

ADEQ

ARKANSAS
Department of Environmental Quality

October 23, 2009

Larry Waldrop
General Manager
El Dorado Water Utilities
500 North Washington
El Dorado, Arkansas 71730

Re: El Dorado (NPDES #AR0033723; AFIN#7000341) Pretreatment
Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Waldrop:

Please find enclosed the finished report for the audit/assessment conducted September 15 through September 17, 2009. The report should be made available for review by appropriate City officials. Discussions and an evaluation should be made concerning the findings/deficiencies. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

The City appears to have personnel knowledgeable and interested in both the Pretreatment and Pollution Prevention Programs and their implementation. 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 and Pretreatment and Pollution Prevention Programs.

Please feel free to contact this office with any questions at (501) 682-0625.

Sincerely,



Allen R. Gilliam
NPDES Pretreatment Coordinator

cc: Rudy Molina/EPA 6WQ-PP
Eric Fleming/NPDES Technical Assistance Manager
Cindy Garner/NPDES Technical Assistance Manager
E-Drive/Pretreatment Reports

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF EL DORADO, ARKANSAS

NPDES PERMIT #AR0033723

October 13, 2009

PREPARED BY: ALLEN GILLIAM

STATE PRETREATMENT COORDINATOR

ADEQ

TABLE OF CONTENTS

A) Introduction

B) Summary of Findings with Required Actions

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

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

LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information .

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment A: Supporting Documentation

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 September 15 - 17, 2009, 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 thereof.

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 to be current with the "Streamlining" revisions to 40 CFR 403 was received by ADEQ on 9/1/09 and is pending review.

The City has two (2) wastewater treatment plants. Both POTWs consist of aerated lagoons followed by dissolved air floatation. 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 almost all of the City's significant industry users' (SIU) contributions. Seven (7) permitted SIUs make up approximately 50% of the south POTW's average 2.84 MGD flow. Three (3) of those seven (7) are categorical metal finishers with a poultry processor constituting about 75% of the total SIU flow (the poultry processor is currently shut down).

This POTW has exhibited sub-lethality to the water flea for the last several years in its effluent to the receiving stream, Bayou De Loutre. No correlation to the industries' wastewater has been attributed to this sub-lethality.

The North POTW has a design flow of 5 MGD and receives contributions from one (1) categorical industrial user (CIU), an interior truck wash facility regulated under the Transportation Equipment category in 40 CFR 442. This facility makes up about 0.1% of the POTW's average 1.5 MGD flow.

The North POTW has not shown any pattern of toxicity to the receiving stream, Mill Creek, in the last three (3) years.

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.

1) Under 40 CFR 403.8(f)(2)(vi), “[The City shall] 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. Inspect and sample the effluent from each Significant Industrial User at least once a year...”

During the file review it was discovered comprehensive inspections were not documented. The inspections lacked detailed information on the IUs' processes, pretreatment, chemical handling and storage procedures, chemical spill prevention areas, hazardous waste storage, sampling procedures and the IUs' monitoring records (See “Audit Checklist's IU File Review, Section 9.a. through 9.q.” and Attch. A-3 for comparison).

If the Audit's inspection checklist items were to have been addressed and documented, the City's inspections would have been deemed adequate. It was suggested to complete such a comprehensive inspection (an example was provided) and use a copy of it during subsequent inspections to use as a work copy to update any changes made at the IU. One of the first questions that should be asked at the beginning of an inspection should be, “Has there been any process, raw material or chemical changes made since the last inspection?”.

The first page of the inspection should also contain a place for the City's inspector and industry representative's printed name, signatures and date of inspection.

2) Under CFR 403.8(f)(1)(B), “Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions (3) Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standards, local limits, and State and local law...;”

During the file review, it was discovered Miller's permit (Attch. A-4c) includes the City's guideline local limit for Cu. Miller Transport is a categorical industrial user covered under 40 CFR 442. Although Miller has submitted a Pollutant Management Plan (PMP) in lieu of monitoring for the regulated parameters, 40 CFR 442's Cu limit (0.84 mg/l) is much lower than the City's local limit (2.07 mg/l maximum monthly average). The Cu limit must be removed as it is less stringent than the federal limitation.

3) Under **40 CFR 403.12(g)**, “*Monitoring and analysis to demonstrate continued compliance.* (1) Except in the case of Non-Significant Categorical Users, 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 and the nature and concentration...”

And, under **40 CFR 403.12(h)**, “*Reporting requirements for Industrial Users not subject to categorical Pretreatment Standards.* The Control Authority must require appropriate reporting from those Industrial Users with Discharges that are not subject to categorical Pretreatment Standards. Significant...Industrial Users must submit to the Control Authority...a description of the nature, concentration, and flow of the pollutants required to be reported by the Control Authority.”

While the City is conducting the monitoring for the industrial users, process flows were not being recorded in the City’s reports. Regulated pollutant flows are essential in developing an allocation system for local limits if necessary and must be recorded.

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

During the file review, slug discharge potential evaluations could not be located. These slug evaluations must be documented in each IU’s file. An example “Slug Evaluation Form” was sent to the City for its use.

5) Under **CFR 403.8(f)(1)(B)**, “Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions: (5) Statement of applicable civil and criminal penalties for violation of Pretreatment Standards and requirements, and any applicable compliance schedule.”

During the file review, it was discovered IU permits did not include criminal penalties. The permits must be revised to include this provision.

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

1) It was strongly recommend to document all IU surveys. This will fulfill the City’s obligation under 40 CFR 403.8(f)(2)(i), “Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request.”

A relatively current non-domestic user survey could not be produced during the audit. The City must conduct these surveys as necessary to determine if there are non-domestic discharges that may be subject to provisions of their Pretreatment Program. While the regulations do not specify a set frequency, a comprehensive industry/non-domestic user survey should be conducted AND documented once per NPDES permit cycle as a rule-of-thumb.

Surveys should be tailored to ask questions about specific business sector operations, chemicals on site, processes and wastes. Pollution Prevention and best management practices should also be asked. For those non-domestic dischargers unaware of P2, this at least might help them to discover what P2 is and what it may mean for their bottom line economics.

2) Recommend liquid waste (septage) hauler(s) be permitted with at least the minimum 40 CFR 403.5(a)(1) and (b) prohibitions included.

A periodic certification statement should also be required: "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.

3) Recommend revising permit applications to include questions about Pollution Prevention (P2) and Best Management Practices (BMPs).

4) Strongly recommend revising and dating existing fact sheets in each IU file updating pertinent information such as: processes/flows, schematics with sampling point clearly marked (possibly pictured), basis for permit limits, rationale for being deemed "Significant", facility's corporate headquarters' environmental contact or registered agent, monitoring frequency, parameters monitored for, picture of actual sampling point, brief chronological history (start-up date, compliance, e.g.). As discussed during the audit, the basic information contained in a comprehensive IU inspection provides the bulk of a good fact sheet.

These fact sheets should be periodically sent to each knowledgeable IU representative to review and update as necessary.

5) Recommend separating the BOD and TSS "surcharge levels" from the permit limits in El Dorado Paper's permit (see Attch. A-2b). Although it is footnoted that levels above these "limits" are subject to service charges (surcharges), as long as the BOD and TSS numbers are in the limits section, it can be construed they are in violation of a permit limit with enforcement action necessary.

6) Reconsider monitoring for volatile organic acids in Miller's permit. Samples are grabbed from the open topped concrete sump located outside. It is probable they evaporate into the atmosphere.

7) Recommend removing the copper limit and sampling requirement at the manhole for

Prescolite's total plant flow. Sampling for compliance with the 40 CFR 433 metals at the end of process is adequate.

8) Recommend sending all metal finishers their toxic organic management plans (TOMP) to be updated as necessary. Documentation from the City that these TOMPs are approved should also be located in the metal finishers' files.

9) As time and resources allow, it is recommended to conduct more domestic-only wastewater sampling using the more sensitive methods recently required for the POTWs' effluent. This will help make the calculations for maximum allowable headworks loadings more legally defensible.

10) Recommend formalizing a grease trap program for the City's food related businesses. Documentation should be required of them to indicate the pumper's license, when their traps were last pumped, what company pumped them out and where the grease was disposed of.

11) Strong recommendation to adopt the legal authority to require any non-domestic discharger to implement appropriate best management practices.

12) Recommend holding a catered annual "Industry Appreciation" luncheon. This will bring your regulated community together open for questions and networking. These are stakeholders in helping the City meet its NPDES permit provisions. This type outreach program is very successful in many Arkansas Pretreatment cities.

13) 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.

14) Recommend writing public service articles for the local newspaper regarding proper disposal of grease and pharmaceuticals as well as giving the general public an idea of their tax paid publicly owned treatment works description and what it is designed to accomplish.

15) 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.

16) Recommend revising the City's current Enforcement Response Plan (ERP) to include the enforcement option of requiring Pollution Prevention Audits by a qualified professional. The IU should be required to follow the audit's recommendations for more efficient processes/pretreatment and return to compliance.

17) It's recommended to modify the City's existing ordinance to include language reflecting its purpose and policy (Section 1.1) to "Encourage pollution prevention, waste minimization, water and energy conservation through best management practices".

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

Require an additional section to be added in the City's Program Enforcement Response Plan and Guide as to what enforcement options the City will take for violations of Best Management Practices.

* * * * *

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.

As previously mentioned, the City has submitted Program modifications to meet the required "Streamlining" revisions to 40 CFR 403.

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?

.....

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: same

Treatment Plant Wastewater Flow: Design- 7 MGD; Actual (Average)- 2.84 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 7

Industrial Contribution to this Treatment Plant

of SIUs : 7 # of CIUs : 3
Industrial Flow (mgd): 1.45 Industrial Flow (%) : 51 %

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/industrial & Ag water supply/fishable

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

Method of Sludge Disposal:

Quantity of Sludge:

<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Public Distribution	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

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

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: n/a
 Issuance Date: "
 Expiration Date: "

List pollutants that are specified in current sludge permit:
"Hauled off-site"

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 sub-lethal effects on ceriodaphnia dubia over the last several years.

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u> 4 </u>	<u> 4 </u>	<u> </u>	<u> </u>
Priority **	<u> 1 </u>	<u> 1 </u>	<u> </u>	<u> </u>
Biomonitoring	<u> </u>	<u> 6 </u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Other: <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* 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 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)

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>NH3-N -7/08, 6/09</u>	<u>unknown</u>

YES NO

Has the treatment plant sludge violated the TCLP Test?

B. TREATMENT PLANT INFORMATION (cont.)

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	9/31/13
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: North
Location Address: 1119 Victor Dumas Rd.

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 5 MGD; Actual (Average)- 1.5 MGD

Sewer System: 100 % Separate; # of SSOs due to grease blockages 9

Industrial Contribution to this Treatment Plant

of SIUs : 1 # of CIUs : 1
Industrial Flow (mgd): .0015 Industrial Flow (%) : 0.001 %

Level of Treatment Type of Process(es):

Primary _____

Secondary 2 aerated lagoons (in series);

Tertiary _____ facultative lagoon; 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/industrial & Ag water supply/fishable

If effluent is disposed of to any location other than the receiving stream, please note: Irrigate two (2) golf courses and a soccer field ???

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.
<input checked="" type="checkbox"/> Lagoon Storage	_____ dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.

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

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: n/a
 Issuance Date: "
 Expiration Date: "

List pollutants that are specified in current sludge permit:
"Hauled off-site"

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 one event of sublethality to the fathead minnow back in 1/07 and sublethality to the ceriodaphnia once in 6/08

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u> </u>	<u> </u>
Priority **	<u>1</u>	<u>1</u>	<u> </u>	<u> </u>
Biomonitoring	<u> </u>	<u>4</u>	<u> </u>	<u> </u>
TCLP	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Other: <u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* 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)

NH3-N 2/09

unknown

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 just submitted (9/1/09) their modified ordinance.

1. Modifications:

<u>Date Approved by DEQ</u>	<u>Ordinance Citation/ Nature of Modification</u>	<u>Date Incorporated in NPDES Permit</u>
<u>Pending review</u>	<u>As mentioned, the City just submitted their modified ordinance. They'll have to follow this up with necessary revisions to any other sections of their Program (ERP, procedures, etc) to be completely current with CFR 403</u>	

2. Modifications in Progress:

<u>Date Requested</u>	<u>Nature of Modification</u>
<u>9/1/09</u>	<u>See above</u>

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: _____

 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 (P²) 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.	<u> n/a </u>	<u> </u>	<u> </u>	<u> </u>
2.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3.	<u> </u>	<u> </u>	<u> </u>	<u> </u>
4.	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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 P² 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
<u> N/A </u>	<u> </u>	<u> </u>	<u> </u>

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)] *Documentation could not be produced that one had been done in several years although City said one was conducted in '06 or '07.*

 If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² 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 P² activity and the distribution of P² reference materials to the IUs which qualify?

What methods are used to update the IWS:

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

How often is the survey to be updated? 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:

<u>Name of IU</u>	<u>Type of Industry</u>	<u>Is the IU Permitted?</u>

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 (*Pilgrims shut down this last year*)
- d. 2 Other regulated nonsignificant IUs (Describe) Hospital & others with potential but are zero process ww discharge
- 8 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 alternatives*

 Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

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
 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:

<u>IU NAME</u>	<u>PERMIT EXPIRATION DATE</u>

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
 n/a 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:

<u>Pollutant</u>	<u>Limit</u>
<u>Will recommend permitting with general and specific prohibitions along with a certification statement regarding "no hazardous waste"</u>	

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

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

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

<u>Pollutant</u>	<u>Limit</u>
n/a	

G. Application of Pretreatment Standards and Requirements

YES NO

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

2/09 Date Notified Letter Method of Notification

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

<input type="checkbox"/> Federal Register	<input checked="" type="checkbox"/> Journals, Newsletters
<input checked="" type="checkbox"/> Meetings, Training	<input type="checkbox"/> Other
<input checked="" type="checkbox"/> Government Agencies	<input checked="" type="checkbox"/> Other <u>Internet</u>

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
n/a			

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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Don't</u>	<input type="checkbox"/>	<u>Narrative</u>	<input type="checkbox"/>	<u>0.2</u>
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>appear</u>	<input type="checkbox"/>	<u>reference is</u>	<input type="checkbox"/>	<u>0.07</u>
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>necessary</u>	<input type="checkbox"/>	<u>made to these</u>	<input type="checkbox"/>	<u>1.71</u>
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>at this</u>	<input type="checkbox"/>	<u>"Guideline</u>	<input type="checkbox"/>	<u>2.07</u>
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>time</u>	<input type="checkbox"/>	<u>limits"</u>	<input type="checkbox"/>	<u>0.65</u>
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<u>0.43</u>
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<u>0.0003</u>
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<u>0.2</u>
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<u>2.38</u>
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<u>0.1</u>
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<u>0.24</u>
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	<u>1.48</u>

* - 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?		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted (mg/l)
	Yes	No	Yes	No	Yes	No	
<u>n/a</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

YES NO

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

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

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)	<u> </u> ✓ mentioned in Program "if necessary"	<u> </u>	<u> </u>
Cadmium (Cd)	<u> </u> ✓	<u> </u> "	<u> </u>
Chromium-Total	<u> </u> ✓	<u> </u> "	<u> </u>
Copper (Cu)	<u> </u> ✓	<u> </u> "	<u> </u>
Cyanide (CN)	<u> </u> ✓	<u> </u> "	<u> </u>
Lead (Pb)	<u> </u> ✓	<u> </u> "	<u> </u>
Mercury (Hg)	<u> </u> ✓	<u> </u> "	<u> </u>
Molybdenum (Mo)	<u> </u> ✓	<u> </u> "	<u> </u>
Nickel (Ni)	<u> </u> ✓	<u> </u> "	<u> </u>
Selenium (Se)	<u> </u> ✓	<u> </u> "	<u> </u>
Silver (Ag)	<u> </u> ✓	<u> </u> "	<u> </u>
Zinc (Zn)	<u> </u> ✓	<u> </u> "	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

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?
Uniformly for both North and South POTWs

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:

5days Conventionals
1week Metals
2weeks 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)
 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:

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)]

- | | | | |
|-------------------------------------|------------------------------------|-------------------------------------|----------------------------|
| <input checked="" type="checkbox"/> | Notice or letter of violation | <input checked="" type="checkbox"/> | Administrative Order |
| <input checked="" type="checkbox"/> | Setting of compliance schedule | <input checked="" type="checkbox"/> | Revocation of permit |
| <input checked="" type="checkbox"/> | Injunctive relief | <input checked="" type="checkbox"/> | Fines (maximum amount): |
| | civil | \$ | <u>1000</u> /day/violation |
| | criminal | \$ | <u>1000</u> /day/violation |
| | administrative | \$ | <u>1000</u> /day/violation |
| <input checked="" type="checkbox"/> | Imprisonment | | |
| <input checked="" type="checkbox"/> | Termination of Service | | |
| <input checked="" type="checkbox"/> | Other: <u>termination of water</u> | | |

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		Return to Compliance?	
		Type	Date	Yes (Date)	No
n/a					

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

#	%	
<u>0</u>	<u>0</u>	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
<u>0</u>	<u>0</u>	Self-monitoring requirements [WENDB-MSNC]
<u>0</u>	<u>0</u>	Reporting requirements [WENDB-PSNC]
<u>0</u>	<u>0</u>	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? _____

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:

	<u>Number</u>	<u>Amount</u>
Civil	<u>0</u>	\$ _____
Administrative	<u>0</u>	\$ _____
Total	<u>0</u>	\$ _____ [WENDB-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO
 &

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

YES NO
 computerized
 hard copy
 OTHER: _____

Are the following files computerized:

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

Can IU monitoring data can be retrieved by:

 Industry name
 Pollutant type
 Industrial category or type
 SIC Code
 IU discharge volume
 Geographic location
 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"

Possibly Are there significant public or community issues impacting the POTW's pretreatment program?
 If yes, please explain: The proposed "combination" pipeline with some other local direct dischargers, with the City owning it, could affect MAHLs

 Are all records maintained for at least 3 years?

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:

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general operating fund	<u>100</u>
<u>IU permit fees</u>	<u>*these go</u>
<u>monitoring charges</u>	<u>back to general</u>
<input checked="" type="checkbox"/> <u>industry surcharges</u>	<u>operating</u>
<u>other (describe)</u>	<u>fund</u>
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:

YES NO

If no, explain

- Legal assistance _____
- Permitting _____
- IU inspections _____
- Sample collection _____
- Sample analyses _____
- Data analysis, review and response _____
- Enforcement _____
- Administration (inc. record keeping /data management) _____

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

- Sampling equipment 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

I. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
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 Code: 2643
Avg. Total Flow (MG/month) 1.3 to 2 Avg. Process Flow (gpd) ??

Industry visited during audit: YES

Comments: Has had some problems in the past with Cu

FILE #: 2 Industry Name Amercable File/ID No. 004
Industry Address 350 Bailey Rd 71730
Industry Description Mfg. Electric Power Cables w/lead sheathing for vulcanizing
Industrial Category n/a 40 CFR n/a SIC Code: 3357
Avg. Total Flow (gpd) 75,000 Avg. Process Flow (gpd) ???

Industry visited during audit: YES

Comments: _____

FILE #: 3 Industry Name Miller Transport File/ID No. 005
Industry Address 2811 NW Avenue
Industry Description Interior/Exterior truck wash facility NAICS 48849
Industrial Category Transport. Equip. Cleaning 40 CFR 442 SIC Code: 4231
Avg. Total Flow (gpd) 5,200 Avg. Process Flow (gpd) -8,000 (batch discharged
~ 2/mo)

Industry visited during audit: YES

Comments: _____

FILE #: 4 Industry Name Prescolite Reflector File/ID No. 008
Industry Address 216 Mims Dr.
Industry Description Anodizing light reflectors
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3471
Ave. Total Flow (gpd) ??? Ave. Process Flow (gpd) 77,000

Industry visited during audit: YES

Comments: _____

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

Industry visited during audit: _____

Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an (See Attch. A-1 for example) application for a control mechanism?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
If yes, what is the application date?	<u>8/08</u>	<u>9/08</u>	<u>9/08</u>	<u>9/08</u>	<u> </u>
Does it ask for Pollution Prevention information?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
2. Does the file contain a (See Attch. A-2 for example) Permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Permit Expiration Date?	<u>9/10</u>	<u>9/10</u>	<u>9/10</u>	<u>9/10</u>	<u> </u>
Is a fact sheet included?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Appropriate discharge limitations?	<u>1</u>	<u>✓</u>	<u>2</u>	<u>3</u>	<u> </u>
e. Appropriate self-monitoring requirements?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u> </u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

Comments: 1) BOD & TSS are in "limits" section. Suggest separating them as they are footnoted as "surcharge levels"; 2) IU submitted a PMP under CFR 442, but the City requires monitoring for Cd, Cr, Cu, Ni & Zn, not the non-polars or Hg. Must remove the Cu limit as it's greater than the CFR 442 limit; 3) Prescolite's permit includes the CFR 433 metal limits applicable at "total plant flow" also. Consider removing this sampling site; 4) City does all self-monitoring for its SIUs.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Sampling locations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
h. Requirement for flow monitoring?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
i. Types of samples (grab or composite) for self-monitoring?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
j. Applicable IU reporting requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
k. Standard conditions for:					
Right of Entry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Records retention?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Civil and Criminal Penalty provisions?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
Revocation of permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
l. Compliance schedules/ progress reports	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
m. General/Specific Prohibitions?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>See #3.d on previous page</u>				<u> </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
5. For IUs with combined wastestream Formula or the Flow weighted Average formula correctly applied? [403.6(d) and (e)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comment: 1) Although under the IUs' permits section regarding "Falsifying Information..." there is a mention of "criminal law", there should be a completely separate section outlining this enforcement option the City has legal authority to use.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
D. <u>Compliance Monitoring</u>					
<u>Sampling</u>					
1. Does the file contain Control Authority sampling results for the industry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Wastewater flow at the time of sampling?	<u>no</u>	<u>no</u>	<u>Batch</u>	<u>no</u>	<u> </u>
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
f. Chain-of-custody records?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>TOMP</u>	<u> </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>timed</u>	<u>timed</u>	<u>Grab</u>	<u>timed</u>	<u> </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
<u>Inspections</u> (See Attch.A-3 for example)					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Date of last Inspection	<u>12/08</u>	<u>12/08</u>	<u>12/08</u>	<u>12/08</u>	<u> </u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Verification of production rates?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
f. Evaluation of pretreatment facilities?	<u>1</u>	<u>n/a</u>	<u>1</u>	<u>1</u>	<u> </u>
g. Evaluation of self-monitoring equipment and techniques?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
i. Manufacturing facilities?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
j. Chemical handling and storage procedures?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
k. Chemical spill prevention areas?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>

Comments: 1) 2 of the files reviewed had any mention of source of regulated wastewater and pretreatment equipment. None of the inspections reviewed were considered adequate.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Hazardous waste storage areas and handling procedures?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
m. Sampling procedures?	<u>n/a</u>	<u>n/a</u>	<u>2</u>	<u>n/a</u>	<u> </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
o. Monitoring records?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
p. Evaluation of Pollution Prevention opportunities?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
q. Control Authority inspector signature?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
<u>IU Self-Monitoring and Reporting</u>					
<i>(City does all sampling for their IUs)</i>					
10. Does the file contain self-monitoring reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
11. Does the file include:					
a. BMR?	<u>n/a</u>	<u>n/a</u>	<u>arch.</u>	<u>arch.</u>	<u> </u>
b. 90-Day Report?	<u>n/a</u>	<u>n/a</u>	<u>arch.</u>	<u>arch.</u>	<u> </u>
c. All periodic reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
12. Did the IU report on all required parameters?	<u>n/a</u>	<u>n/a</u>	<u>N/a</u>	<u>n/a</u>	<u> </u>
13. Did the IU comply with the required sampling frequency(s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
14. Did the IU report flow?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
15. Did the IU comply with the required reporting frequency(s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comments: 1) As previously mentioned, none of the inspections reviewed would be considered comprehensive nor adequate; 2) pH calibration observed.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u> </u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u> </u>
b. Did POTW respond to the spill?	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u> </u>
E. <u>Enforcement</u>					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u> </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u> </u>
3. Did the CA notify the IU 24 hours of becoming aware of the violation(s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
5. Were all nondischarge violations identified in the file?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
6. Was the IU notified of all violations?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comments: 1) City has not conducted a comprehensive slug potential evaluation (nothing documented could be found) on any of its IUs, therefore, no slug control plans, if necessary.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

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: Mfg. food grade paper bags Date/Time of visit: 9/16/09 / 9:30 a.m.

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

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

Additional comments:

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.

Visit conducted by: Gilliam/Peppers Date: 9/16/09



(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 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 their Alar pretreatment system. The Alar media is diatomaceous earth. Ferric sulfate, clay based flocculant 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 for which the IU was showing high readings of. Total plant flow analyticals show Cu now to be below the City's "Guideline Local Limits".

Visit conducted by: Gilliam/Peppers Date: 9/16/09



(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:
AmerCable Inc., 350 Bailey Rd. 71730, 870.309.3323

Type of industry: Mfg. of rubber coated electric cable Date/Time of visit:
9/16/09 / 1:45 p.m.

Industry contacts: Chad Thornton - Env., Health & Safety Coor.

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

Additional comments: The facility has not changed its core operations since the 5/06 audit. Some of the wire brought in is already rubber coated. Finished wire brought in is brass, bronze, tin coated copper and some zinc. Some of the coated cable "produced" by them is actually old cable brought back to them from previous customers for repair.

There are two (2) resin lines at the facility used to produce cables up to ~ 8". Multiple wire strand enters a heated extruder (similar concept as plastic extrusion, only under

much hotter conditions) where compound is introduced and extruded to produce a coated strand. The strand is cooled in a water bath before being wound onto a reel. The Resin Lines are similar to the Continuous Vulcanization (CV) lines, except there is no steam tube.

There are five (5) vulcanization lines and four (4) tuber lines. There are twelve (12) extruders associated with the CV lines and eight (8) extruders associated with the tuber lines. These lines extrude thermoset/rubber compounds. Vegetable oil is used in small quantities on the "A-Line" as a lubricant. The coated strand travels through a steam traced tube, then is cooled in a water bath before being wound onto a reel. Acetophenone is produced during the extrusion process. Miscellaneous specialty operations at the IU includes the trace and spool processing area, the cable reprint line, solvent cleaning, and stencil operations. The trace and spool operation consists of running cable through a process that prints a stencil on the cable for marking and/or other purposes.

Solvent cleaning is used throughout the facility. The most common solvents are methylene chloride and a cyclohexanone/methyl isobutyl ketone mixture. Solvent is used in closed containers referred to as "soak cans" in the facility. The telecom cable operation involves pumping a heated saturant material over a cable jacketed with a fiber braid, using a small amount of acetone as an extender. The saturant is then coated with a lacquer which contains 25% acetone and 20% methanol (small amounts of additional acetone are added as an extender.) The lacquered cable then passes through a short tube where it is subjected to heated air and then wound onto a reel.

To produce lead cured cable, a lead jacket is extruded over the uncured cable coating. The lead jacket acts as a mold (maintaining cable diameter) and to equalize heating and

cooling during the curing (vulcanizing) process. After curing, the lead jacket is normally mechanically removed and the lead reused. Only a small percent of cable is sold with the lead jacket installed. Calcium Stearate is applied to the cable as a lead release agent, as the cable is pulled through a city water cooling trough. The cable is then pulled through extruders. The extruders coat the cable with molten lead from a 10-ton kettle. A 20-ton kettle feeds the 10-ton kettle. The kettles are filled with either virgin lead which is added by hand or with recycled lead which is added by conveyor from one of the hoppers. The molten lead flows from the 10-ton kettle through pipes to the extruder, as the cable is pulled through the extruder by the take-up reel machine. When the reel has the desired amount of cable, the cable is cut and the reel is ready for curing. The loaded reels are moved into the autoclave (vulcanizer) by hand truck. The autoclave is sealed and flooded with carbon dioxide to reduce oxidation of the lead during curing. The autoclave is then heated with steam to provide heat which cures the cable. After this cycle is completed, the cable reel is removed from the autoclave and allowed to cool. The cooled reel of cable is moved to the stripper payoff reeling machine then pulled through the stripper where the lead jacket is mechanically peeled off and cut into chips. These chips are placed in a return hopper to be reused.

As an alternative to the lead cured cable, the IU may use nylon tape for the cable curing. This nylon curing tape is substituted for the lead.

The polycure jacketing operations process is almost identical to the lead jacketing operation except that instead of a lead jacket, thermosets and thermoplastics are used to form a jacket for curing. This source consists of one extruder for thermoset and one extruder for thermoplastic compounds. The majority of "process" wastewater is from the various

cooling operations (both contact and non-) which is recirculated through either chillers or their cooling tower where it is then sent back to the process areas. Any overflow from their (countercurrent flow) cooling water is sent to the city. Lead is still tested every month. As mentioned previously, about every three years, the holding tank bottoms' sludge is manually cleaned out and hauled off-site as haz waste. The periodic overflow from these holding tanks is sent to the city and has been in compliance with their local limits.

Their internal process/environmental program is called "5-S", shine, sort, straighten, sustain and standardize.

This auditor can find no category (CFR) for which any of this facilities' ops fall.

The IU rep needs to supply the city with better (easier to read and more detailed) schematics showing where their wastewater is generated and its flow to the city.

Water consumption is down from about 0.4 mgd to about 0.03 mgd. within the last few years.

Adequate sampling site. The city coordinator seemed knowledgeable of the facility's operations and process water sources.

Visit conducted by: Gilliam/Peppers Date: 9/16/09



(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), 502 Industrial Road,
870.862.8181

Type of industry: Mfg. of Light Fixtures (CFR 433) Date/Time of visit: 9/16/09 / 3:25 p.m.

Industry contacts: Michael Phillips - Eng. Manager

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

Additional comments: Facility makes outdoor industrial light reflectors (shaped like conical bowls) from sheet aluminum. Wastewater is generated from anodizing of aluminum. The reflectors are made from a raw material aluminum 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.

Visit conducted by: Gilliam/Peppers Date: 9/16/09



(signature of auditor conducting visit)

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

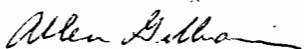
Control Authority: City of El Dorado NPDES #: AR0033723

Industry name: Prescolite

Additional comments:

An automated computer program dictating which of the 47 tanks is used in the anodizing process controls the anodizing. The process is generally described as: alkaline wash; water etching/rinsing; coating in a phosphoric/nitric bath/ water rinse (no counter flow rinses throughout); nitric acid etching /rinsing; coating in a phosphoric/nitric bath; and then several rinses; sulfuric anodizing; two rinses in de-i water; various dye tanks are available at this point if coloring is required and all reflectors are nickel acetate sealed. Final rinse is in de-I water. Some of the tanks are heated and air agitated, some are not. All overflow from rinse tanks are captured in metal grate covered floor trenches and gravity flows back to waste treatment. 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, and a 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. Slug potential was discussed with IU rep while in process/pretreatment area. IU rep indicated it would be virtually impossible for any process water to enter and bypass pretreatment because of their high-level shut off valve which would shut down the entire process. This sump covers the entire area below the process tanks. Tanks all look in good shape. Most piping is PVC and what little iron pipe is left is rusting somewhat. No visible leaks. Some flow and pH meters have been added since last audit. Adequate sampling site.

Visit conducted by: Gilliam/Peppers Date: 9/16/09



(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:
 Miller Transporters Inc., 2811 N.W. Avenue, 870.864.8086

Type of industry: Interior Truck Wash Date/Time of visit: 9/17/09 / 9:00 a.m.
 40 CFR 442

Industry contacts: Tommy Jones - Shop 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	✓*	___	___

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

Additional comments:

This facility owns the trucks that transport hazardous waste, mostly sulfuric and nitric acids which is what is washed out of the tankers' interiors.

It's operations have not changed substantially since the audit conducted about 4 years ago.

Average "dumps" are about 8,000 to 9,000 gallons/2 to 3 times per month.

Spent some time with the IU rep talking about their PMP.

Visit conducted by: Gilliam/Peppers Date: 9/17/09



(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 which prescribed the cleaning procedures depending on the chemical that might be in the tanker. Each chemical had a numbered code which would direct tank cleaning operator to which cleaning method to use. 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. 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. Automated pumps keep blends at proper percentages. This is considered part of their (PMP).

Facility installed a "Kelton(?)" unit (3 to 4 yrs ago?) which replaced their batch cleaning solutions that they kept mixed up. They've reduced water usage down from about 100 gpm to 28 gpm by eliminating the old batch/recirculating unit.

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.

They've recently relined the middle pit with an impermeable "paint" to reduce ground water contamination potential.

Sample point was adequate.

Visit conducted by: Gilliam/Peppers Date: 9/17/09



(signature of auditor conducting visit)

APPLICATION FOR INDUSTRIAL WASTEWATER DISCHARGE PERMIT

SECTION A - GENERAL INFORMATION

A.1. Company name, mailing address, and telephone number:

EL DORADO PAPER BAG MFG. CO. INC.
P. O. BOX 1585
EL DORADO, AR
Zip Code 71731 Telephone No. (870) 862-4977

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

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:

GARY TAYLOR V. P. of Production 870-862-4977

A.4. Alternate person to contact concerning information provided herein

Name LOUIS T. HALL III Title President Tel. No. SAME

A.5. Identify the type of business conducted (auto repair, machine shop, electroplating, warehousing, painting, printing, meat packing, food processing, etc.).

PRINTING and MANUFACTURING of Paper Bags

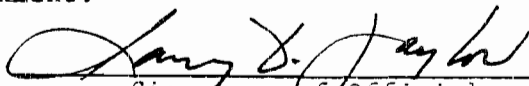
Note to Signing Official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be available to the public without restriction. Requests for confidential 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.

8-29-08

Date



Signature of Official

(Seal if applicable)

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

PRINTING AND BAG MAKING FOR THE FOOD INDUSTRY.
~~OPERATION CONSISTS OF PRINTING PAPER WITH WATER FLEXO INKS, THEN FOLDING, CUTTING, AND GLUING BAGS TOGETHER WITH FOOD GRADE ADHESIVES.~~

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):

	<u>Average gallons</u> <u>per day</u>		
1. <input type="checkbox"/> Domestic wastes (restrooms, employee showers, etc.)	<u>5%</u>	<input checked="" type="checkbox"/> estimated	<input type="checkbox"/> measured
2. <input type="checkbox"/> Cooling water, non-contact	<u>94%</u>	<input checked="" type="checkbox"/> estimated	<input type="checkbox"/> measured
3. <input type="checkbox"/> Boiler/Tower blowdown	<u>1%</u>	<input checked="" type="checkbox"/> estimated	<input type="checkbox"/> measured
4. <input type="checkbox"/> Cooling water, contact	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
5. <input type="checkbox"/> Process	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
6. <input type="checkbox"/> Equipment/Facility Washdown	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
7. <input type="checkbox"/> Air Pollution Control Unit	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
8. <input type="checkbox"/> Storm water runoff to sewer	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
9. <input type="checkbox"/> Other (describe)	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured

Total A.8.1 - A.8.9 _____

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

	<u>Average Gallons</u> <u>per day</u>		
<input type="checkbox"/> Sanitary sewer	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Storm sewer	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Surface water	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Ground water	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Waste haulers	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Evaporation	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> measured
<input type="checkbox"/> Other (describe)	_____	<input type="checkbox"/> estimated	<input type="checkbox"/> 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?

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 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. Electric & Electronic Components
9. Electroplating
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
- Beverage Bottler

A-1d

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

- Air flotation
- Centrifuge
- Chemical precipitation
- Chlorination
- Cyclone
- Filtration
- Flow Equalization
- Grease or oil separation, type _____
- Grease trap
- Grit Removal
- Ion Exchange
- Neutralization, pH correction
- Ozonation
- Reverse Osmosis
- Screen
- Sedimentation
- Septic tank
- Solvent separation
- Spill protection
- 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).

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	CHEMICAL COMPOUND	Known Present	Suspected Present	Known Absent	Suspected Absent	Known or Suspected Concentration/day
I. METALS & INORGANICS						IV. PCBs & RELATED COMPOUNDS					
1. Antimony	[]	[]	[X]	[]	[]	32. Benzene, 1,2,4-trichloro	[]	[]	[X]	[]	[]
2. Arsenic	[]	[]	[X]	[]	[]	33. Benzene, hexachloro	[]	[]	[X]	[]	[]
3. Asbestos	[]	[]	[X]	[]	[]	34. Benzene, ethyl	[]	[]	[X]	[]	[]
4. Beryllium	[]	[]	[X]	[]	[]	35. Benzene, nitro	[]	[]	[X]	[]	[]
5. Cadmium	[]	[]	[X]	[]	[]	36. Toluene	[]	[]	[X]	[]	[]
6. Chromium	[]	[]	[X]	[]	[]	37. Toluene, 2,4-dinitro	[]	[]	[X]	[]	[]
7. Copper	[]	[]	[X]	[]	[]	38. Toluene, 2,6-dinitro	[]	[]	[X]	[]	[]
8. Cyanide	[]	[]	[X]	[]	[]	V. ETHERS					
9. Lead	[]	[]	[X]	[]	[]	47. Ether, bis(chloromethyl)	[]	[]	[X]	[]	[]
10. Mercury	[]	[]	[X]	[]	[]	48. Ether, bis(2-chloroethoxy)	[]	[]	[X]	[]	[]
11. Nickel	[]	[]	[X]	[]	[]	49. Ether, bis(2-chloroisopropyl)	[]	[]	[X]	[]	[]
12. Selenium	[]	[]	[X]	[]	[]	50. Ether, 2-chloroethyl vinyl	[]	[]	[X]	[]	[]
13. Silver	[]	[]	[X]	[]	[]	51. Ether, 4-bromophenyl phenyl	[]	[]	[X]	[]	[]
14. Thallium	[]	[]	[X]	[]	[]	52. Ether, 4-chlorophenyl phenyl	[]	[]	[X]	[]	[]
15. Zinc	[]	[]	[X]	[]	[]	53. Bis(2-chloroethoxy) methane	[]	[]	[X]	[]	[]
II. PHENOLS AND CRESOLS						VI. NITROSAMINES AND OTHER NITROGEN-CONTAINING COMPOUNDS					
16. Phenol(a)	[]	[]	[X]	[]	[]	54. Nitrosamine, dimethyl	[]	[]	[X]	[]	[]
17. Phenol, 2-chloro	[]	[]	[X]	[]	[]	55. Nitrosamine, diphenyl	[]	[]	[X]	[]	[]
18. Phenol, 2,4-dichloro	[]	[]	[X]	[]	[]	56. Nitrosamine, di-n-propyl	[]	[]	[X]	[]	[]
19. Phenol, 2,4,6-trichloro	[]	[]	[X]	[]	[]	57. Benzidine	[]	[]	[X]	[]	[]
20. Phenol, pentachloro	[]	[]	[X]	[]	[]	58. Benzidine, 3,3'-dichloro	[]	[]	[X]	[]	[]
21. Phenol, 2-nitro	[]	[]	[X]	[]	[]	59. Hydrazine, 1,2-diphenyl	[]	[]	[X]	[]	[]
22. Phenol, 4-nitro	[]	[]	[X]	[]	[]	60. Acrylonitrile	[]	[]	[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]	[]	[]						

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?

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
<input type="checkbox"/> Acids and Alkalies	_____
<input type="checkbox"/> Heavy Metal Sludges	_____
<input type="checkbox"/> Inks/Dyes	_____
<input checked="" type="checkbox"/> Oil and/or Grease	1890 gals
<input type="checkbox"/> Organic Compounds	_____
<input type="checkbox"/> Paints	_____
<input type="checkbox"/> Pesticides	_____
<input type="checkbox"/> Plating Wastes	_____
<input type="checkbox"/> Pretreatment Sludges	_____
<input type="checkbox"/> Solvents/Thinners	_____
<input type="checkbox"/> Other Hazardous Wastes (specify)	_____
_____	_____
<input type="checkbox"/> Other wastes(specify)	_____
_____	_____
_____	_____

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

- on-site storage
- off-site storage
- on-site disposal
- off-site disposal

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

All USED LUBRICANTS ARE PICKED UP BY PETROLEUM RECYCLING COMPANY.

EL DORADO WATER UTILITIES

WASTEWATER CONTRIBUTION PERMIT

Company Name: EL DORADO PAPER BAG MFG. CO. INC.

Division Name (If Applicable): _____

Mailing Address: P. O. BOX 1585
Street or P. O. Box
EL DORADO, ARKANSAS 71731
City, State and Zip Code

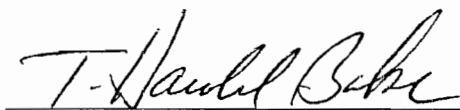
Facility Address: 204 PRESCOLITE DRIVE
Street Address
EL DORADO, ARKANSAS 71730
City, State and Zip Code

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 August 29, 20 08 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, 2008

Expiration Date: SEPTEMBER 30, 2010



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, 20 08.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u> mg/L.	<u>DAILY MAXIMUM</u> mg/L.	<u>SAMPLE FREQUENCY</u>	<u>SAMPLE TYPE</u>
B.O.D.	---	250	Monthly	24 Hour Composite
T.S.S.	---	250	Monthly	24 Hour Composite
Copper	2.07	3.38	2/Year	24 Hour Composite
Zinc	1.48	2.61	2/Year	24 Hour Composite

notes:

- (A) Samples shall be taken according to procedures outlined in 40 CFR 136.3 from the approved sampling facility located in plant full discharge wastestream flow, at the manhole southwest of the building (40' north of road at the west edge of concrete loading area).
- (B) Biochemical Oxygen Demand (B.O.D.) and Total Suspended Solids (T.S.S.) discharges above these limits are subject to service charges of 14¢, and 7¢ per pound, respectively.

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 it's 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. All reports shall be submitted to the following address:

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

6. 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

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 expired.

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.

7. SIGNATORY REQUIREMENTS

All reports required by this permit shall be signed by a principal executive officer 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 modifications 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

Any User who violates an Order of the City Council, or who willfully or negligently fails to comply with these regulations shall be fined not less than \$100.00, nor more than \$1,000.00 for each daily violation, and shall be liable for the costs of litigation (Ordinance Number 1621, § 5.9).

16. 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-3

El Dorado Water Utilities
Industrial Inspection Sheet

Date: 12/016/08

Time: 11:00 am

Industry: El Dorado Paper Bag

Address: 204 Prescolite Drive

Mailing Address: P. O. Box 1585, El Dorado, AR 71731

Contact Person: Gary Taylor (Vice President of Production) 862-4977

Alternate Contact: Louis T. Hall III (President) 862-4997

Industry Description: Printing, folding, and gluing of paper bags.

Description Of Processes: Alar treatment system which consists of a holding tank, treatment tank that uses coagulant to separate the solids from the water which is pushed through a filter screen that is rotating and scraped off which is collected and sent to the landfill. Water is then pumped through a charcoal filter prior to discharge.

Categorical Determination: N/A

Monitoring Frequency: monthly

Parameters Monitored: BOD, TSS, Copper, Zinc

Compliance: Yes

Future Plans: The larger pretreatment system has been installed and has led to decreased BOD & TSS in their effluent. Gary has also been successful in eliminating the various inks from entering the effluent. No changes are planned for the coming year.

Past Years Pretreatment Performance: In consistent compliance.

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, ARKANSAS 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 2, 20 08 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, 2008

Expiration Date: SEPTEMBER 30, 2010



T. Harold Baker
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, 20 08.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u> mg/L.	<u>DAILY MAXIMUM</u> mg/L.	<u>SAMPLE FREQUENCY</u>	<u>SAMPLE TYPE</u>
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, 20 08.

<u>PARAMETER</u>	<u>MAXIMUM MONTHLY AVERAGE</u> mg/L.	<u>DAILY MAXIMUM</u> mg/L.	<u>SAMPLE FREQUENCY</u>	<u>SAMPLE TYPE</u>
pH (C)	---	6-9	Monthly	Grab
Oil & Grease	---	100	Monthly	Grab
Cadmium	0.07	0.11	Monthly	Grab
Chromium	1.71	2.77	Monthly	Grab
Copper	2.07	3.38	Monthly	Grab
Nickel	2.38	3.98	Monthly	Grab
Zinc	1.48	2.61	Monthly	Grab
Volatile Organic Acids	---	---	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.
- (B) Oil and Grease discharges in excess of the above stated limit are subject to a service charge of 5¢ per pound.
- (C) pH limits are in standard pH units, minimum allowable 6, maximum allowable 9.

A-4c

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation
 * State: AR
 Compliance Monitoring Activity Name: *El Dorado Pretreatment Program*
 If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:
 * Compliance Monitoring Type: AFO Defined, AFO Designation, Aerial Photography, Audit, Audit (U)

Linked Facility

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	<i>AR 0033723</i>			

Compliance Monitoring Dates

Planned Start Date: *9/15/09* Actual Start Date:
 Planned End Date: *9/17/09* Actual End Date:

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act
 * Programs: NPDES - Post Administrative Penalty Case (Settlement), NPDES - Pretreatment, NPDES - Sanitary Sewer Overflow (SSO), NPDES - Section 308 Information Requests, NPDES - Sludge/Biosolids
 State Statute:

* Compliance Monitoring Action Reason: Agency Priority, Citizen Complaint/Tip, Core Program, For Cause, Random Inspection
 * Compliance Monitoring Agency Type: State Contractor, State - Using Federal Credential, State, Regional, Other Federal
 Compliance Monitoring Agency Name:
 If State, Local or Tribal lead, did EPA Assist?: No
 Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity? State
 If Joint, what was the purpose of the participation of the other party?
 Which party had the lead?

Government Contacts

Affiliation Type	First Name	Last Name	Phone	Office	Organization
<p>SIC Codes: []</p> <p>NAICS Codes: []</p> <p>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</p> <p>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</p>					

Media Monitored

Media Monitored: []
 Compliance Monitoring Media Indicator: []
 Multimedia Indicator:
Compliance Monitoring Information
 Number of Days Physically Conducting Activity: []
 Number of Hours Physically Conducting Activity: []
 Compliance Monitoring Action Outcome: []
 Compliance Monitoring Rating Code: []

Compliance Monitoring Comments

Compliance Monitoring Comments: []

User Defined Fields

1: []

Special Programs
Pretreatment

Significant Industrial Users (SIUs)
SIUs: 8
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: 2
Administrative Orders Issued to SIUs: 0
Civil Suits Filed Against SIUs: 0
Criminal Suits Filed Against SIUs: 0

Local Limits
Date of Most Recent Technical Evaluation for Local Limits: 5/25/00
Date of Most Recent Adoption of Technically Based Local Limits: 1/4/01
Local Limit Pollutants: Arsenic, Cadmium, Chrome, Copper, Cyanide, Lead, Mercury, Molybdenum, Nickel, Silver, Selenium, Zinc

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

Categorical Industrial Users (CIUs)
CIUs: 3
CIUs in SNC: 0

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

Penalties
Dollar Amount of Penalties Collected: \$ 0
Industrial Users (IUs) from which Penalties have been collected: 0

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

Other Information
SUO Reference: #1621
SUO Date: 1/4/01
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:

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