ADEQ

ARKANSAS
Department of Environmental Quality

September 15, 2006

Harold Baker
Treatment Superintendent
El Dorado Water Utilities
500 North Washington
P.O. Box 1587
El Dorado, Arkansas 71731

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

Dear Mr. Baker:

Please find enclosed the finished report for the audit/assessment conducted May 23rd through May 25th, 2006. Discussions and an evaluation should be made concerning the findings. Please respond to required actions and recommendations in writing within thirty (30) days from the date on this correspondence. This response should outline the steps and schedule in which the City can reasonably address/correct deficiencies and/or required actions.

The City appears to have personnel knowledgeable 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, the Pretreatment Program and Pollution Prevention activities.

Feel free to contact this office with any questions.

Sincerely,

Allen R Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist
cc: Lee Bohme/EPA 6WQ-PM
Frank Esry/ADEQ Inspector Supervisor
Dennis Benson/NPDES Enforcement

NPDES PERMIT FILE
NPDES # AR0033723
AFIN #
Permit PN
✓ Correspondence
Technical Backup
9/20/06 BH Date Scanned

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PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF EL DORADO, ARKANSAS

NPDES PERMIT #AROO33723

SEPTEMBER 15, 2006

PREPARED BY: ALLEN GILLIAM

NPDES PRETREATMENT COORDINATOR

ADEQ

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LIST OF ATTACHMENTS

A) INTRODUCTION

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

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

An audit/assessment was performed May 23 - 25, 2006, of the Pretreatment Program implemented by City of El Dorado, Arkansas. Participants included:

Allen Gilliam	ADEQ/Pretreatment Coordinator
Harold Baker	City/Treatment Supervisor
Glen Holmes	City/General Manager
John Peppers	City/Pretreatment Technician

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

* 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 3/22/85. Partial modifications were submitted beginning 2/21/92, with two (2) extensions requested and granted. The first comprehensive modification was received 10/21/94. A final approvable submittal was received by this office on 8/7/00. The 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.

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 and have exhibited sublethality on an infrequent basis with no cause(s) discovered.

The south POTW has a design flow of 7 MGD and receives almost all of the City's SIU contributions. Eight (8) permitted SIUs make up approximately 50% of the south POTW's average 3.2 MGD flow. Four (4) of those eight (8) are categorical metal finishers with a poultry processor constituting about 75% of the total SIU flow.

The north POTW has a design flow of 5 MGD and receives contributions from one (1) SIU, an interior truck wash facility. That facility makes up about 0.2% of the POTW's average 1.5 MGD flow.

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) significant industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachment(s) A.

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

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of 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 403.5(c)(8)*** "Specific Prohibitions. [El Dorado shall not allow] the following pollutants [to be] introduced into the POTW...Any trucked or hauled waste except at discharge points designated by [the City]".

The waste haulers' permit should contain a description of exactly (describe the point) where at the wastewater treatment plant their wastes may be discharged with other stipulations regarding "reporting in at the office for direct permission to discharge" and language similar to, "the discharge of such wastes shall be witnessed by a representative of the City and samples may be taken at any given time, etc." Inclusion of the general and specific prohibitions per ***40 CFR 403.5(a)(1) & (b)*** into their "permits" should also be given consideration.

2) Under ***40 CFR 403.8(f)(2)(v)*** "...Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users." And, under ***40 CFR 403.12(e)*** "Periodic reports on continued compliance....In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge reported in paragraph (b)(4) of this section...".

During the file review and interview session, it was discovered flows were not being verified. Either via periodically calibrated flow monitoring devices or "bucket tests", the City must verify process flows from their SIUs.

3) Under ***40 CFR 136.3 Table II*** "holding time" for pH measurements is to "analyze immediately".

It was discovered during the file review that the city was allowing samples to be sent off to contract labs and pH was measured at that point in time. pH must be measured immediately during the City's sampling events at its SIUs.

4) Borrowing from ***403.12(b)(5)(ii)*** "A minimum of four (4) grab samples must be used for pH, cyanide, total phenols, etc..."

Prescolite's permit conditions for CN monitoring should be revised to read "grab" sampling instead of a 24 hr. composite.

5) Under ***40 CFRs 403.8(f)(2)(ii) & 403.12(p)*** " [El Dorado] shall notify IUs of any applicable Pretreatment Standards and any applicable requirements under...the Resource Conservation and Recovery Act [RCRA] and The IU [non-domestic discharger] shall notify [the City]....in writing of any discharge into the POTW of a substance....[which] would be a hazardous waste..."

Send all SIUs recent revisions of the Pretreatment Regulations for their information and possible input. See http://cfpub.epa.gov/npdes/home.cfm?program_id=3 for information that should be relayed to the SIUs.

Send a copy of the reporting requirements located in ***40 CFR 403.12(p)*** to the hazardous waste generators shown on ADEQ's list supplied to pretreatment personnel during the audit. This notification should also be sent to the City's dentist offices/clinics, hospitals, chiropractors, long term health clinics and pharmacies. The last time this was done was about ten (10) years ago. There's a great possibility the City's hazardous waste generator "family" has changed since then.

6) Under the City's approved Pretreatment Program, ***Appendix E***, the City's Enforcement Response Plan's "Guide" indicates the first enforcement option for any violation will be at a minimum, a Notice of Violation (NOV).

NOVs were not found for every IU violation found during the file review. The "Guide" should be modified to include simple phone calls as a response to the less egregious IU violations. This is the current procedure typically used when the Pretreatment representative was asked about some violations found during the file review. However, no documentation could be produced in several cases that even the phone calls had been made. This documentation is crucial in starting the non-compliance "clock" to determine if the violating IU is acting in good faith to return to compliance in a timely fashion.

7) Under the current ***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; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

(A) Description of discharge practices, including non-routine batch Discharges;

(B) Description of stored chemicals;

(C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under § 403.5(b) with procedures for follow-up written notification within five days;

(D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response

While the City's current inspection form does include questions whether the facility has a slug control plan, floor drains, chemical storage areas, containment, etc, an evaluation whether there was the potential exists for a slug discharge needs to be addressed.

If it's determined there is a slug potential, the above elements (A thru D) must be included in the IU's file, dated and signed.

It could not be determined from the file review that this had been done. The inspection form has only two (2) questions pertaining to slugs and their plans but, nothing to indicate an evaluation had actually

been conducted.

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

1) Strongly recommend the Pretreatment Tech. (Mr. John Peppers) have his computer networked with the rest of the City's, especially with an internet (e-mail) connection. This office, several times a month on average, sends out pretreatment related issues. Since Mr. Peppers is in more intimate contact with the sampling and inspection of the City's industries, this office feels he may be missing out on valuable information other pretreatment related personnel are receiving that could be passed directly on to the industries.

2) Strongly recommend developing and maintaining a fact sheet in each IU's working file. Information could include rationale for being deemed "Significant" (i.e.: under which criteria in 40 CFR 403.3(t) does the IU fall), IU contact, monitoring frequency, parameters monitored for, brief chronological history (start-up date, compliance, e.g.). Basis/calculations for permit limits should be included. A brief description of the processes that generate wastewater being discharged to the City would also be advisable. As discussed during the audit, information contained in the City's IU inspection form and the IU's applications provide the bulk of a good fact sheet. See Appendix I of EPA's "IU Permitting Guidance Manual" for additional information.

3) Recommend notifying the metal finishers of the "toxic organic management plan (TOMP) submittal in lieu of TTO monitoring" (***40 CFR 433.12***) option once again. It was not clear from the metal finishers' files reviewed which had submitted approved (dated, signed AND evidence the City had approved them) TOMPs.

If TOMPs have been submitted, they should be reviewed, approved, updated, signed and dated at least once per permit cycle. Updated TOMPs from the metal finishers is strongly recommended.

In the case where TOMPs have been submitted and deemed adequate and approved by the City, twice/year monitoring for the TTOs is not necessary. Annual inspections should be the most cost effective way to ensure the TOMP is being implemented in accordance with the metal finishers' submittals.

Within this same recommendation, revise (with a footnote?) the metal finishers' limits' page (or in the reporting section) to further clarify that "if an approved TOMP has been submitted, the toxic organics do not have to be monitored for."

4) Recommend printed AND signed names on chains of custody AND the inspection forms.

5) During the file review the IU inspections were found to be "adequate" but, rather general and brief in nature describing various elements of an inspection. The inspection reports could be more detailed. Modifying inspection report forms using EPA guidance was discussed during the audit interview. Once a comprehensive inspection is on file, it can be used as a template for future ones. Upon

commencement of an inspection, one of the first questions to be asked should be, "Has there been any process, raw material, etc. changes since the last inspection?"

Focus should be given and a section should be included with questions asking about the IU's Pollution Prevention and best management practices.

Remarks during the audit made to the City's coordinator were, that if all this audit's checklist items (Section III, part D.9.a. through D.9.q.) could be "checked off", he could feel fairly comfortable that a comprehensive inspection had been conducted. Once the City is comfortable they have a comprehensive inspection form filled out, it could be formally typed up, filed and used as the template for the next year's inspection without having to spend time re-writing what's already on file. And, as mentioned above, one of the first questions then could be asked, "Has there been any process, raw material, etc. changes since the last inspection?"

6) Recommend developing a Program section or separate procedures manual for various Program implementation activities. Sampling techniques at individual IUs, handling, "date received" stamped, and filing procedures of Pretreatment reports and data, pre-inspection procedures, etc., may be well known to the more experienced pretreatment related employees, but it would make common sense to have these activities briefly summarized in writing for ease of educating new employees.

This "SOP" should also include sampling protocols for each permitted IU with proper equipment preparation, hose usage/change-out period and storage after use. See EPA's "IU Inspection and Sampling Manual for POTWs" dated 4/94 for more details.

7) The City's Pretreatment ordinance should incorporate more Pollution Prevention and Best Management language. The policy/purpose page could include language such as, "To encourage pollution prevention through waste minimization, source reduction and best management practices" as another objective.

8) Strongly recommend revising the City's existing pretreatment ordinance to include legal authority to issue general permits, require best management practices and reports to indicate IU pollution prevention performance results.

9) 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.

10) Recommend inviting industry/business representative in for an "Industry Recognition Day" for not only awards presentations (compliance excellence, pollution prevention success stories, etc) but, to also educate via this outreach effort, the IU reps on general pretreatment requirements and issues.

11) Recommend re-evaluating the allocation system in place for the City's local limits. Consider

mass-based limits based on contributory flow instead of uniform concentration. See EPA's guidance manual, "Local Limits Development Guidance" (7/04) for options.

12) Recommend modifying IU applications and general survey questionnaires to include corporate headquarters' contact or registered agent's name and address. Enforcement correspondence from the City (NOVs, AOs, etc.) can be copied to these contacts. Experience indicates when "upper" management discovers noncompliance "in the field" their influence for "getting back into compliance" activities at their IU can be helpful. Within these applications/surveys, it's also advised the IUs be asked for more information about their pollution prevention activities/results, best management practices, employee training efforts, other environmental certificates, a much more thorough description of their wastewater generating processes and pretreatment processes, up-to-date wastewater flow and product flow diagrams.

13) Recommend adopting a Pollution Prevention policy or resolution or adding another "Objective" to the current Pretreatment Ordinance. Language could include "To encourage pollution prevention through source reduction and waste minimization".

14) Recommend adding pollution prevention audits or assessments as an additional enforcement tool in the City's current Enforcement Response Plan.

15) Recommend tracking influent/effluent trends utilizing present computer system to better understand and forecast loadings to the City's POTWs.

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

1) Modify the City's Pretreatment Program to meet the current ***40 CFR 403*** regulations following the requirements in ***40 CFR 403.18(c)(1)*** within six (6) months from the date of this completed audit.

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of El Dorado NPDES #: AR0033723
Mailing address: El Dorado Water Utilities
500 North Washington, El Dorado, AR 71730

Permit Signatory: Glenn Holmes Title: General Manager

Telephone: 870.862.6451 FAX NUMBER: 870.863.9201

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

Pretreatment program approval date: 3/22/85

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

Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 5/23-25/06 (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Harold Baker	Same	Same
Glen Holmes	Same	Same
John Peppers	Pretreatment Tech.	870.862.0421

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	12/13/04	No problems indicated
PCI	12/22/03	No problems indicated

YES NO

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

If yes, describe the required corrective action: _____

_____

_____

_____

_____

___ ✓ Is the Control Authority currently in SNC or RNC?

. . . . . .

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

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	11/1/02	10/31/07
AR0033936	North	11/1/02	10/31/07

* 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)- 3.20 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 8 # of CIUs : 4
Industrial Flow (mgd): 1.6 Industrial Flow (%) : 50 %

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

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: Primary contact/fishable/swimmable

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

Method of Sludge Disposal:	Quantity of Sludge:
✓ Land Application	4247 dry tons/yr. (In '2000. 1st time
_____ Incineration	_____ dry tons/yr. since POTW began
_____ Monofill	_____ dry tons/yr. operating)
_____ Mun. Solid Waste Landfill	_____ dry tons/yr.
_____ Public Distribution	_____ dry tons/yr.
✓ Lagoon Storage	_____ dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals & 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: ADEQ
Issuance Date: "
Expiration Date: "

List pollutants that are specified in current sludge permit:
Standard parameters in 40 CFR 503

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 sporadic/sub-lethal effects on both species over the last several years with one failure.

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	1	
Priority **	1	1		
Biomonitoring		6		
TCLP				
Other:				

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

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

YES NO N/A

___ ✓* ___ Has the POTW begun tracking the trends in the above samples?
*Data is available

___ ✓ ___ 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	Lo Temps

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	11/1/02	10/31/07
AR0033936	North	11/1/02	10/31/07

* 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; 0 % Combined, # of CSOs 0

Industrial Contribution to this Treatment Plant

# of SIUs : 1 # of CIUs : 1
Industrial Flow (mgd): .003 Industrial Flow (%) : 0.2 %

Level of Treatment	Type of Process(es):
Primary _____	_____
Secondary ✓	2 aerated lagoons (in series); one
Tertiary _____	polishing pond; DAF

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: Primary contact/fishable/swimmable

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.
✓ Lagoon Storage	? dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals & 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: ADEQ
Issuance Date: "
Expiration Date: "

List pollutants that are specified in current sludge permit:
Standard parameters in 40 CFR 503

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?)
Similar sublethality as seen at the South POTW although there's negligible industry contributions (a truck [TEC]} wash facility)

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	1	
Priority **	1	1		
Biomonitoring		6		
TCLP				
Other:				

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

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

YES NO N/A

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

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

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

Parameters Violated	Cause(s)
n/a	

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 substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below. N/A

1. Reg * update program

Date Approved by DEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
N/A		N/A

1. Modifications in Progress:

Date Requested	Nature of Modification
N/A	

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

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

Date of original Pretreatment Program approval: 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 (P^2) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	n/a			
2.				
3.				
4.				

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

		Problems
___	Updating industrial waste survey	
___	Notification of IUs	
___	Permit issuance	
___	Receipt and review of IU reports	
___	Inspection and sampling of IUs	
___	Assessment of IUs for P^2 activity	
___	Analysis of samples	
___	Enforcement	
___	Other: _____	

Briefly describe other problems: _____

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

IU Name	Problem	NPDES Permit Violation Yes	No
N/A		___	___

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

YES NO

✓* ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *The last one was conducted 5/5/03. See Attachment A-1 for example cover letter.

___ ✓ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?

✓ ___ Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

___ ✓ If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

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

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

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

YES NO

___ ✓ Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?

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

a. 9 SIUs (As defined by the Control Authority) [WENDB-SIUS]
b. 5 Categorical Industrial Users (CIUs) [WENDB-CIUS]
c. 4 Noncategorical SIUs
d. 5 Other regulated nonsignificant IUs (Describe) Hospital & others with potential but are zero process ww discharge

14 TOTAL of a. + d.

YES NO

___ ✓ Has the POTW identified any IUs with Pollution Prevention opportunities? *City reps know of IU's 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:

IU NAME	PERMIT EXPIRATION DATE
Possibly Lycus - mention categorizing them & certifying 2/yr no discharge. See Attachment A-2 for info on their application. Might be an OCPSF under CFR 414	

YES NO

✓ ___ Does the Control Authority accept trucked septage wastes?
✓ ___ Does the Control Authority accept other trucked wastes?
✓* ___ Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following: **see Attachment A-3 for more info*

YES NO

✓ ___ Does Control Mechanism designate a discharge point? [403.5(b)(8)]
___n/a__ Are all applicable categorical standards and local limits applied to trucked wastes ?

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

Pollutant	Limit
Narrative Prohibitions	w/specific pH limits

Describe the discharge point(s) (including security procedures):
See Attachment A-3 for more detailed information

___ ✓ 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:

Pollutant	Limit
N/A	

G. Application of Pretreatment Standards and Requirements

YES NO

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

2/96 Date Notified Letter Method of Notification

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

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

YES NO

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

If yes, complete the information below:

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

YES NO

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

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

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

YES NO

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

POLLUTANT	Headworks Analysis Completed? Yes	No	Local Limits Needed? Yes	No	Local Limits Adopted? Yes	No	Numerical Limit Adopted (mg/l)
n/a							

YES NO

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

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

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

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

Uniformly for both North and South POTWs

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	
Other SIUs	1	1/year	
Sampling:			
CIUs	2 to 12	1/year	Because of compliance
Other SIUs	2 to 12	1/year	issues for surcharge purposes
Reporting:			
CIUs	2	2/year	
Other SIUs	12	2/year	
Self-Monitoring:			
CIUs	City does this	2/year	
Other SIUs		2/year	

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

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

	Analytical Method *	Name of Laboratory
Metals	ICP	American Interplex
Cyanide	Spectrophotometric	"
Organics	GC/MS	"
Other	WET	"

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

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

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)]

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

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

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

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

YES NO

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

___ ✓ Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].
Comment: Because city does all self-monitoring, it's only occasionally that an IU will do their own and would have to notify of violations then

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

YES NO N/A

✓ ___ ___ Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
Millers	6/05	Novs	1/05	11/05	
		(Started w/NOVs)			

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

#	%	
1	11	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [WENDB-MSNC]
0	0	Reporting requirements [WENDB-PSNC]
0	0	Pretreatment compliance schedule [WENDB-SSNC]

0 How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES NO

___ ✓ Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. _____

_____

_____

Has the Control Authority experienced any of the following:

YES	NO		EXPLAIN and ID Industrial User
___	✓	Interference [WENDB].	_____
___	✓	Pass through [WENDB].	_____
___	✓	Fire or explosions? (incl. flash point viol.)	_____
___	✓	Corrosive structural damage? (incl. pH <5.0).	_____
___	✓	Flow obstructions?	_____
___	✓	Excessive flow or pollutant concentrations?	_____
___	✓	Heat problems?	_____
___	✓	Interference due to oil or grease?	_____
___	✓	Toxic fumes?	_____
___	✓	Illicit dumping of hauled wastes?	_____

YES NO

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

0 ___ How many SIUs are currently on compliance schedules?

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

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

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

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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?
_____
_____
_____

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:

		Percent of Total Funding
✓	POTW general operating fund	100
___	IU permit fees	*these go
___	monitoring charges	back to general
✓*	industry surcharges	operating
___	other (describe) ___	fund
	Total	100%

✓ ___ Is funding expected to continue near the current level? If no, will it:
Increase ____ or Decrease ____
If no, describe the nature of the changes:
Cost of living increases only

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

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	6 composite samplers, flow meters, pH monitors
✓	___	Safety equipment	Standard list
✓	___	Vehicles	City provided
✓	___	Analytical equipment	City's lab is equipped for the conventionals

L. POLLUTION PREVENTION

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

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

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

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

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

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No
If yes, which of the "Guides to Pollution Prevention" were used? City personnel indicated the metal finishing and auto repair guides were handed out to some facilities.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Cooper Engineered Products File/ID No. 016
Industry Address 166 Cooper Drive
Industry Description Automobile related rubber products (vibration control)
Industrial Category Metal Finisher 40 CFR 433 SIC Code: 3069
Ave. Total Flow (gpd) 168,500* Ave. Process Flow (gpd) 36,000*
*estimated from application
Industry visited during audit: NO

Comments: Zn phosphatizing

FILE #: 2 Industry Name Amercable File/ID No. 005
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
Ave. Total Flow (gpd) 75,200* Ave. Process Flow (gpd) 34,500*
*from application
Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name Miller Transport File/ID No. 006
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
Ave. Total Flow (gpd) 5,200* Ave. Process Flow (gpd) 4600* (batch 2/mo)
*from application
Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name Prescolite Reflector File/ID No. 014
Industry Address 216 Mims Dr.
Industry Description Anodizing light reflectors
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3471
Ave. Total Flow (gpd) 27,400* Ave. Process Flow (gpd) 23,400*
*from application
Industry visited during audit: YES

Comments:

FILE #: 5 Industry Name Milbank File/ID No. 011
Industry Address 195 Prescolite Dr.
Industry Description Manufacture of electric meter boxes
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3643/3613
Ave. Total Flow (gpd) 23,500* Ave. Process Flow (gpd) 12,100*
*from application Ave.
Industry visited during audit: YES

Comments: 5 stage phosphate wash system, powder coat, galvanized sheet metal & aluminum, Fe phosphate and non-chromate sealer

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1.	Does the file contain an application for a control mechanism? (See Attachments A-2 & 4 for examples)	✓	✓	✓	✓	✓
	If yes, what is the application date?	4/01	7/01	7/01	7/01	5/01
	Does it ask for Pollution Prevention information?	no	no	No	No	No
2.	Does the file contain a Permit?	✓	✓	✓	✓	✓
	Permit Expiration Date?	9/06	9/06	9/06	9/06	9/06
	Is a fact sheet included?	1	1	1	1	1
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
	a. Legal Authority Cite?	✓	✓	✓	✓	✓
	b. Expiration date?	✓	✓	✓	✓	✓
	c. Statement of nontransferability?	✓	✓	✓	✓	✓
	d. Appropriate discharge limitations?	✓	3	4	✓	✓
	e. Appropriate self-monitoring requirements?	2	2	2	2 & 5	2
	f. Sampling frequency?	✓	✓	✓	✓	✓

Comments: 1) See Attachment A-5 for example. Could be more comprehensive; 2) City does all self-monitoring for its SIUs; 3) Its "local limits" are based on CFR 433 for Cu, Pb & Zn; 4) IU chose CFR 442's PMP & has it on file; 5) Need to change CN sampling method to "grab" instead of composite.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards

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

Comments: 1) by reference to Ordinance; 2) See #3 on previous page except city's also sampling for Cd, Cr, Cu, Ni & Zn; 2) 433 limits (2/yr); 3) CFR 433 limits (2/yr)

SECTION III: INDUSTRIAL USER FILE REVIEW

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

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	1	n/a	n/a	1	1
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	timed	Timed	Grab	timed	Timed
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓
Inspections					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	✓
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	*See Attachment A-6 for example				
	✓	✓	✓	✓	✓
b. Date of last Inspection	12/05	12/05	12/05	12/05	12/05
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	2	2	2	2	2
b. Inspection date and time?	✓	✓	✓	✓	✓
c. Name and title of IU official contacted?	✓	✓	✓	✓	✓
d. Verification of production rates?	N/a	N/a	n/a	n/a	n/a
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	3	3	3	3	3
f. Evaluation of pretreatment facilities?	3	3	3	3	3
g. Evaluation of self-monitoring equipment and techniques?	n/a	n/a	n/a	n/a	n/a

Comments: 1) 433's are submitting certification statements, not determined if all had submitted "approved" TOMPs (except for Cooper's, see Attachment A-9); 2) Inspector's AND IU rep's printed names AND signatures should also be present on the forms; 3) Could be more descriptive.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	1	1	1	1	1
i. Manufacturing facilities?	2	2	2	2	2
j. Chemical handling and storage procedures?	no	no	no	no	no
k. Chemical spill prevention areas?	no	no	no	no	no
l. Hazardous waste storage areas and handling procedures?	no	no	no	no	no
m. Sampling procedures?	n/a	n/a	n/a	n/a	n/a
n. Laboratory procedures?	n/a	n/a	n/a	n/a	n/a
o. Monitoring records?	n/a	n/a	n/a	n/a	n/a
p. Evaluation of Pollution Prevention opportunities?	no	no	no	no	no
q. Control Authority inspector signature?	no	no	no	no	no
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	n/a	n/a	n/a	n/a	n/a
11. Does the file include:					
a. BMR?	arch.	n/a	✓	arch.	arch.
b. 90-Day Report?	"	n/a	✓	"	"
c. All periodic reports?	N/a	n/a	n/a	n/a	n/a
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	n/a
12. Did the IU report on all required parameters?	n/a	n/a	N/a	n/a	n/a
13. Did the IU comply with the required sampling frequency(s)?	N/a	n/a	N/a	n/a	

Comments: 1) Although there are some questions regarding chem. storage, floor drains, and "slug control plan", there is no apparent "Evaluation of the potential for a slug load"; 2) Could be more descriptive

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
14. Did the IU report flow?	n/a	n/a	n/a	n/a	n/a
15. Did the IU comply with the required reporting frequency(s)?	n/a	n/a	n/a	n/a	n/a
16. For all SIUs, are self-monitoring reports signed and certified?	n/a	n/a	n/a	n/a	n/a
17. Did the IU report all changes in its discharge? [403.12(j)]	✓	n/a	n/a	n/a	2
18. Has the IU developed a Slug Control and Prevention Plan?	1	1	1	1	1
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	no
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	--	--	--	--	-
b. Did POTW respond to the spill?	--	--	--	--	-
E. Enforcement					
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	✓	✓	✓	✓	✓
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	n/a
c. If NS CIU was it compliant within 90 days from commencement of discharge?	✓	n/a	✓	✓	✓

Comments: 1) Inspection forms (or other city documentation) must include a slug potential evaluation, not just questions about floor drains, chemical storage, etc; 2) See Attachment A-8 for example

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
2. How many reports submitted during the past reporting year indicated discharge violations? - *see comment 2)*	0	0	Local limits Cr & Ni 6	0	Zinc 6
3. Did the CA notify the IU 24 hours of becoming aware of the violation(s)?	n/a	n/a	1	n/a	1
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	✓	n/a	✓
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	n/a
6. Was the IU notified of all violations?	n/a	n/a	✓	n/a	✓
7. Was follow-up enforcement action taken by the Control Authority?	n/a	n/a	✓	n/a	✓
8. Did the Control Authority follow its approved ERP?	n/a	n/a	✓	n/a	✓
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	n/a	✓	n/a	✓
10. Is there a compliance schedule? If yes:	N/a	n/a	no	n/a	n/a
11. Were there any compliance schedule violations?	n/a	n/a	n/a	n/a	n/a
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	✓

Comments: 1) via phone & then followed up with (see examples attached) written novs
2) Suggest using "rubber stamp" to date when analyticals were received

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	✓
b. TRC	✓	✓	✓	✓	✓
c. Pass through/Interference	✓	✓	✓	✓	✓
d. Spill/slug loads	✓	✓	✓	✓	✓
e. Reporting	✓	✓	✓	✓	✓
f. Compliance schedule	✓	✓	✓	✓	✓
g. others (specify)	✓	✓	✓	✓	✓
13. Was the SIU published for SNC?	no	no	Yes	no	no
Date of publication.	n/a	n/a	3/06	n/a	n/a

Comments:

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of El Dorado NPDES #: AR0033723

Date of Audit: 5/23 - 25/06 Date entered into QNCR: 9/15/06
(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

NO Is the Control Authority in SNC for violation of any Level I criterion.

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

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

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

Type of industry:
Interior Truck Wash
40 CFR 442

Date/Time of visit:
5/24/06 / 9:40 a.m.

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 5 years ago.

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

Visit conducted by: Gilliam/Peppers Date: 5/24/06

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of El Dorado NPDES #: AR0033723

Industry name: Miller Transporters Inc.

Additional comments:

Facility 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).

Pretreatment is basic settling with pH adjustment with a "scavenger" added to help precipitate 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.

Oil is collected in the middle sump with a basic O&G separator, then removed for recycle.

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

Sample point was adequate.

Visit conducted by: Gilliam/Peppers Date: 5/24/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

Name, address and phone number of industry:
AmerCable Inc., 350 Bailey Rd. 71730, 870.309.3320

Type of industry: Date/Time of visit:
Mfg. of rubber coated electric cable 5/24/06 / 3:00 p.m.

Industry contacts: Bill Reisdorff - Plant Eng/Maintenance Mgr.

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

Additional comments: (The majority of this process description was taken from the facility's air permit.) Facility has not changed ops significantly since the audit completed five (5) years ago.

Finished wire brought in is brass, bronze and tin coated copper. 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 2.5" and 4.5", respectively. 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. Previous lead problems in the past was discovered coming from the floor sweepers (~25 gallon volume) picking up the lead dust and particles from the lead sheathe chipping ops. Now, the sweeper water is drained to the vulcanizing condensate holding tanks and filtered to remove the smaller particles. 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 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.

Visit conducted by: Gilliam/Peppers Date: 5/24/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

Name, address and phone number of industry:
Prescolite (division of Hubbell), 502 Industrial Road, 870.862.8181

Type of industry: Mfg. of Light Fixtures (CFR 433)

Date/Time of visit: 5/24/06 / 1:30 p.m.

Industry contacts: Michael Phillips - Eng. Manager

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

Additional comments: Facility makes outdoor light reflectors (shaped like conical bowls) from sheet aluminum. Wastewater is generated from anodizing of aluminum.

They do have a quasi- environmental program they call "Kiazen" for continual improvement (mainly on work flow). Facility was in the process of moving equipment/assembly areas around to help make production more efficient. They plan on resealing their sumps around the w.w. process area soon.

Visit conducted by: Gilliam/Peppers Date: 5/24/06

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of El Dorado NPDES #: AR0033723

Industry name: Prescolite

Additional comments: This Kiazen program is a work in progress. The IU rep indicated every so often, they go back to determine what has worked, what has not and then "retool" where necessary. They're scheduled to do 16 of these this year. Aluminum sheet (raw mtrl) comes in round, flat sheet forms from which reflectors are (manually or machine-) spun on a lathe to form the "bowl" shape (~800 different shapes), then they're stamped, tooling, machined and polished prior to the anodizing operation. Some of the machining ops are self-contained and close-looped for their coolants and lubricants.
Clean work conditions with good air circulation.
43 total tanks are used in this process (only 3 actively doing the rack anodizing). This process is automated with a computer dictating which tanks the workpiece is to be placed. Process is generally described as: alkaline wash; water rinse (no counterflow rinses throughout); nitric acid etching/rinsing; various sulfuric anodizing (coating/coloring) dye solution baths/rinses (depending on customer needs); final rinse with de-i water. Some tanks are heated and air agitated, some are not. All overflow from rinse tanks are captured in metal grate covered floor trenches which gravity flows back to pretreatment. They do take the acid (sulfuric) out of their anodizing processes and re-generate/purify it for re-use. They do have pump seal problems with this system. The nitric, once "spent" (36%), is sold to another company for their re-use. Pretreatment consists of simple chemical precip with anionic and cationic polymers, sodium hydroxide and pH adjustment. Sludge is filter pressed which is sent to landfill as non-haz. Only toxic organics found (acetone) is in the paint spray booth area for cleaning nozzles.

Adequate sampling site.

Visit conducted by: Gilliam/Peppers Date: 5/24/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of El Dorado NPDES #: AR0033723

Name, address and phone number of industry:
Milbank Mfg. Inc., 195 Prescolite Dr., 870.862.6601

Type of industry:
Mfg. of electric meter boxes
40 CFR 433

Date/Time of visit:
5/24/06 / 11:05 a.m.

Industry contacts: David Singleton-Plant Eng / Chris Gates-Mfg Engineer

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

Additional comments:

Facility (used to be "Hi-Capacity") brings in galvanized sheet steel to produce electric meter boxes and has not changed operations substantially since the last audit conducted five (5) years ago.

Visit conducted by: Gilliam/Peppers Date: 5/24/06

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of El Dorado NPDES #: AR0033723
Industry name: Milbank

Additional Comments: Some extruded aluminum parts are brought in as well as some pre-painted cold rolled steel.
Approximately 5000 units per day are made. Facility has 18 stamping machines for the forming/bending/shaping of the metal boxes. Facility employs a typical 5 stage phosphatizing operation where the pre-welded boxes are sent through a hot caustic spray followed by a fresh water rinse w/countercurrent flow; pieces are then sent through a hot iron phosphatizing spray booth followed by a fresh water rinse (counter flowed). Final stage is a non-chrome sealant "rinse".
Parts are allowed to air dry prior to being sent to powder paint (electrostatic) room. Only color is "Milbank grey".
Other non-wastewater generating operations include basic machining, punching, tapping, drilling, etc with synthetic coolants and lubricants periodically hauled off-site.
Spot welders' cooling water is sent through a recirculation unit used for rinse(s) make up. By using this technique, they've lowered their monthly water bill from about $3,000 to $650.
Nature of wastewater from this standard phosphatizing operation does not require pretreatment to meet CFR 433 standards or local limits except for pH adjustment.

Adequate sample point.

Visit conducted by: Gilliam/Peppers Date: 5/24/06

Allen Gilliam

(signature of auditor conducting visit)

Attachment A-1

El Dorado Water Utilities

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

February 5, 2003

Mr. Howard Grant, Jr.
Bailey Funeral Home
906 West Faulkner
El Dorado, AR 71730

Dear Mr. Grant:

In accordance with provisions of the Air Pollution Control Act and the Clean Water Act, El Dorado Water Utilities is permitted to discharge treated wastewater into the receiving waters of the State of Arkansas. A condition of the above mentioned permit requires the utility to periodically update industrial and commercial wastewater user information to adequately ensure that all industrial and commercial users are properly characterized at all times.

Please complete the attached wastewater survey and return as soon as possible, but no later than April 5, 2003.

If I can be of any assistance, please call me at 862-6451.

Sincerely,

T. Harold Baker

T. Harold Baker
Treatment Superintendent

Enclosure

Attachment A-2

APPLICATION FOR INDUSTRIAL WASTEWATER DISCHARGE PERMIT

SECTION A - GENERAL INFORMATION

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

Lycus Ltd.
P.O. Box 2110
El Dorado AR
Zip Code 71731 Telephone No. (870) 881-5000

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

181 Cooper Drive
El Dorado AR 71730
Zip Code 71730 Telephone No. (870) 881-5000

A.3. Name, title, and telephone number of person authorized to represent this firm in official dealings with the Sewer Authority and/or City:

Len Brotherton, Quality Control Manager
870/881-5000

A.4. Alternate person to contact concerning Information provided herein
Name Vic Forte Title Plant Manager Tel. No. 870/881-5000

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

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.

June 12, 2001
Date

James D. Hargis, President Signature of Official
(Seal if applicable)

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

Lycus Ltd. operates a modern chemical production facility in El Dorado AR. The Plant manufactures benzophenone-type ultra-violet light stabilizers, along with toll and contract business.

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

2869

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

		Average gallons per day	
1. [X]	Domestic wastes (restrooms, employee showers, etc.)	350	[X] estimated [ ] measured
2. [X]	Cooling water, non-contact	350	[X] estimated [ ] measured
3. [X]	Boiler/Tower blowdown	200	[X] estimated [ ] measured
4. [ ]	Cooling water, contact		[ ] estimated [ ] measured
5. [X]	Process	1500	[X] estimated [ ] measured
6. [X]	Equipment/Facility Washdown	1600	[X] estimated [ ] measured
7. [X]	Air Pollution Control Unit	1300	[X] estimated [ ] measured
8. [ ]	Storm water runoff to sewer		[ ] estimated [ ] measured
9. [X]	Other (describe)	3800	[X] estimated [ ] measured
	Condensate		
	Total A.8.1 - A.8.9	9100	

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

	Average Gallons per day		
[X] Sanitary sewer	4700	[X] estimated	[ ] measured
[ ] Storm sewer		[ ] estimated	[ ] measured
[X] Surface water	50	[X] estimated	[ ] measured
[ ] Ground water		[ ] estimated	[ ] measured
[X] Waste haulers	2000	[X] estimated	[ ] measured
[ ] Evaporation		[ ] estimated	[ ] measured
[ ] Other (describe)		[ ] estimated	[ ] measured

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

GNI Disposal Systems, Inc.
2525 Battleground Road, Deer Park TX 77536

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

[X] yes [ ] no

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

A-26

SECTION B - FACILITY OPERATION CHARACTERISTICS

B.1 Number of employee shifts worked per 24-hour day is 2.
Average number of employees per shift is 7.

B.2 Starting times of each shift: 1st 7 am / 7 pm 2nd 7 pm / 7 Am 3rd ___ am / pm

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

B.3 Principal product produced: See Attached

B.4 Raw materials and process additives used:
See Attached

B.5 Production process is:
[X] Batch [ ] Continuous [ ] Both _____%batch _____%continuous
Average number of batches per 24-hour day 1.5

B.6 Hours of operation: _____ a.m. to _____ p.m. [X] continuous

B.7 Is production subject to seasonal variation? [ ] yes [X] no
If yes, briefly describe seasonal production cycle.

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

A-2c

SECTION C - WASTEWATER INFORMATION

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

A. 34 Industrial Categories

1. [ ] Adhesives
2. [ ] Aluminum Forming
3. [ ] Auto & Other Laundries
4. [ ] Battery Manufacturing
5. [ ] Coal Mining
6. [ ] Coil Coating
7. [ ] Copper Forming
8. [ ] Electric & Electronic Components
9. [ ] Elecroplating
10. [ ] Explosives Manufacturing
11. [ ] Foundries
12. [ ] Gum & Wood Chemicals
13. [ ] Inorganic Chemicals
14. [ ] Iron & Steel
15. [ ] Leather Tanning & Finishing
16. [ ] Mechanical Products
17. [ ] Nonferrous Metals
18. [ ] Ore Mining
19. [X] 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-2d

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

[ ] Air flotation
[ ] Centrifuge
[ ] Chemical precipitation
[ ] Chlorination
[ ] Cyclone
[X] Filtration
[ ] Flow Equalization
[ ] Grease or oil separation, type _____
[ ] Grease trap
[ ] Grit Removal
[ ] Ion Exchange
[X] 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).

A-2e

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

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

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

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

SECTION D - OTHER WASTES

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

[X] yes [ ] no

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

D.2 These wastes may best be described as:

	Estimated Gallons or Pounds/Year
[ ] Acids and Alkalies	
[ ] Heavy Metal Sludges	
[ ] Inks/Dyes	
[ ] Oil and/or Grease	
[ ] Organic Compounds	
[ ] Paints	
[ ] Pesticides	
[ ] Plating Wastes	
[ ] Pretreatment Sludges	
[ ] Solvents/Thinners	
[ ] Other Hazardous Wastes (specify)	
Hazardous Waste Water, D028, 3,000,000 lbs/yr; Hazardous Waste Water, D002/D028, 1,000,000 l	
Spent Carbon, D028, 200,000 lbs/yr	
[ ] Other wastes(specify)	
Non-hazardous Waste Water, 4,000,000 lb/yr	

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

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

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

Hazardous Waste Water (D028) is sent to an injection well at GNI in Deer Park TX.

Hazardous Waste Water (D002 & D028) is sent to an injection well at GNI, Deer Park TX.

Spent carbon sent to Rineco, BEnton AR & Systech Environmental Corp, Fredonia KS for fuel blending.

Non-hazardous Waste Water is sent to an injection well at GNI, Deer Park TX.

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El Dorado Water Utilities

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

MEMORANDUM

To: All Wastewater Treatment Plant Operators
From: Harold Baker, Treatment Superintendent
Subject: Standard Operating Procedures for Discharge of Transported Liquid Domestic Waste (Portable Toilet)
Date: August 29, 2001

The following procedures shall become Standard Operating Procedures (SOP) for the delivery of transported domestic waste (portable toilet) at the South Wastewater Treatment Plant.

Effective September 1, 2001, all transported liquid waste (portable toilet) shall be in compliance with City Ordinances 1661 and 1662. The following outlines the SOP for accepting the waste.

1) Presentation **of paperwork**-The transporter is required to present the following paperwork to the Operator prior to discharge.

a) **Transported Waste Manifest(s)-** The generator and tranporter sections shall be completed, signed and dated.
   (i) The physical address of the generator shall be entered in the appropriate space. Post office boxes are not acceptable.
   (ii) The transporter may have more than one collection site per load, but each site must have a separate manifest.
   (iii) Add the number of gallons collected at each site and compare to the capacity of the tank or the amount indicated by the sight gauge if the tank is not full. If the amount collected does not match the amount in the tank, an attempt to verify the amount should be made with the Transporter. If this is not successful, notify Harold Baker or John Peppers.
   (iv) If any information is changed, the person who made the change shall initial the change, along with the date and time.

b) **Health Department Pumper Permit** –This is a 1/3-page form.
   (i) The expiration date is on the right-hand side approximately one inch from the top. A copy is attached.
   (ii) The number shall match the number on the tank.

2) Sampling of Waste Load – The Transporter is not allowed to discharge the contents of the tank until the waste load has been sampled and analyzed for pH, appearance and odor

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Attachment #3

El Dorado Water Utilities

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

AUTHORIZATION FOR DISPOSAL OF LIQUID WASTE

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

I agree to dispose of the portable toilet waste in a specific manhole at the North or South Wastewater Treatment Plant as directed by the Treatment Superintendent. The cost of this disposal shall be $50.00 per 1000 gallons.

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

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

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

James Freeman, Representative Possum Potties Date: 3/24/06

T. Harold Baker, Representative El Dorado Water Utilities Date: 3/24/06

a) Do not write on the manifest until it is verified the waste load will be accepted.
b) Enter the data in the appropriate space on the manifest.
c) After analysis, retain the sample in the old auto sampler refridgerator for lab pick-up the following day. Transported waste proposed for discharge shall:
    (i) **Have a pH between 6.0 and 9.5 S. U.**

        (A) If the pH is outside the pH range by 0.2 S. U. or less, ask the Transporter if he wishes to have the pH analyzed in the laboratory.
        (B) If no, complete a rejection sheet and do not allow the discharge.
        (C) If yes and the laboratory pH is within limits, allow the discharge.

    (ii) Not have an immoderately oily (visible grease) appearance.
    (iii) Not possess any solvent-like, petroleum-like or other odor that is not characteristic of normal portable toilet waste.

3) **The discharge point** shall be the first manhole west of the influent sampling box north of aerated lagoon #1.
4) **Observe the discharge** from start to finish (grease floats). If the character of the waste load changes during discharge, halt the discharge and notify Harold Baker or John Peppers.
5) **Splashing, spilling** or otherwise allowing waste to be discharged anywhere except into the manhole is prohibited.
6) **Complete the disposal** information on the manifest(s) and sign.
7) **Retain all manifests** and/or rejection forms for collection by Harold Baker or John Peppers.
8) **Do not accept waste loads** from any Transporters for which you do not have signed copy of the " Authorization for Disposal of Liquid Waste" on file.

A-3c

ORDINANCE NO. 1637

AN ORDINANCE AMENDING ORDINANCE NO. 1438 CONCERNING TREATING WASTE FROM PORTABLE TOILETS

WHEREAS, Section 3 of Ordinance No. 1621 allows the El Dorado Water Utility Commission to charge for the fees for the treatment of various wastes delivered to it; and

WHEREAS, said ordinance states that the applicable fees and surcharges shall be set forth in the City's rate ordinance, which is Ordinance No. 1438.

NOW, THEREFORE BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF EL DORADO, ARKANSAS that Ordinance No. 1438 is hereby amended by adding the following provision:

SECTION IV (A)

The El Dorado Water and Utility Commission is hereby authorized to charge a fee of $50.00 per 1,000 gallons of wastes from portable toilets that are received at the City Waste Water Treatment Plants. This charge shall become effective on September 1, 2001.

It is, therefore, declared that an emergency exists and this Ordinance being necessary for the immediate preservation of public peace, health and safety shall be in force and take effect immediately from and after its passage.

PASSED: August 23, 2001.

APPROVED:

Mike Dumas

MIKE DUMAS, MAYOR

ATTEST:

John Wells

JOHN WELLS, CITY CLERK

(SEAL)

Attachment A 4

APPLICATION FOR INDUSTRIAL WASTEWATER DISCHARGE PERMIT

SECTION A - GENERAL INFORMATION

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

Cooper-Standard Automotive
166 Cooper Drive
El Dorado, Arkansas
Zip Code 71730 Telephone No. (870) 862-6441

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:

Ron Vaughan, Plant Engineer
(870) 862-6441, ext. 665

A.4. Alternate person to contact concerning Information provided herein
Name Stacy Thomas Title Environmental Coord. Tel. No. (870) 862-6441 ext. 646

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

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.

4/12/01
Date

Signature of Official
(Seal if applicable)

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

Rubber is mixed and then molded into various parts.

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

3061

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

		Average gallons per day	
1. [X]	Domestic wastes (restrooms, employee showers, etc.)	10,500	[X] estimated [ ] measured
2. [X]	Cooling water, non-contact	95,000	[X] estimated [ ] measured
3. [X]	Boiler/Tower blowdown	32,500	[X] estimated [ ] measured
4. [X]	Cooling water, contact	5,000	[X] estimated [ ] measured
5. [X]	Process	20,500	[X] estimated [ ] measured
6. [X]	Equipment/Facility Washdown	5,000	[X] estimated [ ] measured
7. [ ]	Air Pollution Control Unit		[ ] estimated [ ] measured
8. [X]	Storm water runoff to sewer	Rain Dependent	[ ] estimated [ ] measured
9. [ ]	Other (describe)		[ ] estimated [ ] measured
	Total A.8.1 - A.8.9	168,500	

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

		Average Gallons per day		
[X]	Sanitary sewer	168,500	[X] estimated	[ ] measured
[ ]	Storm sewer		[ ] estimated	[ ] measured
[ ]	Surface water		[ ] estimated	[ ] measured
[ ]	Ground water		[ ] estimated	[ ] measured
[ ]	Waste haulers		[ ] estimated	[ ] measured
[ ]	Evaporation		[ ] estimated	[ ] measured
[ ]	Other (describe)		[ ] estimated	[ ] measured

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

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

[X] yes [ ] no

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

SECTION B - FACILITY OPERATION CHARACTERISTICS

B.1 Number of employee shifts worked per 24-hour day is 3.
Average number of employees per shift is 160.

B.2 Starting times of each shift: 1st 6 am / 2 pm 2nd 2 pm / 10 pm 3rd 10 pm / 6 am

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

B.3 Principal product produced: Cooper specializes in automotive rubber related parts.

B.4 Raw materials and process additives used:
Natural and synthetic rubber, carbon black, various rubber processing oils, talc and solvents.

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

B.6 Hours of operation: _____ a.m. to _____ p.m. [X] continuous

B.7 Is production subject to seasonal variation? [ ] yes [X] no
If yes, briefly describe seasonal production cycle.

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

A-4c

Attachment: Description of Planned Expansion

Cooper-Standard Automotive is in the process of constructing a 7,200-sq. ft. addition, which will house a new caustic cleaner/phosphating system. This will be a replacement for the caustic cleaner/phosphating system presently being used. The current caustic cleaner/phosphating system discharges approximately 20,500 gpd to the sanitary sewer, while the new caustic cleaner/phosphating system will discharge approximately 36,000 gpd. This increase is due to the larger capacity, which the new caustic cleaner/phosphating system will have.

Due to the location of the new building addition, the current scrubber dump is being relocated. A water recycling system will be a part of the new scrubber dump. The water discharge from the scrubber dump will decrease from an estimated 5,000 gpd to 1,000 gpd.

Attached is a schematic of the new caustic cleaner/phosphating system, which will be installed.

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. [ ] Elecroplating
10. [ ] Explosives Manufacturing
11. [ ] Foundries
12. [ ] Gum & Wood Chemicals
13. [ ] Inorganic Chemicals
14. [ ] Iron & Steel
15. [ ] Leather Tanning & Finishing
16. [ ] Mechanical Products
17. [ ] Nonferrous Metals
18. [ ] Ore Mining
19. [ ] Organic Chemicals
20. [ ] Paint & Ink
21. [ ] Pesticides
22. [ ] Petroleum Refining
23. [ ] Pharmaceuticals
24. [ ] Photographic Supplies
25. [ ] Plastic & Synthetic Materials
26. [ ] Plastics Processing
27. [ ] Porcelain Enamel
28. [ ] Printing & Publishing
29. [ ] Pump & Paper
30. [X] 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-4e

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

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

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

A-4f

Attachment A-5

El Dorado Water Utilities
Industrial Inspection Sheet

Date: 12/14/05

Time: 1:10 pm

Industry: Cooper Industrial

Address: 166 Cooper Drive

Mailing Address: 166 Cooper Drive, El Dorado, AR 71730

Contact Person: Scott Barton 862-6441

Alternate Contact:

Industry Description: Manufacture of rubber vibration dampening parts for the automobile industry.

Description Of Processes: Molding of rubber parts, phosphatizing wash of the metal inserts that go into some of the vibration dampening parts.

Categorical Determination: Phosphatizing wash system meets the federal categorical standards for metal finishers.

Monitoring Frequency: Monthly

Parameters Monitored: cd, cr, cu, pb, ni, ag, zn, total cyanide, total phenol, VOA, BNA

Compliance: Yes

Future Plans: Cooper will be closed down within the next twelve to eighteen months.

Past Years Pretreatment Performance: Metal concentrations have remained consistently low. They have an excellent pretreatment system that is well maintained and operated.

EL DORADO WATER UTILITIES
INDUSTRIAL PRETREATMENT FACT SHEET
12-12-02 3:00 PM

INDUSTRY: COOPER

ADDRESS: 166 COOPER DRIVE

MAILING ADDRESS: 166 COOPER DRIVE

CONTACT PERSON: STACY THOMAS
PHONE NUMBER: 862-6441 EXT 646

ALTERNATE CONTACT PERSON:
PHONE NUMBER:

CORPORATE EVNIROMENTAL CONTACT:
MAILING ADDRESS:

INDUSTRY DESCRIPTION: MANUFACTURE OF RUBBER VIBRATION DAMPENING PARTS FOR THE AUTO INDUSTRY

DESCRIPTION OF PROCESSES: [illegible] OF PARTS, PHOSPHATIZING WASH OF PARTS PRIOR TO BEING MOLDED WITH RUBBER.

WHY INDUSTRY IS DEEMED "SIGNIFICANT": PHOSPHATIZING WASHES MEETS CATEGORICAL STANDARDS FOR METAL FINISHERS

CATEGORICAL DETERMINATION: YES

MONITORING FREQUENCY: MONTHLY

PARAMETERS MONITORED: CD, CR, CU, FE, NI, AG, ZN, T. CYANIDE, T. PHENOLS, VOA, BNA

EL DORADO WATER UTILITIES
INDUSTRIAL PRETREATMENT FACT SHEET
PAGE TWO

START UP DATE:

COMPLIANCE: YES

~~**PROCESS FLOWS:**~~ NO CHANGES HAVE BEEN MADE SINCE LAST INSPECTION

Attachment A-6

Checklist Questions for POTW Inspecters

I. General Inspection Information:

Date of inspection:	12-13-01 2:30PM	Last inspection date:	12-05-00
Inspected by:	J. PEPPERS	Last inspected by:	

Type of inspection? Demand _____ Scheduled ✓

Did the previous inspection identify areas which the IU was required to correct ? (Y/N) NO

What areas were identified?

What progress has the IU made in correcting the identified deficiencies?

N/A

Persons present during the inspection:

Name	Title	Affiliation
1. JOHN M. PEPPERS	PRETREATMENT CO.	ELDORADO WATER
2. RON VAUGHN	PLANT ENGINEER	COOPER
3.		

II. General Facility Information

Industry name:	COOPER STANDARD AUTOMT	SIC code(s):	3061	Permit on file? (Y/N)	YES
Site address:	166 COOPER DRIVE ELDORADO, AR 71730	Mailing address:	SAME		

Industry contacts (w/ titles)	Fax #: (870) 862-7508	Brief facility description:
1. RON VAUGHN	Phone #: (870) 862-6041 EXT 6105	
2. STACY THOMAS	Phone #: (870) 862-6441 EXT 6410	RUBBER VIBRATION DAMPNING PARTS FOR AUTO

Applicable categorical standards: (e.g., 413, 433, 425, etc.)		Employee showers on site? (Y/N)	YES
Pollutants covered by local limits: (e.g., Cd, Cr, Cu, Pb, Ni, Zn) Are local limits technically based? (Y/N)	VOA, BNA T. CYANIDE, T. PHENOL CD, CR, CU, PB, NI, AG, ZN	Scheduled shutdown periods? (Y/N) When?	YES JULY & DECEMBER

Number of employees:	572	Seasonal production? (Y/N)	NO
Number of shifts per day:	3	Product(s) produced:	RUBBER/METAL BONDED AUTOMOTIVE
Hours of operation per day:	24	Amount of finished product:	
Work days per week:	5	Raw materials used:	RUBBER, POLYMERS, OILS, METALS, CARBONS
Manufacturing processes used:	RUBBER MIXING, EXTRUSION, INJECTION & TRANSFER MOLDING, SURFACE COATING (METALS)		
Planned changes to the plant:	INCREASE SURFACE COATING OPERATIONS		

Changes since last inspection:	Production level:	SAME
	Use of raw materials:	SAME
	Amount of finished product:	SAME

Identified above to the POTW? (Y/N/NA) N/A

II. General Facility Information (continued)

Date the facility commenced discharge to the POTW:	1992	Are O&M schedules available at the facility?	YES
Current long-term average production rate: (if applicable)	N/A	Are there O&M policies and procedures?	YES
Is the facility currently in compliance? (Y/N)	YES	Is O&M training/certification adequate?	YES

If not in compliance, what action has been taken?

Comments:

II. Water Usage and Wastewater Production

. WATER USAGE

SOURCE	AVG. FLOW (gpd)	METERED (Y/N)?	Comments:
Water Company	180,000	YES	
Private Well	N/A	N/A	
TOTAL	110,000		

. . .STEWATER PRODUCTION

WASTEWATER GENERATING PROCESS	AVG. FLOW (gpd)	BATCH OR CONTINUOUS?	BATCH FREQUENCY	MEASURED/ ESTIMATED	TREATED (Y/N)	REGULATED POLLUTANTS	OUTFALL #
1. PROCESS	36,000	CONTINUOUS		EST	YES		
B. EQUIPMENT/FACILITY WASH	1,000	BATCH	DAILY	EST	NO		
C.							
D.							
E.							A-6.c
F. Contact cooling water	5000	BATCH	DAILY	EST	NO		
SUBTOTALS	42,000						
G. Boiler blowdown/Make up	32,500	CONTINUOUS		EST	NO		
H. Evaporation (loss)					N/A		
I. Non-contact cooling	95,000	CONTINUOUS		EST	NO		
J. Lawn maintenance/Irrigation (loss)					N/A		
K. Sanitary (loss)	10,500	CONTINUOUS		EST	NO		
L. In product/Shipped (loss)					N/A		
M. Other							
TOTAL	180,000						

Number of outfalls to the POTW			Number of outfalls to surface waters		Chemicals used in boiler blowdown.
	Total	3		0	
	Regulated	3	All outfalls accounted for? (Y/N)	YES	

Monitoring, Record Keeping and Reporting

Monitoring

it / ling tion	Industry Sampling Location	Flow (gpd)	Permit Limit	Permit Sampling Frequency	Industry Sampling Frequency	Permit Sampling Method (metals)	Industry Sampling Method (metals)	Permit Sampling Method (CN, phenol, O&G, pH)	Industry Sampling Method (CN, phenol, O&G, pH)
[illegible]	N/A	360,000		MONTHLY	N/A	COMP	N/A	GRAB	N/A
[illegible]	N/A			2/YEAR	N/A	COMP	N/A	GRAB	N/A
[illegible]	N/A			2/YEAR	N/A	COMP	N/A	GRAB	N/A

repancies between permit requirements and industry practice for
- Sampling location? (Y/N): No
- Sampling frequency? (Y/N): No
- Sampling method? (Y/N): No

the permit requirements appropriate for:

Sample location(s)? (Y/N)	Yes	If no, explain.
Permit limit(s)? (Y/N)	Yes	If no, explain.
Sample method? (Y/N)	Yes	If no, explain.
Sample frequency? (Y/N)	Yes	If no, explain.

at changes, if any, are needed in the permit? NONE

nples analyzed according to 40 CFR 136?	Yes	Are samples preserved according Part 136?	Yes	Samples analyzed within required holding times?	Yes		
nples taken during periods of process discharge only?	Yes	Samples analyzed in-house or contract?	CONT	Is required analytical certification used?	Yes		

Record Keeping

information kept for 3 years?	Yes	All required information available, current and complete?	Yes	Are all sample results included in the IU's report?	Yes

Reporting

d the facility report results of any more frequent sampling in the last reporting period? N/A If so, were all results reported?

OTW notified of all violations w/i 24 hours? N/A

sample results match what is reported by the industry? N/A Are there any violations which were not reported to the POTW? No

V. Wastewater Treatment Systems

Does the industry treat its process wastes prior to discharge to the POTW? 25 GPM FROM SURFACE COATING

If treatment is in place, complete the following information. *(If no treatment, go to the next section)*

Are any treatment units out of service? (Y/N)	NO	Inadequate system in place to correct a problem? (Y/N)	NO
Unauthorized discharge points in service? (Y/N)	NO	Unauthorized bypasses in place? (Y/N)	NO
Treatment type: ZINC REMOVAL		Date originally installed: 1992	
		Modified since installation? Describe. YES NEW UNIT & LOCATION	
Design flow (gpd): 310,000 MAX		Treatment (batch or continuous)? ~~BATCH~~ CONTINUOUS	
Actual flow (gpd): 24,000		Discharge (batch or continuous)? CONTINUOUS	
Operating Schedule Hours per day: 16 Days per week: 5		Reagents used: *(include usage rates if known)*	
FTEs needed to operate:			
Clarifier volume: N/A		Effluent filtration media (if applicable): STAINLESS ULTRA FILT	
Description of overall condition: SYSTEM IS NEW			

Has the system experienced operational/upset problems since the last inspection? If yes, describe.

NO

VI. Sludge Generation/Waste Disposal

If the facility generates sludge or hauls regulated wastes, please complete the following information. *(If not, go to next section)*

Sludge dewatering method:	Moisture content:	Amount generated (55 gal bbl/mo):	Disposal method:
FILTER PRESS	0 TO 10%	11,000 LBS/MONTH	LANDFILL
Sludge Storage (bbls):		Shipment frequency: 2/MONTH	Manifests available? NO
Sludge hauler(s): WASTE CORPORATION OF AMERICA		Disposal location(s): WASTE CORPORATION OF AMERICA UNION COUNTY LANDFILL	

Hazardous Sludge Generated? (Y/N/NA)	NO	Hazardous Waste Discharged to the POTW? (Y/N/NA)	NO

Manner of Hazardous Waste Disposal: SHIPMENT TO OFFSITE TSD FACILITY

Are hazardous waste manifests available? YES If not, verify manner of hazardous waste disposal.

VII. Combined Wastestream Formula/Permit Limits

Can flow be measured at all sampling locations?	No	Are flows measured at each sampling location?	No

What type of measuring device is used?

Are dilution wastestreams present at the sample location?	No	Is the CWF used at the facility?	No

How are the flows determined? ESTIMATED	Is the facility using dilution to meet its effluent limits? No

Should the facility be using the combined wastestream formula? No

Are there any new flows which need to be considered in the application of the combined wastestream formula? No

Are there any dilution flows which have not been accounted for? No

VIII. Chemical Storage

What chemicals are used at the facility?

CAUSTIC SODA
SULFURIC ACID
FERROUS SULFATE
FLOCCULENT (FLUX AID)

Can chemicals reach floor drains if spilled? No

Is chemical containment needed? No

How often are floors washed? What chemicals are used?

N/A

How often is equipment washed? What chemicals are used?

N/A

Does the facility have a slug control program? No

Has the facility had any past slug discharges? No

Amount of water used in washdowns (gals): N/A

IX. Production/Process Areas of the Industrial User

Are wastestreams separated at the facility? (Y/N)	YES	Are incompatible materials separated? (Y/N)	YES
Do floor drains/troughs lead to the POTW? (Y/N)	No	Are temporary hoses in place as part of production?	No
Are pipes labelled/color coded for easy identification?	YES	Is a piping diagram available at the facility?	YES

Attach a schematic of production, water flow, wastewater production, and a stepwise description of the production process at the facility.

Attach a stepwise description of the chemicals used and/or discharged during production.

Overall Inspection Comments

THE OLD PARTS WASHER HAS BEEN DISMANTLED AND A NEW ADDITION WITH A NEW WASHER HAS BEEN BUILT. THE NEW WASHER IS STATE OF THE ART.

Attachment A-7

El Dorado Water Utilities

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

July 22, 2005

Mr. Tommy Greer
Miller Transporters
P. O. Box 1392
El Dorado, AR 71731

Dear Mr. Greer:

Enclosed are the results of analysis, on samples collected from the final pit of your pretreatment system discharges during June 2005, with an invoice for the cost of the analysis.

The volatiles were below levels of concern. The June 7, 2005 sample contained 3.7 mg/l of chromium which is in violation of your discharge limit of 2.77 mg/l. Also the monthly average of 2.5 mg/l violates your maximum discharge limit of 1.71 mg/l. Please investigate the conditions of June 7, 2005 and respond in writing your findings and plan of corrective action.

You must continue to hold all further discharges until the results of analysis have been received and the batch deemed acceptable for discharge.

We will sample each batch at least for chromium and nickel.

Please feel free to contact me if you have any questions.

Sincerely,

T. Harold Baker
Treatment Superintendent

Enclosures

El Dorado Water Utilities

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

August 23, 2005

Mr. Tommy Greer
Miller Transporters
P. O. Box 1392
El Dorado, AR 71731

Dear Mr. Greer:

Enclosed are the results of analysis, on samples collected from the final pit of your pretreatment system discharges during July 2005, with an invoice for the cost of the analysis.

The volatiles were below levels of concern. All metals were below the daily maximum discharge limits. However, the chromium monthly average of 1.73 mg/l violates the maximum monthly discharge limit of 1.71 mg/l. This, along with the fact that your facility was in significant violation of the TRC conditions of your permit for chromium during the six month period January 2005 - June 2005, you shall be required to make necessary repairs or upgrades to your pretreatment facility to assure consistent compliance.

During a meeting with Mr. Tommy Jones and Mr. Ed Matlage on August 18, 2005 we discussed the fact that recently when discharges have exceeded the chromium limit, analysis were performed on the residue remaining in the trailers prior to washing that showed lower concentrations of chromium than the resultant discharge.

Based on this fact, we agreed that the first step shall be to rebuild the existing pits thus eliminating the possibility that metals are leaching from the existing pits. Please submit, no later than September 18, 2005, a compliance schedule to commence and complete the rebuild.

If after this project is completed, you continue to exceed the discharge limits you shall be required to install an acceptable metals removal technology in order to continue to discharge to the POTW.

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You must continue to hold all further discharges until the results of analysis have been received and the batch deemed acceptable for discharge.

We will sample each batch at least for chromium and nickel.

Please feel free to contact me if you have any questions.

Sincerely,

T. Harold Baker

T. Harold Baker
Treatment Superintendent

Enclosures

MILLER TRANSPORTERS, INC.

Good Move

Specialist
In Transporting Bulk
Commodities
Est. 1942

September 16, 2005

Responsible Care
A Public Commitment

Mr. T. Harold Baker
El Dorado Water Utilities
P O Box 1587
El Dorado, AR 71731

Dear Mr. Baker:

Per our phone conversation today I am requesting an extension until September 30, 2005 to have a compliance schedule put together and forwarded to your attention. We are just getting the bids in at this point and copies will be furnished with the schedule. I do not expect to need all the additional time requested but would not feel right about asking for another extension.

Please contact me if you require any further information at 601-922-8331 ext 256.

Sincerely,

Ed Matlage
Dir. Environmental Affairs

A-7d

El Dorado Water Utilities

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

September 22, 2005

Mr. Tommy Greer
Miller Transporters
P. O. Box 1392
El Dorado, AR 71731

Dear Mr. Greer:

Enclosed are the results of analysis, on samples collected from the final pit of your pretreatment system discharges during August 2005, with an invoice for the cost of the analysis.

The volatiles were below levels of concern. All metals were below the daily maximum discharge limits. However, the chromium monthly average of 1.9 mg/l violates the maximum monthly discharge limit of 1.71 mg/l.

You must continue to hold all further discharges until the results of analysis have been received and the batch deemed acceptable for discharge.

We will sample each batch at least for chromium and nickel.

Please feel free to contact me if you have any questions.

Sincerely,

T. Harold Baker

T. Harold Baker
Treatment Superintendent

Enclosures

A-7e

El Dorado Water Utilities

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

October 21, 2005

Mr. Tommy Greer
Miller Transporters
P. O. Box 1392
El Dorado, AR 71731

Dear Mr. Greer:

Enclosed are the results of analysis, on samples collected from the final pit of your pretreatment system discharges during September 2005, with an invoice for the cost of the analysis.

The volatiles were below levels of concern. All metals were below the daily maximum discharge limits. The September 27, 2005 and September 28, 2005 samples were above the discharge limit for chromium but since these two samples were not discharged, they do not count as violations against your facility.

You must continue to hold all further discharges until the results of analysis have been received and the batch deemed acceptable for discharge.

We will sample each batch at least for chromium and nickel.

Please feel free to contact me if you have any questions.

Sincerely,

T. Harold Baker

T. Harold Baker
Treatment Superintendent

Enclosures

A-75

Attachment A-8

MILBANK

To Whom It May Concern:

On December 9, 2005 a water sample was taken from our waste stream leaving our Waste Water Treatment system. The sample's zinc concentration was 2.6 mg/l. This level was above the monthly allowable average of 1.48 mg/l but below the daily maximum we are allowed. I believe that if we had been checked again in the month of December the average would have been below the 1.48 mg/l that we are allowed.

From telephone conversations you know that Milbank Mfg Co. El Dorado Plant switched chemical vendors on November 1, 2005. The chemical in our main wash tank was changed on this date. This new chemical contained an ingredient called a chelating agent that prevented our waste treatment system from removing zinc efficiently from our waste water stream. We did not know at the time of the switch that this new chemical was going to have such an adverse effect on our zinc level. As soon as the problem showed up we contacted our new chemical vendor to help us solve the problem.

We have worked with our new chemical vendor to develop a new wash system chemical without the chelating agent in the formula. We also have changed our waste water treatment chemicals to try breaking the chelating agent's bond with the zinc. We believe that our new combination of wash system and waste water chemical will keep our zinc level well below our monthly average as soon as all of the "zinc contaminated water" has left our waste water system completely(the concentrate tank plus a day's worth of processing water). This process of eliminating the "zinc contaminated water" in our holding tank is almost over at the writing of this letter. I believe the next monthly sample will yield a dramatic difference in our zinc levels leaving our waste water treatment system.

We have changed the wash system chemicals to remove this problem on January 6, 2005. The contents of the wash tank were pumped into a holding tank to be slowly treated by our waste water system. The zinc level of the holding tank is very high. The level is so high that we have to very slowly add it to our system to keep our zinc level reasonable.

IV. Certification

Based on my inquiry of the persons directly responsible for managing compliance with the TTO limitations, I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last report. I further certify that this facility is implementing this toxic organic pollutant management plan submitted to the Control Authority on December 23, 1986.

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

March 30, 2006
Date

Official's Signature

David Singleton
Official's Name

Plant Engineer
Official's Title

A-8b

El Dorado Water Utilities

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

February 23, 2006

Mr. Tom Galbraith
Milbank Mfg. El Dorado Division
P. O. Box 278
El Dorado, AR 71731

Dear Mr. Galbraith:

Enclosed are the results of analysis on samples collected from your categorical process waste stream and total plant flow January 2006.

The zinc concentration of 6.0 mg/l in your categorical waste stream and 4.1 mg/l in your total plant flow in the January 10, 2006 sample violates your daily maximum discharge limit of 2.63 mg/l. Also the 1.87 mg/l average for zinc during the month of January violates the maximum monthly average of 1.48 mg/l for your categorical process waste stream. Please investigate and respond in writing your findings and plan of corrective action to ensure that the zinc concentrations return to permit requirements.

We will sample at least twice monthly for zinc until a consistent pattern of compliance has been established

This completes the first half of your semi annual sampling requirements.

Feel free to contact me if you have any questions.

Sincerely,

T. Harold Baker

T. Harold Baker
Treatment Superintendent

Enclosures

A-8c

El Dorado Water Utilities

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

January 24, 2006

Mr. Tom Galbraith
Milbank Mfg. El Dorado Division
P. O. Box 278
El Dorado, AR 71731

Dear Mr. Galbraith:

Enclosed are the results of analysis on samples collected from your categorical process wastestream on December 9, 2005.

The zinc concentration of 2.6 mg/l was within the daily maximum discharge limit but is in violation of your maximum monthly average of 1.48 mg/l. Please investigate and respond in writing your findings and plan of corrective action to ensure that the zinc concentration returns to permit requirements.

Feel free to contact me if you have any questions.

Sincerely,

T. Harold Baker

T. Harold Baker
Treatment Superintendent

Enclosures

A-8d

Attachment A-9

TOXIC ORGANIC MANAGEMENT PLAN

Prepared for

COOPER-STANDARD AUTOMOTIVE
166 Cooper Drive
El Dorado, Arkansas 71730
(870) 862-6441

PURPOSE

The City of El Dorado's publicly owned treatment works (POTW) has incorporated an approved industrial pretreatment program in accordance with the overall objectives of the Clean Water Act and the General Pretreatment Regulations (40 CFR Part 403). The industrial pretreatment program has been established to enforce the general discharge prohibitions to the POTW and specific categorical pretreatment standards.

Under El Dorado's industrial pretreatment program, Cooper-Standard Automotive, has been classified as a significant categorical industrial user based on certain processes utilized at the facility and the quantity of effluent being discharged to the City's sanitary sewer system. A Wastewater Contribution Permit has been issued to Cooper by the City of El Dorado Division of Water Pollution Control which requires Cooper to monitor its discharge for certain pollutants on a regular basis and for this discharge to meet the categorical discharge limitations set forth in 40 CFR 433.17 for metal finishers and established local limits.

This Toxic Organic Management Plan (TOMP) has been prepared as an alternative to routine monitoring of toxic organic compounds in Cooper's El Dorado Cooper-Standard Automotive facility effluent.

This TOMP specifies the toxic organic compounds used throughout the facility, the method of disposal of the toxic organic compounds in lieu of discharging directly into the sanitary sewer system, and the procedures to be taken for assuring that toxic organics are not routinely spilled, leaked or dumped into the wastewater discharged to the City of El Dorado's sanitary sewer system.

This TOMP has been prepared in accordance with the US EPA's "Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards" and the City of El Dorado's approved pretreatment program.

I. Facility Description

Cooper-Standard Automotive's El Dorado, Arkansas facility manufactures various rubber products for the automotive industry. The majority of these products are sold as original equipment to motor vehicle manufacturers throughout North America and other countries around the world. Materials used in manufacturing operations include rubber, metal stampings and coating material.

Cooper-Standard Automotive is located at 166 Cooper Drive within the corporate limits of the City of El Dorado (See Figure 1, Site Location). Cooper acquired the existing facility and began production in October of 1964. The facility currently employees over 500 people, operating 24-hours per day, 7 days per week.

II. Facility Processes

Various rubbers, oils, carbon black and additives are mixed together to form a master stock of rubber. The master stock is then introduced to various other ingredients to form a final stock used in product manufacturing. The final stock is run through an extrusion process to form manageable rubber pieces for further processing.

Prefabricated metal stampings are run through a zinc phosphate line, which thoroughly cleans and applies a corrosion inhibitor to the metal prior to further processing. The cleaned metal stampings are then coated as specified on automated spray or dip paint lines and allowed to dry. Rubber is joined to the pre-coated stampings utilizing injection molding and conventional presses to form a specific product.

These manufactured products are run through various finishing processes, prior to being inspected and packaged for shipment.

III. Facility Wastewater

Contact and non-contact cooling waters, boiler blowdown water, fire system blowdown water, and steam condensate are all discharged to the City of El Dorado's sanitary sewer system.

Pretreated wastewater from the caustic cleaning line and wastewater from floor scrubbing operations, shower and restroom facilities, drinking fountains, hand sinks, autoclave operations and air compressor condensate are all discharged to the City of El Dorado's sanitary sewer system.

Wastewater from the caustic cleaning line is treated through a series type treatment process, which includes oil separation, neutralization, and precipitation with chemical addition for solids and metals removal. The solids are then run through a filter press for de-watering prior to

disposal. The pretreated effluent is discharged to the City sanitary sewer system. A line drawing showing the wastewater flow through the treatment system is depicted in Figure 2, Caustic Cleaner Wastewater Treatment System.

An updated line drawing showing the wastewater flow through the facility, which discharges to the City sanitary sewer system is depicted in Figure 3, Wastewater Flow Schematic.

A-9d

Figure 1

Site Location

A 9e

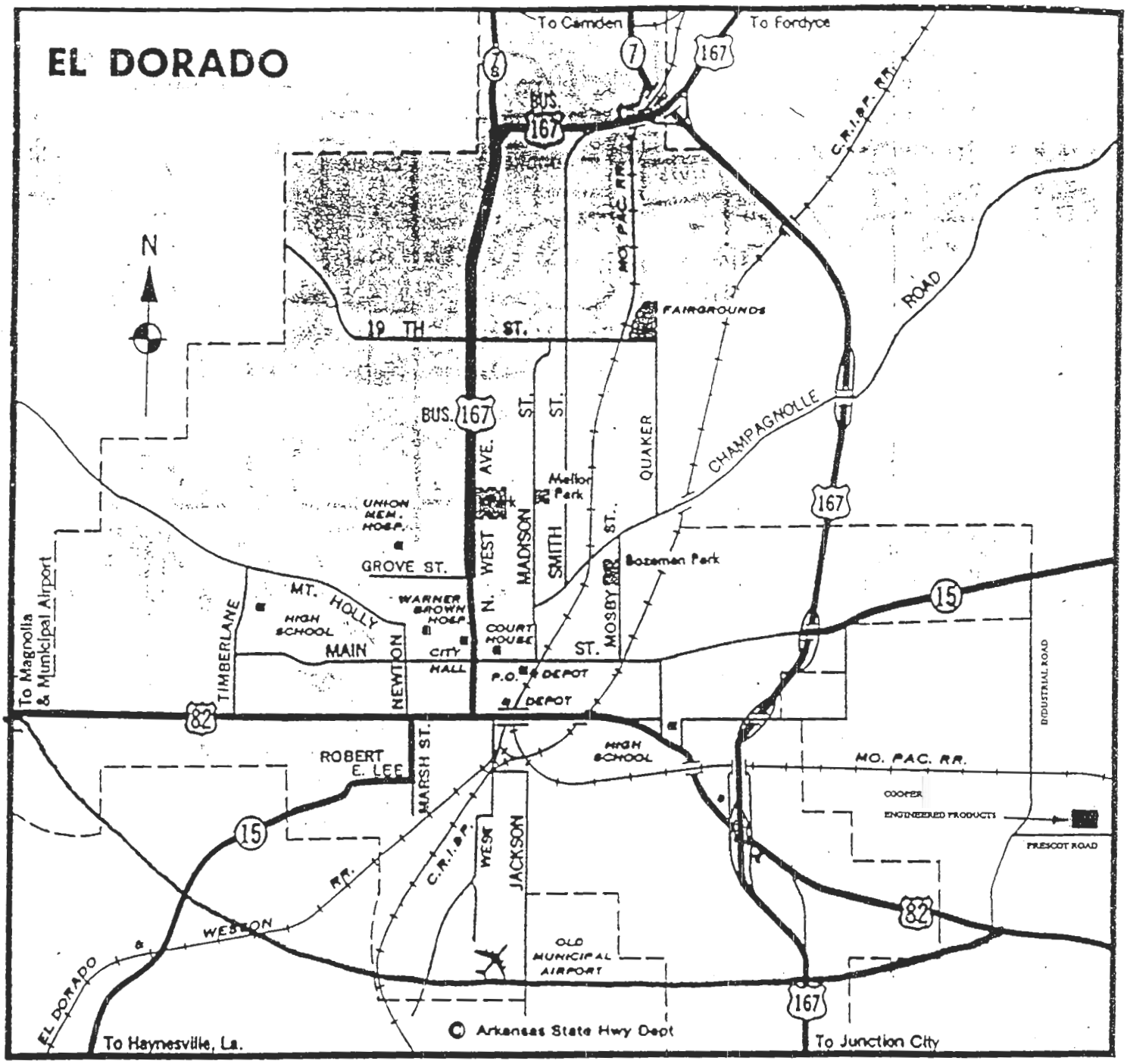
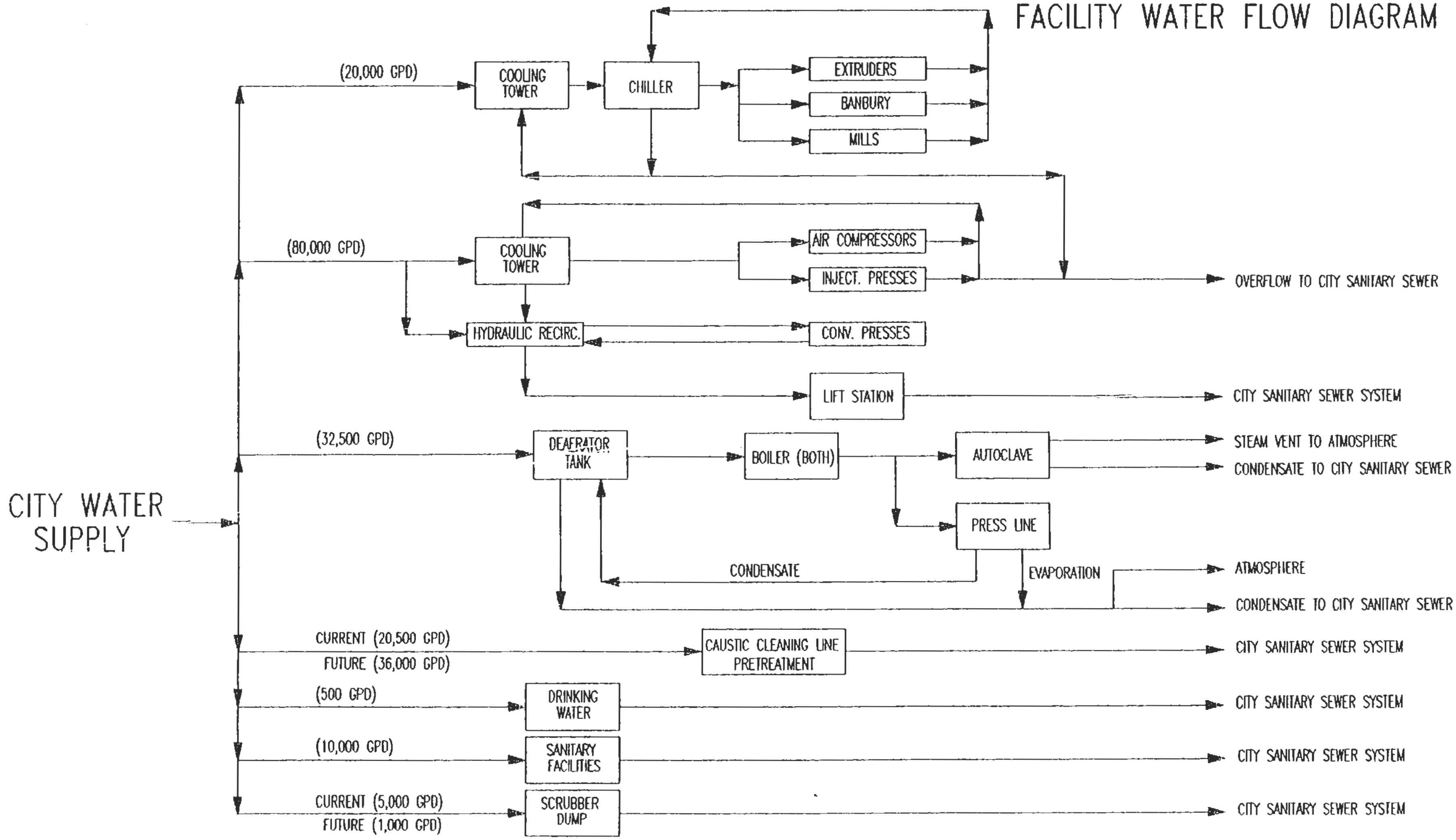


FIGURE 1
SITE LOCATION

FACILITY WATER FLOW DIAGRAM



REV. BY	DATE	REV. BY	DATE	REV. BY	DATE	REV. BY JTC	DATE 01-09-01	REV. BY JTC	DATE 06-02-00	SCALE: NONE	ENG. JOB NO.	TITLE	COOPER TIRE & RUBBER COMPANY
						REVISED PER CIPR. UPDATES		ISSUED FOR REVIEW		DATE: 06-01-00 / DRAWN BY: JTC / FILE NAME	CHECKED BY: / DATE: / APPROVED BY: / DATE:	COOPER STANDARD BLOCK FLOW DIAGRAM FACILITY WATER	EL DORADO, ARK. / D- 55930001 / REV 1

A-42

IV. Identification of Toxic Organic Chemicals Entering the Plant Wastewater

A. Identification of Toxic Organics Used in Manufacturing Operations

Phenol - contained in water treatment and testing chemicals.
Tetrachloroethylene - contained in an elastomer adhesive.
Xylene - contained in elastomer adhesives and a solvent.
Ethyl benzene - contained in elastomer adhesives, a heat cure coating, a solvent and in Safety-Kleen parts washer fluid.
Methyl Isobutyl Ketone - contained in elastomer adhesives and a solvent
Butylbenzyl phthalate – contained in a mixing ingredient
Carbon tetrachloride – contained in an elastomer adhesive
Methylene chloride – contained in gasket remover
Trichloroethylene – contained in a lubricant
Toluene - contained in a solvent, a heat cure coating, a black paint, a sealant and an elastomer adhesive.

B. Identification of Toxic Organics Used in Other Daily Operations

Benzene - contained in motor fuel.

C. Chemical Analysis of Treated Wastewater

Samples were taken of the plant's effluent for analysis for those individual toxic organic compounds listed in Part II (4)(A)(a) of the Indirect Discharge Permit which are reasonably expected to be present. Two (3) grab samples were taken for volatile pollutants and a grab sample was taken for acid and base neutrals. Samples were analyzed using approved EPA methods. The results of this analysis are included in Appendix A.

V. Toxic Organic Management Plan

As a result of the above analyses, Cooper-Standard Automotive believes that all of its toxic organic pollutant discharges can be controlled by a Toxic Organic Management Plan in lieu of routine toxic organic monitoring.

A. Release Prevention, Control and Counter-measure Plan (RPCC)

An RPCC plan has been developed to minimize the risk of unplanned releases of oil and hazardous substances from Cooper-Standard Automotive. The plan identifies all potential release sources throughout the facility and property, and presents the procedures and controls used to prevent toxic and hazardous atmospheric emissions, oil and hazardous

substances spills to surface waters and the sanitary sewer system, and harmful releases of hazardous substances to the subsurface environment.

B. Hazardous and Non-hazardous Material and Waste Storage

Hazardous and non-hazardous materials are stored in various locations throughout the plant. Only materials in use are typically present on the production floor to eliminate the possibility of accidents, spills or releases.

Wastes are properly packaged, stored and disposed of in accordance with local, state and federal regulations. Containment is provided at waste storage areas to prevent spills or runoff from migrating into the environment. No floor drains are present throughout the waste storage area.

C. Spent Solvent Disposal Practices

Spent solvents are collected in 55 gallon drums, and packaged, stored, and disposed of in accordance with local, state and federal RCRA regulations. Storage of the spent solvent is in a contained, well-ventilated area. No floor drains are present throughout. Cooper disposes of all spent solvents at approved permitted waste treatment, storage and/or disposal facilities in a timely manner.

D. Training

All personnel involved in production operations receive yearly instruction in the proper handling and disposal of wastes and clean-up materials in order to keep regulated toxic organics out of industrial wastewater.

E. Inspections

Waste storage areas are inspected weekly by the Environmental Coordinator to insure that hazardous and non-hazardous waste materials have not and are not being leaked or spilled into the plant sanitary sewer system.

F. Solvent Substitution

The plant is currently investigating the replacement of solvents in adhesives with water based adhesives in limited applications throughout the plant.

G. Implementation

All provisions of this plan are being fully implemented as of the certification date below.

VI. Certification

"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the City sanitary sewer system has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing this Toxic Organic Management Plan submitted to the City of El Dorado."

Lamar Hammons
Plant Manager
Cooper-Standard Automotive
(870) 862-6441

3/9/04
Date

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Appendix A

Wastewater Analytical Results

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AMERICAN INTERPLEX CORPORATION
LABORATORIES

8600 Kanis Road
Little Rock, AR 72204-2322
(501) 224-5060
FAX (501) 224-5072

REPORT

Cooper-Standard Automotive
166 Cooper Drive
El Dorado, AR 71730

March 2, 2004
Control No. 79348

ATTN: Mr. Jason Brock

Project Description: One (1) water sample(s) received on February 25, 2004
TOMP Sampling
P.O. No. E71129

Sample Identification: TOMP 1,TOMP2 2-24-04 11:30am
AIC No. 79348-1

Parameter	Method	Result	Batch	Time Analyzed By
Butylbenzyl phthalate	EPA 625	<2.5 ug/l	B2976	26FEB04 0926 226/97
Phenol	EPA 625	<1.5 ug/l	B2976	26FEB04 0926 226/97
Benzene	EPA 624	<4.4 ug/l	V4761	25FEB04 1524 167
Carbon tetrachloride	EPA 624	<2.8 ug/l	V4761	25FEB04 1524 167
Ethylbenzene	EPA 624	<7.2 ug/l	V4761	25FEB04 1524 167
Methylene chloride	EPA 624	<20 ug/l	V4761	25FEB04 1524 167
Tetrachloroethylene	EPA 624	<4.1 ug/l	V4761	25FEB04 1524 167
Toluene	EPA 624	<6 ug/l	V4761	25FEB04 1524 167
Trichloroethylene	EPA 624	<1.9 ug/l	V4761	25FEB04 1524 167

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Cooper-Standard Automotive
166 Cooper Drive
El Dorado, AR 71730

March 2, 2004
Control No. 79348

Parameter	% Recovery	Relative % Difference	Batch
Butylbenzyl phthalate	82.3	8.20	B2976
Phenol	54.8	8.01	B2976
Benzene	110	1.57	V4761
Carbon tetrachloride	111	2.25	V4761
Ethylbenzene	103	1.14	V4761
Methylene chloride	104	0.0986	V4761
Tetrachloroethylene	100	0.830	V4761
Toluene	105	0.391	V4761
Trichloroethylene	101	0.555	V4761

Data has been validated using standard quality control measures (blank, laboratory control, spike and spike duplicate) performed on at least 10% of samples analyzed. Quality Assurance, instrumentation maintenance and calibration were performed in accordance with guidelines established by the USEPA.
SM method = Standard Methods for the Examination of Water and Wastewaster, 20th edition, 1998.

TM/lims

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