

ADEQ

ARKANSAS
Department of Environmental Quality

May 11, 2011

Darrell Phillips
Assistant General Manager
Paragould Light Water and Cable
P.O. Box 9
Paragould, Arkansas 72451

Re: City of Paragould (NPDES #AR0033766) Pretreatment Program Audit/
Municipal Pollution Prevention (P2) Assessment

Dear Mr. Phillips,

Please find enclosed the finished report for the audit/assessment conducted December 7 – 9, 2010. Apologies are extended for this tardy final audit report. The contents should be made available for review by appropriate PLWC officials. Discussions and an evaluation should be made concerning the required actions and recommendations. Please respond within sixty (60) days from the date on this correspondence with your corrective actions regarding the two (2) deficiencies cited and any recommendations you would care to act on.

The two (2) deficiencies took some post audit discovery to come to their conclusions. The file review and site-visits during the physical Audit did not provide enough time to gather all the information needed to make these decisions.

In this auditor's opinion, the PLWC has a staff well qualified and involved in the Program and its implementation. They should be lauded for their efforts. Pollution Prevention efforts could be enhanced with minor adjustments within the day-to-day Pretreatment implementation practices.

It is always a pleasure working with you and your staff and becoming more familiar with Paragould, its industries, Pretreatment and Pollution Prevention Programs.

Feel free to contact this office with any questions.

Sincerely,



Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

ec: Rudy Molina/EPA 6WQ-PO
Eric Fleming/NPDES Inspector Supervisor
Cindy Garner/NPDES Enforcement Manager
E-drive\NPDES\NPDES\Pretreatment\Reports

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF PARAGOULD, ARKANSAS

NPDES PERMIT #AR0033766

May 11, 2011

PREPARED BY: ALLEN GILLIAM

ADEQ STATE PRETREATMENT COORDINATOR

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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(s) A: Supporting Documentation

A) INTRODUCTION

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

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

An audit/assessment was performed December 7th – 9th, 2010, of the Pretreatment Program implemented by Paragould Water, Light and Cable (PLWC). Participants included:

Allen Gilliam ADEQ / State Pretreatment Coordinator

Lisa Ellington PLWC / Environmental Services Manager

Darrell Phillips PLWC/Assistant General Manager

The goals of the audit/assessment were:

- * To determine the implementation and compliance status of the City of Paragould's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;
- * To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges;
- * To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements and;
- * To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

Paragould Light Water & Cable (PLWC) Commission has been empowered by the Paragould City Council to implement and enforce the Pretreatment Program for the City. The terms City or Paragould are synonymous with PLWC in this report.

Paragould's Pretreatment Program was originally approved 3/16/84. Program modifications were approved and incorporated into their NPDES permit 11/22/89 and then again on 5/16/00. Modifications included: development and adoption of technically based local limits; transfer of all IU self-monitoring responsibilities to the City; incorporation of an Enforcement Response Plan, funding resolution, re-evaluation of the Maximum Allowable Headworks Loadings and associated revisions to the ordinance and program narrative.

40 CFR 403 streamlining revisions were made to the National Pretreatment Regulations in

October '05. The City submitted modifications to their Program on 10/6/09 and is pending review.

The City's wastewater treatment plant has a design flow of 6.0 MGD and includes oxidation ditches, final clarification, re-aeration, chlorination, de-chlorination and aerobic sludge digestion. An average of 278 dry tons/yr of biosolids are given to the public.

An average flow of 2.86 MGD is discharged to an un-named ditch, then to the Eight Mile Creek which then flows into the St. Francis River, planning segment 5A. The POTW receives approximately 0.42 MGD from 7 significant industries, 6 of which are categorical (two do not discharge regulated wastewater).

The effluent has shown no pattern of sub-lethality or lethality in either species in the last three (3) years (11 tests).

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to four (4) of their 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 PLWC. 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 Paragould's Pretreatment Program. Actions required by PLWC to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program will be paraphrased citations of the same. A narrative explanation of the finding will follow.

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

a) After a thorough review of Nidec's (previously Emerson Electric) processes, site visit observations, post audit chemical MSDS reviews and correspondence with the chemical manufacturer's representatives, it was determined no core operations existed under the Metal Finishing Standards in 40 CFR 433. Only aluminum die casting operations under 40 CFR 464.15 were present.

The City must revise Nidec's permit to reflect the correct production based permit limits under the appropriate subprocesses in 40 CFR 464.15.

b) After the site visit at MMI Trutech and post audit review of their chemicals' MSDS, this auditor could not find any evidence they had any core operations under the Metal Finishing Standards in 40 CFR 433. This auditor could not locate records an audit site visit had ever been conducted at MMI.

The City must remove any citations to Metal Finishing under 40 CFR 433 and revise MMI's permit to reflect appropriate limits (or "report only") for metals of concern seen in this facility's wastestream. The City may still limit their "subsequently produced" CN per the 40 CFR 433 standards referring to them as "technology transfer" limits since they have historically been conducting CN destruct methods to meet the CFR 433 limits in the past.

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

1) Recommend issuing Martin Sprocket and Prestolite Wire "No Discharge" permits specifying "There will be no regulated metal finishing wastewater discharged to the City's sewage system. Records (manifests or other supporting documentation) will be kept on-site for further verification." or words to that effect. A certification statement stating the same should be required twice/year. These two non-discharging categoricals can then be placed on a separate (Annual Report) list entitled, "Non-Significant, yet permitted IUs", thereby negating the required yearly inspections and sampling requirements by the City per 40 CFR 403.8(f)(2)(v). As deemed necessary, periodic inspections (informal) and possibly un-announced sampling can still be accomplished.

2) Strongly recommend cross training another employee in all aspects of the day-to-day administrative, implementation and enforcement procedures of the City's Pretreatment Program. Drafting standard operating procedures (SOPs) for the day-to-day administrative duties of the City's Pretreatment Coordinator should be a priority. SOPs could include more details on how simple industry surveys are conducted from a draft of example cover letter, to potential source(s) of businesses to the actual survey template. Other SOPs could include sampling protocols for each industry sampled, IU inspections, how daily industry correspondence is handled/filed, etc.

3) PLWC personnel have an excellent start on their IUs' facts 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 wastewater flows could also be included on these schematics. Other information in the fact sheets' schematics could include "flow" of raw material as it travels 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) is advisable.

4) Inspection reports which reference these fact sheets where more information includes a detailed physical description of the IU's manufacturing processes is critical in understanding each significant industries' 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. Obviously, new signatures with the inspection date would be necessary.

5) Recommend recycling old, out-dated permits, duplicates and other needless documents older than three (3) years.

During the audit, documentation was for the most part, easily retrieved, but with some information scattered/duplicated. It seemed to this auditor better order could be achieved.

Retain permitted industries' pertinent information such their most recent permit applications, updated TOMPs 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.

6) Recommend asking each permitted IU to submit in chronological order their pollution prevention/best management practices success stories. Periodic updates to their P2/BMP efforts should be requested in their permits illustrating what they've reduced/saved such as energy/water, raw material cost savings, source reduction, inventory control (lean manufacturing), product substitution, etc.

Several instances of IUs' P2 efforts were observed during the site visits but, no reports were being gathered nor asked for by PLWC. These IUs should be recognized for going above and beyond the basic regulatory minimum. That can be accomplished via both the national and regional P2 programs and databases.

7) Continue sending business sector surveys tailored to "fit" their operations/activities. It may be prudent at this time to begin compiling a list of dental facilities in your service area considering EPA is currently drafting a new pretreatment guideline (category) for them. The Proposed Rule is scheduled for federal register notice in October of this year.

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

As mentioned previously, PLWC has submitted all required Pretreatment Program modifications for approval by ADEQ. Those documents are pending final review.

* * * * *

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	Pages	1- 4
Section II:	Pretreatment Program Analysis	Pages	5-17
Section III:	Industrial User File Evaluation	Pages	18-25

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: Paragould Light Water & Cable NPDES #: AR0033766

Mailing address: 1901 Jones Road, P.O. Box 9, Paragould, AR 72451

Permit Signatory: Darrell Phillips Title: Asst. General Manager

Telephone: 870.239.7700 FAX NUMBER: 870.239.7798

Pretreatment Contact: Lisa Ellington Title: Env. Services Mngr.

Address: Same

Telephone: 870.239.7795

e-mail lellington@paragould.com

Pretreatment program approval date: 3/16/84

Dates of approval of any substantial modifications: 11/22/89 & 5/16/00

Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 3/1 - 2/28 Date(s) of Audit: 12/07-09/10
(ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

<u>NAME</u>	<u>TITLE</u>	<u>PHONE NUMBER</u>
<u>* Lisa Ellington</u>	<u>Environmental Services Mngr.</u>	<u>same</u>

* Identifies Program Contact

Dates of Previous PCIs/Audits:

<u>TYPE</u>	<u>DATE</u>	<u>DEFICIENCIES NOTED</u>
<u>PCI</u>	<u>6/10</u>	<u>"Satisfactory"</u>

SECTION I: GENERAL INFORMATION

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 an asterisk or footnote that tells that there is more explanatory information and where it can be found.

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*33766	Paragould City's Main	2/1/10	1/31/15

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: same
Location Address: 401 Grant Lane

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 6.0 MGD; Actual (Average)- 3.24 MGD

Sewer System: 100 %; # of SSOs due to grease blockages 0

Industrial Contribution to this Treatment Plant

of SIUS : 7 # of CIUS : 6
Industrial Flow (mgd): 0.4 Industrial Flow (%) : 12.26 %

Level of Treatment

Type of Process(es):

Primary _____
Secondary Oxidation ditches; aeration basins; final
Tertiary _____ clarification; re-aeration, aerobic sludge and digestion

Method of Disinfection: Chlorination

Dechlorination YES NO

Effluent Discharge

Receiving Stream Name: unnamed ditch, Eight Mile Creek then to St. Francis River

Receiving Stream Classification: Segment 5A St. Francis River Basin

Receiving Stream Use: secondary contact rec/raw water source/fish propagation

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

Method of Sludge Disposal:

Quantity of Sludge:

_____ Land Application	_____ dry tons/yr.
_____ Incineration	_____ dry tons/yr.
_____ Monofill	_____ dry tons/yr.
_____ Mun. Solid Waste Landfill	_____ dry tons/yr.
<input checked="" type="checkbox"/> Public Distribution	<u>278</u> dry tons/11 months
_____ Lagoon Storage	_____ dry tons/yr.
_____ Other (specify)	_____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: conventionals, TRC and NH3-N

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

- Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
- Have any non-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.
See below. In '08, MAHLs were sent to the City, but a formal request to modify the Program was not sent back for ADEQ to approve and incorporate.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
N/A	City e-submitted (10/8/09) revised Ordinance to be current with the newly revised Pretreatment Streamlining Rule. Other elements of the Program itself were included. It's pending review.	N/A

2. Modifications in Progress:

Date Requested	Nature of Modification
See above	

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: 3/16/84 [WENDB-PTIM]
 Date of most recent Ordinance approved by the Control authority: 11/15/99
 Date of most recent Pretreatment Program modification approval: 5/16/00

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

YES NO

- Deny or condition pollutant discharges
- Require compliance with standards
- Control discharges through permit or similar means
- Require compliance schedules and IU reports
- Carry out inspection and monitoring activities
- Obtain remedies for noncompliance
- Comply with confidentiality requirements
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

- No oversight authority
- No inspection authority
- No remedies for noncompliance
- No "equivalent" standard
- No clear delineation of responsibility for program implementation
- Interjurisdictional agreements not entered into
- Other, Specify: _____

YES NO

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

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

n/a Have provisions been made for the incorporation of Pollution Prevention (P²) policies by contributing jurisdictions?

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

	<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1.	<u>n/a</u>	_____	_____	_____
2.	_____	_____	_____	_____

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

Problems

<input type="checkbox"/> Updating industrial waste survey	<u>N/A</u>
<input type="checkbox"/> Notification of IUs	_____
<input type="checkbox"/> Permit issuance	_____
<input type="checkbox"/> Receipt and review of IU reports	_____
<input type="checkbox"/> Inspection and sampling of IUs	_____
<input type="checkbox"/> Assessment of IUs for P ² activity	_____
<input type="checkbox"/> Analysis of samples	_____
<input type="checkbox"/> Enforcement	_____
<input type="checkbox"/> 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:

<u>IU Name</u>	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</u>
<u>n/a</u>	_____	_____	_____
_____	_____	_____	_____

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

 Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] "ongoing"(see attachment A-1 for example). Last one completed in '09.

 If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² activity? * A question is asked on the survey form regarding Pollution Prevention.

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

 If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P² activity and the distribution of P² reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Information from PLWC engineering department
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) Green County Mfg. Directory, Chamber of Commerce, AR Mfg's Directory & the PLWC Eng. Department

How often is the survey to be updated? "Ongoing"

Are there any problems that the Control Authority has in identifying and categorizing SIUs: Nothing major apparent although there may have been some confusion "categorizing" two IUs correctly.

YES NO

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

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

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

- a. 7 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 6 Categorical Industrial Users (CIUs) [WENDB-CIUS] (2 are zero discharge)
- c. 1 Noncategorical SIUs
- d. 0 Other regulated nonsignificant IUs (Describe)
- 7 TOTAL of a. + d.

YES NO

 Has the POTW identified any IUs with Pollution Prevention opportunities?
 Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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? *See Atatch A-2i

Describe the Control Authority's approved control mechanism (e.g., permit, etc.):
 permit

What is the maximum term of the control mechanism? 5 years

 0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

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

YES NO

 Does the Control Authority accept trucked septage wastes?
 Does the Control Authority accept other trucked wastes?
 n/a Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

YES NO
 n/a Does Control Mechanism designate a discharge point? [403.5(b)(8)]
 n/a Are all applicable categorical standards and local limits applied to trucked wastes?

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

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

Describe the discharge point(s) (including security procedures):
 n/a

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

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?

12/07 Date Notified Method of Notification letter
How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

Federal Register Journals, Newsletters
 Meetings, Training Other _____
 Government Agencies Other Internet

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
<u>ADEQ provided City with revised MAHLs in a 3/4/08 document. No response from the city "accepting" these revised numbers (in a submittal request) could be located although the City is using these as their Maximums on their influent/effluent summary sheet accompanying their annual reports.</u>			

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?		MAHLs/TBLs Adopted (by Resolution)		OLD Numerical MAHLs in Program (lb/day)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.65</u>
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.28</u>
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.64</u>
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>4.61</u>
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.54</u>
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.61</u>
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.0007</u>
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.46</u>
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>5.15</u>
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>**0.20 mg/l (for 1 SIU)</u>
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>0.80</u>
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>7.00</u>

** Se limit approved by a 6/02 resolution

* - If necessary for the sludge disposal option chosen.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

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

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

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)			
Cadmium (Cd)			
Chromium-Total			
Copper (Cu)			
Cyanide (CN)			
Lead (Pb)			
Mercury (Hg)			
Molybdenum (Mo)			
Nickel (Ni)			
Selenium (Se)	(for Martin Sprocket only)		✓
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? n/a

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
Inspections:			
CIUs	<u>1/yr</u>	1/year	_____
Other SIUs	<u>"</u>	1/year	_____
Sampling:			
CIUs	<u>2/yr</u>	1/year	<u>*</u>
Other SIUs	<u>4-24</u>	1/year	<u>**</u>
*City samples CIUs 2/year for the time being to establish good baseline.			
**Increased monitoring for those more potentially problematic SIUs			
Reporting:			
CIUs	<u>n/a</u>	[City performs IUs' self monitoring]	
Other SIUs	<u>"</u>	2/year	_____
Self-Monitoring:			
CIUs	<u>"</u>	2/year	_____
Other SIUs	<u>"</u>	2/year	_____

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

<u>Analytical Method</u> *	<u>Name of Laboratory</u>
Metals <u>Varian AA-Flame & G.Furnace</u>	<u>In-house and American Interplex</u>
Cyanide <u>Spectrophotometric</u>	<u>"</u>
Organics <u>GC/MS</u>	<u>American Interplex</u>
Other <u>WET</u>	<u>AR State University</u>

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

- Does the POTW use QA/QC for sampling and analysis? If yes, describe: Blanks, spikes and duplicates every 10% on their own. They've even sent the same plus de-ionized water to contract lab. In house they follow EPA's DMR-QA Study and ERA's (Environmental Resource Assoc.) test procedures quarterly

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

5 dys Conventionals
2 wks Metals
2 wks 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: n/a

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

YES NO

- Scheduled compliance monitoring
 Unscheduled compliance monitoring
 N/A Demand monitoring for IU compliance
 IU self-monitoring
 Other: _____

*City does monitoring

YES NO

- Has the Control Authority identified any violation of the prohibited discharge standards [403.5(a)&(b)] 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

SECTION II: PROGRAM ANALYSIS AND PROFILE

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

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

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: Since the City does the compliance monitoring, they send the IU a "notice of non-compliance" with the requirement to respond within 15 days
- If no, does the Control Authority conduct all of the monitoring?

YES NO N/A

- Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.

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

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

- Interference [WENDB]. _____
- Pass through [WENDB]. _____
- Fire or explosions? _____
(incl. flash point viol.)
- Corrosive structural damage? _____
(incl. pH <5.0).
- Flow obstructions? _____
- Excessive flow or pollutant concentrations? _____
- Heat problems? _____
- Interference due to oil or grease? _____
- Toxic fumes? _____
- Illicit dumping of hauled wastes? _____

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

	<u>Number</u>	<u>Amount</u>
Civil	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
- YES NO hard copy
- YES NO OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

- | | | |
|-------------------------------------|-------------------------------------|--|
| <u>YES</u> | <u>NO</u> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Control Mechanism Issuance |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Inspection and Sampling schedule (on a calendar) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Monitoring Data |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | IU Compliance Status Tracking |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Other: <u>Inspection reports</u> |
| | | Can IU monitoring data can be retrieved by: |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Industry name |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Pollutant type |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Industrial category or type |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | SIC Code |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | IU discharge volume |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Geographic location |
| <input type="checkbox"/> | <u>n/a</u> | Receiving treatment plant (i.e.if > one plant in the system) |
| <input type="checkbox"/> | <input type="checkbox"/> | Other (specify) _____ |

- Does the POTW have provisions to address claims of confidentiality?
[403.8(f)(1)(vii)]
- Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?

- Are there significant public or community issues impacting the POTW's pretreatment program?
If yes, please explain: _____
- Are all records maintained for at least 3 years?

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

~3.75

- YES NO
- Have any problems in program implementation been observed which appear to be related to inadequate funding?
If yes, describe and show below the source(s) of funding for the program:

	<u>Percent of Total Funding</u>
<input checked="" type="checkbox"/> POTW general operating fund	<u>100</u>
<input checked="" type="checkbox"/> IU permit fees (goes back to the GOF)	_____
<input checked="" type="checkbox"/> monitoring charges (")	_____
<input checked="" type="checkbox"/> industry surcharges (")	_____
_____ other (describe) _____	_____
Total	100%

- Is funding expected to continue near the current level? If no, will it:
Increase _____ or Decrease _____
If no, describe the nature of the changes:

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

<u>YES</u>	<u>NO</u>		<u>If no, explain</u>
✓	___	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:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u>
✓	___	Sampling equipment	16 automatic Iscos, 13 flow meters 2 portable pH meters, 2 in-house
✓	___	Safety equipment	standard list
✓	___	Vehicles	2
✓	___	Analytical equipment	AA flame, G.F. Standard conventional lab equip

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
"Can the Grease Program", recycle bins are located in Paragould for paper, plastics and glass.

2. Has the source of any toxic pollutants been identified?
If yes, what was found?
Selenium was found in the discharge of MSG. They've modified their process so no selenium is discharged into the collection system. Various metals are found in discharges from permitted IUs although they are well below their permitted limitations.

3. Has the POTW implemented any kind of public education program? If yes, describe:
Chemical magic show; water/wastewater model; local civic club presentations; PSAs on local cable system ("Can the Grease, proper disposal of unused/expired pharmaceuticals, etc); the PLWC website has info relating to water conservation, "change a light" program and how to properly dispose of pharmaceuticals.

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?
PLWC plans to document IUs' P2 activities and the success the industries have had in these activities.

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? PLWC
have most of the guides but haven't provided them to applicable businesses.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Nidec Motor (used to be Emerson) File/ID No. 89-05
Industry Address 1000 S. 2nd Avenue
Industry Description Mfg of fractional hp electric motors
Industrial Category Al die casting 40 CFR 464 SIC/NAICS code: 3621/335312
Avg. Total Flow (gpd) 23,000 Avg. Process Flow (gpd) 22,000

Industry visited during audit: YES

Comments: Facility ceased metal finishing ops in 3/08 (shaft penetrate/black oxidizing) and is no longer considered regulated under CFR 433. See Attch. A-3 for letter from IU.

FILE #: 2 Industry Name MMI-Trutec Inc. File/ID No. 97-01
Industry Address 2600 N. 12th Avenue
Industry Description Nitrocarburizing & heat treating outside customers' products
Industrial Category questionable 40 CFR ?? SIC/NAICS Code: 3398/332811
Avg. Total Flow (gpd) 16,550 Avg. Process Flow (gpd) 16,000

Industry visited during audit: YES

Comments: During the site visit, this auditor could find no metal finishing core operations under 40 CFR 433. IU appears to be a simple heat treatment facility.

FILE #: 3 Industry Name Martin Sprocket File/ID No. 89-07
Industry Address 1205 South 3rd Street
Industry Description Mfg. gears/sprockets & other power transmission components
Industrial Category Metal finishing 40 CFR 433 SIC Code: 2899,3089,3569
Avg. Total Flow (gpd) ? Avg. Process Flow (gpd) Zero discharge after 7/09 fire.

Industry visited during audit: YES

Comments: Selenium in their process has caused the City to develop "local limits" for them, but IU is no longer discharging any process water to them.

FILE #: 4 Industry Name Garlock Rubber Tech. File/ID No. 95-01
Industry Address 210 Dana Road
Industry Description Mfg of rubber sheets, conveyor belts and gaskets
Industrial Category Rubber Manufacturing 40 CFR 428 SIC/NAICS Code: 3045/326220
Ave. Total Flow (gpd) 5,600 to 11,000 Ave. Process Flow (gpd) 3,200 to 5,000

Industry visited during audit: YES

Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an (See Attch. A-2 for example) application for a control mechanism?	✓	✓	✓	✓	
If yes, what is the application date?	5/10	8/07	4/08	11/05	
Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2. Does the file contain a (See Attch. A-4 for example) Permit?	✓	✓	✓	✓	
Permit Expiration Date?	9/15	9/12	5/13	4/11	
Is a fact sheet included? (See Attch. A-5 for example)	✓	✓	✓	✓	
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	2	✓	✓	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	✓	✓	✓	

Comments: 1) IU has ceased discharge of any regulated wastewater. The City might consider issuing Martin Sprocket a "No Discharge" permit; 2) Upon further review of MMI's ops & detailed TOMP, it doesn't appear to have any CFR 433 core operations; 3) After site visit and further review of IU's operations, the metal finishing standards in CFR 433 do not apply. All w.w. generating operations are covered under either the Metal Molding & Casting standards in CFR 464.15 or "unregulated" (not dilute); 4) O&G

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Comments: 1) IU has no regulated (CFR 433) discharge, but CFR 433 limits still exist in their permit; 2) Notification of the Streamlining Revisions to CFR 403 was made.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	n/a	n/a	n/a	_____
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	_____
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	_____
D. <u>Compliance Monitoring</u>					
<u>Sampling</u>					
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?	✓	✓	✓	✓	_____
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

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>Timed</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u> </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
<u>Inspections (See Attch. A-6 for example)</u>					
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Date of last Inspection	<u>2/10</u>	<u>2/10</u>	<u>2/10</u>	<u>2/10</u>	<u> </u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Inspection date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Name and title of IU official contacted?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Verification of production rates?	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
f. Evaluation of pretreatment facilities?	<u>✓</u>	<u>n/a</u>	<u>1</u>	<u>✓</u>	<u> </u>

Comments: 1) Martin Sprocket is "pretreating" its wastewater for in-process re-use and recycle. Good pollution prevention practices with no regulated wastewater being discharged to the City.

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Evaluation of self-monitoring equipment and techniques?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
h. Evaluation of slug (See Attch. A-7 for example) discharge control plan & need to develop? 403.8(f)(2)(v)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
i. Manufacturing facilities?	<u>In fact</u>	<u>sheets</u>	<u>"</u>	<u>"</u>	<u> </u>
j. Chemical handling and storage procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
k. Chemical spill prevention areas?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
l. Hazardous waste storage areas and handling procedures?	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u> </u>
m. Sampling procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
n. Laboratory procedures?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
o. Monitoring records?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
p. Evaluation of Pollution Prevention opportunities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
11. Does the file include:					
a. BMR?	<u>archived</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u> </u>
b. 90-Day Report?	<u>arch.</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u> </u>
c. All periodic reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
12. Did the IU report on all required parameters?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
13. Did the IU comply with the required sampling frequency(s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
14. Did the IU report flow?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____
15. Did the IU comply with the required reporting frequency(s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____
16. For all SIUs, are self-monitoring reports signed and certified?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____
18. Has the IU developed a Slug Control and Prevention Plan?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	_____
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	_____
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____
b. Did POTW respond to the spill?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	_____
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>n/a</u>	_____
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	_____

Comments: 1) Nidec informed the City it had outsourced its metal finishing (black oxidizing) operation (Attach.A-3), but no info was located regarding the IU's installation of its new "Sweco" unit (9/08) nor the parts washer/tumbler (6/10) which could have and effect on "changes in its discharge".

SECTION III: INDUSTRIAL USER FILE REVIEW

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

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Paragould NPDES #: AR0033766

Date of Audit: 12/07 - 09/10 Date entered into QNCR: 5/11/11
(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 Paragould NPDES #: AR0033766

Name, address and phone number of industry:

Nidec Motor (formerly Emerson), 1000 S. 2nd Ave., 870.239.2171

Type of industry: Mfg & Assembly of electric motors

Date/Time of visit: 12/8/10 / 8:05 a.m.

Aluminum Die Caster & Metal Finisher??? (CFRs 464 & 433???)

Industry contacts: Joel Tobey - Env., Health & Safety Mgr.

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

Facility hasn't substantially changed its operations since the last (12/07) audit. It did outsource its die penetrate (black oxidizing) operation which was regulated under the metal finishing regulations in 40 CFR 433 (3/08) and installed a new "Sweco" aluminum cast parts deburring/cleaning operation in 9/08 and a bronze & Ag switch parts washer/tumbler in 6/10. IU manufactures & assembles fractional (1/4 to 1/2) hp. electric motors. No Metal Finishing core operations under CFR 433 could not be located/identified.

Visit conducted by: Gilliam/Ellington Date: 12/8/10

Allen Bullion

(signature of auditor conducting visit)

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

Control Authority: City of Paragould NPDES #: AR0033766

Industry name: Nidec (formerly Emerson)

Additional comments: Raw material includes Aluminum, Cu, brass, steel and varnishes. IU aluminum die casts end shields and rotors for assembly of their final product. Facility has about 28 casting machines: typical open/close mold casting operations which are covered under 40 CFR 464.15. Associated wastewater is drained to a central sump then pumped to the pretreatment area. Permit limits are based on the facility's '04 production of 170 thousand lbs/day poured with an estimated 18,300 gpd from the casting, casting quench, mold cooling regulated streams and three (3) "unregulated" (not dilute) wastewater sources (raw material loading/scrap metal storage areas & their above ground tank farm). The Sweco's deburring/cleaning of Al parts would best "fit" under the CFR 464.15 subprocess of: (a)"casting cleaning". The washing/ tumbling (of brass/silver switches) operation wastewater could be considered an "unregulated" wastestream (not dilution) under CFR 403.6. Wastewater strictly from the die casting ops are separately treated. When the IU had the metal finish core operation of blackening, its wastewater was also treated separately to remove some of the heavy metal via chemical precipitation. Any waste oils are collected in their "tank farm" and haul off-site for proper disposal. The remainder of the IU's operations consist of machining, punching, annealing, shaping of metal rods into the motor shafts and assembly. No wastewater is generated from these operations.

The IU's permit has three (3) internal outfalls at which the city samples. It appears "Outfall No. 2 - Metal Finishing..." needs to be revised to reflect CFR 464.15(a) "Casting Cleaning" operations coming from the "Sweco" unit. "Unregulated" (not dilute) wastestreams from the parts washer and tumbler should also be included in this outfall's limits. There seems to have been some confusion about this outfall and its CFR 433 designation after the core operation (shaft penetrate or black oxidizing) was removed.

Visit conducted by: Gilliam/Ellington Date: 12/8/10



(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Paragould NPDES #: AR0033766

Name, address and phone number of industry:

MMI Trutec, 2609 N. 12th Ave., 870.236.6920

Type of industry: Carbon steel heat treat. Date/Time of visit:

12/8/10 / 10:15 a.m.

Industry contacts: Mike Wooldridge - Plant Manager

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

*may not be applicable but the facility has a comprehensive one

Additional comments: Facility has not been "audit visited" for over 10 years internal records indicate. This site visit revealed information that deem them "not categorical" as a metal finisher under 40 CFR 433 as they don't have any core operations, only ancillary operations generating wastewater.

Visit conducted by: Gilliam/Ellington Date: 12/8/10

Allen Gilliam

(signature of auditor conducting visit)

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

Control Authority: City of Paragould NPDES #: AR0033766

Industry name: MMI Trutec

The operations of IU's heat treatment wastewater is all that is discharged but contains measurable levels of CN. The IU is using sodium hypochlorite (liquid bleach) to destroy the CN. Facility nitrocarburizes (heat treatment/case hardens) Fe parts for multiple customers. Processes include an alkaline cleaning soak bath; a water jet wash (2 separate "wash" tanks) which includes one fresh water and one liquid alkaline solution bath (used as a rust preventative); parts are sent to "pre-heat" and then another oven to raise temperature of the parts followed by 2 molten salt baths ("Nutride") which heat treat the parts; a "MMQ" salt bath quench is followed by another water/sulfuric acid bath quench (tank) to control the pH before it is released to the w.w. trench which flows to the settling tanks; final (4) fresh wash countercurrent rinse tanks are used to remove salt residue. Parts can then be chemically (alkaline) "polished" and oil dipped or sprayed depending on customer requests. No wastewater generating operations appear to "fit" any of the 6 core operations in CFR 433. Adequate sampling point.

Visit conducted by: Gilliam/Ellington Date: 12/8/10



(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Paragould NPDES #: AR0033766

Name, address and phone number of industry:
 Martin Sprocket and Gear, 1205 S. Third St., 870.239.8244
 Type of industry: Mfg of sprockets Date/Time of visit:
 Metal Finishing CFR 433 12/8/10 / 1:15 p.m.

Industry contacts: Darrel Pillow - Human Resources

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

*Sanitary only. No regulated W.W. is discharged to the City.

Additional comments: Operations have changed somewhat since the site visit conducted three (3) years ago. A fire destroyed much of the plant and they've only been up to full production since July '10. Facility manufactures various types of power transmission products, mostly sprockets for chain driven equipment, although some sheaves and gears are also made at this site. IU rep. indicated a 6" OD sprocket is the largest they make. A lot of (self contained) machining is also done at this facility. About every 6 months, cutting/cooling fluids are hauled off site for disposal.

Visit conducted by: Gilliam/Ellington Date: 12/8/10

Allen Gilliam

 (signature of auditor conducting visit)

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

Control Authority: City of Paragould NPDES #: AR0033766

Industry name: Martin Sprocket and Gear

Additional comments: Raw material consists mainly of powdered iron (~95%) but includes varying amounts of bronze (~5%), some molybdenum & maybe some other trace metals. Powdered material is sintered into desired configurations held together with a wax-like material. No wastewater is associated with this operation. Facility uses ~10 hydraulic presses to form the solid product. Under the intense pressure and heat generated the powdered form is solidified. Some sprockets are blackened depending on customer specs. Because of the low local limit for Se, the IU is treating (closed loop) its 3 blackening (Se) lines' process wastewater for re-use/recycle using sedimentation filters prior to 3 large (cation & anion) I/X filters. Some water and chems are added as needed, but when this w.w. is too "dirty" for re-use, it is vacuumed out and sent off-site for proper disposal. Regulated w.w. ops include: vibratory tumbling w/mild soap (now sent off-site because of Cu concerns), a caustic cleaner bath, rinse, pre-dip, Se bath, rinse with a final mist of mill oil applied. Their plastic injection molding ops produce no contact wastewater and are self-contained. All waste oils (vegetable, soy and sunflower) is contained and hauled off-site.

City rep was knowledgeable regarding the IU's processes.

At this time, there is no regulated process wastewater being discharged to the City's sewer system.

Visit conducted by: Gilliam/Ellington Date: 12/8/10



(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Paragould NPDES #: AR0033766

Name, address and phone number of industry:
 Garlock Rubber Tech., 201 Dana Drive, 870.239.4051

Type of industry: Mfg of rubber products Date/Time of visit:
 40 CFR 428-Rubber Manufacturing 12/9/10 / 4:15 p.m.

Industry contacts: Burt Lee - Env., Health & Safety Coordinator

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

Facility hasn't changed operations substantially. They now have all contact process wastewater "close looped" through a new chiller system. It uses a filter system treatment system with no blowdown ("~99.9% recycle). They manufacture conveyor belts and sheet rubber for gasket or packing material.

Visit conducted by: Gilliam/Ellington Date: 12/9/10

Allen Ellington

(signature of auditor conducting visit)

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

Control Authority: City of Paragould NPDES #: AR0033766

Industry name: Garlock Rubber Tech.

Additional comments:

All uncured rubber is shipped pre-mixed to the facility. The fabric (for the conveyor belts) can be made up of polyester, nylon or cotton depending on customer specs. The pre-mixed rubber is drawn through mills to be softened which generates heat. From the mills, the softened rubber is conveyed to the extruders and calendars where it is extruded, skimmed or fractioned onto fabric or is rolled into sheets for belt covers, packing or gasket material. The "wiped" fabrics and cover stock are brought together at the "making" table, then taken to the flat press or taken to the rotocures. Uncured sheet rubber is taken to the flat press or rotocures for a final curing process. Heat in the form of steam or heat transfer oil is passed through the jackets of the presses (2) and the rotocures (6). The product flow through the vulcanizer is the same except the rubber is cured with steam as it is in the presses. After the curing cycle, belts are "scheduled" to the finish press for minor repairs before final inspection. The belts are trimmed as need and packaged for shipment.

Visit conducted by: Gilliam/Ellington Date: 12/9/10



(signature of auditor conducting visit)

2009 ANNUAL INDUSTRIAL WASTE QUESTIONNAIRE
PARAGOULD LIGHT WATER & CABLE

Attachment A-1

I. GENERAL INFORMATION

Standard Industrial Classification Code or Codes (SIC) # 3531
Construction Machinery & Equipment

Company Name Allen Engineering Corporation

Mailing Address PO Box 819, Paragould, AR 72451

Address of Premises 819 South Fifth St., Paragould, AR 72450

Name and Title of Signing Official Delbert Warner - Safety Officer

Contact Official:

Name Delbert Warner

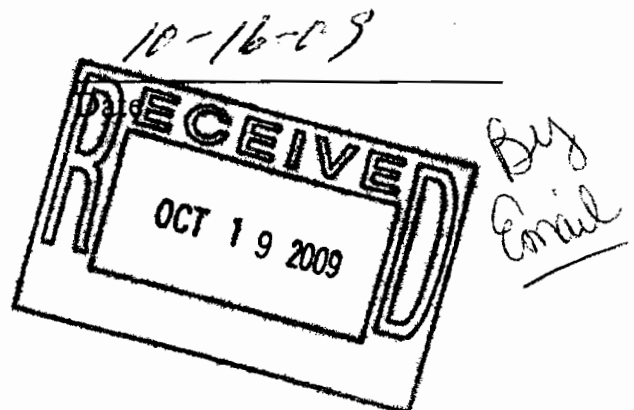
Title Safety Officer

Address PO Box 819, Paragould, AR 72451

Phone Number 870-236-7751

"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."

Delbert Warner
Signature of Official



III. ESTABLISHMENT'S OPERATIONAL CHARACTERISTICS

Principal Product or Service (use SIC Manual, if appropriate):

Finishers, Concrete and Bituminous: Powered

Brief description of manufacturing or service activity on premises:

Manufacture of concrete finishing & placing
Equipment

Principal raw materials used: Metal

Catalysts, Intermediates: N/A

Is your establishment connected to City Light and Water's Sewer System?

✓ Yes

_____ No

Is there wastewater generated within your establishment other than normal domestic sewage from toilet facilities, drinking fountains and lavatories?

✓ Yes

_____ No

(NOTE: IF YOU DO NOT GENERATE ANY WASTEWATER WITHIN YOUR ESTABLISHMENT OTHER THAN NORMAL DOMESTIC SEWAGE, YOU MAY SKIP THE REMAINDER OF THE QUESTIONNAIRE.)

Describe any process changes made during the past year that might affect the quality of wastewater discharges to the city sewer:

None

Type of production processes: _____ Batch Continuous

If batch, average number of batches per 24 hours? _____

Do you have a scheduled shutdown (vacation, etc.)? Yes

When? One week July 4th and One week December 25th

Is production seasonal? No

If yes, explain, indicating month(s) of peak production: _____

Average number of employees per Shift: 15 1st 2nd 3rd

Shift start times: 7:00 AM 1st N/A 2nd N/A 3rd

Shifts normally worked each day:

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
1 st	_____	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	_____
2 nd	_____	<u>N/A</u>	_____	_____	_____	_____	_____
3 rd	_____	<u>N/A</u>	_____	_____	_____	_____	_____

IV. WATER SOURCES, CONSUMPTION AND DISCHARGES

Water Sources:

Source	Quantity
Paragould Light Water & Cable System	<u>8,600</u> gallons per day
Private Wells	<u>0</u> gallons per day
Other	<u>0</u> gallons per day
Total	<u>8,600</u> gallons per day

Describe any raw water treatment processes in use: None

List Water Consumption in Plant:

<u>Source</u>	<u>Quantity</u>
Cooling Water	_____ gallons per day
Boiler Feed	_____ gallons per day
Process Water	_____ gallons per day
Sanitary Sewer System	<u>8,600</u> gallons per day
Contained in Product	_____ gallons per day
Other (irrigation, etc.)	_____ gallons per day
Total.....	<u>8,600</u> gallons per day

List Average Volume of water Discharged to:

<u>Source</u>	<u>Quantity</u>
Paragould CLW Wastewater System	<u>8,600</u> gallons per day
Natural Outlet (stream or storm sewer)	_____ gallons per day
Waste Hauler	_____ gallons per day
Evaporation	_____ gallons per day
Other (explain)	_____ gallons per day
Total.....	<u>8,600</u> gallons per day

List plant sewer outlets, size, and flow: 3 outlets at 4" each

Are there any floor drains located in the facility?

Yes

No

If yes, list the areas where the drains are located: Machine Shop

Is there a Spill Prevention Control Plan in effect for this plant?

Yes

No

How are spills (chemicals, food wastes, etc.) disposed of?

Washed into sewer

Hauled off premises

Other (describe):

Are any of the toxic pollutants listed in the table on page 8 known or suspected of being used at this facility either in the manufacturing of the product or as a by-product of your processes, which may enter the sewage collection system?

Yes

No

If yes, please indicate which pollutant by placing a check mark next to the pollutant name.

VI. POLLUTION PREVENTION PROJECTS

Describe any Pollution Prevention Project activities which are either planned or which have been implemented:

Pits picked up by re-cycler

VII. BEST MANAGEMENT PRACTICES

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:

Recycle Cardboard, pallets and Pits

VIII. ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

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:

None

**65 Toxic Pollutants Listed in Appendix B of 40 CFR 403
(51 FR 20426 Published June 4, 1986)**

___ Acenaphthene	___ Fluoranthene
___ Acrolein	___ Haloethers (other than those listed elsewhere; includes chlorophenylphenyl ethers, bromophenylphenyl ether, bis-(dichloroisopropyl) ether, bis-(chloroethoxy) methane and polychlorinated diphenyl ethers)
___ Acrylonitrile	___ Halomethanes (other than those listed elsewhere; includes methylene chloride, methylchloride, methylbromide, bromoform, dichlorobromomethane)
___ Aldrin/Dieldrin	___ Heptachlor and metabolites
___ Antimony and compounds	___ Hexachlorobutadiene
___ Arsenic and compounds	___ Hexachlorocyclohexane
___ Asbestos	___ Hexachlorocyclopentadiene
___ Benzene	___ Isophorone
___ Benzidine	___ Lead and compounds
___ Beryllium and compounds	___ Mercury and compounds
___ Cadmium and compounds	___ Napthalene
___ Carbon Tetrachloride	___ Nickel and compounds
___ Chlordane (technical mixture and metabolites)	___ Nitrophenols (including (other than 2,4-dinitrophenol; dinitrocresol)
___ Chlorinated benzenes (other than dichlorobenzenes)	___ Nitrosamines
___ Chlorinated ethanes (including 1,2-dichloroethane, 1,1,1-trichloroethane, and hexachloroethane)	___ Pentachlorophenol
___ Chloroalkyl ethers (chloroethyl and mixed ethers)	___ Phenol
___ Chlorinated naphthalene	___ Phtalate esters
___ Chlorinated phenols those listed elsewhere; includes trichlorophenols and chlorinated cresols)	___ Polychlorinated biphenyls (PCBs)
___ Chloroform	___ Polynuclear aromatic hydrocarbons (including benzanthracenes, benzopyrenes, benzofluoranthene, chrysenes, dibenzanthracenes, and indenopyrenes)
___ 2-Chlorophenol	___ Selenium and compounds
___ Chromium and compounds	___ Silver and compounds
___ Copper and compounds	___ 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)
___ Cyanides	___ Tetrachloroethylene
___ DDT and metabolites	___ Thallium and compounds
___ Dichlorobenzenes (1,2-, 1,3- and 1,4-dichlorobenzenes)	___ Toluene
___ Dichlorobenzidine	___ Toxaphene
___ Dichloroethylenes (1,1- and 1,2-dichloroethylene)	___ Trichloroethylene
___ 2,4-dichlorophenol	___ Vinyl chloride
___ Dichloropropane and dichloropropene	___ Zinc and compounds
___ 2,4-dimethylphenol	
___ Dinitrotoluene	
___ Diphenylhydrazine	
___ Endosulfan and metabolites	
___ Endrin and metabolites	
___ Ethylbenzene	

Attachment A-2

APPLICATION FOR PERMIT
FOR DISCHARGE OF INDUSTRIAL WASTES TO PARAGOULD SEWAGE WORKS

PLWC use only: Date Permit Application mailed to the industrial user: <u>3/31/2010</u> LE Date completed Permit Application received by PLWC: <u>5/24/2010</u> LE

Please complete the following:

Check one:

Permit application for renewal of an existing permit.

Current Permit Number: 89-05

Current permit Expiration Date: 9/30/2010

Application for a new permit.

1. Firm Name EMERSON APPLIANCE SOLUTIONS
Mailing Address P.O. BOX 520
City, Zip Code PARAGOULD, AR 72451

Facility Address 1000 SOUTH SECOND AVENUE
City, Zip Code PARAGOULD, AR 72450

Telephone Number: (870) 239-2171
Fax Number: (870) 239-8458
Web Site Address: _____

2. SIC Number(s): 3621
NAICS Number(s): 335312

3. List other environmental control permits held at this time:

STORM WATER PERMIT AR00747
AIR PERMIT 965-AR-4
WASTE WATER DISCHARGE PERMIT 89-05

4a. Quantity of Wastewater (Estimate if new facility):

Discharged to Paragould Sewer	Projected for next five (5) years	
	Flow (gallons per day):	
	Average Daily (30-day)	Maximum Daily (1 day)
Process Wastewater from <i>ALUMINUM DIE CASTING</i> Operation	<u>26,000</u>	<u>36,000</u>
Process Wastewater from <i>METAL FINISHING SWEED</i> Operation	<u>9,280</u>	<u>9,280</u>
Domestic Wastewater (Sanitary)	<u>11,900</u>	<u>12,500</u>
Noncontact Cooling Water	<u>43,100</u>	<u>45,000</u>
Total (process and sanitary)	<u>90,280</u>	<u>102,780</u>

List any periodic or seasonal variations:

NONE

4b. Wastewater Pollutant Parameter Concentrations:

In the spaces below, indicate the measured (or projected for new industry) average and maximum value of each of the listed wastewater pollutants.

Parameter	Units		Sewer Use Ordinance Limit	Concentration	
				Average Daily (30-day)	Maximum Daily (1 day)
BOD5	mg/L	30-Day Average	300	<u>—</u>	<u>300</u>
TSS	mg/L	30-Day Average	300	<u>—</u>	<u>300</u>
pH	S.U.	1-Day Maximum	5.5-11.5	<u>—</u>	<u>5.5-11.5</u>
Oil & Grease	mg/L	1-Day Maximum	100	<u>—</u>	<u>100</u>
Temperature	°C	1-Day Maximum	65	<u>—</u>	<u>65</u>

*Estimate based upon historical data or projections for new facilities based upon comparable existing technology.

4c. EPA Regulated Priority Pollutants:

List any Priority Pollutants (Attachment 1) that are known to be present in the wastestream of processes found at your facility in the spaces provided below. Refer to your facilities MSDS for further information.

<u>Priority Pollutant (Name):</u>		<u>Concentration:</u>
<u>CADMIUM</u>	30 Day Average	<u>.26</u>
	1 Day Maximum	<u>.69</u>
<u>COPPER</u>	30 Day Average	<u>.17</u>
	1 Day Maximum	<u>.32</u>
<u>LEAD</u>	30 Day Average	<u>.16</u>
	1 Day Maximum	<u>.32</u>
<u>CYANIDE</u>	30 Day Average	<u>.65</u>
	1 Day Maximum	<u>1.20</u>
<u>NICKEL</u>	30 Day Average	<u>2.38</u>
	1 Day Maximum	<u>3.98</u>
<u>ZINC</u>	30 Day Average	<u>.18</u>
	1 Day Maximum	<u>.47</u>
<u>DIETHYL PHTHALATE</u>	30 Day Average	<u>.33</u>
	1 Day Maximum	<u>1.00</u>
<u>bis(2-ETHYLHEXYL)PHTHALATE</u>	30 Day Average	<u>.33</u>
	1 Day Maximum	<u>1.00</u>
<u>PHENOLS</u>	30 Day Average	<u>.28</u>
	1 Day Maximum	<u>.79</u>
<u>SILVER</u>	30 Day Average	<u>.24</u>
	1 Day Maximum	<u>.43</u>
	30 Day Average	
	1 Day Maximum	
	30 Day Average	
	1 Day Maximum	
	30 Day Average	
	1 Day Maximum	

(Attach additional sheets as needed.)

List all chemicals/products with MSDS information at your facility that may come into contact with water at any time. Include any chemicals that are stored in an area adjacent to a wastestream that could become contaminated if spilled. Attach additional sheets as needed.

<u>Chemical Name</u>	<u>Amount used per day</u>	<u>Amount Stored at Facility</u>
ALUMINUM	SEE ATTACHED	
COPPER	SEE ATTACHED	
COMPLETE MSDS LIST	SEE ATTACHED	

5. Attach sketches of the following to this document:
 General plant processes and wastewater lines (including the location of all floor drains). Include any existing or proposed pretreatment systems, the location and sizes of all existing and proposed connections to the PLWC Wastewater Collection System. Also, include the details of the proposed monitoring access facilities. *SEE ATTACHED*

6a. Describe the nature of the manufacturing/commercial activities of the plant. Describe in detail any water usages other than sanitary or noncontact cooling water. Attach additional sheets as required.
SEE ATTACHED

6b. Describe any products manufactured or assembled at the plant by type and amount.
SEE ATTACHED
 FRACTIONAL HORSEPOWER ELECTRIC MOTORS, PRESENT
 LINE RATE = 28,000

6c. Describe the type and amount of raw materials used at the facility. *SEE ATTACHED*
 ALUMINUM
 COPPER
 PLASTIC
 LAM STEEL
 SHAFT STEEL
 MYLAR

7a. What are the hours of operation at your facility? *SEE ATTACHED*

Day of the Week

<u>Shift</u>	<u>Hours</u>	<u>Mon</u>	<u>Tue</u>	<u>Wed</u>	<u>Thu</u>	<u>Fri</u>	<u>Sat</u>	<u>Sun</u>
1 st :	_____ to _____	()	()	()	()	()	()	()
2 nd :	_____ to _____	()	()	()	()	()	()	()
3 rd :	_____ to _____	()	()	()	()	()	()	()

7b. What are the proposed/ actual hours of operation of any pretreatment systems at your facility?

Day of the Week:

<u>Shift</u>	<u>Mon</u>	<u>Tue</u>	<u>Wed</u>	<u>Thu</u>	<u>Fri</u>	<u>Sat</u>	<u>Sun</u>
1 st :	<i>7:00 AM to 3:30 PM</i>	<i>7:00 to 3:30</i>	<i>7:00 to 3:30</i>	<i>7:00 to 3:30</i>	<i>7:00 to 3:30</i>	_____ to _____	_____ to _____
2 nd :	<i>3:30 PM to 12:00</i>	<i>3:30 to 12:00</i>	<i>3:30 to 12:00</i>	<i>3:30 to 12:00</i>	<i>3:30 to 12:00</i>	_____ to _____	_____ to _____
3 rd :	<i>12:00 to 7:00</i>	<i>12:00 to 7:00</i>	<i>12:00 to 7:00</i>	<i>12:00 to 7:00</i>	<i>12:00 to 7:00</i>	_____ to _____	_____ to _____

SATURDAY AND SUNDAY AS NEEDED

8. Is your manufacturing/commercial operation subject to National Categorical Pretreatment Standards?

Yes No

If you answered yes to the above question, to which of the following National Categorical Pretreatment Standards are you subject?

- ① 40CFR 464.15 METAL MOLDING AND CASTING
- ② 40CFR 433.15 METAL FINISHING

EPA Categorical standards are listed on the following page.

EPA Categorical Standards	40 CFR Part	New Source Date
Aluminum Forming	467	11/22/1982
Battery Mfg.	461	11/10/1982
Carbon Black Mfg (New Sources Only)	458	5/18/1976
Centralized Waste Treatment	437	8/28/00
Coil Coating	465	1/12/1981 (Subparts A, B, C); 2/10/1983 (Subpart D)
Copper Forming	468	11/12/1982
Electrical & Electronic Components	469	8/24/1982 (Subparts A, B) 3/9/1983 (Subparts C, D)
Electroplating	413	8/31/1982
Feedlots (New Sources Only)	412	9/7/1973
Fertilizer Mfg. (New Sources Only)	418	12/7/1973 (Sub A-D); 1/16/76 (Sub E); 10/7/74 (Sub F-G)
Glass Mfg. (New Sources Only)	426	8/21/1974 (Subparts H, K-M)
Grain Mills (New Sources Only)	406	12/4/1973
Ink Formulating (New Sources Only)	447	2/26/1975
Inorganic Chemicals Mfg.	415	7/24/1980(Phase 1); 10/25/1983 (Phase 2)
Iron & Steel	420	1/7/1981
Leather Tanning & Finishing	425	7/2/1979
Metal Finishing	433	8/31/1982
Metal Molding & Casting	464	11/15/1982
Nonferrous Metals Forming	471	3/5/1984
Nonferrous Metal Mfg.	421	2/17/83 (Sub A-I, K-M) ; 1/22/87 (Sub J); 6/27/84 (Sub N-AE)
Oil & Gas Extraction	435	2/17/95 (Subpart D)
Organic Chem., Plastics & Synthetic Fibers	414	3/21/1983
Paint Formulating (New Sources Only)	446	2/26/1975
Paving & Roofing (New Sources Only)	443	1/10/1975
Petroleum Refining	419	12/21/1979
Pesticide Chemicals Mfg.	455	4/10/1992 (Subparts A, B); 4/14/1994 (Subparts C, E)
Pharmaceuticals	439	5/2/1995
Porcelain Enameling	466	2/27/1981
Pulp, Paper & Paperboard	430	1/6/1981 (Subparts A, C-D,F-L) 12/17/93 (Subparts B, E)
Rubber Mfg (New Sources Only)	428	8/23/1974
Soap & Detergent Mfg. (New Sources Only)	417	12/26/1973 (Subpart Q) 2/20/1975 (Subparts O, P, R)
Steam Electric	423	10/14/1980
Timber Products	429	10/31/1979
Transportation Equipment Cleaning	442	6/25/98
Waste Combustors	444	2/6/1998

Permit Application for New Permit or Permit Renewal
Certification Statement

This permit application must be certified by an authorized representative of the Industrial user. Failure to certify will result in denial of permit.

"I, the undersigned applicant, being the authorized representative of the herein named company, do hereby request a permit to use or to continue to use an industrial sewer connection at the location indicated herein and do agree to comply with applicable provisions of Paragould City Code regulating the use of public sewage works.

I declare that I have examined this report and to the best of my knowledge and belief that it is true, correct, and complete."

Certified by: Scott Wareing Date: 5/18/2010
Authorized Representative*

Name if Signee: SCOTT WAREING Title: PLANT MANAGER
(Please Print)

Name and phone number of person to contact regarding permit information:

JOEL D. TOBEY (870) 239-2171

Corporate Acknowledgement

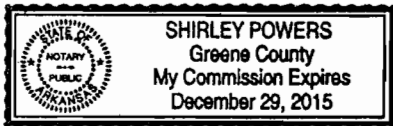
State of Arkansas Arkansas

County of Greene)

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/she 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 18th day of May, 20 10.



Shirley Powers
Notary Public in and for Greene County, Arkansas.

* An authorized representative may be:

- A principal executive officer of at least the level of vice-president (if the Industrial User submitting the report is a corporation).
- A general partner or proprietor if the Industrial User submitting the report is a partnership or sole proprietorship, respectively.

PLEASE NOTE:

The following questions (numbers 9 - 13) deal with current NPDES or PLWC Industrial Pretreatment Program Permit holders.

9. Are the applicable National Categorical Pretreatment Standards and City of Paragould Sewer Use Ordinance wastewater discharge limitations being met on a consistent basis? (Yes) (No)

Explain: *PRETREATMENT IS CONDUCTED FOR HEAVY METAL REMOVAL AND PHENOL DISTRUCTION. ULTRAFILTRATION IS USED TO SEPARATE ALUMINUM DIE CAST OIL FROM WASTEWATER.*

10. If the applicable National Categorical Pretreatment Standards and City of Paragould Sewer Use Ordinance wastewater discharge limitations are not being met on a consistent basis, is additional pretreatment and/ or an alteration of current operations and maintenance (O&M) required by your firm to meet the limitations? *N/A*

Explain:

If additional pretreatment and/or an alteration of current operations and maintenance (O&M) are required to meet the applicable National Categorical discharge limitations, submit the compliance schedule in attachment 2 which documents when your facility will attain final compliance with the applicable limitations. *N/A*

11. Describe any Pollution Prevention (P₂) Project activities which are either planned or have been implemented:

WASTE WATER PRETREATMENT, ULTRAFILTRATION,
CHEMICAL TREATMENT FOR HEAVY METAL REMOVAL
AND PHENOL DESTRUCTION. WFI IS USED FOR
OIL AND WATER SEPARATION.

12. Describe any Best Management Practices (BMP) activities which are either planned or have been implemented:

1. BULK TANK CONTAINMENT.
2. RAW DRUM STORAGE CONTAINMENT.
3. HAZARDOUS WASTE CONTAINMENT.
4. SCRAP METAL CONTAINMENTS.
5. WASTE WATER TREATMENT ROOM CONTAINMENT.
6. WASTE ALUMINUM DROSS CONTAINMENT.
7. HIGH LEVEL ALARM FOR UNDERGROUND COLLECTION TANK.
8. OVERFLOW DRAIN FOR SANITARY SEWER.

13. Describe any Environmental Management System (EMS) activities which are either planned or have been implemented:

1. WASTE WATER PRETREATMENT:

CAUSTIC SODA, FERRIC CHLORIDE FOR HEAVY METAL
REMOVAL.

FERRIC CHLORIDE, HYDROGEN PEROXIDE FOR PHENOL
DISTRIBUTION.

ULTRAFILTRATION FOR OIL AND GREASE REMOVAL

Attachment A-3



March 18, 2008

Ms. Lisa Ellington
PLWC
P.O. Box 9
Paragould, Arkansas 72450

Dear Ms. Ellington:

This letter serves as notice that the Emerson Motor Company facility in Paragould, Arkansas has stopped wastewater discharge from the Shafts Penetrate Operation permanently. The Penetrate operation has been outsourced to a facility in Walnut Ridge eliminating the Shafts coating operation at this location. The waste treatment tank for the Shafts Penetrate operation will be disconnected from the discharge point in the Wastewater Treatment Room.

This Treatment Room change will require a Discharge Permit Modification to Emerson's existing Permit 89-05.

Please let me know if you would like to come to the facility and view the change at your convenience. Do not hesitate to let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads 'Joel D. Tobey'.

Joel D. Tobey
Plant Engineer

CC: J.R. Gore
S. Wareing

Attachment A-4



INDUSTRIAL WASTES DISCHARGE PERMIT

PERMIT NO. 89-05

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,

Nidec Motor Corporation
1000 South 2nd Avenue
P.O. Box 520
Paragould, Arkansas 72450

is authorized to discharge industrial wastes from activities classified by SIC No. 3621 from premises at the above address to the Paragould Wastewater Collection System in accordance with application for permit submitted to Paragould Light, Water and Cable on May 24, 2010, effluent limitations, monitoring requirements, and conditions set forth in Parts I, II and III hereof.

This permit shall become effective on October 1, 2010.

This permit and authorization to discharge shall expire at midnight on September 30, 2015.

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

Signed this twentieth day of September, 2010.

A handwritten signature in black ink, appearing to read "Lisa Ellington", is written over a horizontal line.

Lisa Ellington, Environmental Services Manager

PERMIT NO. 89-05

PART I - EFFLUENT LIMITATIONS

OUTFALL NO. 001 - REGULATED PROCESS WASTEWATER FROM ALUMINUM DIECASTING AFTER PRETREATMENT AND RAIN WATER FROM SCRAP STORAGE, DRUM STORAGE AND TANK FARM AREAS AFTER PRETREATMENT; Process Wastewater regulated by National Categorical Standard for Aluminum Diecasters 40 CFR 464.15 (b), (c), and (h), Standards for Existing Sources. Unregulated rain water is significantly polluted with total phenols. Wastewater, Regulated and Nonregulated dilution wastewaters, from these sources is discharged continuously from this outfall. This combined 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>
Copper (T), mg/l	0.28 ^{1,5}	0.15 ^{1,5}	Composite
Lead (T), mg/l	0.29 ^{1,5}	0.14 ^{1,5}	Composite
Zinc (T), mg/l	0.41 ^{1,5}	0.16 ^{1,5}	Composite
Total Phenols, mg/l	0.69 ^{2,5}	0.24 ^{2,5}	Grab
TTO's, mg/l ³	0.88 ^{1,5}	0.29 ^{1,5}	Grab/Comp

OR

Alternate Oil & Grease, mg/l ⁴	10.9 ^{1,5}	3.6 ^{1,5}	Grab
---	---------------------	--------------------	------

Daily Flows gpd

Casting Quench	Report Only
Aluminum Die Cast	Report Only
Mold Cooling	Report Only
Pretreatment Oil	
Skim Wastes	Report Only
Drum Storage Area	Report Only
Scrap Metal Storage Area	Report Only
Aboveground Tank Farm	Report Only

¹Calculated equivalent concentration limits for Copper, Lead, Zinc, TTO and Alternate Oil & Grease, in accordance with 40 CFR 403.6 (e), at Outfall No. 001 are based on average pounds of aluminum poured of 0.175 M lb/day^a with average wastewater flows at this monitoring point of:

<u>Wastestream</u>	<u>40 CFR 403.6(e) Designation</u>	<u>Avg. Daily Flow^a</u>
Casting Quench - 40 CFR 464.15(b)	Regulated	15,680 gpd
Die Casting - 40 CFR 464.15(c)	Regulated	224 gpd
Mold Cooling - 40 CFR 464.15(h)	Regulated	6,496 gpd
Scrap Metal Storage Area	Dilution	450 gpd
Tank Farm (Rain Water)	Dilution	<u>150 gpd</u>
Total Daily Flows:		23,000 gpd
Dilution Flows:		600 gpd
Dilution Factor:	$\frac{23,000 - 600}{23,000}$	= 0.974

^aAverages based on data from the years 2005 to 2009.

²Calculated equivalent concentration limits for Total Phenols, in accordance with 40 CFR 403.6 (e), at Outfall No. 001 are based on average pounds of aluminum poured of 0.175 M lb/day^a with average wastewater flows at this monitoring point of:

<u>Wastestream</u>	<u>40 CFR 403.6(e) Designation</u>	<u>Avg. Daily Flow^a</u>
Casting Quench - 40 CFR 464.15(b)	Unregulated	15,680 gpd
Die Casting - 40 CFR 464.15(c)	Regulated	224 gpd
Mold Cooling - 40 CFR 464.15(h)	Unregulated	6,496 gpd
Scrap Metal Storage Area	Unregulated	450 gpd
Tank Farm (Rain Water)	Dilution ^b	<u>150 gpd</u>
Total Daily Flows:		23,000 gpd
Dilution Flows:		150 gpd

Dilution Factor:
$$\frac{23,000 - 150}{23,000} = 0.993$$

^aAverages based on data from the years 2005 to 2009.

^bRain water wastestream polluted with Phenols.

³TTO's is defined as the sum of the mass (concentrations) of the toxic organic compounds listed in 40 CFR 464.11 (a) (1), (2), and (6) which are found at concentrations greater than 0.010 mg/l.

⁴The Permittee, Emerson Motor Company, shall declare and document for PLWC which limit, either TTO's or Alternate Oil and Grease, they opt to comply with at Outfall No. 001.

⁵Detailed permit limit calculations can be found in the Statement of Basis.

OUTFALL NO. 002 – METAL FINISHING – REGULATED PROCESS WASTEWATER FROM SWECO UNIT, PART WASHER AND TUMBLER OPERATIONS: Process Wastewater from Metal Finishing is regulated by 40 CFR 433.15, Standards for Existing Sources. Regulated wastewater from this source is discharged continuously from this outfall, with a flow of approximately 11,300 gpd. 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	0.69 ¹	0.26 ¹	Composite
Chromium (T), mg/l	2.77 ¹	1.71 ¹	Composite
Copper (T), mg/l	3.38 ¹	2.07 ¹	Composite
Cyanide (T), mg/l	1.20 ¹	0.65 ¹	Grab
Lead (T), mg/l	0.69 ¹	0.43 ¹	Composite
Nickel (T), mg/l	3.98 ¹	2.38 ¹	Composite
Silver (T), mg/l	0.43 ¹	0.24 ¹	Composite
Zinc (T), mg/l	2.61 ¹	1.48 ¹	Composite
TTO (T), mg/l	2.13 ¹		Grab/Comp
Flows, gpd			
Sweco Unit		Report Only	
Part Washer		Report Only	
Tumbler		Report Only	

¹Processed wastewater per 40 CFR 433.15, Metal Finishing – Pretreatment Standards for Existing Sources.

OUTFALL NO. 003 - END OF PIPE - A COMBINED FLOW OF: 1) REGULATED PROCESS WASTEWATER FROM ALUMINUM DIE CASTING AFTER PRETREATMENT; 2) REGULATED PROCESS WASTEWATER FROM SWECO UNIT, PART WASHER AND TUMBLER OPERATIONS FOR METAL FINISHING; 3) DILUTION WASTESTREAM OF RAIN WATER FROM SCRAP STORAGE, DRUM STORAGE AND TANK FARM; 4) DILUTION NON-CONTACT COOLING WATER - 35,000 gpd; AND, 5) DILUTION DOMESTIC (SANITARY) WASTESTREAM - 30,000 gpd. Process Wastewater from Aluminum Die Casting is regulated by 40 CFR 464.15 (b), (c), and (h), Standards for Existing Sources. Process wastewater from Sweeco Unit is regulated by 40 CFR 433.15, Standards for Existing Sources. Combined wastewater, Regulated, Non-regulated, and Dilution wastewaters from these sources is discharged continuously from this outfall. This combined 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		Report Only	Composite
Chromium (T), mg/l		Report Only	Composite
Copper (T), mg/l		Report Only	Composite
Cyanide (T), mg/l		Report Only	Grab
Lead (T), mg/l		Report Only	Composite
Nickel (T), mg/l		Report Only	Composite
Silver (T), mg/l		Report Only	Composite
Zinc (T), mg/l		Report Only	Composite
Total Phenol, mg/l		Report Only	Grab
TTO (T), mg/l		Report Only	Grab/Comp
pH, S.U.		5.5 - 11.5 ¹	Grab
Oil & Grease, mg/l		100 ¹	Grab
Heat (Temp)		104°F (40°C) ¹	Grab

¹Local Sewer Use Ordinance.

PERMIT NO. 89-05

PART II - MONITORING REQUIREMENTS

- 1) Nidec Motor Corporation (Nidec) shall provide sampling access facilities on its process waste lines at points before process wastes have mixed with other waste streams from its premises to facilitate sampling at points designated as Outfall No. 001, Outfall No. 002 and Outfall No. 003. The location of each of these sampling points 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) Nidec shall pay to PLWC the costs of the required sampling and analyses.
- 4) Nidec 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 a 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 composite samples, except that temperature, pH, cyanide, total phenols, volatile organics, sulfides, and oil and grease shall be performed on grab samples.

- 6) Nidec shall keep daily records of aluminum metal poured and of total and process wastewater discharged to the PLWC Wastewater Collection System. Daily flows to be determined using calculated average annual flow rates for Nidec's wastewater treatment system. These flows shall be certified annually by an outside source and checked quarterly by Nidec using an approved method, i.e. bucket method. Reports on flow certification shall be reported to PLWC when completed. Daily records of aluminum metal poured and 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.

Part II - Monitoring Requirements (Continued)

- 7) The Nidec sampling points shall be:

Outfall No. 001 – Collection Tank following Permeate Sump on effluent line from pretreatment system. Appropriate 24 hour Composite or Grab samples shall be collected at this point, after pretreatment, to determine combined pollutant concentrations in pretreated wastes from Aluminum Die Casting Operations regulated by 40 CFR 464.15 (b), (c) and (h).

Outfall No. 002 – Collection Tank from Sweco Unit, Part Washer and Tumbler Operations. Appropriate 24 hour Composite or Grab samples shall be collected at this point to determine combined pollutant concentrations in wastes from the Burnishing Operations regulated by 40 CFR 433.15.

Outfall No. 003 - Lift Station Wetwell 15 feet South and 65 feet East of the Southeast corner of Emerson building: Appropriate 24 hour or grab samples shall be collected at this point to determine combined pollutant concentrations from: 1) Aluminum Diecasting; 2) Metal Finishing (Sweco Unit, Part Washer and Tumbler Operations); 3) Non-contact Cooling Water; 4) Dilution Water; and, 5) Domestic (Sanitary) Wastewater.

- 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.

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PART III - CONDITIONS OF PERMIT

- 1) Nidec Motor Corporation (Nidec) 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) Nidec 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 Nidec to mitigate any adverse effects of spills/slug loadings.

- 4) Nidec 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) Nidec 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) Nidec 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 Environmental Quality 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 Nidec 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 Nidec plant. Such access shall include ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any

Part III - Conditions of Permit (Continued)

additional duties. Nidec shall retain for a minimum of three years any records of wastes discharge monitoring activities and results and shall 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. PLWC personnel shall comply with all generally applicable safety and security requirements of Nidec.

- 8) This permit may be reopened by Paragould Light, Water and Cable any time during the effective duration for revisions to discharge limitations, monitoring and/or reporting requirements or conditions.
- 9) Provided that Nidec has submitted acceptable application for renewal at least six 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) Nidec 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.

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PART IV – 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 and POTW, including, but not limited to, wastestreams with 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 Paragould Light, Water & Cable 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 concentrations which, either singly or by interaction with other pollutants, will cause interference with either 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 result 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 Article IV Section 5 of 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 sewers for maintenance and repair;
 - 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; and
 - 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 auxillary 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.

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PART V – 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 BOD's, TSS, fats, oils and grease, and 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 Paragould Light and Water Commission personnel or the 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;

Part V – Violations and Suspensions (Continued)

- g) Failure to accurately report noncompliance;
 - 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.
- 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 Article XI, Section 7 of the Paragould Sewer Use 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 under Article XI Section 3 and Article XI Section 7 of the Paragould Sewer Use Ordinance.

Part V – Violations and Suspensions (Continued)

3) Termination of Discharge

In addition to those provisions in Article VI Section 6 of the Paragould Sewer Use Ordinance, any user that violates the following conditions of this ordinance, wastewater discharge permits, or orders issued hereunder, is subject to discharge termination.

- a) Violation of wastewater discharge permit conditions;
- b) Failure to accurately report the wastewater constituents and characteristics of its discharge;
- 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; and
- e) Violation of the pretreatment standards in Article III Section 1 of the Paragould Sewer Use Ordinance.

Such user will be notified by the Manager of the proposed termination of its discharge and be offered an opportunity to show cause under Article XI Section 3 of the Paragould Sewer Use Ordinance why the proposed action should not be taken.

PERMIT NO. 89-05

PART VI – TRANSFER OF PERMIT

- 1) **Wastewater Discharge Permit Transfer**
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 operator 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 A-5

PLWC use only:

Date Fact Sheet mailed to the industrial user: 10/27/10
Date completed Fact Sheet received by PLWC: 11/13/2010 CE

PARAGOULD LIGHT, WATER & CABLE
FACT SHEET INFORMATION FOR PERMITTED FACILITIES

Facility Name NIDEC MOTOR CORPORATION
Facility Address 1000 SOUTH SECOND AVENUE
Mailing Address P.O. BOX 520
PARAGOULD, ARKANSAS
72451
Website N/A
Contact Person(s) JOEL D. TOBEY
Phone Number (870) 239-2171
Fax Number (870) 239-8458
E-mail Address JOEL.TOBEY@NIDEC-MOTOR.COM
PLWC Permit Number 89-05
Effective Dates OCTOBER 1, 2010
SIC Number(s) 3621
NAISC Number(s) 335312
Date Production Began OCTOBER 1, 2010

List all discharges into the Paragould Sewer System. Include source and flow amounts.

PLEASE SEE ATTACHED DIAGRAM

Attach a physical description of manufacturing processes and schematics showing the flow of raw material as it travels through the various processes to the end product. Include wastewater-generating operations with flows and materials handling practices (totes, carboy, forklifts, buckets, etc.). Also include a list of all chemicals used in the various processes.

PLEASE SEE ATTACHED DIAGRAM

What product(s) are produced at this facility?

FRACTIONAL HORSEPOWER ELECTRIC APPLIANCE MOTORS.

What raw products are used?

PLEASE SEE ATTACHED MSDS LIST

What are the hours of operation at your facility?

Shift	Day of the Week						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
1 st	07:00 to 15:30	07:00 to 15:30	07:00 to 15:30	07:00 to 15:30	07:00 to 15:30	AS to NEED	AS to NEED
2 nd	15:30 to 24:00	15:30 to 24:00	15:30 to 24:00	15:30 to 24:00	15:30 to 24:00	AS to NEED	AS to NEED
3 rd	24:00 to 07:00	24:00 to 07:00	24:00 to 07:00	24:00 to 07:00	24:00 to 07:00	AS to NEED	AS to NEED

How many employees work on each shift?

Shift	Day of the Week						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
1 st	334	334	334	334	334	AS NEEDED	AS NEEDED
2 nd	164	164	164	164	164	AS NEEDED	AS NEEDED
3 rd	126	126	126	126	126	AS NEEDED	AS NEEDED

What, if any, pretreatment equipment is used at this facility?

ULTRA FILTRATION, CHEMICAL, EVAPORATOR

What are the actual hours of operation of the pretreatment systems at your facility?

Shift	Day of the Week						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
1 st	07:00 to 15:30	07:00 to 15:30	07:00 to 15:30	07:00 to 15:30	07:00 to 15:30	AS to NEED	AS to NEED
2 nd	15:30 to 24:00	15:30 to 24:00	15:30 to 24:00	15:30 to 24:00	15:30 to 24:00	AS to NEED	AS to NEED
3 rd	24:00 to 07:00	24:00 to 07:00	24:00 to 07:00	24:00 to 07:00	24:00 to 07:00	AS to NEED	AS to NEED

Pollution Prevention Activities used:

WASTE MINIMIZATION PROGRAM (SEE ATTACHED)
AFTER BURNERS FOR VISIBLE EMISSION REDUCTION,
PRETREATMENT FOR WASTE WATER REDUCTION AND COMPLIANCE,
RECYCLING OF METAL, OFFICE PAPER, PLASTIC AND LAMP WASTE.

Best Management Practices used:

POST SIGNS NOT TO PUT CHEMICALS IN DRAINS. KEEP LIDS ON DRUMS
AND BUNGS SECURE. PROVIDE CONCRETE CONTAINMENTS FOR
HAZARDOUS WASTE STORAGE, RAW DRUM MATERIAL, TANK FARM
AND SCRAP METAL. DRUMS INSIDE THE FACILITY HAVE SECONDARY
CONTAINMENT.

Environmental Management System used:

INTERNAL AND EXTERNAL AUDITS

Does your facility have a National Pollutant Discharge Elimination System (NPDES) permit?

Yes No

If yes, what is the NPDES permit number?

N/A

Does the facility hold other environmental permits?

Yes No

If yes, provide the permit number(s) and type of permit.

STORM WATER PERMIT (AR00747)

MINOR SOURCE AIR PERMIT (965-AR-5)

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.

Scott Waring
Signature of Official

PLANT MANAGER
Title

11/2/2010
Date

A-5c

Attachment A-6

PARAGOULD LIGHT, WATER & CABLE
INDUSTRIAL USER INSPECTION REPORT

DATE OF INSPECTION: 02/15/10

TIME OF INSPECTION: 10 AM

INSPECTED BY: Lisa Ellington
INDUSTRIAL REPRESENTATIVE: Joel Tobey
RESPONSIBLE OFFICIAL: Steve Wareing, Plant Manager
CONTACT: Joel Tobey, Plant Engineer
PHONE NUMBER: 239-2171

NAME & ADDRESS OF INDUSTRIAL FACILITY:

Emerson Electric Company
1000 South 2nd Street
P.O. Box 520
Paragould, AR 72450

PLWC PERMIT #:

89-05

JOEL D. TOBEY
Printed Name of Industrial Representative

Lisa Ellington
Printed Name of PLWC Representative

Joel D. Tobey
Signature
Lisa Ellington
Signature

CHANGES IN PROCESSES, PRODUCTS, CHEMICALS OR PRETREATMENT SINCE LAST INSPECTION ON 02/09/09:

N/A

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

N/A

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

IF NO, LIST VIOLATIONS AND DATE OCCURRED:

Copper Daily:	September 9, 2009	Reported 0.459 mg/L; limit 0.32 mg/L
Copper Monthly Average:	September 2009	Reported 0.247 mg/L; limit 0.17 mg/L

LAST DATE OF CALIBRATION FOR FLOW MONITORING EQUIPMENT:

Uses a laser to measure depth of discharged water and pump speeds to check flow meters.
Hess Environmental has been hired to check all discharge flows from all areas; completed week of February 8, 2010; waiting to receive paperwork.

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 checked="" type="checkbox"/> NO |
| B) Incentive programs for employee input on recycling, process improvement of other pollution prevention activities | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |
| C) Others: | <input type="checkbox"/> YES | <input checked="" type="checkbox"/> NO |

POLLUTION PREVENTION PRACTICES AND ACTIVITIES IN PLACE:

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

Waste Minimization Program, Best Management Practices
Recycle batteries, light bulbs, aerosol cans and electronic equipment
Have introduced a plastic recycling program

A-66

PRETREATMENT FACILITIES OPERATION AND MAINTENANCE:

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

Mr. Tobey attends training outside Emerson on various programs and then trains employees in-house.
 Training conducted in-house on HAZWOPER, RCRA, P₂, SPCC and Universal Waste
 Training conducted by Consulting Engineer (includes Slug Control and TOMP)

RECORDS AND REPORTS:

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

LABORATORY PROCEDURES**:

- | | | | | |
|----|--|---|-----------------------------|---|
| A) | EPA approved analytical testing procedures used | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input checked="" 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 checked="" type="checkbox"/> n/a |
| C) | Quality control procedures used | <input type="checkbox"/> YES | <input type="checkbox"/> NO | <input checked="" type="checkbox"/> n/a |
| D) | Commercial Laboratory used | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a |
| | Lab Name | American Interplex | | |
| | Lab Address | Little Rock, Arkansas | | |
| | Reason for Use: | Stormwater (General Permit) | | |

*Emerson has 2 generators on site; system is monitored 24/7.

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

TOXIC ORGANICS MANGEMENT PLAN:

A) Description of observed regulated processes and discharges.

Discharges from die casting and Sweco unit. Sweco Unit installed May 2009; processes aluminum shield ends from casting and deburs them (smooths them out) using steel shot. Process wastewater from die casting goes through pretreatment of pH adjustment, zinc removal (using ferric chloride), ultrafiltration and phenol removal (using hydrogen peroxide); Sweco discharge goes through pretreatment using ferric chloride (for Zinc removal) and caustic soda. Emerson also has discharges from sanitary and the rainwater collection area. The treatment tanks are "desludged" every six (6) months; the entire treatment system is cleaned every six (6) months.

B) Description of stored chemicals.

Chemicals (ferric chloride, caustic soda, hydrogen peroxide) are bought as needed; stored in area to be used. Large containment tank is available; if there is a large spill, all chemicals are contained in treatment room area and will go through pretreatment units before being discharged.

C) Description of chemical handling procedures.

A forklift is used to unload chemicals (in totes) from trucks; chemicals are unloaded in area where used and stored; in tank farm chemicals are unloaded, placed in tanks and pumped to area needed; if a spill occurs employees are to follow the Emergency Contingency Plan and SPCC; no chemical can leave area where spilled.

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

Emerson has been informed that any slugs or spilled discharges are to be reported to PLWC immediately by contacting the Environmental Services Manager at 239-7795 or PLWC SCADA Operator at 239-7700.

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.

Emerson has a SPCC on file; copy located at PLWC; emergency spill equipment located in waste treatment room

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

Only floor drain is located in battery storage area (required by OSHA).

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

Inter-Rail Systems, Inc. picks up all hazardous disposals; Joel audits annually anyone is associated with hazardous waste disposal for Emerson; non hazardous waste facilities are audited every three years

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

SPCC on file

J) Evaluation of TOMP need.

TOMP is not needed; Emerson is not eligible to certify out of TTO testing

A-6d

PHYSICAL DESCRIPTION OF MANUFACTURING PROCESSES:

Emerson produces fractional horsepower motors for washers and dryers. Raw materials used in the process are steel, copper, aluminum and plastics. In the die casting area there are 16 end shield and 8 rotor machines. See Fact Sheet for more information.

WASTEWATER GENERATING OPERATIONS AND FLOWS:

Die Casting	24,500 gpd
Sweco Unit	~3,000 gpd

OTHER SOURCES OF WASTEWATER:

Sanitary	20,000 gpd
Rainwater	500 gpd
Boiler Blowdown	50 gpd

REGULATED WASTESTREAM(S):

Die Casting	40 CFR Part 464.15 (b), (c), (h) – Aluminum Die Casters
Sweco Unit	40 CFR 433.15 – Metal Finishing for Existing Sources

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

Aluminum is melted in furnaces, and then poured into die cast machines to form rotors or end shields. Parts then go to machining or milling. Parts are then sent to the sub-assembly area where they are dipped in varnish and placed in drying ovens. Copper coated bonded Aluminum wire goes to oven for curing. Motors are then assembled using the various parts manufactured. Defective motors are disassembled for repair or recycled.

Approximate number of employees:	650
Number of shifts:	3 shifts; prime shift (A & B)
Average number of hours/week:	Operate 24 hrs/day, 5 days/week

DESCRIPTION OF PRETREATMENT SYSTEM(S):

Ultrafiltration, pH adjustment, Hydrogen Peroxide, Ferric Chloride

Continuous pH monitoring:

EQ Tank	pH \geq 10 S.U.
Permeate Pit	pH \leq 3 S.U.
Retention Tank	pH \geq 8.5 S.U.

Meters calibrated monthly; probes checked monthly

COMMENTS:

Chemicals used in Sweco unit include EvapoRust and Liquid Cleaner
Inventory of spare parts, replacement pumps, and probes on hand to replace/repair equipment
Prime shifts work Saturday through Tuesday 10 hours/day.

A-be

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August 21, 2006

Mr. John Wallace
Plant Manager
MMI Trutec
P.O. Box 757
Paragould, AR 72450

Re: Slug Discharge Evaluation

Dear Mr. Wallace:

Recently there have been some changes to the national pretreatment regulations, known as the "Streamlining Regulations". Many of these changes we have already incorporated into our local pretreatment program through recent changes to our Pretreatment Ordinance and Program. Therefore, most of the changes will be transparent to you.

However, there is one new requirement that will affect you directly, and that is the need for the utility to perform an evaluation on each significant industrial user (or local permit holder) as to their potential to make slug discharges. We are required to perform this evaluation by October 14, 2006.


So, in the weeks ahead I will be visiting with you and asking a number of questions regarding your spill and slug discharge prevention and mitigation practices. You may already have such a plan in place, but just so you'll be ready when I come by, here are a few of the things I will be looking for:

1. If you have an already existing spill/slug plan (SPCC, TOMP, Contingency), you need to have it handy for reference.
2. I will need a list of your bulk chemicals (like the ones you've given me MSD sheets for), including the location of the chemical in your facility, the quantity stored and the container type.
3. For manufacturing processes that have chemicals or process solutions in tanks, I will need to know the chemical (or solution) name, its location (on a schematic), and the tank size, in gallons.
4. If you have a pretreatment system, any required calibration of instrumentation and/or equipment will need to be up to date.
5. Name(s) of any chemical solutions that are discharged in a batch or non-scheduled manner (occurring at 6-month frequency or longer).
6. A list of any non-discharged wastes (Hazmat, solid waste, etc.), including the type of waste, the quantity per year generated, and the disposal method you are using for the waste.

I realize this is a lot of information, but I wanted to give you a "heads up" that we will be asking for it so you will be prepared when I call. I envision starting to make these visits next week, and so I will be calling you soon to set up a time for me to come by.

Thank you for your time and cooperation as we work through this together. As always, your efforts to help protect our water environment are greatly appreciated.

Sincerely,


Lisa Gilbreath
Environmental Services Manager

Paragould Light, Water and Cable
Wastewater Treatment Plant
Industrial Pretreatment

Slug/Spill Evaluation Checklist

SIU Name: MMI - Trutec Date: 09/05/06

Permit No: 97-01 Contact: Jody Faulkner

1. Spill Plan

- a. Type on file (SPCC, TOMP, Contingency): TOMP (2006); Quality Systems Manual (2003)
- b. Number of Spills in the last 3 years: None

2. Chemical Storage

- a. Attach a chemical list, including location of chemical, quantity stored, and container size.
- b. Containment: Yes _____ No _____ Describe: _____

Condition: Good _____ Fair _____ Poor _____ N/A _____
- c. Drains/Trenches: Yes X No _____ Routed to: Outside holding tanks
Distance from storage tanks or drums (in feet): 3 to 50 feet
- d. Spill Potential (High, Medium, Low): Low

3. Manufacturing Processes

- a. Process solutions in tanks – see attached list

<u>Chemical Name</u>	<u>Location (attach sketch)</u>	<u>Tank Size (in gal)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

3. Manufacturing Processes - continued

b. Do process solution tanks overflow? Yes No

If no, is overflow liquid contained? Yes No

Describe containment: _____

Condition of containment: Good Fair Poor N/A

c. Drains/Trenches: Yes No Routed to: Outside holding tanks

Distance from Process Tanks (in feet): 3 feet

d. Spill Potential (High, Medium, Low): Low

4. Pretreatment System

a. Evaluate potential for operating upsets (High, Medium, Low): Low

b. Calibration frequency of instrumentation and/or equipment (specify): pH meter is certified annually; pH meter calibrated daily

c. Spare parts on hand: Yes No (Spare pH probe)

d. Excess wastewater holding capacity: Yes No (24-hr capacity)
NOTE: Trench holds ~1,000 gal and can be dammed.

e. Is there a control system to monitor operation of treatment system?

Yes - Manual Check No

f. By-pass potential: High Medium Low N/A

5. Loading/Receiving Docks

a. Drains/Sumps: Yes No If yes, routed to:

Storm Sanitary Pretreatment Other

6. Specific Prohibitions (Article III of the Paragould Sewer Use Ordinance)

a. Are any items present? Yes No

b. Potential to discharge: Yes No

7. Non-Routine Batch Discharges

a. Does facility have these type of discharges? Yes X No _____

(Defined as non-scheduled, occurring at 6 month frequency or longer.)

b. Name of chemical solution discharged: Discharge from settling tanks

8. Non-Discharged Wastes

a. Are any generated? Yes X No _____

b. If yes, list the non-discharged wastes:

<u>Type of Waste</u>	<u>Quantity per Year Generated</u>	<u>Disposal Method</u>
<u>KQ Sludge</u>	<u>217,866 lbs (2005)</u>	<u>Hauled off</u>
<u>Waste Oil</u>	<u>1,585 gal (2005)</u>	<u>Hauled off</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

c. Describe protective measures to prevent accidental discharge of these substances into the sanitary sewer system:

Trench can be dammed if needed

Recommendations

- a. X Existing Spill Plan adequate, Combined Slug/Spill Control Plan not needed
- b. New Slug-Spill Control Plan required
- c. Add slug provisions to existing Spill Plan
- d. Other deficiencies to be corrected:

- e. No Slug/Spill Control Plan is necessary at this facility
-

Alisa Ellington
Signature

12/7/06
Date

ATTACHMENTS:

Chemical Spill Procedure
TOMP
Layout of Facility
Chemical Storage List
Wastewater Flow Diagram
MSDS of Chemical on Site

Compliance Activity Type: Inspection/Evaluation

* Compliance Monitoring Type:

* State: AR

- AFO Defined
- AFO Designation
- Aerial Photography
- Audit**
- Audit (IU)

Compliance Monitoring Activity Name: *Paragould Pretreatment Audit*

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

Linked Facility FACILITIES

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	<i>AR0033766</i> <input type="button" value="VALIDATE"/>			

Planned Start Date: *12/7/10*

Actual Start Date: *12/7/10*

Planned End Date: *12/9/10*

Actual End Date: *12/9/10*

Statutes and Sections Information

Federal Statutes: CWA - Clean Water Act

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

State Statute:

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

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

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

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

Which party had the lead?

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

Compliance Monitoring Agency Name:

Government Contacts CONTACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization
SIC Codes:		<p>Codes</p> <p>ADD / REMOVE</p>			
NAICS Codes:		<p>Codes</p> <p>ADD / REMOVE</p>			
OECA National Priority:		<p>Priorities</p> <ul style="list-style-type: none"> 2009 - (CA Only) - Air Toxics - Flares 2009 - (CA Only) - Air Toxics - LDAR 2009 - (CA Only) - Air Toxics - Surface Coating 2009 - (CA Only) - Financial Assurance 2009 - (CA Only) - MP - Mining 			
Regional Priority:		<ul style="list-style-type: none"> 2009 - Region 06 - Air Toxics Major Sources (O & G) 2009 - Region 06 - Brine Spills from Oil & Gas Operations 2009 - Region 06 - CD Implementation 2009 - Region 06 - Minor Wastewater Collection & Treatment System 2009 - Region 06 - Petroleum Refining 			

Media Monitored

Compliance Monitoring Information

Media Monitored:

Number of Days Physically Conducting Activity:

Number of Hours Physically Conducting Activity:

Multimedia Indicator:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

Compliance Monitoring Comments

Compliance Monitoring Comments:

User Defined Fields

1

Trusted sites

100%

Special Programs
Pretreatment

Significant Industrial Users (SIUs)

SIUs:

SIUs Without Control Mechanism:

SIUs Not Inspected:

SIUs Not Sampled:

SIUs in SNC with Pretreatment Standards:

SIUs in SNC with Reporting Requirements:

SIUs in SNC with Pretreatment Schedule:

SIUs in SNC Published in Newspaper:

SIUs on Schedules:

Violation Notices issued to SIUs:

Administrative Orders issued to SIUs:

Civil Suits Filed Against SIUs:

Criminal Suits Filed Against SIUs:

Categorical Industrial Users (CIUs)

CIUs:

CIUs in SNC:

Penalties

Dollar Amount of Penalties Collected: \$

Industrial Users (IUs) from which Penalties have been collected:

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Violation of IU Schedule for Remedial Measures:

Formal Response to Violation of IU Schedule for Remedial Measures:

Local Limits

Date of Most Recent Technical Evaluation for Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

Removal Credits

Removal Credits Application Status:

Date of Most Recent Removal Credits Approval:

Removal Credits:

Acceptance of Waste

Acceptance of Hazardous Waste:

Acceptance of Non-Hazardous Industrial Waste:

Acceptance of Hauled Domestic Wastes:

Deficiencies

Deficiencies Identified During IU File Review:

Control Mechanism Deficiencies:

Legal Authority Deficiencies:

Deficiencies in Data Management and Public Participation:

Deficiencies in Interpretation and Application of Pretreatment Standards:

Inadequacy of Sampling and Inspections:

Adequacy of Pretreatment Resources:

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling: