closed when not in use, use secondary containment	Sprinkler system, BC fire extinguishers
Cutting Fluid and Oil Storage Area(s)	EMP-009 Chemical handling procedure, EMP-008 used oil procedure, P-003 SPCC Plan	May cause fire to spread quickly	No open flames or sparks in area, Keep closed when not in use, use secondary containment	Sprinkler system, BC fire extinguishers
Smoking			Smoking is prohibited inside the building. No smoking signs are posted in areas of concern	
Heaters			All heaters must meet OSHA and NFPA standards.	
Hot work (e.g., welding, soldering, cutting, braising, heating metal, etc.)	Hot work is covered under EMP-023 PB			
Open Flames			Open flames (like candles) are prohibited in work place areas as potential ignition sources for combustible materials such as paper cardboard and wood.	

Regular PM of Heat Producing Equipment:

PM Schedules for Electrical Equipment, Heaters, Plastic Extrusion Heating Elements, AC Units and other heat producing equipment are maintained by plant maintenance in their PM control system. Personnel responsible for completion of these PM's are the Maintenance Managers of each Business Unit. Person responsible for PM on all Fire Suppression Systems is the Emergency Coordinator or Facility Maintenance manager.

APPENDIX G
TTO CERTIFICATION AND SOLVENT MANAGEMENT PLAN

In lieu of requiring monitoring for TTO, the control authority (City of Pine Bluff Engineering Department) 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 [or pretreatment standard] 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. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting [or control] authority."

For indirect dischargers, the statement is to be included as a comment to the periodic reports required by 40 CFR 403.12(e). If monitoring is necessary to measure compliance with the TTO standard, the industrial discharger need analyze for only those pollutants which would reasonably be expected to be present.

In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies to the satisfaction of the control authority 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.

SOLVENT AND TOXIC ORGANIC MANAGEMENT PLAN

Solvents (Dibasic Ester), inks and thinners are used in low volumes in the Pad Print area of the plant (see figure 1-2). There are no open floor drains in which solvents could enter the sewer. These materials are stored at the point of use in the Pad Print area. There are no floor drains in this location which could permit a spill to the sewer or to the wastewater pretreatment system.

Solvents (non-toxic mold and die cleaners and release agents) are stored in the New/Used Oil Storage Area #7 shown in Figure1-2: Facility Layout Plan. These materials are isolated from wastewater by a system of berms and secondary containment pallets and building walls.

None of the Toxic Organic Chemicals listed at 40CFR 433.11(e) are present in materials used at this facility in standard production and normal production maintenance activities. The only materials brought or site that may contain these materials are paints associated with building and grounds maintenance. These materials are managed and disposed of as hazardous waste and have no potential for disposal through or dumping into the wastewater treatment system.

Fate of Spent Materials:

- Used Oil is sent off site for recycling;
- Waste Solvent, Thinner, Paints, Inks, etc. are sent off site for incineration;
- Spent Maintenance Parts Washers Solution is sent c ^c site where it is used as a material ingredient in rubber manufacture;
- Debris from any of the above is sent off site for recycling, incineration or land filling.

APPENDIX H
SLUG DISCHARGE PREVENTION AND CONTROL PLAN

The purpose of this plan is to provide detailed instructions for slug prevention and control.
A complete copy of this plan is maintained in the Environmental Representative's Office and the Plant Manager's Office.

Definition of a "Slugload" Discharge:
As defined by the WW Permit and City Ordinance, any spill or discharge released in such volume or strength as to cause interference to the treatment facility (City POTW).

Reporting Obligations:
From the permit, **Stant must immediately report** to the City Utility:

1. Upon becoming aware of an upset condition which places the plant treatment system in a temporary state of noncompliance with permit limitations;
2. Upon an accidental spill or "slugload" discharged into the sanitary sewer;
3. Stant must also 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.

Slug Prevention:

1. All drums are to be marked with a label identifying the contents and associated hazards.
2. All drums must be sealed at all times when not being filled or dispensed from.
3. Drums put up in a dispensing rack are to be fitted with approved faucets and pressure relief devices.
4. Secondary containment is to be employed at all times.
5. Storage and Dispensing areas are to be kept isolated from drains and other pathways where an accidental spill could cause a release to the City sewer system or the environment.

Spill Containment and Response:
See Section III and IV of this manual for detailed Spill Containment and Response Procedures. For the purposes of this section, the spilled material must be kept from reaching a floor drain or bing discharged from the Wastewater Pretreatment System without adequate treatment to remain in compliance with our permit. Inert absorbent material, rags, paper towels, and such can all be used to sop up such a spill or dike it away from a sewer or open ground. Do not use iron or any item that could spark a flammable material while cleaning up. If a spill results in the material reaching the sewer system, stop the municipal drain, prevent additional solvent from reaching the sewer and notify the appropriate authorities.

Control and containment of any spill of hazardous materials will be accomplished through the use of materials and procedures readily available throughout the facility and manufactured specifically for the material involved. Immediately notify the Emergency Coordinator or your Supervisor to implement the appropriate spill response for the situation.

Slug Reporting Procedures:

Initial Notification: Whenever a spill or slugload is released to the City Wastewater Sewer System wastewater operators will gather the following information and notify the City of Pine Bluff as follows:

Wastewater Treatment Plant at: (870) 535-0821
if no-one is available to answer, notify:
24 Hour Stoppage Crew at: (870) 535-0821

Date:_____
Location: Stant Manufacturing, 5300 Jefferson Parkway, Pine Bluff, AR 71603
Phone Number: 870-247-5480 ex. 294
Estimated Time Slug Discharge Began:_____
Time Slug Discharge Ended (if known):_____
Approximate Volume of the Discharge (gallons):_____
Approximate chemical composition or description of the discharge:_____
_____

If operators are unavailable to make the above notification, the Supervisor, EC, AEC, Plant Manager or Division EHS Engineer must make this notification.

Follow-up Notification: Within 8 hours of a slug load discharge, notify the Division EHS Engineer at (765) 265-3178 (24 hrs any day). Typically, this type of notification will require a written follow-up to be submitted to the City within 5 to 7 days. This written follow up will be drafted by the Environmental Representative and reviewed by the Division EHS Engineer and Tomkins Legal Department prior to submission to the City.

APPENDIX I (FOR REFERENCE ONLY)
EVIDENCE OF INITIAL ASSESSMENT OF SPILL POTENTIAL FOR BOTH OIL AND HAZARDOUS MATERIALS

TABLE I (note: to date there have been no reportable spills of any of these materials)

CHEMICAL LIST: OILS & HAZARDOUS MATERIALS THAT COMPRISES THE SPILL POTENTIAL FOR STANT MANUFACTURING, INC, PINE BLUFF PLANT

MATERIAL	GALLON	TANK LOCATION	FLOW TO:	POTENTIAL RELEASE FROM FACILITY	PROBABILITY
Ammonia	55	Chlorination Area	WWT/Sanitation Sewer	55	Low – Would be treated by WW system
Sodium Hydroxide	125	Chlorination Area	WWT/Sanitation Sewer	125	Low – Would be treated by WW system
Hydrogen Peroxide	55	Plating Department	WWT/Sanitation Sewer	55	Low – Would be treated by WW system
Hydrochloric Acid	110	Plating Department	WWT/Sanitation Sewer	110	Low – Would be treated by WW system
TCE (Eliminated 4/2006)	0(55)	Bldg & Grounds Shed	Diked, Soil	0	None - Material is no longer used.
Chlorine Gas	300LBS	Chlorination Area	Air	300 LBS	Unlikely – Area is inspected and highly secured.
Oils (in Drums)	935	Risk Area #7	Containment	0	Unlikely - Would be contained by secondary containment or the bldg.
Oils (in Equipment)	3,000	Plastics	Contained by Building	0	Low - Would be contained by the bldg.
Oils (in Equipment)	750	Stamping	Contained by Building	0	Low - Would be contained by the bldg.
Used Oil (Container)	275	Risk Area #7	Containment		Unlikely - Would be contained by secondary containment or the bldg.
Oil & Mop Water (Tank)	7,000	Risk Area #8	Containment		Low – Tank is fully contained
Animal Fat(Holding Tank)		East of Chlorinator	Containment		Low – Would be contained by secondary containment or the bldg.
Transformer Oil		Risk Area #3	Soil		Unlikely – would require the Transformer to fail.
Citrus cleaner, floor finish	495	Lube Area	Wastewater	55	Possible, area uses WW

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Draw Clean EXP, IC #345,
Spartan Concrete Seal (Oil Content
For SPCC = 275 gal)

Trench as part of
containment

MATERIAL	GALLON	TANK LOCATION	FLOW TO:	POTENTIAL RELEASE FROM FACILITY	PROBABILITY
Chrome Sulfate in Nitric Acid ZC1430	55	Plating Department	Waste Water Treatment	55 gallons	Low. Material is contained And will be treated in WW. WW Alarms will stop slug discharge.
Silicic Acid (30-50%) NC325	110	Plating Department	Waste Water Treatment	55 gallons	Low. Material is contained And will be treated in WW. WW Alarms will stop slug discharge.
Silicic Acid in Potassium Hydroxide CR140-S	110	Plating Department	Waste Water Treatment	55 gallons	Low. Material is contained And will be treated in WW. WW Alarms will stop slug discharge.
Caustic Soda, Liquid (50%) CR340	110	Plating Department	Waste Water Treatment	55 gallons	Low. Material is contained And will be treated in WW. WW Alarms will stop slug discharge.
Reacted Aldehyde (1-5%) ZB1010	110	Plating Department	Waste Water Treatment	55 gallons	Low. Material is contained And will be treated in WW. WW Alarms will stop slug discharge.
Zinc Chloride & Potassium Starter ZB1003	110	Plating Department	Waste Water Treatment	55 gallons	Low. Material is contained And will be treated in WW. WW Alarms will stop slug discharge.
41 Be Nitric Acid	165 lb	Plating Department	Waste Water Treatment	55 gallons	Low. Material is contained And will be treated in WW. WW Alarms will stop slug discharge.
Boric Acid (55lb Bags)	1,650 lb	Plating Department	Not Applicable	1,650 lb	Low. Material is a granular solid. Potential for release limited to spill during Receiving & handling during rain. Otherwise, sweep up localized spill.
Muriate of Potash (55lb Bags)	1,540 lb	Plating Department	Not Applicable	1,540 lb	Low. Material is a granular solid. Potential for release limited to spill during Receiving & handling during rain. Otherwise, sweep up localized spill.

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Pickle Salt (400 lb Drum)	800 lb	Plating Department	Not Applicable	400 lb	Low. Material is a granular solid. Potential for release limited to spill during Receiving & handling during rain. Otherwise, sweep up localized spill

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PLANT SITE SPILL PREVENTION

In assessing the Pine Bluff Plant spill potential for both oil and hazardous materials, a list of oil and chemicals has been provided, Table I, based on hazard, mode of storage, transfer from storage production, past spill experience and physical-chemical properties of each substance. As a result of this assessment, specific spill prevention provisions either exist or will be made part of the Plant operation to minimize potentially harmful discharges.

Discussion of these spill prevention control measures appears throughout this plan.

This Appendix is provided to show evidence of the Methods employed in assessing the plant and developing this plan. It is provided as a reference only.

POTENTIAL SPILL CAUSES CONSIDERED DURING THE ASSESSMENT

1. Employee Negligence
    A. Unloading

Plant personnel not in attendance during unloading. Hauler could discharge bulk vehicle contents to leading site into containment dike. All raw material tank truck unloading lines are capped and locked.

    B. Transfer

All pump switches are spring loaded to automatically shut off power when released. All valves are spring loaded to shut off automatically.

2. Power Failure

Not significant in that, material movement is via pumping; thus all flow would cease if material were being transferred at time of power failure.

3. Flooding and weather related

Possible but considered low.

4. Vandalism

Possible but considered low.

5. Fire or Explosions

Potential for spill to waterway is negligible due to distance of material and viscosity of fluid. Potential for spill to POTW is possible in the event the fire department would overflow the process tanks.

A. Facility Drainage

    1. Segregation of Drains

All process waters are segregated from cooling waters, and are pumped into the Plant's effluent treatment system. The treated effluent is discharged into the Pine Bluff POTW. Storm drains go directly to the sewer.

2. Drainage of Dike Areas

All containment dikes are drained with manually operated sump pumps. All dikes are under roof so no means of storm water removal is required.

3. Monitoring of Effluents

Process waters, after in-plant treatment, are discharged into the Pine Bluff POTW. The pH is monitored via an alarm signal and is checked hourly during operation of treatment facility. Effluent is analyzed and reported to POTW as required by EPA regulations and Pine Bluff ordinances.

B. Bulk Storage Tanks

1. Oil and hazardous material bulk storage tanks have been installed in accordance with design, material of construction, adequate gauges, and safety devices compatible with the respective material to be handled.

1. Each above ground bulk storage tank is contained with containment capable of containing the contents of the largest tank.

3. Each above ground storage tank is inspected on a regular basis. Inspections include seams, rivets, bolts, gaskets, nozzle connections, valves, piping and condition of foundations and supports.

2. As with any of the in-plant transfer facilities, any visible leaks of oil or hazardous materials from the tank, tank fittings, pumps or piping in the immediate storage area are to be corrected immediately.

C. Transfer Operation, Pumping & In-Plant Process

1. Segregation of Drains
All process waters are segregated from cooling waters, and are pumped into the Plant's effluent treatment system. The treated effluent is discharged into the Pine Bluff POTW. Storm drains go directly to the sewer.

2. Drainage of Diked Areas
All containment dikes are drained with manually operated sump pump. All dikes are under roof so no means of storm water removal is required.

3. Monitoring of Effluents
Process waters, after in-plant treatment, are discharged into the Pine Bluff POTW. The pH is monitored via an alarm signal and is checked during operation of treatment facility. Effluent is analyzed and reported to POTW as required by EPA regulations and Pine Bluff ordinances.

Reference is made to the individual Material Safety Data Sheet covering the respective materials in this plan for proper treatment and disposal.

A. Small spills are to be treated as per normal practice
B. Large spills - action is to be taken to pump as much of the spilled material as soon as possible into suitable containers (i.e., drums or tanks).
C. Reorientation of Container - often the simplest and most effective countermeasures are overlooked. Among these is the reorientation of the ruptured container. For spills from relatively small containers which have ruptured, it is often possible to stop any remaining material from escaping by simply righting the container or repositioning drum.
D. Overpacking to place the container inside another container

Any spill or leakage into the process water system is to be checked for quantity discharged. Condition of the effluent treatment system is to be assessed for needed corrective action to prevent the discharge of any material in harmful quantity to the Pine Bluff City Sewer (POTW).

D. Plant Security

1. The Pine Bluff Plant is completely fenced.
2. For night operation and plant security, storage and process areas are strategically lighted.
3. Any unauthorized personnel present in the Plant are to be referred to the office.

B. Retention (See Table II)

Records of regularly scheduled inspections (equipment and spill containment facilities), environmental incidence reports (spills and leaks) and all incidents which have resulted in the release of toxic or hazardous pollutants to the streams of Jefferson County and the State of Arkansas are to be retained for a minimum of three (3) years.

Likewise, inter-organizational reports and memoranda, EPA reports and correspondence concerning spill incidents and/or spill prevention and containment activities are to be retained for a minimum of three (3) years.

The Slug Plan for oil and hazardous material is to be retained until superseded.

Office of Water
EPA-833-F-06-005
February 2006

National Pretreatment Program

(40 CFR 403)

Pretreatment Streamlining Rule Fact Sheet 2.0: Required Changes

Do any of the Streamlining Rule changes require states or POTWs to modify their pretreatment regulations or program documents?

Yes, there are required changes in the Pretreatment Streamlining Rule. The majority of the regulatory changes made in the final Pretreatment Streamlining Rule, however, are not required. That is, for many of the changes (e.g., sampling for pollutants not present, general control mechanisms, and equivalent mass limits for concentration limits), the state Approval Authority (or Control Authority depending upon which role the state plays in the particular municipality) and POTW Control Authority may choose whether or not they wish to adopt these specific streamlining provisions. As a general rule, those streamlining changes which are considered less stringent than the current regulations do not need to be adopted. If the state wishes to implement these less stringent requirements, it will need to formally revise its own regulations to provide the appropriate legal authority for such implementation.

There are several streamlining-related changes that are more stringent than the previous Federal requirements and therefore are considered required modifications for the state and/or the POTW. Therefore, to the extent that existing state or POTW legal authorities are inconsistent with the required changes, they must be revised. Of course, where state or local authorities are already consistent with these required provisions, further changes would not be necessary.

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Which changes are considered required?

EPA has identified the following 13 rule changes that are more stringent than existing provisions in 40 CFR Part 403, and therefore may require changes to the appropriate state or POTW authorities. States and POTWs should make the changes as soon as possible, and EPA and state NPDES permitting authorities should revise NPDES permits to require implementation of these required changes by POTWs. A general description of each change is included, along with a summary of what state or POTW follow-up actions are needed.

1. Updated removal credits provisions relating to Overflows [§ 403.7(h)]

Description of required change: This change provides updated references relating to requirements that POTWs must meet to adjust removal credits for combined sewer overflows (CSOs).

What follow-up actions are required? Before approving any removal credits, states that are currently delegated oversight of the pretreatment program must revise their regulations where state legal authorities include a provision similar to § 403.7(h). No change to POTW pretreatment programs is necessary based on this regulatory change.

2. Slug control requirements must be included in SIU control mechanisms [§ 403.8(f)(1)(iii)(B)(6)]

Description of required change: The Streamlining Rule requires that applicable slug control requirements be included in the SIU's control mechanism.

What follow-up actions are required? POTWs must incorporate slug control requirements into their SIU control mechanisms and must revise their approved program, if necessary, to ensure that they have the legal authority and procedures to modify control mechanisms as needed. Once the POTW's authority to include these requirements is established, EPA foresees them being incorporated into SIU control mechanisms when the control mechanisms are next reissued. States must revise their regulations, if necessary, to ensure that they have the authority to enforce this requirement.

3. SIUs must be evaluated for the need for a plan or other action to control slug discharges within a year from the final rule's effective date or from becoming an SIU [§ 403.8(f)(2)(vi)]

Description of required change: The final Streamlining Rule specifies that POTWs must evaluate all of their SIUs for the need for a slug control plan or other actions at least one time. If the POTW has not yet done so, it must complete the evaluations before October 14, 2006 or within a year of the Industrial User being designated as significant. Where the evaluation has been conducted and documented previously, even if conducted prior to publication of the Streamlining Rule, no new evaluation is required.

What follow-up actions are required? For this provision, the applicable state regulations must be revised to specify the October 14, 2006 date for existing SIUs, and the 'within one year' final rule change for Users designated as SIUs after October 14, 2005. While POTWs must conduct this evaluation, as described above, a pretreatment program modification may not be necessary.

4. SIUs are required to notify the POTW immediately of any changes at its facility affecting the potential for a slug discharge [§ 403.8(f)(2)(vi)]

Description of required change: The final Streamlining Rule requires SIUs to notify the POTW immediately of changes that occur at the facility affecting the potential for a slug discharge, thereby allowing the POTW to reevaluate the need for a slug control plan or other actions to prevent such discharges.

What follow-up actions are required? POTWs must revise their approved program as necessary to ensure that they have the legal authority and procedures to enforce this requirement. States must revise their regulations, if necessary, to ensure that they have the authority to enforce this requirement.

5. Significant Noncompliance (SNC) definition is expanded to include additional types of Pretreatment Standards and Requirements [§ 403.8(f)(2)(viii)(A-C)]

Description of required change: The final Streamlining Rule made several wording changes that expand the types of Standards and Requirements that are to be considered when determining whether an SIU's violations constitute SNC. These changes affect what EPA considers to be "chronic violations" (§ 403.8(f)(2)(viii)(A)), "Technical Review Criteria violations" (§ 403.8(f)(2)(viii)(B)), and "other" violations (§ 403.8(f)(2)(viii)(C)). Note that changes to the SNC requirements for late reports, for the type of newspapers must be used for publishing SNC violations, and for the application of SNC to SIUs only are optional revisions.

What follow-up actions are required? State regulations must be revised, if necessary, to reflect the expanded coverage of Standards and Requirements in the SNC definition. In addition, if necessary, POTWs need to revise their SNC definition in their legal authority, enforcement response plan, and/or program procedures to reflect expanded coverage of standards and requirements in the SNC definition.

6. SIU reports must include BMP compliance information [§ 403.12(b), (e), (h)]

Description of required change: The final Streamlining Rule requires SIUs to submit documentation as required by the Control Authority or applicable Pretreatment Standards and Requirements to determine compliance with BMP-based Standards or local limits.

What follow-up actions are required? State regulations must be revised, if necessary, to require SIUs to report on compliance with BMP-based categorical Pretreatment Standards or local limits. In addition, POTWs must revise their legal authority, enforcement response plan, and program procedures as necessary to require SIUs to report on compliance with BMP-based categorical Pretreatment Standards or local limits, and to enforce those requirements where Users fail to submit the required information.

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7. SIU control mechanisms must contain any BMPs required by a Pretreatment Standard, local limits, state, or local law [403.8(f)(1)(iii)(B)(3)]

Description of recommended change: The final Streamlining Rule clarified that among the effluent limits that must be contained in all SIU control mechanisms are Best Management Practices (BMPs) that are required by a categorical Pretreatment Standard, local limit, state or local law.

What follow-up actions are recommended? This revision merely clarifies that applicable BMPs would be required to be included in control mechanisms. It is EPA's expectation that most POTWs already have the authority to implement this requirement. POTWs, however, must ensure that they have the legal authority and procedures to implement this requirement, and to include appropriate BMPs in the control mechanism where appropriate. States should revise their regulations, if necessary, to ensure that they have the authority to enforce this requirement.

8. Documentation of compliance with BMP requirements must be maintained as part of the SIU's and POTW's record-keeping requirements [§ 403.12(o)]

Description of required change: The final Streamlining Rule clarified that the POTW and the SIU must maintain records of BMP compliance in the same way that other records are maintained as part of § 403.12(o).

What follow-up actions are required? States and POTWs must revise their requirements and program procedures, if necessary, to ensure that they have the authority to implement and enforce this requirement. SIU permits also should be revised to clearly require that this documentation be maintained by the User.

9. Control Authorities which perform sampling for SIUs must perform any required repeat sampling and analysis within 30 days of becoming aware of a violation [§ 403.12(g)(2)]

Description of required change: The final Streamlining Rule provides that where a Control Authority has assumed responsibility for sampling in lieu of the SIU, it is the Control Authority which must repeat sampling and analysis within 30 days of becoming aware of an exceedance. The only exception to this requirement is if the Control Authority specifically requires the Industrial User to perform the repeat analysis.

What follow-up actions are required? POTWs should generally have the ability to sample any time they determine it is appropriate, and therefore no POTW program revision may be necessary. However, POTWs must revise their approved program as necessary to ensure that they have the legal authority and procedures to implement this requirement. States must revise their regulations, if necessary, to ensure that they have the authority to enforce this requirement.

10. Require periodic compliance reports to comply with sampling requirements, require Control Authority to specify the number of grab samples necessary in periodic and non-categorical SIU reports, and require non-categorical SIUs to report all monitoring results [§ 403.12(g)(3), (4), (6)]

Description of required changes: SIUs are now required to follow sampling requirements in § 403.12 for periodic compliance reports (§ 403.12(e) and (h)), whereas they were previously only explicitly applicable to baseline monitoring reports and 90-day compliance reports. In addition, for the reports required in § 403.12(e) and (h), the final rule requires the Control Authority to indicate the number of grab samples necessary to assess and assure compliance by Industrial Users with applicable categorical Pretreatment Standards and Requirements. Also, the final rule now requires that non-categorical SIUs report all monitoring results, whereas the previous regulations only made this requirement explicit for categorical SIUs.

What follow-up actions are required? State regulations must be revised to reflect these final rule changes. Many POTW pretreatment programs already include these requirements, but POTW legal authorities and program procedures must be revised as necessary to reflect this final rule change.

11. Non-Categorical SIUs are required to provide representative samples in their periodic monitoring reports [§ 403.12(g)(3)]

Description of required change: The final Streamlining Rule extends to the § 403.12(b), (d), and (h) monitoring reports the requirement that SIUs provide data which are representative of conditions during the reporting period.

What follow-up actions are required? Many POTW pretreatment programs already include this requirement, but POTWs must revise their approved program and SIU control mechanisms as necessary to ensure that they have the legal authority and procedures to enforce this requirement. States must revise their regulations, if necessary, to ensure that they have the authority to enforce this requirement.

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12. Require notifications of changed discharge to go to the Control Authority and the POTW, where the POTW is not the Control Authority [§ 403.12(j)]

Description of required change: The pretreatment regulations now clarify that Industrial Users must notify the Control Authority, as well as the POTW, if the POTW is not the Control Authority. Prior to the Streamlining Rule, the regulations only specified that the notice go to the POTW.

What follow-up actions are required? State regulations must be revised to require changed discharge notifications to be submitted to the state where the POTW is not the Control Authority. POTWs are not required to make this change since they were already required to be notified in the previous version of § 403.12(j), and the revision brought about by the Pretreatment Streamlining Rule does not change this requirement.

13. How and when the POTW can designate a "duly authorized employee" to sign POTW reports [§ 403.12(m)]

Description of required change: The pretreatment regulations now specify that the POTW must, in writing by the principal executive officer or ranking elected official of the POTW, authorize the use of a "duly authorized employee". In addition, the regulations require that the authorization be submitted to the Approval Authority prior to or together with the POTW report being submitted.

What follow-up actions are required? State regulations must be revised to require POTWs to follow the procedures for authorizing "duly authorized employees" to sign POTW reports and for submitting reports signed by such employees. POTWs are not required to make this change, although they will be required to follow the new state requirements relating to "duly authorized employee" signatures upon their adoption.

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