

*"One Team, One Goal...Customer Service"*

870-239-7700  
Fax: 870-239-7798  
www.paragould.com

July 16, 2014

Mr. Allen Gilliam  
Pretreatment Coordinator  
Water Division  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Paragould Light Water and Cable (PLWC) NPDES #AR0033766  
Corrective Action Report on Pretreatment Program Audit/Assessment

Dear Mr. Gilliam:

Please find enclosed the Corrective Action Report for Paragould Light, Water and Cable based on the audit/assessment you conducted on our Pretreatment Program in May 2014.

If you have any questions or need additional information, please contact Lisa Ellington, Environmental Services Manager, at (870) 239-7795.

Sincerely,

Darrell Phillips  
General Manager/CEO

Enclosures

**Corrective Action Report**

**Pretreatment Program Audit**

**and**

**Pollution Prevention Assessment**

**NPDES Permit #AR0033766**

**Submitted by:**  
**Lisa Ellington**  
**Manager of Environmental Services**  
**Paragould Light, Water and Cable**  
**July 16, 2014**

## Required Actions

### Required Action 1:

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

During the file review, it was discovered BMPs (toxic organic management plans [TOMPs] and Slug Control Plans) were not included as Pretreatment requirements in applicable permits. The City must include these BMP implementation requirements in the appropriate section(s) of their applicable permits.

The "Effluent Limitations" page (see Attech. A-3b) must contain the BMPs such as "Implement approved TOMP". These could also be further described in Part III of PLWC's SIU permits (see beginning on Attach. A-3e).

Certification statements for PLWC's Metal Finishers are already being submitted semi-annually. Slug control plans' (SCPs) implementation certification statements would be considered an adequate semi-annual response from applicable SIUs they were implementing their submitted/approved SCPs.

### Response:

BMPs are now included in Part I – Effluent Limits of applicable industrial permits in accordance with **40 CFR 403(f)(1)(iii)(B)(3)**. In addition, a signed and notarized BMP implementation certification statement will be required from applicable IUs in January and July each year. See attached generic industrial permit for details.

### Required Action 2:

Under **40 CFR 403.12(b)(4)(i)&(ii)**, "The User shall submit information showing the measured average daily and maximum daily flow, in gallons per day, to the POTW from each of the following: (i) Regulated process streams; and (ii) Other streams as necessary to allow use of the combined wastestream formula of §403.6(e)."

2a) And under **40 CFR 403.12(g)(1)**, Monitoring and analysis to demonstrate continued compliance. "...the reports required in paragraphs (b), (d), (e), and (h) of this section shall contain the results of sampling and analysis of the Discharge, including the flow[s].. In addition, where the POTW itself collects all the information required for the report, including flow data, the Industrial User will not be required to submit the report."

It was discovered during the file review and conversations with the PLWC's Pretreatment personnel, there was no discrimination between process flows and non-process flows recorded at some of their permitted industries. Some industries' flow was recorded from their water usage records.

PLWC must monitor its industries' process and non-process flows and record separately. These flows must be verifiable even if the measurement system is a stop watch and a five (5) gallon bucket although calibrate-able flow meters would be the most acceptable method.

**Response:**

Currently, only one (1) permitted categorical IU does not have process or sanitary flow meters. Sampling personnel have been instructed to measure and record industrial flows of all IU process and non-process wastewater during each sampling visit, but no less than once per quarter.

**Recommended Actions**

**Recommendation 1:**

Strongly recommend escalating enforcement options beyond informal letters of non-compliance to Nidec if their zinc excursions continue. While it is recognized Nidec, PLWC and the chemical representative have been working together to rectify these violations, over a year's worth of data showing continuing zinc excursions was apparent and returning to compliance in a timely fashion was not.

The City's own enforcement response guide (Section 6, page 32 of PLWC's approved Pretreatment Program) states, "Range of Enforcement Responses" for "Recurring. [violations] of (discharge limits) with no known damage resulting" should result in a range of enforcement options beginning with a Notice of Violation to the most severe, "[issuing a] consent order with penalties".

It was discussed with PLWC's Pretreatment personnel to begin issuing formal notices of violations and escalating this enforcement option to consent orders if Nidec continues to violate its zinc limitations. It is felt more formal enforcement options may help the facility understand the gravity of continuing zinc violations even though they have not met the criteria of significant non-compliance.

**Response:**

PLWC understands the importance of escalating enforcement action towards IUs consistently violating IU permit effluent limits, and will do so when conditions warrant. However, Nidec is not in SNC due to the violations and were in compliance for the months of May 2014 and June 2014. Therefore, PLWC is not prepared at this time to escalate enforcement actions towards Nidec, and will closely monitor the Zinc concentrations to determine appropriate future action(s).

**Recommendation 2:**

Recommend investigating the stormwater (and other possible dilution) flows at Tenneco. There was some confusion between PLWC's Pretreatment rep and the Tenneco representative where the parking lot's stormwater was connected to. The Tenneco rep thought it was tied in with regulated wastewater before treatment. This is depicted on their wastewater flow schematic as

well as what appears as dilution coming from their "water cooler drain" and boilers' blowdown prior to treatment.

**Response:**

PLWC is currently working with Tenneco to determine all flows entering their waste treatment plant (WTP). Based on recent discussions, the parking lot's stormwater referred to by the Tenneco representative during the site visit is actually rainwater from the scrap metal storage containers, which cannot be released to the environment without proper treatment. Therefore, this flow to the WTP would be considered unregulated rather than a dilution wastestream as discussed with the State Pretreatment Coordinator on the afternoon of Friday June 27, 2014. In addition, PLWC is working with Tenneco to update schematic flow diagrams to produce comprehensive illustrations in describing all flows into the WTP for determining appropriate permit effluent limits.

**Recommendation 3:**

Recommend defining "composite" sample in IUs' permits. While it is understood by PWLC's sampling personnel their composite samples will all be timed, it is not confirmed or defined in the IUs' permits. If an industry flow proportioned its "composite" sample to confirm or argue a City's timed composite's results, the two samples' results could be quite different.

**Response:**

IU permits have been modified to include definitions for composite, grab and BMP. In addition, all sampling, including split sampling, is conducted by PLWC personnel. See attached generic industrial permit for details.

**Recommendation 4:**

Recommend including Pollution Prevention (P2) questions on the City's standard industrial user survey form. This will at least introduce P2 to the small businesses possibly causing them to further investigate and become more knowledgeable regarding money saving source reduction and best management practices.

**Response:**

The Industrial Wastewater Survey form has been updated to include questions regarding Pollution Prevention (P2), Best Management Practices (BMPs) and Environmental Management Systems (EMSs). See attached Industrial Waste Questionnaire form.

**Recommendation 5:**

Recommend sending the hazardous waste notification in 40 CFR 403.12(p) to the generators on the ADEQ list provided to the City's Pretreatment rep during the audit. Some of these small

businesses move around the country often, may be connected to the City one year and then closed down the next.

**Response:**

On June 5, 2014, hazardous waste notification letters were sent to IUs/businesses on the list provided by ADEQ during the audit.

**Recommendation 6:**

Recommend including a more comprehensive narrative in the IU inspections regarding the appearance and the maintenance of the industry's process and pretreatment equipment, tanks/supports, plumbing, pumps and other appurtenances. Rusting or leaking equipment should be noted and pointed out to the industry representative. Poor housekeeping is usually a direct reflection on how the industry's personnel follow their overall proper O&M.

**Response:**

While IUs inspection reports have current pictures showing the appearance of the IU process and pretreatment equipment, reports will be expanded to include a narrative on appearance and maintenance procedures of process and pretreatment equipment. See attached generic IU Inspection Report.

**Recommendation 7:**

Recommend including a more comprehensive narrative in the IU inspections regarding chemical handling procedures. This would begin with the virgin chemicals being brought in to their unloading dock; how they are transferred to their storage areas (fork lifts?); then from their central chemical storage area to their various work stations (via bucket? Barrel dollies? Overhead pumped through piping? Etc.). Understanding how bulk chemical are moved about the facility may help the City representative understand more about the potential of a slug discharge in case of an accident resulting in a large spill.

**Response:**

Chemical handling procedures on IU inspection reports will be expanded to include all modes of chemical transport from the unloading dock to usage area. See attached generic IU inspection report.

**Recommendation 8:**

PLWC personnel have an excellent beginning for their IUs' fact sheets. Continue (every permit cycle?) sending these fact sheets to the IUs' representatives to update, sign and date with any changes in processes or chemicals. Updated, detailed description of processes should be included as well as accurate manufacturing/process schematics should be required.

Non-regulated/dilute wastewater flows should also be included on these schematics. Other information in the fact sheets' schematics could include "flow" of work pieces as they travel through the various processes to the end product out the back door, materials' (especially haz waste) handling practices (totes, carboys, forklift, buckets, etc.), how chemicals are handled from point A to point B, and especially the sampling point(s) should be included. Actual pictures of the sampling point(s) are advisable.

**Response:**

IU fact sheets will continue to be updated on a regular basis (at least once per permit cycle). Accurate manufacturing and process schematics will be required with each new fact sheet, and PLWC will work with IUs to ensure schematics precisely describe manufacturing processes and pretreatment methods used within the facility. PLWC currently takes pictures of sampling points at each facility, and will continue this practice during site visits for attaching to inspection reports and fact sheets.

**Recommendation 9:**

Inspection reports which reference fact sheets where more information includes a detailed physical description of the IU's manufacturing processes is critical in understanding each significant industry's wastewater generating operations.

Once a comprehensive inspection is on file electronically for each IU, for the next annual inspection, this auditor would recommend City personnel use the previous year's completed inspection and "red ink" necessary updates or IU changes on that form instead of re-writing a new one each year that basically says the same thing, thus saving time. Obviously, new signatures with the inspection date would be necessary.

**Response:**

Electronic inspection reports have been used by PLWC for at least the past five (5) years. Current inspections are conducted using a copy of the previous inspection report and "red lining" updated information. The electronic files are then modified after each IU site visit to reflect any changes noted during inspection. In addition, inspection reports will reference IU fact sheets where one can find additional and detailed information on the IU. See attached generic IU inspection report.

**Recommendation 10:**

Recommend retain permitted industries' pertinent information such their most recent permit applications, updated TOMP's and Slug Control Plans. Recommend retaining any original baseline monitoring reports and 90-day compliance reports if they're still "findable". Those should not be recycled after three (3) years, but permanently kept in the IU's file.

**Response:**

As discussed in the Corrective Action Report for the Pretreatment Audit conducted in 2010, all IU files have been rework to recycle documents older than three (3) years. Pertinent information will be permanently retained in industrial files.

**Recommendation 11:**

Recommend continuing public outreach regarding proper disposal of grease, pharmaceuticals, non-dispersible "flushable" wipes and toxic household chemicals.

**Response:**

PLWC strives to educate the public on environmental and pollution issues through electronic media, informational videos and public service announcements. These educational practices will continue, and will be updated to reflect current issues and topics.



# **ATTACHMENT #1**

## **GENERIC INDUSTRIAL WASTES DISCHARGE PERMIT**



**INDUSTRIAL WASTES DISCHARGE PERMIT**

**PERMIT NO. ##-##**

In compliance with the provisions and conditions of the City of Paragould Ordinance No. 909 as amended by Ordinance No. 99-27, and also with any applicable provisions of Federal or State of Arkansas law or regulation,

[IU NAME]  
[IU ADDRESS]

is authorized to discharge industrial wastes from activities classified by NAICS No. 337215 from premises at the above address to the Paragould Wastewater Collection System in accordance with application for permit submitted on [DATE] to Paragould City Light, Water and Cable, effluent limitations, monitoring requirements, and conditions set forth in Parts I through VII hereof.

This permit shall become effective [DATE].

This permit and authorization to discharge shall expire at midnight on [DATE].

This permit is not transferable to persons, companies, or processes other than those to which it is originally issued.

Signed this [DATE] day of [MONTH, YEAR].

---

[PRINTED NAME AND TITLE OF SIGNEE]

PERMIT NO. ##-##

PART I - EFFLUENT LIMITATIONS

OUTFALL NO. 001 – PROCESS WASTEWATER: Process wastewater regulated by National Categorical Standard for Metal Finishers – 40 CFR 433.17, Pretreatment Standards for Existing Sources. Approximately 10,000 gpd process wastewater is discharged continuously from this outfall. This wastestream shall be monitored for the following listed pollutants, as set forth by Part II – Monitoring Requirements.

<u>Pollutant Parameter</u>	<u>Maximum for Any One Day</u>	<u>Maximum For Monthly Average</u>	<u>Sample Type</u>
Cadmium (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Composite <sup>4</sup>
Chromium (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Composite <sup>4</sup>
Copper (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Composite <sup>4</sup>
Lead (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Composite <sup>4</sup>
Nickel (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Composite <sup>4</sup>
Silver (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Composite <sup>4</sup>
Zinc (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Composite <sup>4</sup>
Cyanide (T), mg/l	[LIMIT] <sup>1</sup>	[LIMIT] <sup>1</sup>	Grab <sup>3</sup>
TTO's, mg/l	[LIMIT] <sup>1</sup>		Comp/Grab <sup>3,4</sup>
pH, S.U.	5.5 – 11.5 <sup>2</sup>		Grab <sup>3</sup>
Oil & Grease, mg/l	100 <sup>2</sup>		Grab <sup>3</sup>
Heat (Temperature)	104° F (40° C) <sup>2</sup>		Grab <sup>3</sup>

Implementation of Best Management Practice(s)<sup>5</sup>

Toxic Organic Management Plan	Submit Certification Reports twice a year
Slug Control Plan	(January and July)

<sup>1</sup>Process wastewater per 40 CFR 433.17, Pretreatment Standards for New Sources--Metals Finishers.

<sup>2</sup>Local Sewer Use Ordinance.

<sup>3</sup>Grab - A sample which is taken from a wastestream on a one-time basis without consideration of the flow rate of the wastestream and without consideration of time.

<sup>4</sup>Composite – Sample composed of two or more discrete samples based on time. The aggregate sample will reflect the average water quality covering the compositing or sample period.

<sup>5</sup>Best Management Practice (BMP) – A permit condition used in place of or in conjunction with effluent limitations to prevent or control the discharge of pollutants. BMPs may include a schedule of activities, prohibition of practices, maintenance procedure, or other management practice.

**Part I – Effluent Limitations (Continued)**

OUTFALL NO. 002 – EFFLUENT DOMESTIC SANITARY SEWAGE FLOW: Effluent domestic sanitary sewage flow shall be randomly monitored for the following listed pollutants as set forth by Part II – Monitoring Requirements:

<u>Pollutant Parameter</u>	<u>Maximum for Any One Day</u>	<u>Maximum For Monthly Average</u>	<u>Sample Type</u>
Cadmium (T), mg/l		REPORT ONLY	Composite <sup>3</sup>
Chromium (T), mg/l		REPORT ONLY	Composite <sup>3</sup>
Copper (T), mg/l		REPORT ONLY	Composite <sup>3</sup>
Lead (T), mg/l		REPORT ONLY	Composite <sup>3</sup>
Nickel (T), mg/l		REPORT ONLY	Composite <sup>3</sup>
Silver (T), mg/l		REPORT ONLY	Composite <sup>3</sup>
Zinc (T), mg/l		REPORT ONLY	Composite <sup>3</sup>
Cyanide (T), mg/l		REPORT ONLY	Grab <sup>2</sup>
TTO's, mg/l		REPORT ONLY	Comp/Grab <sup>2,3</sup>
pH, S.U.	5.5 – 11.5 <sup>1</sup>		Grab <sup>2</sup>
Oil & Grease, mg/l	100 <sup>1</sup>		Grab <sup>2</sup>
Heat (Temperature)	104° F (40° C) <sup>1</sup>		Grab <sup>2</sup>

<sup>1</sup> Local Sewer Use Ordinance.

<sup>2</sup> Grab - A sample which is taken from a wastestream on a one-time basis without consideration of the flow rate of the wastestream and without consideration of time.

<sup>3</sup> Composite – Sample composed of two or more discrete samples. The aggregate sample will reflect the average water quality covering the compositing or sample period.

**PERMIT NO. ##-##**

**PART II - MONITORING REQUIREMENTS**

- 1) [IU NAME] shall provide sampling access facilities on its process waste lines at points before process wastes have mixed with other wastestreams from its premises. The location of this sampling point is described in PART II - 7 below.

The location, configuration and equipment contained in the sampling access facilities shall be as approved by the Paragould Light, Water & Cable (PLWC) Manager.

- 2) Sampling and analysis of industrial waste discharged into the Paragould Wastewater Collection System shall be performed by PLWC.

The sampling and analyses shall be performed in accord with 40 CFR 136, as amended, or other test procedure approved by the Approval Authority.

- 3) [IU NAME] shall pay to PLWC the costs of the required sampling and analyses.

- 4) [IU NAME] may, upon their request, obtain a portion of the samples for their analyses. The splitting of samples shall be performed only by authorized PLWC personnel.

- 5) The sampling of process wastewater shall be randomly performed at frequency determined by PLWC. The frequency of compliance monitoring shall in no case be less than that required for significant industrial users by 40 CFR 403.12--twice per year. The analyses shall be performed on 24-hour time proportioned composite samples, except that temperature, pH, cyanide, total phenols, volatile organics, sulfides, and oil and grease analyses shall be performed on grab samples.

- 6) [IU NAME] shall keep daily records of total and process wastewater discharged to the PLWC Wastewater Collection System. Daily records of total and process wastewater discharged to the PLWC Wastewater Collection System, shall, upon request, be reported in writing to the PLWC Manager or his designated representative.

- 7) The [IU NAME] sampling points shall be:

Outfall No. 001 – Effluent Process Wastewater. Monitoring facility on [IU NAME] process wasteline located approximately 20 feet outside the back (South side) center of the [IU NAME] building.

---

**Part II - Monitoring Requirements (Continued)**

Outfall No. 002 – Effluent Domestic Sanitary Sewage: Monitoring station in the east manhole on domestic sanitary sewage outfall located south of the approximate midpoint of the [IU NAME] building between the [IU NAME] building and the lift station to the PLWC POTW.

- 8) Samples shall be taken on production and/or cleanup days. The day of the week on which the samples are taken may be varied and shall be determined by the PLWC Manager.
- 9) In lieu of the requirements for monitoring for TTO, [IU NAME] may certify that no toxic organic compounds are stored, used or generated by the industry or that toxic organic compounds are controlled by the implementation of a solvents management plan approved by the PLWC Manager. To qualify for waiver of monitoring for TTO, the certification on the following page shall be provided by [IU NAME] each time compliance monitoring is performed by PLWC.
- 10) In cases where the Pretreatment Standard requires compliance with a Best Management Practice (BMP), [IU NAME] must ensure a current copy is on file with PLWC. In addition, [IU NAME] must implement the BMP and document actions required by the Pretreatment Standard. Documentation of BMP implementation must be submitted to PLWC in January and July of each year to determine the compliance status of [IU NAME]. The BMP certification statement can be found on page 7 of this permit.

REVISION DATE

PERMIT NO. ##-##

TOTAL TOXIC ORGANICS CERTIFICATION STATEMENT

Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation, or pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since the last scheduled compliance monitoring for TTO by PLWC. I further verify that this facility is implementing the toxic organic management plan submitted to PLWC.

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.

\_\_\_\_\_  
Typed Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title (President, Secretary, Treas. or Vice-Pres.)

\_\_\_\_\_  
Date of Signature

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS, COUNTY OF \_\_\_\_\_

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_ of \_\_\_\_\_, a corporation, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
Notary Public in and for \_\_\_\_\_

County, Arkansas

My commission expires: \_\_\_\_\_

REVISION DATE

PERMIT NO. ##-##

**BEST MANAGEMENT PRACTICE (BMP) CERTIFICATION STATEMENT**

I certify that [IU NAME] has implemented the following Best Management Practice(s) (BMPs) on file at Paragould Light, Water and Cable during the period from \_\_\_\_\_ to \_\_\_\_\_ Furthermore, I certify that [IU NAME] will continue such implementation of BMPs during the period from \_\_\_\_\_ to \_\_\_\_\_

BMPs on file at PLWC:

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.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Typed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date of Signature

CORPORATE ACKNOWLEDGMENT  
STATE OF ARKANSAS )

COUNTY OF \_\_\_\_\_)

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_ of \_\_\_\_\_, a corporation, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
Notary Public in and for \_\_\_\_\_ County, Arkansas

My commission expires: \_\_\_\_\_



**PERMIT NO. ##-##**

**PART III - CONDITIONS OF PERMIT**

- 1) [IU NAME] shall pay to PLWC an annual amount of \$500.00, which represents the costs incurred by PLWC in evaluating, issuance and maintenance of this permit.
- 2) Plans and specifications for monitoring access facilities and for pretreatment facilities shall be approved by the PLWC Manager prior to construction.
- 3) [IU NAME] shall notify the PLWC Manager of Environmental Services immediately (telephone no. 239-7795) once aware of any spill/slug loading of any pollutant released to the Paragould Sewer System in such strength and/or volume as to cause interference in the Wastewater Treatment Plant or cause conditions hazardous to operating personnel, equipment, the general public, or the environment. Notifications of such spills/slug loadings which occur at night or on weekends should be made to the PLWC Dispatcher (telephone no. 239-7700). Immediate appropriate action shall be taken by [IU NAME] to mitigate any adverse effects of spills/slug loadings.
- 4) [IU NAME] shall notify the PLWC Manager in advance, in writing, of any change in production or treatment processes which would significantly affect either the volume or character of wastewaters discharged to the Paragould Sewer System.
- 5) [IU NAME] shall maintain documentation of the disposal of sludge or other materials classified as "Hazardous Wastes" by a method and at a site approved by appropriate State and Federal Regulatory Agencies.
- 6) [IU NAME] shall, in compliance with 40 CFR 403.12(P)(1), notify the Manager of PLWC, EPA Region VI Waste Management Division and the Arkansas Department of Pollution Control and Ecology Hazardous Waste Division in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR 261.
- 7) For the purpose of determining whether the Paragould Municipal Code and/or any permit or order issued thereunder is being met and whether [IU NAME] is complying with all requirements thereof, the PLWC Manager and/or his authorized representative shall have access to production, materials storage and wastewater pretreatment areas of the [IU NAME] plant. Such access shall include ready access to all parts of the premises for the purpose of inspection, sampling, records examination and copying, and the performance of any additional duties. [IU NAME] shall retain for a minimum of three years any records of wastes discharge monitoring activities and results and shall

---

**Part III - Conditions of Permit (Continued)**

make such records of monitoring available for inspection and copying by the PLWC Manager or his designated representative. Access shall be during production and/or cleanup shifts. Upon presentation of suitable identification, the PLWC Manager or his designated representative shall be permitted to enter without delay, for the purposes of performing the above duties:

- 8) This permit may be reopened by PLWC any time during the effective duration for revisions to discharge limitations, monitoring and/or reporting requirements or conditions.
- 9) Provided that [IU NAME] has submitted an acceptable application for renewal at least three months prior to the expiration date of this permit set forth on the permit cover sheet, this permit shall remain in effect, beyond the expiration date, until the PLWC Manager has either issued a renewal permit or has notified the permittee in writing that renewal of the permit is denied.
- 10) [IU NAME] shall be subject to applicable civil and criminal penalties for violations of pretreatment standards and requirements and provisions and conditions of this permit as provided for by Arkansas State Statutes and the Paragould Municipal Code.

**PERMIT NO. ##-##**

**PART IV – STATEMENT OF BASIS FOR PERMIT LIMITS**

Process wastewater discharged from Outfall 001 limits are as stipulated by 40 CFR 433.17, Metal Finishing Pretreatment Standards for New Sources.

Metal Finishing operations employed by [IU NAME] Outfall 001 consists of [PROCESS]. Limits are taken directly from 40 CFR 433.17.

**40 CFR 433.17 – Pretreatment Standards for New Sources, Metal Finishing**

Pollutant or pollutant property	Maximum for any 1 day	Maximum for monthly average
	Milligrams per Liter (mg/L)	
Cadmium (T)	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead(T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide	1.20	0.65
TTO	2.13	

Limits for pH, Temperature, BOD<sub>5</sub>, TSS and Oil & Grease are stipulated by the Paragould Sewer Use – Pretreatment Ordinance.

PERMIT NO. ##-##

**PART V – PROHIBITIONS**

1) **General Prohibitions**

No industrial user shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass-through or interference.

2) **Specific Prohibitions**

In addition to the General Prohibitions listed above, the following pollutants may not be introduced into the POTW.

- a) Pollutants which create a fire or explosive hazard in the municipal wastewater collection system and POTW, including, but not limited to, wastestreams having a closed cup flashpoint of less than 140° F (60° C) using the test methods specified in 40 CFR 261.21.
- b) Any wastewater having a pH of less than 5.5 S.U. or more than 11.5 S.U., or otherwise causing corrosive structural damage to the POTW equipment or endangering PLWC personnel.
- c) Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in interference, but in no case solids greater than one-half (1/2) inches (1.27 centimeters) in any dimension.
- d) Any wastewater containing pollutants, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW, or any wastewater treatment or sludge process, or which will constitute a hazard to humans or animals.
- e) Any wastewater having a temperature greater than 150° F (65° C); or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104° F (40° C).
- f) Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass-through.
- g) Any pollutants which results in the presence of toxic gases, vapors or fumes within the POTW in a quantity that may cause acute worker health and safety problems.
- h) Any trucked or hauled pollutants, except at discharge points designated by the Paragould Light and Water Commission in accordance with the Paragould Sewer Use – Pretreatment Ordinance.
- i) Any noxious or malodorous liquids, gases, solids or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance, a hazard to life, or to prevent entry into the sewer system for maintenance and repair.

---

**Part V - Prohibition (Continued)**

- j) Any wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent thereby violating Paragould's NPDES permit.
- k) Any wastewater containing any radioactive wastes or isotopes except as specifically approved by the Paragould Light and Water Commission in an Industrial Waste Discharge Permit in compliance with applicable State or Federal regulations.
- l) Storm water, surface water, ground water, artesian well water, roof runoff, subsurface drainage, swimming pool drainage, condensate, deionized water, noncontact cooling water and unpolluted industrial wastewater, unless specifically authorized by the Paragould Light and Water Commission in an Industrial Waste Discharge Permit.
- m) Any sludges, screenings or other residues from the pretreatment of industrial wastes.
- n) Any medical wastes, except as specifically authorized by the Paragould Light and Water Commission in an Industrial Waste Discharge Permit.
- o) Any wastewater causing the treatment plant's effluent to fail a toxicity test.
- p) Any wastes containing detergents, surface active agents, surfactants or other substances which may cause excessive foaming or scum in the POTW.
- q) Any discharge of fats, oils or greases of animal, vegetable or mineral origin is limited to one hundred (100) mg/L.

**3. Prohibition of Bypass**

Bypass means the intentional diversion of wastestreams from any portion of an Industrial User's treatment facility. Bypass is prohibited and enforcement action may be taken against an Industrial User unless:

- a) the bypass was unavoidable to prevent loss of life, personal injury or severe property damage; and
- b) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance.

PERMIT NO. ##-##

**PART VI – VIOLATIONS AND SUSPENSIONS**1) **Significant Violations**

The Paragould Light and Water Commission shall publish annually, in the largest daily newspaper published in the municipality where the POTW is located, a list of the industrial users which, during the previous 12 months were in significant noncompliance with applicable pretreatment standards and requirements. The term significant noncompliance shall mean:

- a) Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of wastewater measurements taken during a six-month period, as determined by EPA Region 6 criteria, exceed the daily maximum limit or average limit for the same pollutant parameter by any amount;
- b) Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a 6-month period equals or exceeds the product of the daily maximum limit or the average limit multiplied by the applicable criteria [1.4 for BODs, TSS, Fats, Oils and Grease; 1.2 for all other pollutants except pH];
- c) Any other discharge violation that the Paragould Light and Water Commission believes has caused, alone or in combination with other discharges, interference or pass-through (including endangering the health of the Paragould Light and Water Commission personnel or general public);
- d) Any discharge of pollutants that has caused imminent endangerment to the public or to the environment, or has resulted in the Paragould Light and Water Commission exercising its emergency authority to halt or prevent such a discharge;
- e) Failure to meet, within 90 days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction or attaining final compliance;
- f) Failure to provide within 30 days after the due date, any required reports, including baseline monitoring reports, 90 day compliance reports, periodic self-monitoring reports and reports on compliance with compliance schedules;
- g) Failure to accurately report noncompliance; and/or
- h) Any other violation(s) which the Paragould Light and Water Commission determines will adversely affect the operation or implementation of the local pretreatment program.

---

Part VI – Violations and Suspensions (Continued)

## 2) Emergency Suspensions

The Paragould Light and Water Commission may immediately suspend a user's discharge (after informal notice to the user which may be verbal and directed to any owner, manager or person in charge or in possession of the user) whenever such suspension is necessary in order to stop an actual or threatened discharge which reasonably appears to be present or cause an imminent or substantial endangerment to the health or welfare of persons. The Paragould Light and Water Commission may also immediately suspend a user's discharge (after notice and opportunity to respond) that threatens to interfere with the operation of the POTW, or which presents or may present an endangerment to the environment.

- a) Any user notified of a suspension of its discharge shall immediately stop or eliminate its contribution. In the event of a user's failure to immediately comply voluntarily with the suspension order, the Paragould Light and Water Commission shall take such steps as deemed necessary, including immediate severance of the sewer connection, to prevent or minimize damage to the POTW, its receiving stream or endangerment to any individuals. The Paragould Light and Water Commission shall allow the user to recommence its discharge when the user has demonstrated to the satisfaction of the Paragould Light and Water Commission that the period of endangerment has passed, unless the termination proceedings set forth in the Paragould Sewer Use – Pretreatment Ordinance are initiated against the user.
- b) A user that is responsible, in whole or in part, for any discharge presenting imminent endangerment shall submit a detailed written statement describing the causes of the harmful contribution and the measures taken to prevent any future occurrence to the Paragould Light and Water Commission, prior to the date of any show cause or termination hearing as detailed in the Paragould Sewer Use – Pretreatment Ordinance.

## 3) Termination of Discharge

In addition to those provisions in the Paragould Sewer Use – Pretreatment Ordinance, any user that violates the following conditions of the Paragould Sewer Use – Pretreatment Ordinance, wastewater discharge permits or orders issued hereunder, is subject to discharge terminations.

- a) Violation of wastewater discharge permit conditions.
- b) Failure to accurately report wastewater constituents and characteristics of the discharge.

Part VI – Violations and Suspensions (Continued)

- c) Failure to report significant changes in operations or wastewater volume, constituents and characteristics prior to discharge.
- d) Refusal of reasonable access to the user's premises for the purpose of inspection, monitoring or sampling.
- e) Violation of the pretreatment standards in the Paragould Sewer Use – Pretreatment Ordinance.

Such user will be notified by the PLWC Manager of the proposed termination of its discharge and be offered an opportunity to show cause as detailed in the Paragould Sewer Use – Pretreatment Ordinance why the proposed action should not be taken.



**PERMIT NO. ##-##**

**PART VII – TRANSFER OF PERMIT**

Wastewater discharge permits may be reassigned or transferred to a new owner and/or operator only if the permittee gives at least thirty (30) days advance notice to the Paragould Light and Water Commission and the Paragould Light and Water Commission approves the wastewater discharge permit transfer. The notice to the Paragould Light and Water Commission must include a written certification by the new owner and/or operators which:

- a) states that the new owner and/or operator has no immediate intent to change the facility's operations and processes;
- b) identifies the specific date on which the transfer is to occur; and
- c) acknowledges full responsibility for complying with the existing wastewater discharge permit.

Failure to provide advance notice of a transfer renders the wastewater discharge permit voidable on the date of facility transfer.

# **ATTACHMENT #2**

## **GENERIC INDUSTRIAL USER INSPECTION REPORT**

PARAGOULD LIGHT, WATER & CABLE  
INDUSTRIAL USER INSPECTION REPORT

DATE OF INSPECTION: [DATE]

TIME OF INSPECTION: [TIME]

INSPECTED BY: [PLWC REP]

CONTACTS: [IU REP]

PHONE NUMBER: [CONTACT INFO]

NAME & ADDRESS OF INDUSTRIAL FACILITY:

[IU NAME]

[IU ADDRESS]

PLWC PERMIT INFORMATION:

Permit #: [PLWC PERMIT #]

Effective: [DATE]

Expires: [DATE]

SIC #: [APPLICABLE SIC #]

NAISC #: [APPLICABLE NAISC #]

OTHER ENVIRONMENTAL PERMITS:

[LIST OTHER ENVIRONMENTAL PERMITS HELD BY IU]

BACKGROUND INFORMATION:

[DESCRIBE BACKGROUND INFORMATION; INCLUDE START DATE OF PRODUCTION,  
TYPE OF INDUSTRY, ETC.]

\_\_\_\_\_  
Printed Name of Industrial Representative

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name of PLWC Representative

\_\_\_\_\_  
Signature

REVISION DATE

CHANGES IN PROCESSES, PRODUCTS, CHEMICALS OR PRETREATMENT SINCE LAST INSPECTION ON [DATE]:

ANTICIPATED CHANGES TO PROCESSES, PRODUCTS, CHEMICAL OR PRETREATMENT AND TIME FRAME FOR CHANGES:

WAS IU IN COMPLIANCE FOR THE LAST MONITORING PERIOD?  YES  NO

IF NO, LIST VIOLATIONS AND DATE OCCURRED:

LAST DATE OF CALIBRATION FOR FLOW MONITORING EQUIPMENT:

POLLUTION PREVENTION ACTIVITIES: DOES THE IU EMPLOY ANY OF THE FOLLOWING TO ENCOURAGE AND IMPLEMENT POLLUTION PREVENTION ACTIVITIES?

- |   |                              |                             |
|---|------------------------------|-----------------------------|
| A) In-house environmental teams*  | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| B) Incentive programs for employee input on recycling, process improvement of other pollution prevention activities | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| C) Others:  | <input type="checkbox"/> YES | <input type="checkbox"/> NO |

\*Have a green team who meet weekly to discuss recycling and ways to reduce waste; also have a Leadership Board – they promote and reward recycling and reducing waste in the home.

POLLUTION PREVENTION PRACTICES AND ACTIVITIES IN PLACE:

- |                          |                              |                             |
|--------------------------|------------------------------|-----------------------------|
| A) Counter-Current Flows | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| B) Air Knives            | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| C) Fog Rinses            | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| D) Flow Controllers      | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| E) Conductivity Meters   | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| F) Others:               | <input type="checkbox"/> YES | <input type="checkbox"/> NO |

[DESCRIBE OTHER POLLUTION PREVENTION ACTIVITIES OF IU]

ARE BMPs ON FILE AT PLWC?  YES  NO  
IF YES, HAVE BMPs BEEN IMPLEMENTED BY FACILITY?  YES  NO

REVISION DATE

PRETREATMENT FACILITIES OPERATION AND MAINTENANCE:

- |    |   |                              |                             |
|----|---|------------------------------|-----------------------------|
| A) | Standby power or other equivalent provisions provided**     | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| B) | Adequate alarm system for power of equivalent failures      | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| C) | Sludges and solids adequately disposed                      | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| D) | All treatment units in service                              | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| E) | Consulting Engineer   | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
|    | Name: Andy Stickler   |                              |                             |
| F) | Qualified operating staff                                   | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| G) | Established procedures available for training new operators | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
|    | Training Provided by: In-house or Andy Stickler             |                              |                             |
| H) | Instruction files kept for O & M of all new major equipment | <input type="checkbox"/> YES | <input type="checkbox"/> NO |
| I) | Operation and Maintenance manual maintained                 | <input type="checkbox"/> YES | <input type="checkbox"/> NO |

RECORDS AND REPORTS:

- |    |  |                              |                             |                              |
|----|--|------------------------------|-----------------------------|------------------------------|
| A) | Adequate Records Maintained of:                        |                              |                             |                              |
|    | I) Sampling date, time and exact location              | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
|    | II) Analyses dates and times                           | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
|    | III) Individual performing analyses                    | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
|    | IV) Analytical methods/techniques used                 | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
|    | V) Analytical results                                  | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
| B) | Lab equipment calibration and maintenance records kept | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
| C) | Quality Assurance Records kept                         | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |

LABORATORY PROCEDURES\*:

- |    |  |                              |                             |                              |
|----|--|------------------------------|-----------------------------|------------------------------|
| A) | EPA approved analytical testing procedures used                                | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
| B) | If alternate analytical procedures are used, proper approval has been obtained | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
| C) | Quality control procedures used  | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
| D) | Commercial Laboratory used   | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
|    | [NAME OF COMMERCIAL LABORATORY]  |                              |                             |                              |
|    | [ADDRESS OF COMMERCIAL LABORATORY]   |                              |                             |                              |

\*NOTE: All sampling performed by PLWC personnel. Analyses performed by PLWC or American Interplex.

REVISION DATE

TOXIC ORGANICS MANGEMENT PLAN:

- A) Description of observed regulated processes and discharges.

[LIST ALL SOURCES OF WASTEWATER AND APPROXIMATE DISCHARGES]  
[DESCRIBE PROCESSES DISCHARGING REGULATED WASTESTREAMS]

- B) Description of stored chemicals.

[LIST ALL STORED CHEMICALS AND APPEARANCE OF STORAGE UNIT; INCLUDE PICTURES]

- C) Description of chemical handling procedures.

[EXPAND SECTION TO INCLUDE ALL MODES OF CHEMICAL HANDLING PROCEDURES FROM UNLOADING OFF TRUCK TO HOW CHEMICAL(S) ARE TRANSPORTED TO PROCESS/TREATMENT AREA FOR USE]

- D) Procedures for notification of POTW of slugs or spilled discharges.

Notify PLWC immediately; Environmental Services Manager at 239-7795 or SCADA Operator at 239-7700.

- E) Are notification procedures posted in a prominent place for employees?  YES  NO

- E) Procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, worker training, containment structures.

[EXPLAIN IU PROCEDURES FOR PROTECTING EMPLOYEES AND POTW]

- F) Floor drains accessible from storage and chemical usage areas.

[DESCRIBE LOCATION OF FLOOR DRAINS IN PRODUCTION AREA]

- G) Manifests of shipments of hazardous wastes to proper disposal.

[INCLUDE COMPANY RESPONSIBLE FOR PICKUP AND DISPOSAL OF HAZ WASTE]

- H) Does SIU have a TTO limit in permit?  YES  NO  n/a

- I) Does SIU have an approved plan to control slug discharges or a Toxic Organics Management Plan?  YES  NO  n/a

- J) Evaluation of TOMP need.  YES  NO  n/a

PHYSICAL DESCRIPTION OF MANUFACTURING PROCESSES:

[DESCRIBE PROCESSES; INCLUDE NARRATIVE ON APPEARANCE OF PROCESSING AND PRETREATMENT SYSTEMS; INCLUDE PICTURES]

WASTEWATER GENERATING OPERATIONS AND FLOWS:

[PROCESS DESCRIPTION]                      Average = [#]                      Maximum = [#]

OTHER SOURCES OF WASTEWATER:

[DESCRIPTION OF DISCHARGE]                      Average = [#]                      Maximum = [#]

REGULATED WASTESTREAM(S):

[DESCRIBE APPLICABLE STANDARDS ON REGULATED DISCHARGES]

FLOW OF RAW MATERIAL AS IT GOES THROUGH PROCESSES TO END PRODUCT(S):

[DESCRIBE MANUFACTURING PROCESS FLOW]

Approximate number of employees:                      [#]  
Number of shifts:                      [DAYS WORKED; # SHIFTS]  
Average number of hours/week:                      [HOURS PER DAY/ DAYS PER WEEK]

DESCRIPTION OF PRETREATMENT SYSTEM(S):

[NARRATIVE ON PRETREATMENT SYSTEM(S)]

COMMENTS:

For more detailed information concerning [IU NAME], please refer to the [IU NAME] fact sheet.

RESPONSIBLE OFFICIAL: [NAME AND TITLE]

REVISION DATE

Pictures at [IU NAME]

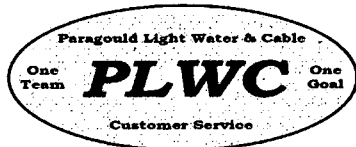
[WHEN POSSIBLE, INCLUDE PICTURES OF PROCESSES, PRETREATMENT EQUIPMENT, DISCHARGES, FLOW METERING EQUIPMENT, CHEMICAL STORAGE AREAS, ETC.; PROPERLY LABEL EACH PICTURE]

REVISION DATE



# **ATTACHMENT #3**

## **INDUSTRIAL WASTE QUESTIONNAIRE**



Lisa Ellington  
 Environmental Services Division  
 P.O. Box 9  
 Paragould, AR 72450  
 Phone (870) 239-7795

## PARAGOULD LIGHT, WATER & CABLE (PLWC) INDUSTRIAL WASTE QUESTIONNAIRE

PLWC is required by EPA to identify and evaluate the impacts of non-domestic discharges to the sanitary sewer system. In order to comply with this requirement, we are asking that your company fill out this questionnaire. The information provided will be used to update our Wastewater Pretreatment files and assist us in monitoring what types of wastes are being discharged into the City's sanitary sewer system. Anyone who does not respond to this questionnaire will be in violation of the Paragould Sewer Use – Pretreatment Ordinance. Please completely fill out the survey, and ensure it is signed before submitting to PLWC. Any information that does not pertain to your company should be answered "N/A". If you have questions concerning the questionnaire, please call Lisa Ellington at (870) 239-7795 for assistance. The completed form should be returned to PLWC no later than [INSERT DATE].

BUSINESS INFORMATION	
Name:	
Physical Address:	
Mailing Address:	
Phone:	Fax:
Website:	
Days of Operation:	
Number of Employees:	
SIC / NAICS:	

CONTACT INFORMATION	
Individual Responsible for Operation	Individual Providing Information
Name:	Name:
Title:	Title:
Phone:	Phone:
Email:	Email:

TYPE OF BUSINESS (please check all that apply)		
<input type="checkbox"/> Manufacturing / Assembly	<input type="checkbox"/> Storage / Warehouse	<input type="checkbox"/> Vehicle / Equipment Wash
<input type="checkbox"/> Sales / Distribution	<input type="checkbox"/> Food Preparation / Service	<input type="checkbox"/> Retail Sales only
<input type="checkbox"/> Auto Services	<input type="checkbox"/> Medical / Dental Office	<input type="checkbox"/> Other (specify)

REVISION DATE



**CHECK THE BOXES OF ALL PROCESSES/ACTIVITIES THAT OCCUR AT THIS FACILITY.**

<input type="checkbox"/> Asbestos Manufacturing	<input type="checkbox"/> Medical Procedures / Surgeries
<input type="checkbox"/> Auto Body Shop, Vehicle Repair	<input type="checkbox"/> Metal Finishing (plating, anodizing, coating etching)
<input type="checkbox"/> Auto / Truck Wash	<input type="checkbox"/> Metal Products Manufacturing
<input type="checkbox"/> Battery Manufacturing	<input type="checkbox"/> Metals Molding, Casting, Forming
<input type="checkbox"/> Cement Manufacturing	<input type="checkbox"/> Machining-Sheet Metal Shop
<input type="checkbox"/> Copper / Aluminum Forming	<input type="checkbox"/> Painting / Finishing
<input type="checkbox"/> Coil Coating / Can Making	<input type="checkbox"/> Paint / Ink Formulation
<input type="checkbox"/> Chemical Manufacturing	<input type="checkbox"/> Petroleum Refining
<input type="checkbox"/> Dairy Products	<input type="checkbox"/> Pharmaceutical Manufacturing
<input type="checkbox"/> Dentistry	<input type="checkbox"/> Photo Processing
<input type="checkbox"/> Dry Cleaning / Laundries	<input type="checkbox"/> Plastics Manufacturing / Molding
<input type="checkbox"/> Electrical / Electronic Component Manufacturing	<input type="checkbox"/> Porcelain Coating
<input type="checkbox"/> Electroplating	<input type="checkbox"/> Printed Circuit Board Manufacturing
<input type="checkbox"/> Feedlot	<input type="checkbox"/> Pulp, Paper, Paperboard Manufacturing
<input type="checkbox"/> Fertilizer Manufacturing	<input type="checkbox"/> Rubber Manufacturing / Processing
<input type="checkbox"/> Flammables / Explosive Use	<input type="checkbox"/> Radioactive Materials Use
<input type="checkbox"/> Fuel Oil Dealer	<input type="checkbox"/> Smelting
<input type="checkbox"/> Funeral Services	<input type="checkbox"/> Soap / Detergent Manufacturing
<input type="checkbox"/> Glass Manufacturing	<input type="checkbox"/> Steam / Power Generation
<input type="checkbox"/> Grain Mill	<input type="checkbox"/> Sugar Processing
<input type="checkbox"/> Iron / Steel Manufacturing	<input type="checkbox"/> Textile Manufacturing
<input type="checkbox"/> Laboratory	<input type="checkbox"/> Timber Products
<input type="checkbox"/> Leather / Tanning / Refinishing	<input type="checkbox"/> Woodworking Shop

REVISION DATE

**CHEMICAL INVENTORY - DOES THIS BUSINESS USE ANY OF THE MATERIALS LISTED BELOW?**

(place an "X" in the appropriate box)

Category	Yes	No	Not Sure	If Yes, Please Identify
Inks/ Dyes / Paints				
Acids / Caustics				
Solvents / Incl. Cleaning				
Flammables / Explosives				
Grease / Oils				
Pesticides / Herbicides				
Metals / Inorganics				
Mercury or Silver Compounds				
Halogenated Aromatics				
Ethers				
Monocyclic Aromatics				
Phenols / Cresols				
Phthalate Esters				
Polycyclic Hydrocarbons				
Nitrosamines				
Nitrogen Containing Compounds				
Radioactive Isotopes				

If you are unsure of the category, please list any other chemicals used on a separate sheet.

**IS ANY WASTEWATER FROM THIS FACILITY TREATED BEFORE DISCHARGED?  Yes  No**

If yes, what kind of treatment is performed?

<input type="checkbox"/> Sand / Sediment Interceptor	<input type="checkbox"/> Silver Recovery
<input type="checkbox"/> Oil / Grease Interceptor	<input type="checkbox"/> Amalgam Separator
<input type="checkbox"/> pH Correction	<input type="checkbox"/> Solvent Recovery
<input type="checkbox"/> Chemical or Physical Treatment	<input type="checkbox"/> Other

Specify:

**HAS ANY CHEMICAL ANALYSIS BEEN PERFORMED ON WASTEWATER DISCHARGES FROM THIS FACILITY IN THE LAST THREE (3) YEAR?**

Yes       No

**ARE THERE ANY WASTES GENERATED AT THIS FACILITY THAT ARE NOT DISCHARGED TO THE SANITARY SEWER?**

Yes       No      *NOTE: If yes, please describe the waste and disposal method for the waste.*

	Other Waste	Disposal Method
1		
2		
3		

**DOES THIS FACILITY GENERATE ANY HAZARDOUS WASTE?**

Yes    No      *NOTE: If yes, please list hazardous wastes generated and disposal method. Attach additional sheets if necessary.*

	Hazardous Waste	Disposal Method
1		
2		
3		

**PLEASE PROVIDE THE FOLLOWING INFORMATION OF ANY ONSITE WASTE TREATMENT VENDORS AND ANY COMPANIES THAT HAUL SOLID, LIQUID, HAZARDOUS OR NON-HAZARDOUS WASTES FROM THIS FACILITY FOR OFFSITE TREATMENT AND / OR DISPOSAL.**

Company Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
 Website: \_\_\_\_\_ Email: \_\_\_\_\_

Company Name: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
 Website: \_\_\_\_\_ Email: \_\_\_\_\_

**DESCRIBE ANY POLLUTION PREVENTION ACTIVITIES USED AT THE FACILITY (INCLUDE THOSE WHICH ARE PLANNED OR WHICH HAVE BEEN IMPLEMENTED).**


**BEST MANAGEMENT PRACTICES ARE METHODS THAT HAVE BEEN DETERMINED TO BE THE MOST EFFECTIVE AND PRACTICAL MEANS OF PREVENTING OR REDUCING POLLUTION. THE ULTIMATE GOAL OF THESE PRACTICES IS TO INCREASE EFFICIENCY WHILE REDUCING POLLUTION. DESCRIBE ANY BEST MANAGEMENT PRACTICES ACTIVITIES WHICH ARE EITHER PLANNED OR WHICH HAVE BEEN IMPLEMENTED.**


**AN EMS IS A CONTINUAL CYCLE OF PLANNING, IMPLEMENTING, REVIEWING AND IMPROVING THE PROCESSES AND ACTIONS THAT AN ORGANIZATION UNDERTAKES TO MEET ITS BUSINESS AND ENVIRONMENTAL GOALS. MOST EMS'S ARE BUILT ON THE "PLAN, DO, CHECK, ACT" MODEL, WHICH LEADS TO CONTINUAL IMPROVEMENT. LIST ANY ENVIRONMENTAL MANAGEMENT SYSTEMS IN PLACE AT THIS FACILITY.**


REVISION DATE

**PLEASE ESTIMATE THIS FACILITY'S AVERAGE MONTHLY WATER USAGE FOR THE WINTER AND SUMMER MONTHS.**

Average monthly gallons used: Winter: \_\_\_\_\_ Summer: \_\_\_\_\_

**DO YOU ANTICIPATE ANY FUTURE CHANGES IN YOUR CURRENT OPERATIONS OR PROCESSES?**

Yes  No

**ATTACH A SCHEMATIC WITH THE LAYOUT OF YOUR FACILITY. PLEASE LABEL ACTIVITIES PERFORMED IN EACH AREA, ALL WATER SOURCES, ALL FLOOR DRAINS AND ALL DISCHARGES.**

**CERTIFICATION STATEMENT**

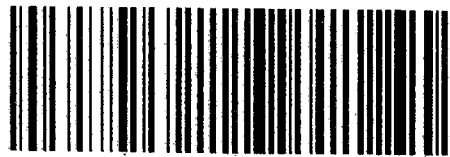
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervisions in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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 fines and imprisonment for knowing violations."

Name: \_\_\_\_\_ Title: \_\_\_\_\_  
(Please Print)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

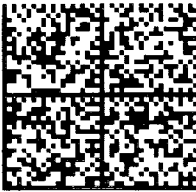


**CERTIFIED MAIL™**

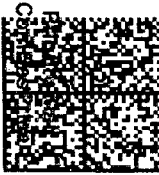


7010 1670 0001 9054 1532

**CPU** U.S. POSTAGE  
PB 1P 000 \$ 0.00<sup>0</sup>  
3661009 MAILED JUL 17 2014  
FCMF 72450



UNITED STATES POSTAGE  
PITNEY BOWES  
02 1P \$ 007.82<sup>0</sup>  
0003182006 JUL 16 2014  
MAILED FROM ZIP CODE 72450



Lisa Ellington  
PLWC  
P.O. Box 9  
Paragould, AR 72450

---

Mr. Allen Gilliam  
Pretreatment Coordinator  
Water Division  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

