ADEQ

ARKANSAS
Department of Environmental Quality

September 17, 2012

Larry Waldrop
General Manager
El Dorado Water Utilities
500 North Washington
P.O. Box 1587
El Dorado, Arkansas 71731

Re: City of El Dorado (NPDES #AR0033723) Pretreatment Program Audit/Municipal Pollution Prevention Assessment; AFIN 7000341

Dear Mr. Waldrop:

Please find enclosed the finished report for the audit/assessment conducted August 28th through August the 30th, 2012. Discussions and an evaluation should be made concerning the findings. Please respond to required actions and recommendations in writing within thirty (30) days from the date on this correspondence. This response should outline the steps and schedule in which the City can reasonably address/correct deficiencies and/or required actions.

The City appears to have personnel knowledgeable of the Pretreatment Program, but it is believed more Pollution Prevention activities can be incorporated. Many of the audit/assessment recommendations are meant to aide your Programs to further evolve in achieving the Clean Water Act's objectives to eliminate discharge of pollutants to the environment.

It was a pleasure working with your staff during the audit and becoming more familiar with the City of El Dorado, its industries, the Pretreatment Program and Pollution Prevention activities.

Feel free to contact this office with any questions.

Sincerely,

Allen Gilliam

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

Attachments: Audit/Assessment, Checklist and Supporting Documents (Attachment A)

ec: Craig Uyeda/NPDES Enforcement Branch Manager
Eric Fleming/Inspection Engineer Supervisor
Rudy Molina/EPA 6WQ-PO

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF EL DORADO, ARKANSAS

NPDES PERMIT #AR0033723

September 17, 2012

PREPARED BY: ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ADEQ

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LIST OF ATTACHMENTS

A) INTRODUCTION

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

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

An audit/assessment was performed August 28 - 30, 2012, of the Pretreatment Program implemented by City of El Dorado, Arkansas. Participants included:

Allen Gilliam	ADEQ/Pretreatment Coordinator
Harold Baker	City/Treatment Superintendent
John Peppers	City/Pretreatment Technician
Larry Waldrop	City/General Manager

The goals of the audit/assessment were:

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

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

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

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

El Dorado's Pretreatment Program was originally approved on 3/22/85. A Program modification was published on 7/12/01, approved and incorporated into its NPDES permits on 8/16/01. These modifications included changes in the City's Pretreatment Ordinance, headworks loading evaluation with "guideline local limits", inclusion of an Enforcement Response Plan and minor program narrative revisions.

A non-substantial modification to the Program Ordinance to be current with the "Streamlining" revisions to 40 CFR 403 was received by this office on 4/4/12. That Ordinance was reviewed and sent back to the City on 7/24/12 for their final draft. Submittal of the final draft Ordinance and the rest of their narrative Pretreatment Program modifications are due on 9/24/12.

The City has two (2) wastewater treatment plants. The POTWs consist of aerated lagoons, facultative lagoons followed by dissolved air floatation as needed. Disinfection is not necessary. Both POTWs discharge into intermittent streams with a 7Q10 of 0 cfs.

The South POTW has a design flow of 7 MGD and receives most of the City's significant industrial users' (SIU) contributions. Five (5) permitted SIUs make up approximately 18% of the South POTW's average 1 MGD flow. Two (2) of those are categorical metal finishers, one a rendering plant, one a cable manufacturer/repair company and the other being a paper bag manufacturer.

The North POTW has a design flow of 5 MGD and receives contributions from one (1) categorical industrial user (CIU), a Transportation Equipment Cleaning facility regulated under 40 CFR 442. This facility makes up about 0.001% of the POTW's average 1.3 MGD flow.

Approximately 56.5 million gallons of the North plant's effluent is discharged to the local country club's golf course and to some soccer fields when needed over a year's period of time.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to four (4) of their permitted industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Supporting documentation obtained during the audit is included as Attachment A.

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

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of El Dorado's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1a) Under ***40 CFR 403.8(f)(2)(i)***, "[El Dorado shall] Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to [ADEQ] upon request..."; and

1b) Under ***Section 2 of the City's Pretreatment Program***, Industrial Waste Survey, "The industrial waste survey (IWS) is used to obtain this information. Four major activities comprise the IWS: (1) Composition of a master list of potential IUs located in the service area; (2) Survey of each of these industries to collect the necessary information;...(4) Summarization of the data for use in the Pretreatment Program."

During the audit checklist interview it was discovered the City had sent out approximately 25 IU surveys in June of 2011. No "master list" or "summarization" could be provided compiling pertinent information from these. The City must continue the IU surveys and also develop a master list continually updating it as future surveys are requested/submitted. This "on-going" IU survey process may be more easily accomplished if the City was to survey industry/business sectors from the City's phone book "yellow pages".

See Section 2.4 and Table 2.1 of EPA's "Guidance Manual for POTW Pretreatment Program Development" (10/83) at http://www.epa.gov/npdes/pubs/owm0003.pdf for information about and an example "master list" with some pertinent information regarding surveyed IUs.

2a) Under ***Section 4.2.5. of the City's Pretreatment Program*** Permits Duration, "...The Significant Industrial User shall apply for a permit reissuance no later than 90 days prior to the expiration of the SIU's existing permit"; and

2b) Under ***Section 12. Duty to Reapply*** of the SIUs permits' ***Standard Conditions***, (see Attch. A-3g) "The Utility shall notify a user one hundred and eighty (180) days prior to the expiration date of the User's permit. Within ninety (90) days of the notification, the User shall reapply for reissuance of the permit on a form provided by the utility."

During the file review no documentation could be found that the Utility notified the user one hundred and eighty (180) days prior to the expiration date and SIU permit applications found were submitted approximately thirty (30) days prior to their permits' expiration date.

The City must notify the users of their expiration date and ensure they re-apply for a permit ninety

(90) days prior to their current permits' expiration date.

The applications should be considered incomplete if the industry representative has not filled in the SIC and NAICS code(s).

3a) Under ***40 CFR 403.12(g)*** Monitoring and analysis to demonstrate continued compliance. "...the reports required in paragraphs (b), (d), (e), and (h) of this section shall contain the results of sampling and analysis of the Discharge, including the flow..."

3b) Under ***Section 4.3.3.a. of the City's Pretreatment Program***, Periodic Compliance Reports: "...The SIU shall be monitored for the nature, concentration and flow..."

It is realized the City conducts the sampling for its SIUs, but process flows were not recorded on the monitoring results summarized by the City. The City must record the process flows while it is sampling its SIUs. It was understood that most of the industries had process water flow meters and that some of these flows were recorded, but located at the Pretreatment Technician's office, not with the SIUs' files.

This reporting requirement should also be included in the permits issued to the City's permitted industries. Since some of the industries visited recorded other quality control measurements, recording daily process flows should be of little inconvenience to them and could be reported by them.

4) Under ***40 CFR 403.5(b)(8)***, "Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW: Any trucked or hauled pollutants, except at discharge points designated by the POTW."

During the file review it was discovered a copy of the liquid waste haulers authorization (see Attch. A-1) did not specify at what point at the POTW they were to discharge their wastewater. The City must include the discharge point in their "authorization".

5) Under ***40 CFR 403.12(b)***, "Reporting requirements for industrial users upon effective date of categorical pretreatment standard—baseline report. "Within 180 days after the effective date of a categorical Pretreatment Standard...existing Industrial Users subject to such categorical Pretreatment Standards and currently discharging to or scheduled to discharge to a POTW shall be required to submit to [El Dorado] a report which contains the information listed in paragraphs (b)(1)–(7) of this section. ***(3)*** Description of operations. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes. "

During the file review not all SIUs' wastewater flow schematics could be produced or were inadequate. Milbank's was located, but was not comprehensive in that directional arrows were not depicted showing the flows from their process/rinse tanks to and through their pretreatment system.

During Prescolite's site visit the IU representative produced a fairly accurate process wastewater schematics and was willing to update and make it more comprehensive.

The City must have these wastewater flow schematics as well as the pretreatment systems' flows on file and kept up-to-date. Follow-up with the City's SIUs must be made to request updated and comprehensive wastewater flow schematics. These should be dated and kept in the SIUs' files.

6) Under the ***Metal Finishing Standards in 40 CFR 433.12(a)***, "In lieu of requiring monitoring for TTO, [El Dorado] may allow dischargers to make the following certification statement: 'Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation...for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan [TOMP] submitted to [El Dorado].' "

During the Prescolite file review it was discovered their submitted TOMP only identified nickel acetate which is not a toxic organic. During the site visit it was discovered Prescolite did have acetone on-site which is a toxic organic.

The City must require Prescolite to resubmit their TOMP to address the acetone and any other toxic organics they may have on-site which were not discussed.

7) Under ***40 CFR 403.8(f)(1)(iii)(B)(3)***, "...individual control mechanisms must be enforceable and contain, at a minimum, the following conditions: Effluent limits, including Best Management Practices (BMP), based on applicable general Pretreatment Standards in part 403 of this chapter..."

It was discovered during Miller Transporter's file review that its permit only footnoted (see Attch. A-4b) they had submitted a Pollution Management Plan (PMP). The City must modify Miller's permit to include the specific criteria of that PMP (BMP). See 40 CFR 442.15(b)(5) for the specific PMP criteria that must be included (possibly in a special conditions part of their permit).

That PMP was not signed until the day of this office's site visit on 8/29/12 and there was no proof that the City had approved it. This "approval" must be documented in Miller's file.

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

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

During Miller Transporter's file review it was discovered the City's inspection did not cover all the questions that should have been answered (or documents reviewed) regarding Miller's Pollution Management Plan (PMP).

It is recommended Miller's inspection be tailored to specifically ask questions and review on-site documents to determine compliance or non-compliance with the facility's PMP.

2) It is strongly recommended to record all permitted industries' pH during the City sampling events. These pH readings should be placed on the Chain of Custody and recorded on the IUs' sampling results summary sheets since the City has pH limits in its current Ordinance.

3) Recommend organizing all Pretreatment records and correspondence. Most information asked for during the Audit could be located, but some documentation was located at the Pretreatment Technician's office blocks away. He had to be called to bring over some of his paperwork to answer various questions asked during the Audit. Other information was not located in the tabbed sections where it should have been and there was documentation that had not been dated and inserted into the various industries' files.

4) Recommend including questions regarding Pollution Prevention (P2) activities, Best Management Practices, water and energy conservation on all SIU permit applications.

5) Recommend IU Surveys be tailored to ask questions about specific business sector operations/ processes, chemicals on site and type of non-domestic wastewater discharged to the City. Healthcare facilities' survey questions would obviously not apply to an auto body or a machine shop's survey. Pollution Prevention (P2) and best management practices should also be asked.

6) Recommend following up selected IU surveys (using the City's water usage records) with informal inspections to determine what constitutes their large volumes of water. Many businesses will have cooling towers and boilers that contain additives for corrosion control, algaecide, scale inhibitors and biocides. The City should be knowledgeable about these chemicals and where they may be coming from.

7) Recommend liquid waste hauler(s) "authorization" (see Attch. A-1) include the minimum 40 CFR 403.5(a)(1) and (b) prohibitions and a certification statement that "There shall be no hazardous, industrial or restaurant grease trap waste discharged by [Company Name] to the City's wastewater collection system or treatment plant." A certification statement per 40 CFR 403.6(a)(2)(ii) should be included from the hauler's owner.

8) During the checklist interview it was stated that the IU inspections were the industries' fact sheets. Although most of the information may be contained in these a more succinct fact sheet is recommended to be developed.

See Section 11-1 of EPA's "Industrial User Guidance Manual" (9/89) at http://www.epa.gov/npdes/pubs/owm0017.pdf for example fact sheet pertinent information.

Actual start-up (first discharge) dates, basis for limits, and pictures of their exact sampling points are but three additional pieces of information that should be included as fact sheet information that this office can quickly think of.

These fact sheets should periodically be sent to each IU representative to review and update as necessary. These fact sheets should be dated as to their last revision/update.

9) Reconsider the required monitoring for the base neutrals, acid extractables, and phenols in Miller's permit (see Attch. A-4c) if they've historically shown non-detect of less than 0.1 mg/l. Miller's ~2,500 gallons batch discharged once per month to the City is more than likely not detectable at the City wastewater treatment plant.

10) Recommend sending all SIUs a copy of their reporting requirements located in 40 CFR 403.12. One provision, the notification of "changed discharge" requirement is consistently "overlooked" by many IUs and control authorities throughout the State. Equipment or plumbing modifications to pretreatment/process equipment constitute such changes requiring notification in the form of updated schematics.

11) Strongly recommend including a separate section in the Pretreatment Program including fairly detailed standard operating procedures for sampling, inspections, day-to-day activities of the City Pretreatment Coordinator, etc. This would be invaluable for training persons new to the program.

12) Recommend clarifying "composite sampling" in the City's IU permits. It's realized the City is taking time proportioned composites for compliance, but the permits only state "24 hour composites" (See Attch. A-3b). If an industry wished to conduct its own monitoring, it may set up a sampler for flow proportioned sampling. There could possibly be a significant difference in flow proportioned vs. time proportioned sampling results. The City's sampling and possible industry sampling should be conducted by the same protocol to avoid any confusion.

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

The City's final draft Pretreatment Ordinance and draft narrative Pretreatment Program sections are due to ADEQ on September 24, 2012.

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of El Dorado TRACKING NPDES #: AR0033723
Mailing address: El Dorado Water Utilities
500 North Washington, P.O. Box 1587, El Dorado, AR 71730

Permit Signatory: Larry Waldrop Title: General Manager

Telephone: 870.862.6451 FAX NUMBER: 870.863.9201

Pretreatment Contact: Harold Baker Title: Treatment Superintendent
Address: Same
Telephone: Same
e-mail harold@eldoradowater.com

Pretreatment program approval date: 3/22/85

Dates of approval of any substantial modifications: 8/16/01

Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 8/28-30/12 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Harold Baker	Same	Same
John Peppers	Pretreatment Tech.	???

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	12/14/10	No IU survey on file and Prescolite's TOMP was not completed nor reviewed

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?

. . . . . .

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
*AR0033723	South	10/1/08	9/30/13
AR0033936	North	9/1/08	8/31/13

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: South
Location Address: 325 Quail Crossing Rd.

Expiration Date of NPDES Permit: AR0033723

Treatment Plant Wastewater Flow: Design- 7 MGD; Actual (Avg.)- 1 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 4

Industrial Contribution to this Treatment Plant

# of SIUs : 5 # of CIUs: 2
Industrial Flow (mgd): 0.18 Industrial Flow(%): 18 %

Level of Treatment		Type of Process(es):
Primary	_____	_____
Secondary	✓	2 aerated & 2 facultative lagoons
Tertiary	_____	w/dissolved air floatation as necessary

Method of Disinfection: N/A

Dechlorination _____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Bayou De Loutre then to the Ouachita River

Receiving Stream Classification: Segment 2D of the Ouachita River Basin

Receiving Stream Use: Secondary contact recreation/raw water source for public, industrial & AG water supply/propagation of desirable species of fish

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

Method of Sludge Disposal:		Quantity of Sludge:	
_____	Land Application	_____	dry tons/yr.
_____	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.
_____	Other (specify)	_____	dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals, WET & NH3-N

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for South 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: ADEQ
Effective Date: 10/1/08
Expiration Date: 9/30/13

List pollutants that are specified in current sludge permit:
Reference to 40 CFR 503 criteria (narrative only)

YES	NO	N/A	
✓	___	___	Has the Control Authority submitted results of whole effluent biological toxicity testing.
✓	___	___	Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There's been lethal effects on the water flea on 8/11 & 3/12 and sub-lethality to the water flea on 6/09, 12/09, 6/10, 7/11 - 9/11, 2/12 & 3/12. No TRE. WET limits only in their NPDES permit.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4		
Priority **	1	1		
Biomonitoring		6 Jan, Feb, March, June, July - Dec Quarterly		
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.
"Most parameters have remained the same"

YES	NO	N/A	
___	✓	___	Has the POTW begun tracking the trends in the above samples?
✓	___	___	Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
NH3-H (10/31/11; 3/31/12 and on 4/30/12)	Cold weather

YES	NO	
___	✓	Has the treatment plant sludge violated the TCLP Test?

SECTION I: GENERAL INFORMATION

2. Individual Treatment Plant Information

a. Name of Treatment Plant: North
Location Address: 1119 Victor Dumas Rd.

Expiration Date of NPDES Permit: AR0033936

Treatment Plant Wastewater Flow: Design- 5 MGD; Actual (Avg.)- 1.28 MGD
(0.155 MGD to golf courses and soccer fields)
Sewer System: 100 % # of SSOs due to grease blockages: 4

Industrial Contribution to this Treatment Plant

# of SIUs: 1 # of CIUs: 1
Industrial Flow (mgd): .0013 Industrial Flow(%): 0.001 %

Level of Treatment		Type of Process(es):
Primary		
Secondary	✓	2 aerated lagoons (in series); one
Tertiary		facultative lagoon and dissolved air floatation

Method of Disinfection: None

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Mill Creek to Flat Creek to Haynes Creek to Smackover

Receiving Stream Classification: Segment 2D of the Ouachita River Basin

Receiving Stream Use: Secondary contact recreation/public, industrial & AG water supply/propagation of desirable species of fish

If effluent is disposed of to any location other than the receiving stream, please note: Irrigate a golf course and soccer fields

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.
____	Other (specify)	____	dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals, WET & NH3-N

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for North 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: ADEQ
Effective Date: 9/1/08
Expiration Date: 8/31/13

List pollutants that are specified in current sludge permit:
Reference to 40 CFR 503 criteria (narrative only)

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?) Sublethality shown on the water flea on 8/09, 12/10 & 1/11. WET limits only. No TRE.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4		
Priority **	1	1		
Biomonitoring		4		
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.
Parameters have remained about 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)
Late reporting	Achieve compliance with final NH3-N limits
	Annual Pretreatment Report

YES	NO	
___	✓	Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
___	✓	**Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]**
✓	___	**Have any *NON*-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.** City submitted (9/1/09) their modified ordinance. Those mods were not found by ADEQ Pretreatment. Program mods were re-submitted on 4/4/12 (only the Ordinance). The City has until 9/24/12 to submit final draft of revised Ord. and submit the remaining Pret. Program.

1. Modifications:

Date Approved by ADEQ Pending review	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
	See above	

2. Modifications in Progress:

Date Requested	Nature of Modification
9/1/09	Streamlining mods to their Pretreatment Ord. and their Pretreatment Progam.

YES	NO	
___	✓	**Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:**
n/a	___	**Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.**

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

Date of original Pretreatment Program approval: 3/22/85 **[WENDB-PTIM]**
Date of most recent Ordinance approved by the Control authority: 1/4/01
Date of most recent Pretreatment Program modification approval: 8/16/01

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?**

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: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ **Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:**

n/a ___ **Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?**

n/a ___ **Have provisions been made for the incorporation of Pollution Prevention (P^2)** policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	n/a			
2.				
3.				

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
n/a		___	___

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)] *City sent out ~25 IU surveys to different type businesses in 6/11.*

___ ✓ 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?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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) Visual drive-bys w/possible un-announced inspections

How often is the survey to be updated? Ongoing (program isn't specific about frequency)

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

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. 6 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 3 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 3 Noncategorical SIUs
d. 3 Other regulated nonsignificant IUs (Describe) Hospital & others with potential but are zero process w.w. discharge and Lion Oil ground water clean-up.

9 TOTAL of a. + d.

YES	NO	
✓	___	Has the POTW identified any IUs with Pollution Prevention opportunities? *City reps know of IUs that have implemented P2 practices and alternatives*
✓*	___	Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

** In revised Pretreatment Ordinance.*

If not, the Control Authority has defined "significant industrial user" to mean:

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
n/a	

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	
___	✓	Does the Control Authority accept trucked septage wastes?
✓	___	Does the Control Authority accept other trucked wastes? *Porta-Potty only*
___	✓	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, that are applied to waste haulers:

Pollutant	Limit
Recommend including general and specific prohibitions along with a certification statement regarding "no hazardous waste" and specifying a dedicated discharge point.	

Describe the discharge point(s) (including security procedures):
None

___	✓	Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?
✓	___	Does the Control Authority accept groundwater clean-up sites' wastewater?
___	✓	Does the Control Authority have a control mechanism for regulating wastes from UST sites?

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

Pollutant	Limit
None. See Attachment A-1	

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?

2/09 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	___	Other ___
✓	Government Agencies	✓	Other Internet

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
n/a			

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?		MAHL Numerical "Guideline Limits" Adopted Monthly Avg. (mg/l)
		Yes	No	Yes	No	Yes	No	
Arsenic (As)		✓		Don't appear necessary at this time		Narrative reference is made to these "Guideline limits"		0.2
Cadmium (Cd)		✓						0.07
Chromium-Total		✓						1.71
Copper (Cu)		✓						2.07
Cyanide (CN)		✓						0.65
Lead (Pb)		✓						0.43
Mercury (Hg)		✓						0.0003
Molybdenum (Mo)	*	✓						0.2
Nickel (Ni)		✓						2.38
Selenium (Se)	*	✓						0.1
Silver (Ag)		✓						0.24
Zinc (Zn)		✓						1.48

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

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)
n/a							

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)	✓ mentioned in Program "if necessary"		
Cadmium (Cd)	✓		
Chromium-Total	✓		
Copper (Cu)	✓		
Cyanide (CN)	✓		
Lead (Pb)	✓		
Mercury (Hg)	✓		
Molybdenum (Mo)	✓		
Nickel (Ni)	✓		
Selenium (Se)	✓		
Silver (Ag)	✓		
Zinc (Zn)	✓		

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? _____
Local limits would apply for both North and South POTWs

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	
Other SIUs	1	1/year	
Sampling:			
CIUs	12*	1/year	*Miller Transporters for pH & O&G. + City does all the other IU sampling
Other SIUs	2 to 12+	1/year	
Reporting:			
CIUs	12*	2/year	"
Other SIUs	2 - 12+	2/year	"
Self-Monitoring:			
CIUs	2*	2/year	*City conducts all sampling
Other SIUs	2*	2/year	" "

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
0	0	Not sampled at least once in the past reporting year?
0	0	Not inspected at least once in the past Pretreatment reporting year?
0	0	Not inspected and not sampled at least once in the past reporting year ? [WENDB-NOIN]-[403.8(f)(2)(v)]

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

	Analytical Method *	Name of Laboratory
Metals	ICP/MS & 1631E for Hg	American Interplex
Cyanide	Spectrophotometric	"
Organics	GC/MS	"
Other	WET	"

Were all wastewater samples analyzed by 40 CFR 136 methods? *Yes*

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe: they follow EPA's performance evaluation procedures (kits) and rely on the state's certification system

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

5 days Conventionals
1 week Metals
2 weeks 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 *(city does this except for M.T.)*
___	___	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)]

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

* *Newly revised Pretreatment Ord. is consistent.*

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

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
✓ Setting of compliance schedule
✓ Injunctive relief
✓ Administrative Order
✓ Revocation of permit
✓ Fines (maximum amount):

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

✓ Imprisonment
✓ Termination of Service
✓ Other: termination of water

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES	NO	
✓		When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
	✓	Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)]. Comment: Because city does all self-monitoring, it's only occasionally that an IU will do their own and would have to notify of violations then
✓		If no, does the Control Authority conduct all of the monitoring?

YES	NO	N/A	
✓			Does the pattern of enforcement conform to the Enforcement Response Plan?

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
n/a					

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 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?	

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	Number	Amount
Civil	0	$
Administrative	0	$
Total	0	$ [WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

YES	NO	
✓	___	computerized
✓	___	hard copy
___	___	OTHER: _____

Are the following files computerized:

✓	___	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
___	✓	Receiving treatment plant (i.e.if > one plant in the system)
___	___	Other (specify) _____

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

___ ✓ Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?
"Would be kept in locked file cabinet"

___ ✓ Are there significant public or community issues impacting the POTW's pretreatment program?
If yes, please explain: _____

✓ ___ Are all records maintained for at least 3 years?

SECTION II: PROGRAM ANALYSIS AND PROFILE

K. RESOURCES

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

About 1.3 FTE's

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	*these go
___	monitoring charges	back to general
✓*	industry surcharges	operating
___	other (describe) ___	fund
	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:
Cost of living increases only

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

			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	4 portable ISCO composite samplers and pH monitors
✓	___	Safety equipment	Standard list
✓	___	Vehicles	1.5 Pick ups
✓	___	Analytical equipment	City's lab is equipped for the conventionals

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
   Although not part of the Pretreatment Program a local TSD facility has begun a household hazardous waste collection program; water conservation education has been an ongoing practice for years.

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

3. Has the POTW implemented any kind of public education program? If yes, describe:
   Publication of "Water Watch" in the newspaper; have had occasional school tours

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? City personnel indicated the metal finishing and auto repair guides were handed out to some facilities years ago.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name El Dorado Paper Bag File/ID No. 002
Industry Address 204 Prescolite Drive
Industry Description Mfg. of food grade paper bags
Industrial Category n/a 40 CFR n/a
SIC/NAICs Codes: 2674/322220
Avg. Total Flow (MG/month) 1.3 to 2 Avg. Process Flow (gpd) 2500/12 hrs

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name Milbank Mfg. Co. File/ID No. 005
Industry Address 195 Prescolite Dr.
Industry Description Mfg. of industrial and home watt/hr meter enclosures
Industrial Category Metal Finishing 40 CFR 433
SIC/NAICS Codes: 3613/335313
Avg. Total Flow (gpd) 13,000 Avg. Process Flow (gpd) 3,500

Industry visited during audit: YES

Comments: 5 stage phosphatizing followed by powder coat painting

FILE #: 3 Industry Name Miller Transport File/ID No. 004
Industry Address 2811 NW Avenue
Industry Description Interior/Exterior truck wash facility
Industrial Category Transport. Equip. Cleaning 40 CFR 442
SIC/NAICS Codes: 4231/811192

Avg. Total Flow (gpd) 5,200 Avg. Process Flow ~2,500/batch discharged once/month

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name Prescolite Reflector File/ID No. 006
Industry Address 216 Mims Dr.
Industry Description Anodizing light reflectors
Industrial Category Metal Finishing 40 CFR 433
SIC/NAICS Codes: 3471/335121
Avg. Total Flow (gpd) 53,000 Avg. Process Flow (gpd) 50,000

Industry visited during audit: YES

Comments:

FILE #: Industry Name File/ID No.
Industry Address
Industry Description
Industrial Category 40 CFR SIC Code:
Avg. Total Flow (gpd) Avg. Process Flow (gpd)

Industry visited during audit:

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1.	Does the file contain an *(See Attch. A-2 for example)* application for a control mechanism?	1	✓	✓	✓	
	If yes, what is the application date?	2 9/10	2 9/10	2 9/10	2 9/10	
	Does it ask for Pollution Prevention information?	no	no	no	no	
2.	Does the file contain a *(See Attch. A-3 for example)* Permit?	✓	✓	✓	✓	
	Permit Expiration Date?	9/15	9/15	9/15	9/15	
	Is a fact sheet included?	3	3	3	3	
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
	a. Legal Authority Cite?	✓	✓	✓	✓	
	b. Expiration date?	✓	✓	✓	✓	
	c. Statement of nontransferability?	✓	✓	✓	✓	
	d. Appropriate discharge limitations?	✓	✓	4	✓	
	e. Appropriate self-monitoring requirements?	5	5	5	5	
	f. Sampling frequency?	✓	✓	✓	✓	
	g. Sampling locations?	✓	✓	✓	✓	
	h. Requirement for flow monitoring?	no	no	no	no	

Comments: 1) IU did not include SIC or NAICS codes; 2) The permit applications reviewed were not sent in 90 days prior to permit expiration date as per permit requirements or Ord. provisions; 3) Pretreatment personnel consider their IUs' comprehensive inspections as fact sheets; 4) Miller Transporters is a categorical Transportation Equipment Cleaner under CFR 422 and has submitted a PMP, but City still includes Cd, Cr, Ni, Zn, base neutrals, acid extractables and Phenols to be monitored (see Attch A-4); 5) City does all self-monitoring except for Miller's O&G and pH.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	1	✓	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	n/a	n/a	n/a	
5. For IUs with combined wastestream Formula or the Flow weighted Average formula correctly applied? [403.6(d) and (e)]	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	
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	

Comment: 1) IU's permit also includes the Metal Finishing limitations in it for Cu and Zn although it is not a categorical.

SECTION III: INDUSTRIAL USER FILE REVIEW

D. Compliance Monitoring	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	1	1	Measured Batch	1	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	n/a	✓	n/a	2	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	timed	timed	Grab	timed	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections *(See Attch. A-5 for an old example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	1/12	1/12	1/12	1/12	

Comments: 1) IU meters are in place, but flows could not easily be located on City's monitoring reports; 2) TOMP submitted did not mention any toxic organics on-site (which they had -> acetone)

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	
f. Evaluation of pretreatment facilities?	✓	✓	✓	✓	
g. Evaluation of self-monitoring equipment and techniques?	n/a	n/a	✓	n/a	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	1	1	1	1	
i. Manufacturing facilities?	✓	✓	✓	✓	
j. Chemical handling and storage procedures?	✓	✓	✓	✓	
k. Chemical spill prevention areas?	✓	✓	✓	✓	
l. Hazardous waste storage areas and handling procedures?	2	n/a	2	2	
m. Sampling procedures?	n/a	n/a	✓	n/a	
n. Laboratory procedures?	n/a	n/a	✓	n/a	
o. Monitoring records?	n/a	n/a	✓	n/a	
p. Evaluation of Pollution Prevention opportunities?	✓	✓	3	✓	
q. Control Authority inspector signature?	✓	✓	✓	✓	

IU Self-Monitoring and Reporting

(City does all sampling for their IUs) 10. Does the file contain self-monitoring reports?	n/a	n/a	n/a	n/a	

Comments: 1) Slug evaluations indicated "low potential", but IUs have developed one anyway; 2) No mention of haz waste storage or handling procedures; 3) IU is a TEC under 40 CFR 442 and has a PMP.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
11. Does the file include:					
a. BMR?	n/a	arch.	arch.	arch.	
b. 90-Day Report?	n/a	arch.	arch.	arch.	
c. All periodic reports?	n/a	n/a	n/a	n/a	
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	
12. Did the IU report on all required parameters?	n/a	n/a	n/a	n/a	
13. Did the IU comply with the required sampling frequency(s)?	n/a	n/a	n/a	n/a	
14. Did the IU report flow?	1	1	1	1	
15. Did the IU comply with the required reporting frequency(s)?	n/a	n/a	n/a	n/a	
16. For all SIUs, are self-monitoring reports signed and certified?	n/a	n/a	n/a	n/a	
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	
18. Has the IU developed a Slug Control and Prevention Plan?	✓	✓	✓	✓	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	**no**	**no**	**no**	**no**	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	--	--	--	--	
b. Did POTW respond to the spill?	--	--	--	--	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	✓	✓	✓	✓	

Comments: 1) City records flow during sampling events, some total water usage and some metered process w.w. Flows recorded need to be process only.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	0	0	
3. Did the CA notify the IU 24 hours of becoming aware of the violation(s)?	n/a	n/a	n/a	n/a	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	n/a	n/a	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	
6. Was the IU notified of all violations?	n/a	n/a	n/a	n/a	
7. Was follow-up enforcement action taken by the Control Authority?	n/a	n/a	n/a	n/a	
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	n/a	n/a	n/a	
10. Is there a compliance schedule? If yes:	n/a	n/a	no	n/a	
11. Were there any compliance schedule violations?	n/a	n/a	n/a	n/a	
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	✓	✓	✓	
g. others (specify)	✓	✓	✓	✓	
13. Was the SIU published for SNC?	n/a	n/a	n/a	n/a	
Date of publication.	n/a	n/a	n/a	n/a	

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of El Dorado NPDES #: AR0033723

Date of Audit: 8/28 - 30/12 Date entered into QNCR: 9/17/12
(ASSESSMENT)

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

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PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

Name, address and phone number of industry:
Miller Transporters Inc., 2811 N.W. Avenue, 870.864.8086

Type of industry:
Interior Truck Wash
40 CFR 442
Industry contacts: Tommy Jones - Shop Manager

Date/Time of visit:
8/29/12 / 3:35 p.m.

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

*Following CFR 442's Pollution Management Plan (PMP)

Additional comments:

This facility owns the trucks that transport various chemicals, mostly sulfuric and nitric acids which is what is washed out of the tankers' interiors. Resins are no longer cleaned as well as any other chemicals the City has determined "incompatible". It's operations have not changed substantially since the audit conducted about 3 years ago.

Average "dumps" are about 2,500 gallons/month.

Visit conducted by: Gilliam/Peppers Date: 8/29/12

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of El Dorado NPDES #: AR0033723

Industry name: Miller Transporters Inc.

Additional comments: Facility rep produced the manual and had loaded on his computer procedures prescribing the cleaning procedures depending on the chemical that might be in the tanker. Each chemical had a numbered code which would direct the tank cleaning operator to the cleaning method to be used. Facility has one covered wash bay. A connecting building contains detergents/chemicals used as appropriate depending on the contents of the tanker. It's basically a one-man operation, but the operator has to fill out a tank entry permit and receive approval before entering a trailer. Written procedures/directions for temperatures and timing for the wash and rinse cycles are kept on-site. Depending on contents of tanker interior, the different blends of detergents are also kept in a procedures manual and computerized. Automated pumps keep blends at proper percentages. This is considered part of their (PMP).

Facility installed a "Kelton" unit which replaced their batch cleaning solutions that they kept mixed up.

Pretreatment is basic settling with pH adjustment with a "scavenger" added to help precipitate any Ni & Cr which they've had problems with. Three partially underground concrete pits receive wastewater from the wash bay as well as from the boiler blowdown. Pretreatment is 3 simple concrete sumps half way in the ground. The first catches the washwater. The oil is siphoned off the first tank to the middle one where the oil is collected, then removed for recycle. A smaller stainless steel 3 cell tank sits about chest high which also removes O&G. A local landfill, Waste Corp. of America, takes Miller's sludge, "dries it" on-site with sawdust and places it into its landfill.

Miller appeared to be following its required PMP with negligible chance of a slug discharge.

Sample point was adequate.

Visit conducted by: Gilliam/Peppers Date: 8/29/12

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

Name, address and phone number of industry:
Milbank Mfg. Inc., 195 Prescolite Dr., 870.862.6601
Type of industry: Mfg. of electric meter boxes CFR 433.15

Date/Time of visit:
8/29/12 / 9:40 a.m.

Industry contacts: Tim Beal - Manufacturing Engineer

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

Additional comments: Facility brings in galvanized sheet steel (~95%) and some extruded aluminum parts as well as some pre-painted cold rolled steel are brought in to produce electric watt/meter enclosures and has not changed operations substantially in over a decade.
Facility has 18 stamping machines for the forming/bending/shaping of the metal "boxes". Facility employs a typical 5 stage phosphatizing operation where the pre-spot welded boxes are sent through a hot (110 F) caustic spray (potassium/sodium hydroxide) booth followed by a fresh water rinse w/some countercurrent flow (CCF as needed). Workpieces are then sent through a hot (110 F) iron phosphatizing spray booth followed by a fresh water rinse

Visit conducted by: Gilliam/Peppers Date: 8/29/12

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of El Dorado NPDES #: AR0033723

Industry name: Milbank Mfg.

Additional Comments: which is also CCF. Final stage is a non-chrome sealant "rinse" tank where pH is lowered as needed. All process tanks are labeled as to content. This tank is dumped ~2 weeks. Process tank overflows, leaks or spills are contained in a below grade trough which gravity flows into their primary 3,000 gallon below grade pit. The fresh water rinses are allowed to CCF or continually overflow to pretreatment while the caustic and phosphoric acid tanks are batch discharge ~every 14 weeks. They use conductivity meters in the fresh water rinse tanks and monitored daily in case they need to be dumped because of high TDS. They also use an acid "de-scaler" where the spray nozzles sit in a 55 gallon drum overnight when cleaning is needed. Parts are sent through a dry-off oven then sent to powder paint room then to a bake oven. Their only color is the "Milbank [utility] grey". The powder coat nozzles are cleaned by air or replaced when necessary. Other non-wastewater discharging operations include machining, punching, tapping, drilling, etc. with utilizes a water soluble oil which is periodically hauled off-site. Oil-sorb is used in this area to keep the floors clean of any overspray. Spot welders' cooling water is sent through a recirculation unit used for rinse(s) make up. Typical chemical precipitation/clarifier is used as their pretreatment prior to discharge to the City. Sludge is sent from the bottom of the clarifier to a filter press with decant sent back to primary 3,000 gallon below grade pit.

The City's Pretreatment person was unsure whether they were sampling during the "worst case" scenario when the caustic and phosphoric tanks were batch discharged ~every 14 weeks. Chemical storage is basically at the stations where the chemicals are needed. Adequate sampling site inside a covered concrete sump.

Visit conducted by: Gilliam/Peppers Date: 8/29/12

Allen Gilliam

((signature of auditor conducting visit

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

Name, address and phone number of industry:
Prescolite (division of Hubbell), 216 Mims Road, 870.862.8181

Type of industry: CFR 433
Mfg. of Reflective Light Fixtures

Date/Time of visit:
8/29/12 / 1:40 p.m.

Industry contacts: Michael Phillips - Eng. Manager

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
5. Hazardous waste generated or stored?	✓		
6. Proper solid waste disposal?	✓		
7. Solvent management/TTO control?	✓		
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	✓		

Additional comments: Facility has not made any substantial changes to their processes since the last audit 3 years ago. Facility shapes, machines and anodizes outdoor industrial light reflectors (shaped like cones or "bowls") from sheet aluminum. Wastewater is generated from anodizing of aluminum. The reflectors are made from raw material purchased in a round flat disk. The disk is shaped on automatic spinning machines to one of about 800 different shapes as needed. Then they are stamped, machined and polished prior to the anodizing process. Alkaline wash, caustic or acid etch are batch discharged every other week and are "rotated".

Visit conducted by: Gilliam/Peppers Date: 8/29/12

(signature of auditor conducting visit

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

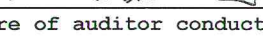
Control Authority: City of El Dorado NPDES #: AR0033723

Industry name: Prescolite

Additional comments:

A computer program dictates which of the 47 tanks is used in the automated anodizing process. The process is generally described and not necessarily in order as: heated alkaline wash/cleaner; water rinse; caustic strip (as necessary); nitric acid cleaner; water rinse (some rinse waters are countercurrent flowed [CCF]); nitric acid etching /rinsing; coating in a phosphoric/nitric bath; water rinse; desmut with with nitric/sulfuric acid; water rinses; heated phosphoric acid bright dip; three sulfuric acid anodizing baths with water rinses in between; heated "wheat", gold or blak dye tanks are used at this point if "coloring" is required; nickel acetate sealed followed by a hot water rinse. Final rinse is in de-I water. A sump is under the entire area below the process tanks and gravity flows back to pretreatment. The sulfuric acid in the three anodizing tanks are recycled and reused by pumping it through a resin bed to filter out the aluminum and impurities. Since about '95, the phosphoric/nitric solution that is carried out of the bath; into the first rinse is captured until it reaches about 36% at which time it is pumped into a holding tank to be sold for use in fertilizer manufacture. During that period, facility also scrubs its acid rinses through resin for reuse. Pretreatment consists of two holding tanks in series that monitor and adjust the pH and then it is treated with anionic and cationic polymers, sodium hydroxide, sent through a clarifier with final pH adjustment. Sludge is collected and run through a filter press to leave a cake that is sent to the landfill as a non-haz material. Tanks all look in good shape. Even the pretreatment system is a below grade holding pit which slopes to a sump and pumped back through pretreatment when necessary. Most piping is PVC and what little iron pipe is left, some is rusty looking. No visible leaks. IU rep indicated the iron pipe would be replaced with PVC when necessary. Adequate sampling site from below the clarifier.

Visit conducted by: Gilliam/Peppers Date: 8/29/12



(signature of auditor conducting visit

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

Name, address and phone number of industry:
El Dorado Bag Mfg. 204 Prescolite Dr., 870.862.4977

Type of industry: Date/Time of visit:
Mfg. food grade paper bags 8/29/12 / 11:00 a.m.

Industry contacts: Gary D. Taylor - V.P. Production

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

Additional comments:

Facility has not changed processes substantially since the last audit 3 years ago.

Facility brings in huge rolls of kraft bleached and natural paper for their production of food grade paper bags such as sugar, flour, salt, dog/cat food, etc. Only the bleached is printed on. ~80% of the total water discharged is non-contact cooling water. All of their inks and adhesives (borated starch, corn based) are food grade quality. They have 8 printing presses operating 24 hrs. five days/week.

Visit conducted by: Gilliam/Peppers Date: 8/29/12

(signature of auditor conducting visit

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of El Dorado NPDES #: AR0033723
Industry name: El Dorado Paper Bag Mfg.
Additional Comments: Building is set up in separate sections: printing, bagging, warehousing and finished goods. No floor drains throughout. First the paper is loaded into a typical intertwined serpentine roller system where the various types of paper are pressed together with the bleach kraft on the outside. Base inks are brought in via metal grated totes. The various water based inks are computer blended in 12-500 gallon mixing tanks with final customer spec colors stored in numerous 55 gallon drums. As colors are needed, operators bring 5 gallon buckets over to a drum and "scoop up" desired colored ink out of it. Then it is peristaltically pumped out of the bucket into a specified flexigraphic (photo-polymer "plate") chamber. The ink is continually recycled back thru the 5 gallon bucket so when job is complete, only the five gallon bucket and drip pans have to be cleaned along with flexigraphic rollers. Any waste ("work-off") inks are re-used into different usable colors (grey, blue, etc) until they can do no more with it but print black. There is an 8,000 gallon water based bag coating shellac storage tank near the printing operations with secondary containment. This shellac is used for the outside of most bags for appearance. The cleaning area (where any "process water" is generated) for any printing press parts includes "washing machines" (built for the cleaning of transmissions). Smaller parts are hand cleaned with high pressure hot water, workers standing on platforms. All washwater is contained in metal tanks which are hardlined to be pumped into a holding tank which is continually agitated and then sent to their "Alar" pretreatment system. The Alar media is diatomaceous earth. Ferric sulfate, clay based floculant is also used to help settling of solids in "process" tank. Solids are skimmed off the surface of a rotating drum sitting down in "process" tank and sent off-site for disposal as non-haz waste. Sampling site is a manhole which contains total plant flow, 80% of which is non-contact cooling water. The Alar unit was installed to help remove Cu (in the green ink) for which the IU was showing high readings of. Adequate sampling point inside a manhole outside the south side of the building.

Visit conducted by: Gilliam/Peppers Date: 8/29/12

(signature of auditor conducting visit

Attachment A-1

El Dorado Water Utilities

500 NORTH WASHINGTON • P. O. BOX 1587 • EL DORADO, AR 71731 (870) 862-6451

AUTHORIZATION FOR DISPOSAL OF LIQUID WASTE

& Possum Potties

I HAYS RENTAL do hereby certify that I will dispose of only domestic (portable toilet) waste from construction sites into the El Dorado Water Utility's collection system. This authorization only provides for the disposal of portable toilet waste. Any gravel, grit, sand, grease trap, sludge wastes, any waste exhibiting any of the prohibited discharge characteristics listed in City Ordinances 1621 or 1622 or any pollutant that will interfere with the operation or performance of the Wastewater Treatment Plant are not permitted for disposal.

I agree to dispose of the portable toilet waste in a specific [illegible] as directed by the Treatment Superintendent. The cost of this disposal shall be $50.00 per 1000 gallons.

I understand that a completed "Transported Waste Manifest" form originating from each collection site shall ~~be available for inspection. These manifests shall be given to the plant operator prior to disposal.~~ if so directed by utility personnel Utility Personnel may collect a sample from each load to check pH, appearance and odor. I further understand that the Utility has the right to randomly perform additional analyses to determine acceptability for disposal. If samples reveal that the hauled waste is unacceptable, I will be required to cease discharge immediately and complete a "Record of Waste Load Rejection" form indicating an alternative disposal acceptable by the *Arkansas Department of Environmental Quality*.

Prior to disposal

Additionally, I understand that the Utility has the right to check references and regulatory agencies records concerning my company's history. Any deviation or refusal to comply with the requirements stated in this certification, local ordinances or directives issued by El Dorado Water Utilities shall result in the immediate termination of disposal privileges into the collection system and may result in the imposition of civil or criminal penalties as specified in City Ordinances 1621 and 1622.

This authorization is effective upon the signatures of authorized of both HAYS RENTAL and El Dorado Water Utilities.

Chris Siderits, Representative HAYS RENTAL Date: 8/28/07

T. Harold Blake, Representative El Dorado Water Utilities Date: 8/28/07

Attachment A-2

APPLICATION FOR INDUSTRIAL WASTEWATER DISCHARGE PERMIT

SECTION A - GENERAL INFORMATION

A.1. Company name, mailing address, and telephone number:
Milbank Mfg. Co. 195 Prescolite Drive El Dorado, AR

Zip Code 71730 Telephone No. (870) 862-6601

A.2. Address of production or manufacturing facility. (If same as above, check [X].)

Zip Code _____ Telephone No. ( )

A.3. Name, title, and telephone number of person authorized to represent this firm in official dealings with the Sewer Authority and/or City:
Tim Beal, Mfg. Engineer 870-862-6601

A.4. Alternate person to contact concerning Information provided herein
Name Tom Galbraith Title Plant Manager Tel. No. (870) 862-6601

A.5. Identify the type of business conducted (auto repair, machine shop, electroplating, warehousing, painting, printing, meat packing, food processing, etc.).
Manufacture watt-Hour meter enclosures (sheet metal fabrication)

Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit be required for your facility, the information in this questionnaire will be used to issue the permit.

This is to be signed by an authorized official of your firm after adequate completion of this form and review of the information by the signing official.

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment.

9/15/2010 _____
Date Signature of Official
(Seal if applicable)

A.6. Provide a brief narrative description of the manufacturing, production, or service activities your firm conducts.

Component parts are cut and formed by punch press. The components are then spot-welded together to form the outer shell of the enclosure, which is then treated in a 5-stage wash system before being powder coated. The powder coat is then cured and the enclosures are assembled and shipped.

A.7. Standard Industrial Classification Number(s) (SIC Code) for your facilities:

_____ _____ _____ _____ _____ _____ _____ _____

A.8. This facility generates the following types of wastes (check all that apply):

		Average gallons per day	
1. [X]	Domestic wastes (restrooms, employee showers, etc.)	3,400	[X] estimated [ ] measured
2. [ ]	Cooling water, non-contact		[ ] estimated [ ] measured
3. [ ]	Boiler/Tower blowdown		[ ] estimated [ ] measured
4. [ ]	Cooling water, contact		[ ] estimated [ ] measured
5. [X]	Process	3,500	[X] estimated [ ] measured
6. [ ]	Equipment/Facility Washdown		[ ] estimated [ ] measured
7. [ ]	Air Pollution Control Unit		[ ] estimated [ ] measured
8. [X]	Storm water runoff to sewer	6,400	[X] estimated [ ] measured
9. [ ]	Other (describe)		[ ] estimated [ ] measured
	Total A.8.1 - A.8.9	13,300	

A.9. Wastes are discharged to (check all that apply):

	Average Gallons per day		
[X] Sanitary sewer	6,280	[X] estimated	[ ] measured
[X] Storm sewer	6,400	[X] estimated	[ ] measured
[ ] Surface water		[ ] estimated	[ ] measured
[ ] Ground water		[ ] estimated	[ ] measured
[ ] Waste haulers		[ ] estimated	[ ] measured
[X] Evaporation	620	[X] estimated	[ ] measured
[ ] Other (describe)		[ ] estimated	[ ] measured

Provide name and address of waste hauler(s), if used.

_____

_____

A.10. Is a Spill Prevention Control and Countermeasure Plan prepared for the facility?

[X] yes [] no

Note: If your facility did not check one or more of the items listed in A.8.4 through A.8.9 above, then you do not need to complete any further sections in this survey/application. If any items A.8.4 through A.8.9 were checked, complete the remainder of this survey/application.

SECTION B - FACILITY OPERATION CHARACTERISTICS

B.1 Number of employee shifts worked per 24-hour day is 1.
Average number of employees per shift is 100.

B.2 Starting times of each shift: 1st 7:00 am/pm 2nd N/A am/pm 3rd N/A am/pm

Note: The following information in this section must be completed for each product line.

B.3 Principal product produced: Watt-Hour meter enclosures

B.4 Raw materials and process additives used:
Materials: galvanized sheet metal and aluminum
Additives: water-soluble oil, alkaline cleaner, iron phosphatizer, non-chromate sealer

B.5 Production process is:
[ ] Batch [X] Continuous [ ] Both _____%batch _____%continuous
Average number of batches per 24-hour day _____

B.6 Hours of operation: 7:00 a.m. to 3:30 p.m. [X] continuous

B.7 Is production subject to seasonal variation? [X] yes [ ] no
If yes, briefly describe seasonal production cycle.
Production is typically highest during the spring and summer months, with the peak occuring during the summer. Production is cut back as required during the fall and winter months.

B.8 Are any process changes or expansions planned during the next three years?
[ ] yes [X] no
If yes, attach a separate sheet to this form describing the nature of planned changes or expansions.

A-2c

SECTION C - WASTEWATER INFORMATION

C.1 If your facility employs processes in any of the 34 industrial categories or business activities listed below and any of these processes generate wastewater or waste sludge, place a check beside the category or business activity (check all that apply).

A. 34 Industrial Categories

1. [ ] Adhesives
2. [ ] Aluminum Forming
3. [ ] Auto & Other Laundries
4. [ ] Battery Manufacturing
5. [ ] Coal Mining
6. [ ] Coil Coating
7. [ ] Copper Forming
8. [X] Electric & Electronic Components
9. [ ] Elecroplating
10. [ ] Explosives Manufacturing
11. [ ] Foundries
12. [ ] Gum & Wood Chemicals
13. [ ] Inorganic Chemicals
14. [ ] Iron & Steel
15. [ ] Leather Tanning & Finishing
16. [ ] Mechanical Products
17. [ ] Nonferrous Metals
18. [ ] Ore Mining
19. [ ] Organic Chemicals
20. [ ] Paint & Ink
21. [ ] Pesticides
22. [ ] Petroleum Refining
23. [ ] Pharmaceuticals
24. [ ] Photographic Supplies
25. [ ] Plastic & Synthetic Materials
26. [ ] Plastics Processing
27. [ ] Porcelain Enamel
28. [ ] Printing & Publishing
29. [ ] Pump & Paper
30. [ ] Rubber
31. [ ] Soaps & Detergents
32. [ ] Steam Electric
33. [ ] Textile Mills
34. [ ] Timber

B. Other Business Activity

[ ] Dairy Products

[ ] Slaughter/Meat Packing/Rendering

[ ] Food/Edible Products Processor

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[ ] Beverage Bottler

C.2 Pretreatment devices or processes used for treating wastewater or sludge (check as many as appropriate)

[ ] Air flotation
[ ] Centrifuge
[X] Chemical precipitation
[ ] Chlorination
[ ] Cyclone
[ ] Filtration
[X] Flow Equalization
[ ] Grease or oil separation, type _____
[ ] Grease trap
[ ] Grit Removal
[ ] Ion Exchange
[ ] Neutralization, pH correction
[ ] Ozonation
[ ] Reverse Osmosis
[ ] Screen
[X] Sedimentation
[ ] Septic tank
[ ] Solvent separation
[ ] Spill protection
[X] Sump
[ ] Biological treatment, type _____
[ ] Rainwater diversion or storage _____
[ ] Other chemical treatment, type _____
[ ] Other physical treatment, type _____
[ ] Other, type _____
[ ] No pretreatment provided

C.3 If any wastewater analyses have been performed on the wastewater discharge(s) from your facilities, attach a copy of the most recent data to this questionnaire. Be sure to include the date of the analysis, name of laboratory performing the analysis, and location(s) from which sample(s) were taken (attach sketches, plans, etc., as necessary).

These reports are already on file with the El Dorado Water Utility.

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C.4 Priority Pollutant Information: Please indicate by placing an "x" in the appropriate box by each listed chemical whether it is "Suspected to be Absent," "Known to be Absent," "Suspected to be Present," or "Known to be Present" in your manufacturing or service activity or generated as a by-product.

CHEMICAL COMPOUND	Known Present	Suspected Present	Known Absent	Suspected Absent	Known or Suspected Concentration/day
I. METALS & INORGANICS					
1. Antimony	[ ]	[ ]	[ ]	[X]	—
2. Arsenic	[ ]	[ ]	[ ]	[X]	—
3. Asbestos	[ ]	[ ]	[ ]	[X]	—
4. Beryllium	[ ]	[ ]	[ ]	[X]	—
5. Cadmium	[ ]	[ ]	[ ]	[X]	—
6. Chromium	[X]	[ ]	[ ]	[ ]	0.007 mg/l
7. Copper	[X]	[ ]	[ ]	[ ]	0.023 mg/l
8. Cyanide	[ ]	[ ]	[ ]	[X]	—
9. Lead	[ ]	[ ]	[ ]	[X]	—
10. Mercury	[ ]	[ ]	[ ]	[X]	—
11. Nickel	[X]	[ ]	[ ]	[ ]	0.01 mg/l
12. Selenium	[ ]	[ ]	[ ]	[X]	—
13. Silver	[ ]	[ ]	[ ]	[X]	—
14. Thallium	[ ]	[ ]	[ ]	[X]	—
15. Zinc	[X]	[ ]	[ ]	[ ]	0.29 mg/l
II. PHENOLS AND CRESOLS					
16. Phenol(s)	[ ]	[ ]	[ ]	[X]	—
17. Phenol, 2-chloro	[ ]	[ ]	[ ]	[X]	—
18. Phenol, 2,4-dichloro	[ ]	[ ]	[ ]	[X]	—
19. Phenol, 2,4,6-trichloro	[ ]	[ ]	[ ]	[X]	—
20. Phenol, pentachloro	[ ]	[ ]	[ ]	[X]	—
21. Phenol, 2-nitro	[ ]	[ ]	[ ]	[X]	—
22. PHenol, 4-nitro	[ ]	[ ]	[ ]	[X]	—
23. Phenol, 2,4-dinitro	[ ]	[ ]	[ ]	[X]	—
24. Phenol, 2,4-dimethyl	[ ]	[ ]	[ ]	[X]	—
25. m-Cresol, p-chloro	[ ]	[ ]	[ ]	[X]	—
26. o-Cresol, 4,6-dinitro	[ ]	[ ]	[ ]	[X]	—
III. MONOCYCLIC AROMATICS (EXCLUDING PHENOLS, CRESOLS AND PHTHALATES)					
27. Benzene	[ ]	[ ]	[ ]	[X]	—
28. Benzene,chloro	[ ]	[ ]	[ ]	[X]	—
29. Benzene, 1,2-dichloro	[ ]	[ ]	[ ]	[X]	—
30. Benzene, 1,3-dichloro	[ ]	[ ]	[ ]	[X]	—
31. Benzene, 1,4-dichloro	[ ]	[ ]	[ ]	[X]	—
32. Benzene, 1,2,4-trichloro	[ ]	[ ]	[ ]	[X]	—
33. Benzene,hexachloro	[ ]	[ ]	[ ]	[X]	—
34. Benzene, ethyl	[ ]	[ ]	[ ]	[X]	—
35. Benzene, nitro	[ ]	[ ]	[ ]	[X]	—
36. Toluene	[ ]	[ ]	[ ]	[X]	—
37. Toluene, 2,4-dinitro	[ ]	[ ]	[ ]	[X]	—
38. Toluene, 2,6-dinitro	[ ]	[ ]	[ ]	[X]	—
IV. PCBs & RELATED COMPOUNDS					
39. PCB-1016	[ ]	[ ]	[ ]	[X]	—
40. PCB-1221	[ ]	[ ]	[ ]	[X]	—
41. PCB-1232	[ ]	[ ]	[ ]	[X]	—
42. PCB-1242	[ ]	[ ]	[ ]	[X]	—
43. PCB-1248	[ ]	[ ]	[ ]	[X]	—
44. PCB-1254	[ ]	[ ]	[ ]	[X]	—
45. PCB-1260	[ ]	[ ]	[ ]	[X]	—
46. 2-Chloronaphthalene	[ ]	[ ]	[ ]	[X]	—
V. ETHERS					
47. Ether, bis(chloromethyl)	[ ]	[ ]	[ ]	[X]	—
48. Ether, bis(2-chloroethyl)	[ ]	[ ]	[ ]	[X]	—
49. Ether, bis(2-chlorosopropyl)	[ ]	[ ]	[ ]	[X]	—
50. Ether, 2-chloroethyl vinyl	[ ]	[ ]	[ ]	[X]	—
51. Ether, 4-bromophenyl phenyl	[ ]	[ ]	[ ]	[X]	—
52. Ether, 4-chlorophenyl phenyl	[ ]	[ ]	[ ]	[X]	—
53. Bis(2-chloroethoxy) methane	[ ]	[ ]	[ ]	[X]	—
VI. NITROSAMINES AND OTHER NITROGEN-CONTAINING COMPOUNDS					
54. Nitrosamine, dimethyl	[ ]	[ ]	[ ]	[X]	—
55. Nitrosamine, diphenyl	[ ]	[ ]	[ ]	[X]	—
56. Nitrosamine, di-n-propyl	[ ]	[ ]	[ ]	[X]	—
57. Benzidine	[ ]	[ ]	[ ]	[X]	—
58. Benzidine, 3,3'-dichloro	[ ]	[ ]	[ ]	[X]	—
59. Hydrazine, 1,2-diphenyl	[ ]	[ ]	[ ]	[X]	—
60. Acrylonitrile	[ ]	[ ]	[ ]	[X]	—

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CHEMICAL COMPOUND	Known Present	Suspected Present	Known Absent	Suspected Absent	Known or Suspected Concentration/day
VII. HALOGENATED ALIPHATICS					
61. Methane, bromo-	[ ]	[ ]	[ ]	[X]	___
62. Methane, chloro-	[ ]	[ ]	[ ]	[X]	___
63. Methane, dichloro	[ ]	[ ]	[ ]	[X]	___
64. Methane, chlorodibromo	[ ]	[ ]	[ ]	[X]	___
65. Methane, dichlorobromo	[ ]	[ ]	[ ]	[X]	___
66. Methane, tribromo	[ ]	[ ]	[ ]	[X]	___
67. Methane, trichloro	[ ]	[ ]	[ ]	[X]	___
68. Methane, tetrachloro	[ ]	[ ]	[ ]	[X]	___
69. Methane, trichlorofluoro	[ ]	[ ]	[ ]	[X]	___
70. Methane, dichlorodifluoro	[ ]	[ ]	[ ]	[X]	___
71. Ethane, 1,1-dichloro	[ ]	[ ]	[ ]	[X]	___
72. Ethane, 1,2-dichloro	[ ]	[ ]	[ ]	[X]	___
73. Ethane, 1,1,1-trichloro	[ ]	[ ]	[ ]	[X]	___
74. Ethane, 1,1,2-trichloro	[ ]	[ ]	[ ]	[X]	___
75. Ethane, 1,1,2,1-tetrachloro	[ ]	[ ]	[ ]	[X]	___
76. Ethane, hexachloro	[ ]	[ ]	[ ]	[X]	___
77. Ethene, chloro	[ ]	[ ]	[ ]	[X]	___
78. Ethene, 1,1-dichloro	[ ]	[ ]	[ ]	[X]	___
79. Ethene, trans-dichloro	[ ]	[ ]	[ ]	[X]	___
80. Ethene, trichloro	[ ]	[ ]	[ ]	[X]	___
81. Ethene, tetrachloro	[ ]	[ ]	[ ]	[X]	___
82. Propane, 1,2-dichloro	[ ]	[ ]	[ ]	[X]	___
83. Propene, 2,4-dichloro	[ ]	[ ]	[ ]	[X]	___
84. Butadiene, hexachloro	[ ]	[ ]	[ ]	[X]	___
85. Cyclopentadiene, hexachloro	[ ]	[ ]	[ ]	[X]	___
VIII. PHTHALATE ESTERS					
86. Phthalate, di-c-methyl	[ ]	[ ]	[ ]	[X]	___
87. Phthalate, di-n-ethyl	[ ]	[ ]	[ ]	[X]	___
88. Phathalate, di-n-butyl	[ ]	[ ]	[ ]	[X]	___
89. Phthalate, di-n-octyl	[ ]	[ ]	[ ]	[X]	___
90. Phthalate, bis(2-ethylhexyl)	[ ]	[ ]	[ ]	[X]	___
91. Phthalate, butyl benzyl	[ ]	[ ]	[ ]	[X]	___
IX. POLYCYCLIC AROMATIC HYDROCARBONS					
92. Acenaphthene	[ ]	[ ]	[ ]	[X]	___
93. Acenaphthylene	[ ]	[ ]	[ ]	[X]	___
94. Anthracene	[ ]	[ ]	[ ]	[X]	___
95. Benzo (a) anthracene	[ ]	[ ]	[ ]	[X]	___
96. Benzo (b) fluoranthene	[ ]	[ ]	[ ]	[X]	___
97. Benzo (k) fluoranthene	[ ]	[ ]	[ ]	[X]	___
98. Benzo (ghi) perylene	[ ]	[ ]	[ ]	[X]	___
99. Benzo (a) pyrene	[ ]	[ ]	[ ]	[X]	___
100. Chrysene	[ ]	[ ]	[ ]	[X]	___
101. Dibenzo (a,n,) anthracene	[ ]	[ ]	[ ]	[X]	___
102. Fluoranthene	[ ]	[ ]	[ ]	[X]	___
103. Fluorene	[ ]	[ ]	[ ]	[X]	___
104. Indeno (1,2,3-cd) pyrene	[ ]	[ ]	[ ]	[X]	___
105. Naphthalene	[ ]	[ ]	[ ]	[X]	___
106. Phenanthrene	[ ]	[ ]	[ ]	[X]	___
107. Pyrene	[ ]	[ ]	[ ]	[X]	___
X. PESTICIDES					
108. Acrolein	[ ]	[ ]	[ ]	[X]	___
109. Aldrin	[ ]	[ ]	[ ]	[X]	___
110. BHC (Alpha)	[ ]	[ ]	[ ]	[X]	___
111. BHC (Beta)	[ ]	[ ]	[ ]	[X]	___
112. BHC (Gamma) or Lindane	[ ]	[ ]	[ ]	[X]	___
113. BHC (Delta)	[ ]	[ ]	[ ]	[X]	___
114. Chlordane	[ ]	[ ]	[ ]	[X]	___
115. DDD	[ ]	[ ]	[ ]	[X]	___
116. DDE	[ ]	[ ]	[ ]	[X]	___
117. DDT	[ ]	[ ]	[ ]	[X]	___
118. Dieldrin	[ ]	[ ]	[ ]	[X]	___
119. Endosulfan (Alpha)	[ ]	[ ]	[ ]	[X]	___
120. Endosulfan (Beta)	[ ]	[ ]	[ ]	[X]	___
121. Endosulfan Sulfate	[ ]	[ ]	[ ]	[X]	___
122. Endrin	[ ]	[ ]	[ ]	[X]	___
123. Endrin aldehyde	[ ]	[ ]	[ ]	[X]	___
124. Heptachlor	[ ]	[ ]	[ ]	[X]	___
125. Heptachlor epoxide	[ ]	[ ]	[ ]	[X]	___
126. Isophorone	[ ]	[ ]	[ ]	[X]	___
127. TCDD (or Dioxin)	[ ]	[ ]	[ ]	[X]	___
128. Toxaphene	[ ]	[ ]	[ ]	[X]	___

C.5 If you are unable to identify the chemical constituents of products you use that discharged in your wastewater, attach copies of the materials safety data sheets for such products.

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SECTION D - OTHER WASTES

D.1 Are any liquid wastes or sludges from this firm disposed of by means other than discharge to the sewer system?

[X] yes [ ] no

If "no," skip remainder of Section D.
If "yes," complete items 2 and 3.

D.2 These wastes may best be described as:

	Estimated Gallons or Pounds/Year
[ ] Acids and Alkalies	
[ ] Heavy Metal Sludges	
[ ] Inks/Dyes	
[X] Oil and/or Grease	100 Gallons
[ ] Organic Compounds	
[ ] Paints	
[ ] Pesticides	
[ ] Plating Wastes	
[X] Pretreatment Sludges	14,000 lbs
[ ] Solvents/Thinners	
[ ] Other Hazardous Wastes (specify)	
_____	
_____	
[ ] Other wastes(specify)	
_____	
_____	

D.3 For the above checked wastes, does your company practice:

[ ] on-site storage
[ ] off-site storage
[ ] on-site disposal
[X] off-site disposal

Briefly describe the method(s) of storage or disposal checked above.

Pretreatment sludge is dried and disposed of in the landfill.
Waste oil is collected and processed by Safety Kleen.

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Attachment A-3

EL DORADO WATER UTILITIES

WASTEWATER CONTRIBUTION PERMIT

Company Name: MILBANK MFG.

DIVISION NAME (If Applicable): EL DORADO DIVISION

Mailing Address: P.O. BOX 278
Street or P.O. Box

El Dorado, AR 71731
City, State and Zip Code

Facility Address: 195 PRESCOLITE DRIVE
Street Address

EL DORADO, ARKANSAS 71730
City, State and Zip Code

The above Industrial User (IU) is authorized to discharge industrial wastewater to the City of El Dorado Publicly Owned Treatment Works (POTW) in compliance with the City's Sewer Use Ordinance Number 1622, the City's Pretreatment Ordinance Number 1621 and any applicable provisions of Federal or State law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit is granted in accordance with the application filed on September 15, 2010 in the office of the El Dorado Water Utilities, and in conformity with plans, specifications, and other data submitted to the Utility in support of the above application.

Effective Date: October 1, 2010

Expiration Date: September 30, 2015

T. Harold Baker
Treatment Superintendent

PART I – Wastewater Discharge Limitations and Monitoring Requirements

The Industrial User shall comply with the effluent limitations specified below by October 1, 2010.

PARAMETER	MAXIMUM MONTHLY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Cadmium	0.26	0.69	2/Year	24 Hour Composite
Chromium	1.71	2.77	2/Year	24 Hour Composite
Copper	2.07	3.38	2/Year	24 Hour Composite
Lead	.43	.69	2/Year	24 Hour Composite
Nickel	2.38	3.98	2/Year	24 Hour Composite
Silver	.24	.43	2/Year	24 Hour Composite
Cyanide, total	.65	1.20	2/Year	Grab
Zinc	1.48	2.61	1/Monthly	24 Hour Composite
T.T.O.	(B)	(B)	(B)	

Notes:

(A) Samples shall be taken according to procedures outlined in 40 CFR 136.3 from the approved sampling facility located in phosphatizing wash wastestream flow, which is the west inlet into a manhole located:

Latitude: 33° 11' 59.066" N Longitude: 92° 37' 1.995" W

(B) The IU has filed a Toxic Organic Management Plan with the Utility.

PART II – REPORTING REQUIREMENTS

1. The IU shall notify the Utility immediately upon any accidental or slug discharge to the sanitary sewer as outlined in the Accidental Discharges / Slug Control Plan section of the City's Ordinance Number 1621, § 2.8. Formal written notification discussing circumstances and remedies shall be submitted to the Utility within 5 days of the occurrence.

2. The IU shall notify the Utility prior to the introduction of new wastewater or pollutants or any substantial change in the volume or characteristics of the wastewater being introduced into the POTW from the User's industrial processes. Formal written notification shall follow within 30 days of such introduction. The IU shall also notify the utility prior to equipment or plumbing modifications to pretreatment or process equipment. Such changes shall require notification in the form of updated schematics.

3. Any upset experienced by the IU of its treatment that places it in a temporary state of noncompliance with wastewater discharge limitations contained in this permit or other limitations specified in the City's Ordinance shall be reported to the Utility within 24 hours of first awareness of the commencement of the upset. A detailed report shall be filed within 5 days.

4. The IU shall notify the Utility immediately upon receiving knowledge of a pending bypass and within 24 hours of an unanticipated bypass of its pretreatment facilities, as outlined in the "Prohibition of Bypasses" section of the City's Ordinance Number 1621 § 2.9. Formal written notification containing the nature, the cause, the duration and solutions to avoid future bypasses shall be submitted to the Utility within 5 days.

5. The IU must submit a T.T.O. Certification Statement to the Utility Semi-annually in March and September.

6. All reports shall be submitted to the following address:

El Dorado Water Utilities
Pretreatment Coordinator
P.O. Box 1587
El Dorado, AR 71731

7. In case of a spill of any substances on the toxic pollutants list or any other potentially hazardous substance that could enter your sanitary sewer system, you should immediately notify El Dorado Water Utilities. Please post the following contacts in appropriate locations at your facility and designate responsibility on each shift to insure that proper notification is achieved in case of such a spill. The after hours numbers should be called in the order they are listed until contact is made.

Monday - Friday 8:00 A.M. – 5:00 P.M.

Harold Baker:	862-6451 or 814-1762
John Peppers:	862-0421 or 862-6451
Larry Waldrop:	862-6451 or 814-7558

After Hours & Weekends

Harold Baker	(Home):	862-5019
John Peppers	(Home):	310-0691
Larry Waldrop	(Home)	881-8611

Operator on Duty
South Treatment Plant: 862-8321

Operator on Duty
North Treatment Plant: 862-9386

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PART III – STANDARD CONDITIONS

1. PROHIBITIVE DISCHARGE

The IU shall comply with all the General Discharge Prohibitions listed in Section 2.1 of City Ordinance Number 1621.

2. RIGHT OF ENTRY

The IU shall allow the Utility or its representatives, exhibiting proper credentials and identification, to enter upon the premises of the User, at all reasonable hours, for the purposes of inspection, sampling, or records inspection. Reasonable hours in the context of inspection and sampling includes any time the IU is operating any process which results in a process wastewater discharge to the Utility's sewerage system.

3. RECORDS RETENTION

(a) The IU shall retain and preserve for no less than three (3) years, any records, books, documents, memoranda, reports, correspondence, and any and all summaries thereof, relating to monitoring, sampling, and chemical analyses made by or in behalf of the User in connection with its discharge.

(b). All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Utility shall be retained and preserved by the IU until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expires.

4. CONFIDENTIAL INFORMATION

Except for data determined to be confidential under Section 4.10 of the City's Ordinance Number 1621, all reports required by this permit shall be available for public inspection at the office of the Pretreatment Coordinator.

5. DILUTION

No IU 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.

6. PROPER DISPOSAL OF PRETREATMENT SLUDGES AND SPENT CHEMICALS

The disposal of sludges and spent chemicals generated shall be done in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

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7. SIGNATORY REQUIREMENTS

All reports required by this permit shall be signed by a principal executive office of the User, or his designee.

8. REVOCATION OF PERMIT

The permit issued to the IU by the Utility may be revoked when, after inspection, monitoring or analysis, it is determined that the discharge of wastewater to the sanitary sewer is in violation of Federal, State, or local laws, ordinances, or regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any other required reporting form, shall be cause for permit revocation.

9. LIMITATION OF PERMIT TRANSFER

Wastewater Discharge Permits are issued to a specific User for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new User, different premises, or a new or changed operation without the approval of the Utility. Any succeeding owner, or User, shall also comply with the terms and conditions of the existing permit.

10. 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 subject to civil penalties and relief.

11. MODIFICATION OR REVISION OF THE PERMIT

(a) The terms and conditions of this permit may be subject to modification by the Utility at any time as limitations or requirements as identified by the City's Ordinance, are modified or 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 promulgating a new Federal pretreatment standard, or as a result of a change of operation or process by the IU.

(d) Any permit modification which result in new conditions in the permit shall include a reasonable time schedule for compliance if necessary.

12. DUTY TO REAPPLY

The Utility shall notify a User one hundred and eighty (180) days prior to the expiration of the User's permit. Within ninety (90) days of the notification, the User shall reapply for reissuance of the permit on a form provided by the utility.

13. 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.

14. PUBLIC NOTIFICATION

At least annually a list of significant violators of non-domestic users, not in compliance with pretreatment requirements will be published in the El Dorado News-times. (40 CFR 403.8 (f) (2) (vii)). The notification shall also summarize any enforcement action taken.

15. CIVIL PENALTIES

a. Any User who is found to have violated or continues to violate an order of **The City** and/or **The Control Authority** or who negligently fails to comply with any provisions of this Ordinance or the orders, rules, regulations and permits issued thereunder, may be fined not more than One Thousand Dollars ($1,000.00) for each offense. Jurisdiction to determine such penalties shall be in the City Municipal Court or other court of appropriate jurisdiction. Each day on which a violation shall occur or continue shall be a separate and distinct offense.

b. In addition to the civil penalties provided for herein, **The City** may recover, from the User in violation, any damages suffered, reasonable attorney's fees, court costs, court reporter's fees and other expenses of litigation in any action in law or equity against any person or other entity.

c. The City Attorney shall petition the Court to impose, assess and recover all civil penalties, legal fees, and costs together with damages if appropriate. In determining the amount of the penalty, **The Control Authority** in its recommendation for civil penalties, the City Council and the Court shall take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained by the User in allowing the violation, the timing and nature of any corrective actions taken by the User, the compliance history of the User and any other factors as justice requires.

16. CRIMINAL PROSECUTION:

a. **The Control Authority** may recommend to the City Council that the City Attorney criminally prosecute any User who knowingly or willfully violates any provision of this Ordinance, its Wastewater Contribution Permit or any orders issued thereunder. If so prosecuted, the User shall, upon conviction, be guilty of a misdemeanor, and punished by a fine not to exceed $1,000.00 per violation per day or imprisonment for not more than six (6) months, or both.

b. Any person who knowingly or willingly makes any false statement, representation or certification in any application, record, report, plan or other document filed or required to be maintained pursuant to this Ordinance or its Wastewater Contribution Permit, or who falsifies, tampers with, or knowingly or willingly renders inaccurate any monitoring or sampling device, wastewater sample or other methods required under this Ordinance, shall be guilty of a misdemeanor, and shall, upon conviction, be punished by a fine or not more than $1,000.00 or by imprisonment for not more than six (6) months or both.

17. MONITORING

Monitoring is to be done by the POTW and analysis by an independent contract lab. IU shall pay the costs of analysis and freight.

Attachment A-4

EL DORADO WATER UTILITIES

WASTEWATER CONTRIBUTION PERMIT

Company Name: MILLER TRANSPORTERS, INC.

DIVISION NAME (If Applicable): _____

Mailing Address: P.O. BOX 1392
Street or P.O. Box

El Dorado, AR 71731
City, State and Zip Code

Facility Address: 2811 NORTHWEST AVENUE
Street Address

EL DORADO, ARKANSAS 71730
City, State and Zip Code

The above Industrial User (IU) is authorized to discharge industrial wastewater to the City of El Dorado Publicly Owned Treatment Works (POTW) in compliance with the City's Sewer Use Ordinance Number 1622, the City's Pretreatment Ordinance Number 1621 and any applicable provisions of Federal or State law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit is granted in accordance with the application filed on September 15, 2010 in the office of the El Dorado Water Utilities, and in conformity with plans, specifications, and other data submitted to the Utility in support of the above application.

Effective Date: October 1, 2010

Expiration Date: September 30, 2015

T. Harold Baker
Treatment Superintendent

PART I – Wastewater Discharge Limitations and Monitoring Requirements

A. Federally Regulated Categorical Process Discharge

The Industrial User shall comply with the effluent limitations specified below by October 1, 2010

PARAMETER	MAXIMUM MONTHLY AVERAGE	DAILY MAXIMUM	SAMPLE FREQUENCY	SAMPLE TYPE
Non-Polar Material (SGT-HEM)	(A)	(A)	(A)	(A)
Copper	(A)	(A)	(A)	(A)
Mercury	(A)	(A)	(A)	(A)

Notes:

(A) The IU has a Pollutant Management Plan on file with the Utility.

PART I – Wastewater Discharge Limitations and Monitoring Requirements

B. Locally Regulated Total Plant Discharge

The Industrial User shall comply with the effluent limitations specified below by October 1, 2010

PARAMETER	MAXIMUM MONTHLY AVERAGE mg/L.	DAILY MAXIMUM mg/L.	SAMPLE FREQUENCY	SAMPLE TYPE
pH (C)	---	6-9	Monthly	Grab
Oil & Grease	(B)	(B)	Monthly	Grab
Cadmium	0.07	0.11	Monthly	Grab
Chromium	1.71	2.77	Monthly	Grab
Nickel	2.38	3.98	Monthly	Grab
Zinc	1.48	2.61	Monthly	Grab
Base Neutrals	---	---	Annually	Grab
Acid Extractables	---	---	Annually	Grab
Phenols (Total)	---	---	Annually	Grab

Notes:

(A) Samples shall be taken according to procedures outlined in 40 CFR 136.3 from the approved sampling facility located in Pretreatment System Discharge wastestream flow, at the discharge side of pump at middle oil separation pit.

Latitude: 33° 4' 40.869" N Longitude: 92° 39 47.009" W

(B) Oil and Grease discharges in excess of 100mg/1 are subject to an excess strength surcharge of 5¢ per pound.

(C) pH limits are in standard pH units, minimum allowable 6, maximum allowable 9.

A-4c

Attachment A-5

Pretreatment Industrial Inspection
Facility Information

Facility Name: MILBANK MFG.	Site Address: 195 PRESCOLITE DRIVE
Signatory Authority (Name & Title): TOM GALBRAITH, PLANT MANAGER	
Phone: 870-862-6601	Mailing Address (if different):
Fax:	
Address:	Corporate Owner Name and address (if applicable):
Contact Person (Name & Title):	
TOM GALBRAITH, PLANT MANAGER	Phone:
Phone: 870-862-6601	Fax:
Fax:	Corporate CEO:
e-mail:	e-mail:
Facility Tracking #ARP00	**Last Inspection Date:** 12-16-09
POTW (City) IU discharges to: EL DORADO	POTW's NPDES #AR00
Industrial Classification: ☒ Categorical	☐ Significant
If Categorical, list which CFR #(s) the facility is subject to:	

Table of Contents

Comments: THIS IS IN REFERENCE TO THE 2009 COMPREHENSIVE INSPECTION, PP_2, AND SLUG CONTROL INSPECTION

Inspector's Name (Print): JOHN M. PEPPERS	Signature: John M. Peppers
IU Rep's Name (Print) Thomas Galbraith	Signature: Thomas Galbraith
Date and Time Inspection Ended: 12-2-10 1100	

Pretreatment Industrial Inspection
Facility Information

Facility Name: MILBANK MFG.	Site Address: 195 PRESCOLITE DRIVE EL DORADO, AR 71730
Signatory Authority (Name & Title): TOM GALBRAITH	
Phone: 870-862-6601	Mailing Address (if different):
Fax:	
Address: 195 PRESCOLITE DRIVE	Corporate Owner Name and address (if applicable):
Contact Person (Name & Title): TONI GALBRAITH PLANT MANAGER	
Phone: 870-862-6601	Phone:
Fax:	Fax:
e-mail:	Corporate CEO:
	e-mail:
Facility Tracking #ARP00	**Last Inspection Date:** 12-09-08
POTW (City) IU discharges to: EL DORADO WATER UTILITIES	POTW's NPDES #AR00
Industrial Classification: ☒ Categorical	☐ Significant
If Categorical, list which CFR #(s) the facility is subject to:	

Table of Contents

Comments : FACILITY IS CLEAN, GOOD PRETREATMENT SYSTEM WITH KNOWLEDGEABLE OPERATORS

Inspector's Name (Print): JOHN M. PEPPERS	Signature: John M. Peppers
IU Rep's Name (Print) Thomas Galbraith	Signature: Thomas Galbraith
Date and Time Inspection Ended: 12-16-09 1400	

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 12-16-09	SIC code(s):
IU Reps/Titles	Control Authority Reps/Titles
TOM GALBRAITH	JOHN PEPPERS
PLANT MANAGER	EL DORADO WATER
End product(s): (W)ATTS METER BOXES	Approx. # of units produced: 2650 DAILY
Days of Operation: MON - FRI	Days of Production (if different):
Hours of Operation: 6:00 AM - 3:30 PM	Hours of Production (if different):
Shift 1, hrs.: 6 to 3:30 / Shift 2, hrs.: to NA / Shift 3, hrs.: to NA	
# of Employees: 86+14 SAL / Peak Mos.: JULY, AUG, SEPT / "Off" Mos.: THE REST OF THEM	
Are there any scheduled plant shutdowns? Yes ☐ No ☒ N/A ☐ If yes, when?	
Are there designated plant clean-up days? Yes ☐ No ☒ N/A ☐ If yes, when?	
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒ **No** ☐	
If **No**, explain:	
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☐ No ☒	
If Yes, explain:	
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: ☐ Yes. ☒ No	
If Yes, explain:	
Has there been any changes since the last inspection regarding the following items:	
Plant/flow/process layout? Yes ☐ No ☒ If yes, obtain copy of updated schematic for facility file.	
Processes? Yes ☐ No ☒ If yes, explain:	
Production Levels? Yes ☒ No ☐ If yes, explain: SLOW DOWN DUE TO ECONOMY.	
Raw materials? Yes ☐ No ☒ If yes, explain:	
Flow rates? Yes ☐ No ☒ If yes, explain	
Are regulated and non-regulated wastestreams combined? yes ☐ no ☒	
Prior to Pretreatment System? yes ☐ no ☒ N/A ☐	
If Yes, was the CWF used to calculate limits? yes ☐ no ☐	
Prior to connection to the POTW sanitary sewer? yes ☐ no ☒ N/A ☐	
At connection to sanitary sewer? yes ☐ no ☒ N/A ☐	
Production and flows verified for Production-Based Standards? yes ☐ no ☐ N/A ☐	
What is the current avg. production rate and process flow?	
Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes ☐ no ☐	

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

☐ Permit Renewal	☐ Bi-Annual	☐ Spill/Slug	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

Inspection Objective(s) YEARLY INSPECTION

Checklist of items to be reviewed and/or visually inspected:

☐ Pre-inspection Meeting	☐ Permit Conditions	☐ Safety Concerns
☒ Process Inspection	☒ Pretreatment Process	☑ TOMP
☒ Chemical Storage	☒ Discharge point(s)	☑ Spills/Slug Control Plan
☒ Records Review	☐ RCRA information	☑ Process/Flow/Pretreatment Schematics
☐ IU sampling procedures	☐ Flow/pH Meter(s)	☐ Calibration Records
☐ MSDS Inventory List	☐ New MSDS	☐

Comments:

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? ☐ Yes ☒ No

Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

Records Review

Process Area(s)

Pretreatment System

Self Monitoring Procedures

Diversion/Sewer Meters

Spill/Slug Control Plan

Sampling Point

Chemical Storage

Attachment A: Industrial Process(es)

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

1. Parts Cleaning/Paint Prep.	Yes ☒ No ☐	4.	Yes ☐ No ☐
2.	Yes ☐ No ☐	5.	Yes ☐ No ☐
3.	Yes ☐ No ☐	6.	Yes ☐ No ☐

Were processes visually inspected? Yes ☐ No ☐ N/A ☐

Brief description of process(es): Five stage wash system cleans the parts and preps them for paint. Two rinse tanks overflow at a total of 6 gal/min. Three solutron tanks are dumped every 1-10 weeks depending upon the tank and treated with the normal rinse overflow. They are added to the rinse water at 1/4 - 1/2 gal./min.

General observations of facility's indoor housekeeping:

General observations of area outside facility's building:

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured estimated. If batch discharged, list frequency and volume (1000 gal/month, e.g.).

☒ Process Rinse Overflows 2,760 Gal/day	☐ Equip. Cleanup	☐ Floor Cleanup	☒ Spent Bath Solutions 150-200 Gal/day
☐ Product Cleaning	☐ Forklifts Maint./Wash	☒ Tank Dragout Treated with rinse overflows	☐ Air Pollution Devices
☐ Boiler Blowdown	☐ Spent Rinse Tanks	☐ Equipment Coolants	☐ Non-Contact Cooling Water
☒ Stormwater N/A - 100gal/day est.	☐	☐	☐

List Major Raw Materials and Chemicals used:

Raw materials include galvanized steel and aluminum.
Chemicals used are listed in the Slug Discharge Prevention Plan.

Check Waste Stream Pollutants of Concern from Process(es)

☐ BOD	☐ CN^-	☒ Metals (List) Zinc	☐ Solvents (List)
☐ TSS	☐ Cl_2		
☐ O&G	☐ S^-		
☐ pH	☐		

Are there floor drains in the Process area? ☐ Yes ☒ No If yes list number and the location of all floor drains:

No drains, but the pit is open.

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan? Yes ☐ No ☒

Does this facility practice P2? Yes ☒ No ☐

Environmental Management System in place? Yes ☐ No ☐

ISO Certified? Yes ☐ No ☒

Written Standard Operating Procedures? Yes ☐ No ☒

Explain: Some, but not all. Operation manuals are present.

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

Explain:

Water Reuse: Yes ☐ No ☒

Explain:

Cost Accounting to Track Savings: Yes ☐ No ☒

Explain:

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

Explain: Some chemicals purchased in lower concentrations. Currently looking into ambient temp. wash system chemicals.

Employee Training: Yes ☒ No ☐

Explain: Operator receives training required to maintain wastewater operator license

Spent Solvent Reclamation? Yes ☒ No ☐

Explain: Used solvents are collected, sealed and transported off site.

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

Explain: Don't currently. We have recently acquired a compactor though and will soon begin recycling boxes & other cardboard.

Recycle Waste Oil, Solvents, and Lubricants? Yes ☒ No ☐

Explain: Also collected, sealed and sent off site

Other Activities

P2 Equipment/Practices in use:

☐ Overflow Alarms	☐ Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☐ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☐ Air Jets to Blow Parts Dry	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☒ Water Soluble Cutting Fluids	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☒ Conductivity Meters
☐ Dead Rinse Tanks	☐ Bath / Rinse Filtration

Asf

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment?	☐ Yes	☐ No	☒ N/A
Are they pretreated prior to discharge to the sanitary sewer?	☒ Yes	☐ No	☐ N/A
Was the pretreatment system visually inspected during this visit?	☐ Yes	☐ No	☐ N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☐ Flow Equalization	☐ Ozonation	☐ Chlorinating
☒ Chemical Precipitation	☐ Oil/Water Separation	☐ Reverse Osmosis	☒ Grit Removal (Solidification)
☒ Sludge Filter Press	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☒ pH Adjustment	☐ Sand Trap	☒ Sedimentation	☐ Silver Recovery
☐ Belt/Disk Oil Skimmer	☐	☐	☐

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):

Does the description match the schematic currently on file? ☐ Yes ☐ No ☐ N/A

System Operator(s) Name: Tim Beal, Randy Nash

Does discharge permit require licensed operator? ☐ Yes ☒ No ☐ N/A

Is the System Operator(s) licensed by the State of Arkansas? ☒ Yes ☐ No ☐ N/A

List Name(s) and License classification: Tim Beal, Basic Industrial

Is training provided to the Pretreatment System Operator(s)? ☒ Yes ☐ No ☐ N/A

If Yes, list type and frequency: Training required to maintain wastewater license, bi-annually.

Is the discharge from the Pretreatment System? ☐ Batch ☐ Continuous ☐ Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: gallons per

Discharge cycles on & off with normal operation, number of batches & volumes per varies.

Describe process from which batch originated (spent bath, e.g.): N/A

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)

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Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area(s)?	☒ Yes	☐ No
Was this area(s) visually inspected?	☐ Yes	☐ No ☐ N/A

Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. wash system/wastewater chem storage area is largest. Near no drains, but close to wastewater pit.	☐ Yes ☒ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2. Press chem storage area consists of 1 55 gal drum of soluble oil. Is near a drain	☒ Yes ☐ No	☐ Pretreatment ☒ Sanitary Sewer ☐ Storm Sewer
3. Maint & die shop chem storage areas consist of mainly oils.	☐ Yes ☒ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer

Does the Chemical Storage Area(s) contain any of the following?

☐ Dikes, Berms for Containment	☐ Plugs for Floor Drains
☐ Secondary Tanks for Holding	☐ Premix (low) Concentrations
☐ Alarms	☐ Chain restraints, limited access
☒ Spills Control Kits for Cleanup	☒ Notification Procedures
☐ Chemical desegregation within Storage Area	☐ Other

Chemical Inventory List (MSDS) on file?	☒ Yes	☐ No	☐ N/A
Were any new MSDS reviewed during the Inspection?	☐ Yes	☐ No	☐ N/A

If yes, list below:

Chemical storage comments:

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

Mostly 55 gal. drums, handled with dolly.

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	☒ yes ☐ no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☐ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☒ yes ☐ no ☐ N/A
(B) Describes storage and handling of chemicals	☒ yes ☐ no ☐ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☒ yes ☐ no ☐ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☒ yes ☐ no ☐ N/A
2. Describes procedures and equipment for emergency response	☒ yes ☐ no ☐ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☒ yes ☐ no ☐ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☒ yes ☐ no ☐ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☐ yes ☒ no ☐ N/A
If no: Training is in development.	
Does the facility have Spill/Slug Notification Procedures posted?	☒ yes ☐ no
Is it posted in areas where chemicals are used and stored? Posted near drains & chem storage	☒ yes ☐ no
If Yes how many? Three	
Are appropriate personnel provided training in the event of a spill or slug discharge?	☐ yes ☒ no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☒ no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? ☐ yes ☐ no ☐ N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point Covered manhole on level ground. Overall good condition, some dirt/debris around sample/monitoring channel.	
Total Flow Monitoring Point	
Upstream Manhole	
Point of Connection:	

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.

Grab samples are taken from the wastewater treatment effluent stream inside the plant and immediately tested for Zinc.

Where is the sample point located?

☐ End of Process	☒ Pretreatment Effluent	☐ Total Flow
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required
☐ Safety Hazards Identified	☐	☐

Is the Sample Collection Site Adequate?	☐ Yes ☐ No ☐ N/A
Does the facility rep. request a split sample on this sampling/inspection?	☐ Yes ☐ No
Does the facility perform self-monitoring tests in-house? Just for Zinc.	☒ Yes ☐ No ☐ N/A
If no, record the name and address of Contract Lab:	
Automatic Sampler ☐ or Manual ☐	
IU Self-Monitoring Results reviewed:	☐ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☐ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☐ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☐ Yes ☐ No ☐ N/A
Were correct Sample Types Collected	☐ Yes ☐ No ☐ N/A
Dates and times of Sample Collection Recorded?	☐ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☐ Yes ☐ No ☐ N/A

List the parameters the facility monitors and the frequency:

☐ Cd(t)	☐ Cu(t)	☐ Cr(t)	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☒ Zn(t) Daily	☐ pH	☐ CN^-(t)	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☐	☐	☐	☐	☐

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU report TTO? ☐ Analysis ☒ Certification Statement

Does the facility have a Toxic Organic Management Plan? ☒ Yes ☐ No ☐ N/A

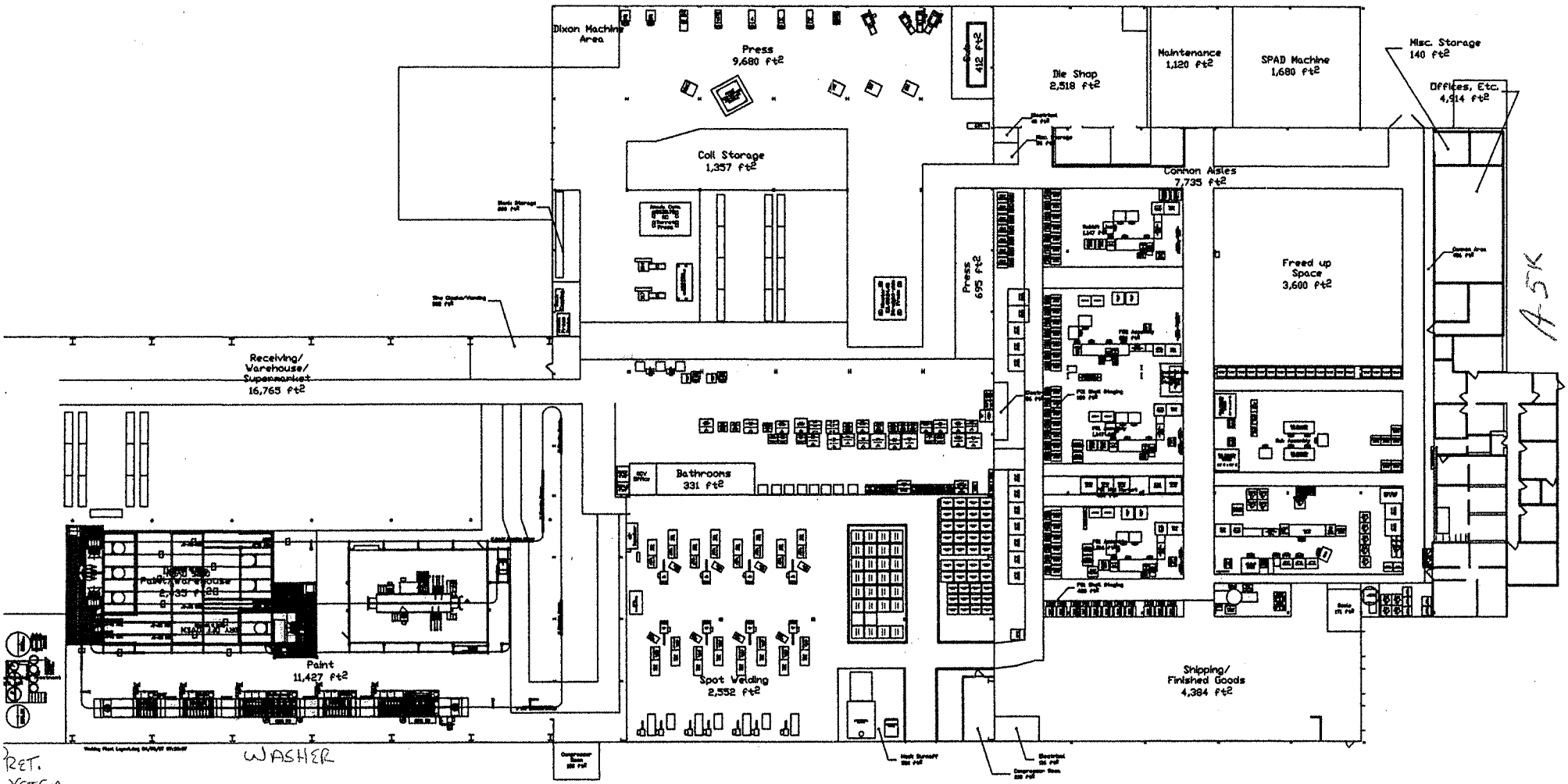
If yes, Does the plan show how toxic organics are used, stored, and disposed? ☒ Yes ☐ No ☐ N/A

List the date of the last revision to the TOMP: 12/14/09

Is the TOMP being followed as written? ☒ Yes ☐ No ☐ N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? ☐ Yes ☐ No ☐ N/A (If yes, provide description of evidence in comments.)

Comments: Training still in development. TOMP will be updated upon wastewater sample & analysis for toxic organics.


Dixon Machine Area
Press
9,680 ft2
412 ft2
Die Shop
2,518 ft2
Maintenance
1,120 ft2
SPAD Machine
1,680 ft2
Misc. Storage
140 ft2
Offices, Etc.
4,914 ft2
Coil Storage
1,357 ft2
Common Aisles
7,735 ft2
Press
695 ft2
Freed up Space
3,600 ft2
Receiving/ Warehouse/ Supermarket
16,765 ft2
Bathrooms
331 ft2
Paint
11,427 ft2
Spot Welding
2,552 ft2
Shipping/ Finished Goods
4,384 ft2
WASHER
A-5K

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Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: El Dorado Pretreatment Program Audit

If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method: ~~AR0033723~~ (c-33936)

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

* Linked Facility

CONTRACTS

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0033723 VALIDATE	(c-33936) by Allen Gilliam		

Compliance Monitoring Dates

Planned Start Date: 8/28/12

Planned End Date: 8/30/12

Actual Start Date: 8/28/12

Actual End Date: 8/30/12

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

CONTRACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes:

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: 24

Compliance Monitoring Action Outcome: Marginal

Compliance Monitoring Rating Code:

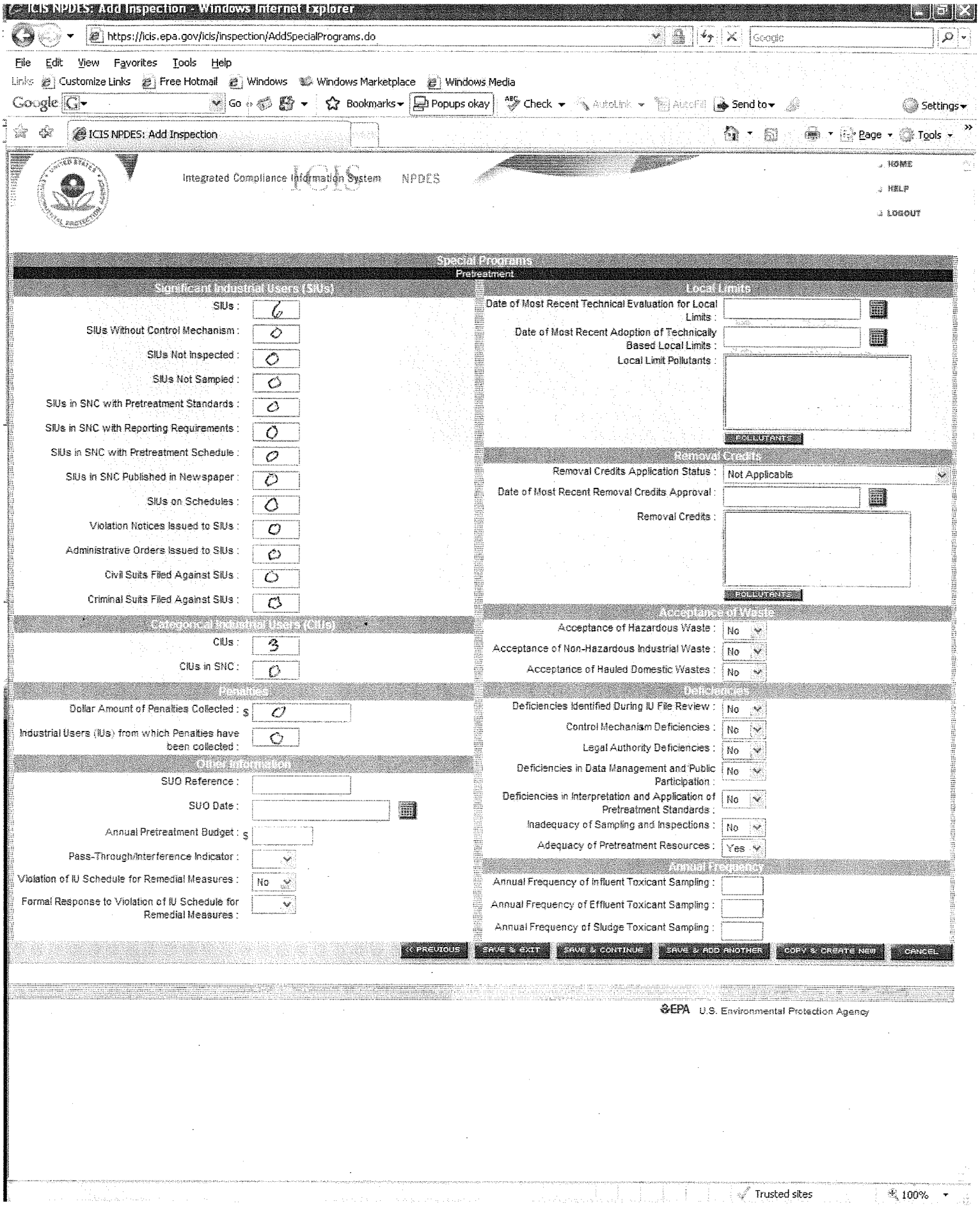
Compliance Monitoring Comments

Compliance Monitoring Comments:

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 ICIS NPDES

HOME
HELP
LOGOUT

Special Programs

Pretreatment

Significant Industrial Users (SIUs)

SIUs: 6
SIUs Without Control Mechanism: 0
SIUs Not Inspected: 0
SIUs Not Sampled: 0
SIUs in SNC with Pretreatment Standards: 0
SIUs in SNC with Reporting Requirements: 0
SIUs in SNC with Pretreatment Schedule: 0
SIUs in SNC Published in Newspaper: 0
SIUs on Schedules: 0
Violation Notices Issued to SIUs: 0
Administrative Orders Issued to SIUs: 0
Civil Suits Filed Against SIUs: 0
Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

CIUs: 3
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:
Date of Most Recent Adoption of Technically Based Local Limits:
Local Limit Pollutants:
POLLUTANTS

Removal Credits

Removal Credits Application Status: Not Applicable
Date of Most Recent Removal Credits Approval:
Removal Credits:
POLLUTANTS

Acceptance of Waste

Acceptance of Hazardous Waste: No
Acceptance of Non-Hazardous Industrial Waste: No
Acceptance of Hauled Domestic Wastes: No

Deficiencies

Deficiencies Identified During IU File Review: No
Control Mechanism Deficiencies: No
Legal Authority Deficiencies: No
Deficiencies in Data Management and Public Participation: No
Deficiencies in Interpretation and Application of Pretreatment Standards: No
Inadequacy of Sampling and Inspections: No
Adequacy of Pretreatment Resources: Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:
Annual Frequency of Effluent Toxicant Sampling:
Annual Frequency of Sludge Toxicant Sampling:

<< PREVIOUS SAVE & EXIT SAVE & CONTINUE SAVE & ADD ANOTHER COPY & CREATE NEW CANCEL

EPA U.S. Environmental Protection Agency

Trusted sites 100%