

ADEQ

ARKANSAS
Department of Environmental Quality

February 25, 2008

Darrell Phillips
Chief Operations Officer
1901 Jones Road
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 11th through the 13th, 2008. The contents should be made available for review by appropriate City officials. A review should be made of the required actions and recommendations. Please provide within thirty (30) days written corrective actions and comments to this office.

Paragould Light Water and Cable (PWLC) appears to have a staff keenly interested and knowledgeable of both the Pretreatment and Pollution Prevention programs and their implementation. This auditor was impressed with the professionalism and cooperation exhibited by your personnel during the audit and industry site visits. This State auditor commends them for their work ethic and performance.

Two of EPA's focal points being integrated with the National Pretreatment Program are: Pollution Prevention (P2) and partnerships between the regulators and those regulated in achieving the objectives of the Clean Water Act. It's obvious this has been a successful work in progress by your Pretreatment personnel.

It was a pleasure working with your staff during the audit and becoming more familiar with Paragould, its industries and your 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

cc: Rudy Molina/EPA 6WQ-PP
Greg Hurley/NPDES Enforcement
Eric Fleming/NPDES Inspector

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT
CITY OF PARAGOULD, ARKANSAS**

NPDES PERMIT #AR0033766

February 22, 2008

**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 12th – 14th, 2008, 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

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
- * 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 is 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.

However, since "streamlining" revisions were made to the National Pretreatment Regulations (40 CFR 403) in October '05, the Program is not current with its requirements and modifications to their Program will be necessary.

The City's wastewater treatment plant has a design flow of 6.0 MGD and includes primary clarification, oxidation ditches, final clarification, re-aeration, chlorination, de-chlorination and aerobic sludge digestion. An average of 286 dry tons of biosolids are land applied per year.

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 0.55 MGD from 10 significant industries, 8 of which are categorical.

The effluent has shown no pattern of sub-lethality or lethality in either species.

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 the City (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 403.12(i)** "The reports required by paragraphs (b), (d), and (e) of this section shall include the certification statement as set forth in 40 CFR 403.6(a)(2)(ii), and shall be signed as follows..."

Not all reports submitted by the industries included this certification statement and must be included (See Attch. A-4e for example).

2) Under **40 CFR 403.12(e)** "...In addition, this report shall include a record of measured or estimated average and maximum daily [regulated process] flows for the reporting period for the Discharge reported..."

The City does all the sampling/monitoring for their IUs. It was not ascertained if the flows the City was recording was total plant or process flows. Categorical process flows must be accurately measured and recorded.

3a) Under **40 CFR 433.12(b)** [Regarding toxic organic management plans [TOMPs] in lieu of monitoring for the toxic organics], “a discharger shall submit a solvent management plan that specifies to the satisfaction of the [City] the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater.”

A TOMP could not be located in Spectrum’s file but they were making the certification statement. Updated and signed TOMPs should be kept in appropriate metal finishers’ files. Correspondence from the City should also be sent to the metal finisher indicating the City has approved or concurred with the submitted TOMP.

3b) Under **40 CFR 403.12(e)** “In cases where the Pretreatment Standard requires compliance with a Best Management Practice [a TOMP for example]...the User shall submit documentation required by the Control Authority or the Pretreatment Standard necessary to determine the compliance status of the User.”

The City should begin preparation of additional permit reporting requirements for their metal finishers to verify compliance with their submitted TOMPs.

4) Under the City’s **Pretreatment Program’s** Enforcement Response Plan (ERP), one of the initial enforcement options is to make a phone call to notify an IU of a violation. But on page 34 of that ERP, “The PC [pretreatment coordinator] should also maintain documentation of follow-up phone or in-person contacts...”

Not all records of communications (ROCs) regarding IU violations could be produced during the audit. These ROCs must be documented to “start the clock” for escalated enforcement actions if necessary.

5a) Under **40 CFR 403.8(f)(2)(vi)** “Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006.”

5b) Under **40 CFR 403.8(f)(1)(vi)(A)** “Obtain remedies for noncompliance by any Industrial User with any Pretreatment Standard and Requirement”

Correspondence dated 8/1/07, discovered during the file review revealed the City had sent Martin Sprocket a notice that a slug control plan was deemed necessary (see Attch. A-13e). No further correspondence nor slug control plan had been submitted for approval from Martin could be located.

The City must take necessary enforcement actions necessary to obtain reports determined necessary from its industries.

6) Under **40 CFR 403.8(f)(2)(vii)** “Investigate instances of noncompliance with Pretreatment Standards and Requirements, as indicated in the reports and notices required under 40 CFR 403.12, or indicated by analysis, inspection, and surveillance activities described in paragraph (f)(2)(v) of this section. Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions”.

It was discovered during the file review that a chain of custody did not appear complete (see Atch. A-9). It could not be determined who the sampler (Bill Keasler) relinquished the sample to before it was received by the contract lab. With this chain of custody “broken”, the final lab results could be challenged in a court of law.

7) Under **40 CFR 403.8(f)(1)(ii)** “Require compliance with applicable Pretreatment Standards and Requirements by Industrial Users...”

A tumbling operation which generated a small amount of wastewater was discovered at Spectrum during the site visit. Its discharge point was not connected to the City’s normal sampling point. City personnel had no knowledge if it had been monitored for compliance with 40 CFR 433. This wastestream must also be monitored for compliance.

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

1) **Strongly recommend** sending the hazardous waste notification statement in 40 CFR 403.12(p) to ALL haz waste generators connected to the City’s collection system. A copy of ADEQ’s generators list was supplied to aid in this updated notification process. And, it’s strongly recommended to send this notification requirement to the City’s hospitals, dentists, dental clinics, chiropractors, veterinarians, film processors, long term health clinics, pharmacies and others having the potential to discharge haz waste into the City’s collection system. Many, if not all of these small quantity generators are not being tracked by ADEQ.

2) Recommend revising permit language clarifying types of samples to be taken. The permit limit’s page should include another column identifying what type of sample (grab or composite) should be taken for each parameter. At a minimum, a footnote should be added to reference the type samples referenced under the permits’ Part II-Monitoring Requirements, paragraph 5). This will help make sample types more identifiable for both the IUs (in the case they want to monitor themselves for QA) and any outside entity (ADEQ inspector, e.g.).

3) Recommend drafting standard operating procedures (SOPs) for the day-to-day administrative duties of the City’s Pretreatment Coordinator. 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 correspondence should be handled/filed, etc.

4) CLW personnel have an excellent start on their IUs’ facts sheets. It’s recommended to also date

the most current ones, include more detailed data with hand calculations that illustrate the basis for permit limits.

5) Continue sending the City's IUs these fact sheets for the reps to update, sign and date with any changes in processes or chemicals. Updated, detailed description of processes should be included as well as accurate process schematics should be required. Non-regulated wastewater flows should also be included on these schematics.

6) Inspection reports should reference these fact sheets where more information includes a physical description of manufacturing processes (e.g.: 5 polishing stations, 15 welding stations, 10 self-contained machining units, assembly, etc). Other information in the fact sheets (or in the inspections) 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, measured/estimated dilution water sources/flows, etc. should be included.

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.

7) Recommend including in the city's Ordinance/ERP and guide an option of requiring P2 Audits and Best Management Plans to be developed and implemented.

8) Also, consider requirements for licensed operators where deemed necessary.

9) Recommend recycling old permits and other needless documents older than 3 years. Recommend keeping any original baseline monitoring reports and 90-day compliance reports if they're still "findable".

During the audit, documentation was, for the most part, easily retrievable but, it seemed to this auditor, better order could be attended to.

10) Strongly recommend cross training another employee in all aspects of the day-to-day operations of the City's Pretreatment Program.

11) Recommend more attention be given to the Pollution Prevention (P2) program. Several instances of IUs' P2 efforts were observed during the site visits but, no reports were being gathered nor asked for by the City reps. These IUs should be recognized for going above and beyond the basic regulatory minimum. That can be accomplished via both the national P2 and regional P2 programs and databases.

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

Submit Program and ordinance modifications to be current with the revised (“streamlining”) National Pretreatment Regulations in 40 CFR 403. No time frame will be mentioned here as the City’s next NPDES permit will have a schedule of compliance requiring it.

* * * * *

The City should consider the 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: Chief Operations Officer

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: 12/11-13/07
 (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>12/05</u>	<u>"Satisfactory"</u>
<u>PCI</u>	<u>5/05</u>	<u>Inspection form problems, IU flow-monitoring calibration and last self-monitoring results</u>

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.

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	9/1/04	8/31/09

* 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)- 2.86 MGD

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

Industrial Contribution to this Treatment Plant

of SIUS : 10 # of CIUS : 8
 Industrial Flow (mgd): .55 Industrial Flow (%) : 19.34 %

Level of Treatment

Type of Process(es):

Primary

Secondary

Tertiary

Primary Clarification; Oxidation ditches;
final clarification and re-aeration, aerobic sludge 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:

<input checked="" type="checkbox"/> Land Application	<u>263</u> dry tons/11 months
<input type="checkbox"/> Incineration	<u> </u> dry tons/yr.
<input type="checkbox"/> Monofill	<u> </u> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<u> </u> dry tons/yr.
<input type="checkbox"/> Public Distribution	<u> </u> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<u> </u> dry tons/yr.
<input type="checkbox"/> Other (specify)	<u> </u> dry tons/yr.

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

a. (continuation of individual treatment plant information for Paragould City Treatment Plant.)

YES NO

Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: same
 Issuance Date: same
 Expiration Date: same

List pollutants that are specified in current sludge permit:
Reference to provisions in 40 CFR 503

YES NO N/A

Has the Control Authority submitted results of whole effluent biological toxicity testing.

Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) _____

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

	<u>Influent</u>	<u>Effluent</u>	<u>Sludge</u>	<u>Ambient</u>
Metals *	<u>4</u>	<u>4</u>	<u>4</u>	<u>--</u>
Priority **	<u>2</u>	<u>2</u>	<u>--</u>	<u>--</u>
Biomonitoring	<u>--</u>	<u>4</u>	<u>--</u>	<u>--</u>
TCLP	<u>--</u>	<u>--</u>	<u>4</u>	<u>--</u>
Other: _____	_____	_____	_____	_____

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

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

city coordinator indicated she thought various pollutant loadings were remaining fairly constant

YES NO N/A

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

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

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

<u>Parameters Violated</u>	<u>Cause(s)</u>
<u>TRC (5/07)</u>	<u>??</u>
_____	_____
_____	_____

YES NO

Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

SECTION

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]

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

A request to re-evaluate their MAHLs has been made

1. Modifications:

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

2. Modifications in Progress:

Date Requested Nature of Modification
Not an official request but, the City is waiting on DEQ's spreadsheet calcs

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: _____

 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>	<u> </u>	<u> </u>	<u> </u>
2.	<u> </u>	<u> </u>	<u> </u>	<u> </u>

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

Problems

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

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>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </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)] Yearly (see attachment A-1 for example, cover letter sent and other associated material used)

 If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P² activity?

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

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

What methods are used to update the IWS:

- Review of newspaper/phone book
- Information from PLWC engineering department
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) Green County Mfg. Directory (on line)

How often is the survey to be updated? annually (City chooses different industry/business sectors yearly)

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

YES NO

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

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

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

- a. 10 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 8 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 2 Noncategorical SIUs
- d. 0 Other regulated nonsignificant IUs (Describe) _____
- 10 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)] *Not current with streamlining's

If not, the Control Authority has defined "significant industrial user" to mean: Old CFR 403 definition

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?

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

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

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

IU NAME	PERMIT
	EXPIRATION DATE
LA Darling (City waiting on cat. determination)	11/06
Martin Sprocket (City waiting on DEQ's new MAHLs)	6/05

YES NO

 n/a

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

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

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

Pollutant	Limit
n/a	

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:

Pollutant	Limit
N/A	

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?

7/04* Date Notified Method of Notification letter
How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards? *See Attech. A-2 for example cover letter

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

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
	Awaiting MAHLS from DEQ		

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		MAHL's Adopted by Resolution?		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 checked="" type="checkbox"/>	<input type="checkbox"/>	0.65
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.28
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.64
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	4.61
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.54
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.61
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.0007
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.46
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	5.15
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.26 (specific to 1 SIU)
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.80
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7.00

* - If necessary for the sludge disposal option chosen.

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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)	<u> </u>	<u> </u>	<u> </u>
Cadmium (Cd)	<u> </u>	<u> </u>	<u> </u>
Chromium-Total	<u> </u>	<u> </u>	<u> </u>
Copper (Cu)	<u> </u>	<u> </u>	<u> </u>
Cyanide (CN)	<u> </u>	<u> </u>	<u> </u>
Lead (Pb)	<u> </u>	<u> </u>	<u> </u>
Mercury (Hg)	<u> </u>	<u> </u>	<u> </u>
Molybdenum (Mo)	<u> </u>	<u> </u>	<u> </u>
Nickel (Ni)	<u> </u>	<u> </u>	<u> </u>
Selenium (Se)	<u> </u>	<u> </u>	<u> </u>
Silver (Ag)	<u> </u>	<u> </u>	<u> </u>
Zinc (Zn)	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1/yr	1/year	?
Other SIUs	"	1/year	_____
Sampling:			
CIUs	2/yr	1/year	*
Other SIUs	4-24	1/year	**
*City samples CIUs 2/month for the time being to establish good baseline.			
**Increased monitoring for those more potentially problematic SIUs			
Reporting:			
CIUs	city does it	2/year	_____
Other SIUs	"	2/year	_____
Self-Monitoring:			
CIUs	"	2/year	_____
Other SIUs	"	2/year	_____

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
0	0	Not sampled at least once in the past reporting year?
0	0	Not inspected at least once in the past Pretreatment reporting year?
0	0	Not inspected 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: No

YES NO
 If requested?
 n/a To verify IU self-monitoring results?

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

	Analytical Method *	Name of Laboratory
Metals	Varian AA-Flame & G.Furnace	In-house
Cyanide	Spectrophotometric	"
Organics	GC/MS	American Interplex
Other	_____	_____

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 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
1 wk Organics

Is there an established protocol clearly detailing sampling location and procedures? **Just recently finished*

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.

SECTION II: PROGRAM ANALYSIS AND PROFILE

I. ENFORCEMENT

YES NO

- * Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] **Not current with the revised version*
- Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the plan:

YES NO

- Describe how the Control Authority will investigate instances of noncompliance
- Describe the Control Authority's types of escalating enforcement responses and the periods for each response
- Identify by Title the Official(s) responsible for implementing each type of enforcement response
- Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

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

- | | | | | | | | | | | | | | |
|--|--|-------------|----------------|-------------|----------------|----------|----|-------------|----------------|----------------|----|-------|----------------|
| <input checked="" type="checkbox"/> Notice or letter of violation | <input checked="" type="checkbox"/> Administrative Order | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Setting of compliance schedule | <input checked="" type="checkbox"/> Revocation of permit | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> Injunctive relief | <input checked="" type="checkbox"/> Fines (maximum amount): | | | | | | | | | | | | |
| | <table border="0"> <tr> <td> civil</td> <td>\$</td> <td><u>1000</u></td> <td>/day/violation</td> </tr> <tr> <td> criminal</td> <td>\$</td> <td><u>1000</u></td> <td>/day/violation</td> </tr> <tr> <td> administrative</td> <td>\$</td> <td>_____</td> <td>/day/violation</td> </tr> </table> | civil | \$ | <u>1000</u> | /day/violation | criminal | \$ | <u>1000</u> | /day/violation | administrative | \$ | _____ | /day/violation |
| civil | \$ | <u>1000</u> | /day/violation | | | | | | | | | | |
| criminal | \$ | <u>1000</u> | /day/violation | | | | | | | | | | |
| administrative | \$ | _____ | /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)]
**Not all records of (violations) communications could be located (See Atch. A-7 for current procedural paperwork)*
- 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 (See Atch. A-11 for examples)
- If no, does the Control Authority conduct all of the monitoring?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO N/A

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

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Date	Return to Compliance?	
				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:

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

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

YES NO

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

Has the Control Authority experienced any of the following:

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

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

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

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

YES NO
 computerized
 hard copy
 OTHER: _____

Are the following files computerized:

YES NO

Control Mechanism Issuance
 Inspection and Sampling schedule (on a calendar)
 Monitoring Data
 IU Compliance Status Tracking
 Other: Inspection reports

Can IU monitoring data can be retrieved by:

Industry name
 Pollutant type
 Industrial category or type
 SIC Code
 IU discharge volume
 Geographic location
 n/a Receiving treatment plant (i.e.if > one plant in the system)
 Other (specify) _____

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

Have IUs requested that data be held confidential?
 How is confidential information handled by the Control Authority?

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

Are all records maintained for at least 3 years?

SECTION II: PROGRAM ANALYSIS AND PROFILE

K. RESOURCES

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

approx. 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)	<u> </u>
<input checked="" type="checkbox"/> monitoring charges (")	<u> </u>
<input checked="" type="checkbox"/> industry surcharges (")	<u> </u>
<u> </u> other (describe) _____	<u> </u>
Total	100%

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

If no, describe the nature of the changes:

sewer rates are being increased again which should translate into an increase in the pretreatment budget

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

YES NO

If no, explain

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

Does the Control Authority have access to adequate:

YES NO

If yes then list and if no, explain

- Sampling equipment 16 automatic Iscos, 13 flow meters
2 portable pH meters, 2 in-house
- Safety equipment standard list
- Vehicles 3
- Analytical equipment AA flame, G.F. Standard conventional lab equip

SECTION II: PROGRAM ANALYSIS AND PROFILE

I. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
There is a recycling group in the area

2. Has the source of any toxic pollutants been identified?
If yes, what was found?
Various metals from the permitted IUs and selenium from Martin Sprocket

3. Has the POTW implemented any kind of public education program? If yes, describe:
chemical magic show & exhibit at the science fair, local civic club presentations, "change a light program", recycling information on cable system and website

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?
City coordinator is currently attempting to get success stories from several of her industries.

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? they
have most of the guides but haven't given them to applicable businesses yet.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name L.A. Darling Company File/ID No. 94-03
Industry Address 1401 Hwy 49B North, P.O. Box 970
Industry Description Mfg. metal display racks/fixtures for WalMart, K-Mart, etc
Industrial Category Metal finishing* 40 CFR 433* SIC Code: 2542
Avg. Total Flow (gpd) 21,000 Avg. (Reg'd?) Process Flow (gpd) 0*?

Industry visited during audit: YES

Comments: *New "metal prep." chemical doesn't seem to match up to any core op.

FILE #: 2 Industry Name Spectrum Finishing File/ID No. 92-01
Industry Address 1203 East Goldsmith Road
Industry Description Powder Coating products for other IUs (i.e: a jobshop)
Industrial Category Metal Finishing 40 CFR 433.17 SIC Code: 3479
Avg. Total Flow (gpd) 14,000 Avg. Process Flow (gpd) 1,000-13,000 (varies with production)

Industry visited during audit: YES 870-239-3607

Comments: 5 stage phosphatizing

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) ~7,000+ Avg. Process Flow (gpd) 2,000 to 7,000

Industry visited during audit: YES 870.239.8558

Comments: Selenium in their process has caused the City to develop "local limits" for them

FILE #: 4 Industry Name Dr. Pepper Bottling File/ID No. 89-03
Industry Address 2001 West Kings Hwy
Industry Description Soft Drink Manufacturing/Bottling
Industrial Category N/A 40 CFR N/A SIC Code: 2086
Avg. Total Flow (gpd) 15,000 Avg. Process Flow (gpd) 11,000

Industry visited during audit: YES

Comments: _____

FILE #: 5 Industry Name _____ File/ID No. _____
Industry Address _____
Industry Description _____
Industrial Category _____ 40 CFR _____ SIC Code: _____
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) _____

Industry visited during audit:

Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an (See Attch. A-3 for example) application for a control mechanism?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
If yes, what is the application date?	<u>2</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Does it ask for Pollution Prevention information?	<u>10/01</u>	<u>8/04</u>	<u>6/05</u>	<u>9/04</u>	<u> </u>
Does it ask for Pollution Prevention information?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Does the file contain a (See Attch. A-4 for example) Permit?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
Permit Expiration Date?	<u>3</u>	<u> </u>	<u>3</u>	<u> </u>	<u> </u>
Is a fact sheet included? (See Attch. A-5 for example)	<u>11/06</u>	<u>10/09</u>	<u>6/05</u>	<u>4/10</u>	<u> </u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Appropriate discharge limitations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
e. Appropriate self-monitoring requirements?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>5</u>	<u> </u>
f. Sampling frequency?	<u>4</u>	<u>4</u>	<u>4</u>	<u>4</u>	<u> </u>

Comments: 1) Questions regarding Darling's new process chemistry & whether it falls under a core op in CFR 433; 2) City waiting on Cat. determination for Darling and new DEQ MAHLs for Spectrum's; 3) See Attch. A-4g for section that specifies "...the permit shall remain in effect beyond expiration date..."; 4) City does monitoring; 5) IU's permit requires hourly pH monitoring (see Attch. A-6 for example results & calibration records)

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>1</u>	<u>1</u>	<u>1</u>	<u>1</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>

C. Application of Standards

1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>✓</u>	<u>✓</u>	<u>2</u>	<u>✓</u>	<u> </u>
3. Was the IU notified of recent revisions to applicable pretreatment (See Attch. A-8 for example) standards? [403.8(f)(2)(iii)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comments: 1) Permit limits' page should have a footnote referencing type of samples discussed on page 3 of permits to "connect" the two; 2) Martin has to ship its Selenium laden w.w. off-site. Treatment to meet local limits have been too costly. Local limits are currently being re-evaluated.

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)]	<u>✓</u>	<u>n/a</u>	<u>✓</u>	<u>n/a</u>	<u> </u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
D. <u>Compliance Monitoring</u>					
<u>Sampling</u>					
1. Does the file contain Control Authority sampling results for the industry?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
b. Sample date and time?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
c. Sample type?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
d. Wastewater flow at the time of sampling?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
e. Sample preservation procedures?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
f. Chain-of-custody records?	<u>1</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

Comments: 1) Chain of custody is not complete (See Atatch. A-9). It does not show who the sample tech. relinquished the sample to.

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>1</u>	<u>2</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-12 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>10/06</u>	<u>9/06</u>	<u>8/06</u>	<u>9/06</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>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u>3</u>	<u>3</u>	<u>3</u>	<u>3</u>	<u> </u>
f. Evaluation of pretreatment facilities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>

Comments: 1) Couldn't locate in City's files but, IU is certifying; 2) "They're still working on it" but still doing a TTO analysis with all non-detects; 3) Identified in fact sheets (see Attch. A-5 for example)

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-13 for example) discharge control plan & need to develop? 403.8(f)(2)(v)]	<u>✓</u>	<u>✓</u>	<u>1</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>2</u>	<u>2</u>	<u>2</u>	<u>2</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>3</u>	<u>3</u>	<u>3</u>	<u>3</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>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>

IU Self-Monitoring and Reporting

10. Does the file contain self-monitoring reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>✓</u>	<u> </u>
11. Does the file include:					
a. BMR?	<u>Arch</u>	<u>arch</u>	<u>arch</u>	<u>arch</u>	<u> </u>
b. 90-Day Report?	<u>arch</u>	<u>arch</u>	<u>arch</u>	<u>arch</u>	<u> </u>
c. All periodic reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>
12. Did the IU report on all required parameters?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u> </u>

Comments: 1) IU's slug potential evaluation doesn't appear complete (Attch. A-13). Correspondence (Attch. A-13e) from the city indicates a slug plan is necessary. One could not be produced; 2) handling procedures not questioned; 3) name of certified lab

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

Comments: 1) complete certification statement not being made on all pretreatment related reports submitted (See Attech. A-3f for example); 2) Slug plan determined not necessary; 3) Slug plan determined necessary but not located. (See Attech. A-13e)

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>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>5</u>	<u>4</u>	<u>4</u>	<u> </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>✓</u>	<u>✓</u>	<u>✓</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>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u> </u>
8. Did the Control Authority follow its approved ERP?	<u>n/a</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u> </u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>n/a</u>	<u>✓</u>	<u>✓</u>	<u>1</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>

Comments: 1) letters were sent to violating IUS notifying them within 2 weeks and phone calls were supposed to have been made within 24 hrs. But, all ROCs weren't documented. See Attchs. A-7 & A-11 for examples.

REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Paragould NPDES #: AR0033766

Date of Audit: 12/11 - 13/08 Date entered into QNCR: 2/22/08

(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 <i>*minor administrative deficiencies</i>	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:
 Martin Sprocket and Gear, 1205 S. Third, 870.239.8244
 Type of industry: Metal Finishing CFR 433 Date/Time of visit:
 12/12/08 / 10:00 a.m.

Industry contacts: Darrel Pillow - Personnel Manager

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

Additional comments: Facility manufactures various types of power transmission products, mostly sprockets for chain driven equipment, although some sheaves and gears are also made at this site. Operations haven't changes substantially since the site visit conducted five (5) years ago except water usage has gone down. IU rep. indicated a 6" OD sprocket is the largest they make with about 30,000 units produced/yr. 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: 12/12/08

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 copper, some molybdenum & maybe some other trace metals. Powdered material is formed into desired configurations held together with a wax-like material. No wastewater is associated with this forming 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 have to be sent thru a phosphoric acid bath followed by 2 rinse tanks to remove mill oil. Some sprockets are blackened depending on customer specs. This includes a selenium based chemistry in an electro-chemical process followed by rinses and a final rust preventative bath. Because of the low local limit for Se, the IU is storing its blackening process wastewater in a holding tank to be hauled off-site. Attempts to treat the Se laden W.W. (ion exchange units) were too expensive and burdensome. The city is re-evaluating their Se local limit. Vibratory tumbling wastewater, subject to CFR 433 is discharged to the city combined with sanitary but, Se is not present at levels of concern from this source. The tumbler's (4 of them) intermittent (held in troughs until they fill up) and separate discharge needs to be addressed in the IU's permit. Their plastic injection molding ops produce no contact wastewater and are self-contained. City rep was knowledgeable about the IU's processes but, agreed the tumbling operation W.W. sampling may have been overlooked.

Visit conducted by: Gilliam/Ellington Date: 12/12/08



(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:

L.A. Darling Company, 1401 Hwy 49B North, 870.239.6421

Type of industry:

Date/Time of visit:

Metal Finish (CFR 433)

12/12/08 / 1:45 p.m.

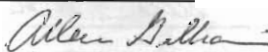
Industry contacts: Mark Joslin -Mngr.Safety & Env. Compliance
/ Andy Stickler - LA's Contract Engineer

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

*Appears new process is not a core op. under CFR 433

Additional comments: Facility makes commercial store shelves and racks. Raw material is mostly cold & hot rolled carbon steel. Slit stock is sent thru a series of "stands" that form the support round/square/rectangular shapes. Coolant (~1,500 gallons) from this operation is self-contained, recirculated thru a "paper" filter and hauled off-site "maybe" 1/yr. This system has not been significantly changed since the last site visit five (5) years ago. A determination that this cold forming operation is not subject the iron and steel category located in CFR 420 Subpart J.

Visit conducted by: Gilliam/Ellington Date: 12/12/08



(signature of auditor conducting visit)

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

Control Authority: City of Paragould NPDES #: AR0033766

Industry name: L.A. Darling Company

Additional comments: Various drums with hand pumps were situated around this forming op containing hydraulic, gear and synthetic cutting oils.

Facility has changed their basic (CFR 433 Core operation) "Milbank" 5-stage Fe phosphatizing line over to a "UniPrep" system which does not appear to fit the criteria of any core operation under CFR 433. Their current system for preparing their products for powder coating is as follows (with some excerpts from the manufacturer itself): Stages 1 & 2 - mildly alkaline detergent air agitated cleaners (counter current flow so stage 2 is really just drag-out from stage 1) with emulsifying surfactants; stages 3 thru 4 - 2 clear water rinses (counter current flow) with a final stage 5 water soluble organic "thin film" dry-in-place coating (no etching nor removal of substrate which replaces the phosphatizing). The UniPrep system utilizes microorganism bioremediation, combined with highly emulsified surfactants to consume and metabolize a wide range of oils from the cleaner. This cleaner never has to be dumped. The working pH of the cleaner is ~9 s.u. and temperature has to be watched carefully to protect the organisms. Powder coat painting is the final stage for their finished product. Treatment of any overflows/rinses (300 to 400 gpd) is not required to meet CFR 433 limitations and it was the conclusion of this auditor that the process presently utilized at L.A. Darling does not fall under a federally regulated process.

Other operations conducted at the facility included welding, polishing/grinding/milling and powder coating.

There are no floor drains in the building.

The city rep was very knowledgeable of the facility's operations and set up and the IU reps were very conversant in the categorical regulations and pretreatment requirements.

Visit conducted by: Gilliam/Ellington Date: 12/12/08



(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:
 7-UP RC Bottling, 2001 W. Kings Hwy. 870.236.8765
 Type of industry: Soft drink bottler Date/Time of visit:
 12/13/08/ 8:30 a.m.

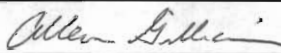
Industry contacts: Johnny Houston-QC Manager

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

Additional comments:

Facility bottles soft drinks under various names and flavors. Main problem with their wastewater has been pH. City has had to replace their service line because of corrosion. 144 cases is considered a "float" and on this day, about 1,400 cases. ~30 different flavors are sent out from this facility.

Visit conducted by: Gilliam/Ellington Date: 12/13/08



(signature of auditor conducting visit)

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

Control Authority: City of Paragould NPDES #: AR0033766

Industry name: 7-UP RC Bottling

A serpentine line moves the pre-sanitized empty plastic bottles and aluminum cans through the various stages of cleaning and rinsing prior to the actual addition of customer flavored soft drinks fluid. Syrups and concentrates are sent in by customers and these "are not wasted". The facility adds water and remaining ingredients (corn syrup, salt, CO₂, citric acid, etc) to meet customer specs. ~14 mixing tanks are involved. Most everything is automated including "topping" the bottles off with their plastic screw tops. Most wastewater from this facility is from continual clean-up operations which all drains to a treatment tank out back. After "treatment" the W.W. is sent to a concrete sump towards the front of the building. "Pretreatment" consists of some O&G removal and pH adjustment. The sampling point is adequate and the City coordinator was very familiar with this IU's operations and problems from the past.

The IU is required to conduct hourly pH monitoring and daily calibrations because of their past history of discharging low pH wastewater.

Visit conducted by: Gilliam/Ellington Date: 12/13/08



(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:

Spectrum, 1203 E. Goldsmith Rd., 870.239.3607

Type of industry:

Date/Time of visit:

Metal Finisher (CFR 433)

12/13/08 / 9:30 a.m.

Industry contacts: Joe McAuliffe - Plant Supervisor(?)

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

Additional comments: Facility iron phosphatizes and powder coat paints various shaped parts for different customers. This facility would be considered a job shop. They've been in business for ~16 years and have watched their customer base steadily decrease because of customers' outsourcing to China and Mexico.

Visit conducted by: Gilliam/Ellington Date: 12/13/08



(signature of auditor conducting visit)

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

Control Authority: City of Paragould NPDES #: AR0033766

Industry name: Spectrum

Additional comments: They powder coat parts of ~25 different customers' products on an infrequent basis but their main customer is now Milwaukee Tool.

Most of the customer pieces brought in are aluminum with some steel parts, aluminum and magnesium castings.

Phosphatizing operations consists of a simple 5 stage alkaline spray, rinse, Fe phosphatize, followed by two cold water final rinses. They do practices counter-current rinsing as make-up water for pollution prevention on all their rinses back to the heated alkaline and phosphate baths.

Parts are dried off prior to sending to the powder coating operations, sent through a curing oven, then shipped off to their customers.

Very simple process set-up but, differing schedules of baths/rinses batch discharges would make "representative sampling" difficult.

Sampling station is adequate with a bubbler flow measurement device.

IU rep very knowledgeable regarding regs and cooperative during visit. City rep knowledgeable about this IU's processes and set-up.

Visit conducted by: Gilliam/Ellington Date: 12/13/08



(signature of auditor conducting visit)

copy

Attachment A1

P.O. Box 9
1901 Jones Road
Paragould, AR 72450

CityLightWater

Providers to Paragould
electric • water • cable • Internet

870-239-7700
Fax: 870-239-7798

September 19, 2006

Mr. Stan Smith
President
Smith Precision
101 West Monroe
Paragould, AR 72450

Dear Mr. Smith:

Please find enclosed your Annual Industrial Waste Questionnaire. This is a requirement of our pretreatment program, and your help in filling out the form is needed and greatly appreciated. Your name was obtained either from the Paragould Chamber of Commerce Existing Manufacturer's List or from a list we received from the Arkansas Department of Environmental Quality.

If you discharge only sanitary wastewater or are not connected to the sewer system in any way, please note this on the questionnaire and return to me. Be sure to complete the general information portion of the questionnaire.

Please return the completed form to my attention by October 10, 2006. Keep a copy of the questionnaire for your files.

If I can be of any assistance, please contact me at (870) 239-7795. Thank You.

Sincerely,

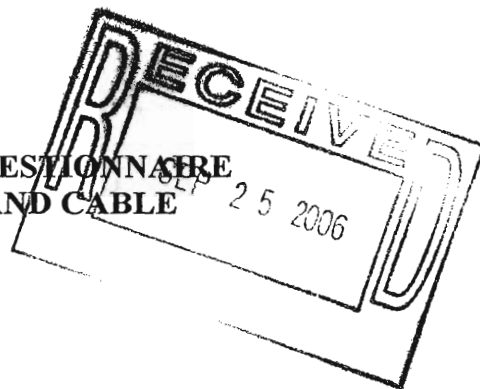


Lisa Gilbreath

Manager

Environmental Services

ANNUAL INDUSTRIAL WASTE QUESTIONNAIRE
PARAGOULD LIGHT WATER AND CABLE



YEAR 2006

I. GENERAL INFORMATION

Standard Industrial Classification Code or Codes (SIC) 3399

Company Name Smith Precision Machining Inc

Mailing Address 101 W. Monroe Paragould AR 72450

Address of Premises 101 W. Monroe Paragould AR 72450

Name and Title of Signing Official Stan Smith, President

Contact Official:

Name Stan Smith

Title President

Address 101 W. Monroe Paragould AR 72450

Phone Number 870 236 7300

This is to certify that the information contained in this questionnaire is familiar to me and to the best of my knowledge and belief, such information is true, complete and accurate.

Stan Smith
Signature of Official

9-20-06.
Date

III. ESTABLISHMENT'S OPERATIONAL CHARACTERISTICS

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

machine shop - repair work

Brief description of manufacturing or service activity on premises:

Machine shop - repair work

Principal raw materials used: steel

Catalysts, Intermediates: none

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

Yes Yes _____ No

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

_____ Yes _____ No 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:

Type of production processes: _____ Batch _____ Continuous

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

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

When? _____

Is production seasonal? _____

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

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

Shift start times: _____ 1st _____ 2nd _____ 3rd

Shifts normally worked each day:

	Sun	Mon	Tue	Wed	Thu	Fri	Sat
1 st	_____	_____	_____	_____	_____	_____	_____
2 nd	_____	_____	_____	_____	_____	_____	_____
3 rd	_____	_____	_____	_____	_____	_____	_____

IV. WATER SOURCES, CONSUMPTION AND DISCHARGES

Water Sources:

<u>Source</u>	<u>Quantity</u>
Paragould Light Water & Cable system	_____ gallons per day
Private Wells	_____ gallons per day
Other	_____ gallons per day
Total	_____ gallons per day

Describe any raw water treatment processes in use: _____

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	_____ gallons per day
Contained in Product	_____ gallons per day
Other (irrigation, etc.)	_____ gallons per day
Total.....	_____ gallons per day

List Average Volume of water Discharged to:

<u>Source</u>	<u>Quantity</u>
PLWC Wastewater System	_____ 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.....	_____ gallons per day

Is discharge to sewer: _____ Intermittent _____ Steady

If intermittent, describe (holding tanks, sump pumps, lift stations, flow rates, etc.):

Does your establishment have a current National Pollutant Discharge Elimination System Permit?

_____ Yes _____ No

If so, what is the identifying number? _____

V. WASTEWATER QUALITY AND PRETREATMENT

Describe any wastewater equipment or processes in use: _____

List plant sewer outlets, size, and flow: _____

Are there any floor drains located in the facility?

_____ Yes _____ No

If yes, list the areas where the drains are located: _____

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:

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:

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:

TABLE
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 benzantracenes, 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	

Industry	Notes	2000	2001	2002	2003	2004	2005	2006
Allen Engineering	Domestic only	X			X	X	X	
Advertising Express						X		
American Railcar	send	X			X	X	X	
Ameristeel	Domestic only	X		X		X		
arkansas methodist hos.	send	X	X	X	X	X	X	
Anchor	permitted						X	
BML/Basic Physicians	Domestic only					X		
Camco	not connected	X	X					
Capman Screen Printing	not connected					X		
Caps Plus	Domestic only	X					X	
College bookstore	not connected					X		
Cupples signs	not connected					X		
Coldstream	not connected		X			X		
Delta Asphalt	Domestic only					X		
Double trailer	not connected					X		
Emerson	permitted							
Fairview automated burnouts	not connected					X		
Fabco Machine	not connected	X	X					
Garlock	permitted							
Gillmores								
Glenn corp								
Goodrich corp						X		
Greene county optics								
HID/ICN machining	not connected					X		
Hedger bros ready mix	Domestic only					X		
Hillcrest tool and die	not connected					X		
Hunter machine	Domestic only					X		
Hutco	Domestic only			X				
Isom's machine	not connected					X		
J&S woodcrafts	not connected					X		
Jenkins lamp	not connected					X		
KEG	Domestic only	X	X			X		
Keasler	Domestic only	X				X		
Kueters	send	X	X			X	X	X

A-1;

	2000	2001	2002	2003	2004	2005	2006
LA darling							X
Nuckles & son Septic		X					X
Magic touch					X		X
Mann's tool shop		X	X				
MSG							
McCarroll Printing	X					X	X
Mccoys signs						X	
MMI	X						
New creation designs					X		
Paragould daily press	X	X	X		X		
Paragould Laundry	X	X					
Peerless	X		X	X			X
Pillow fish farm				X	X		X
Prestolite							
Randy's dycleaner				X			X
Razorback concrete		X	X			X	
roto rooter							
RC & 7up							
Samuel Gin					X	X	
Shanco	X		X		X	X	
Sign-tech						X	
Smith precision	X			X			X
Spectrum							
Tenneco							
Turbo Ice						X	
teleflora	X	X					X
Tool Specialists							
Turner Dairies		X	X				X
Utility trailer	X	X					
White Inc			X			X	
Wilbert Burial Vault						X	
Wonder Industries						X	
Walsh Heartland	X						
Wellsco						X	
Walmart	X						X
Walsyren							X

A-1K



Site Search

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Paragould Regional Chamber
300 West Court Street, Paragould, AR 72450
Telephone: 870.236.6600

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- ☼ CITY OF PARAGOULD
- ☼ ECONOMIC DEVELOPMENT
- ☼ COMMUNITY
- ☼ RELOCATION
- ☼ TOURISM

Economic Development Corpora

Existing Manufacturers

Allen Engineering Corporation
819 South 5th Street
P.O. Box 819
Paragould, AR 72451
870-236-7751
Dewayne & Mary Allen, Owners
Tim Guinn, Plant Manager
Jennifer Barrington, Admin. Assistant
Manufacture: Concrete/Paving Equipment
Employ: 100

Send
Don't
Send

American Railcar Industries
901 Jones Road
Paragould, AR 72450
870-236-6600
Jack Pipkin, Manufacturing Director
Al Arthur, Plant Manager
Ray Noel, Human Resources
Manufacture: Railcars
Employ: 325

American Railcar Industries
7755 Hwy 34 E.
Marmaduke, AR 72443
870-597-2224
Jack Pipkin, Manufacturing Director
Mike Sowards, Plant Manager
Dean Inman, Sr. Human Resource Manager
Manufacture: Tanker Railcars
Employ: 260

Anchor Packaging, Inc
1211 North 12th Avenue
Paragould, AR 72450
Satya Garg, Vice President of Operations
Mitch Thompson, Human Resources
Manufacture: Plastic Food Containers
Employ: 430-Paragould & Marmaduke combined

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NEW SPECULATIVE BUILDING

Paragould, Arkansas
100,000 sq. ft. (expandable)
Conventional steel building
Easy customization
Click here for more details.

Existing Manufacturers Continued



Paragould

REGIONAL CHAMBER OF COMMERCE
Moving in the right direction

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- ☼ **ECONOMIC DEVELOPMENT**
- ☼ **COMMUNITY**
- ☼ **RELOCATION**
- ☼ **TOURISM**

Economic Development Corpora

Existing Manufacturers (continued)

Arkansas Methodist Hospital
900 W. Kingshighway
P.O. Box 339
Paragould, AR 72451
870-239-7000
Ron Rooney, President
Barry Davis, Vice President of Operations
Kelly Blake, Human Resource Manager
Employ: 450

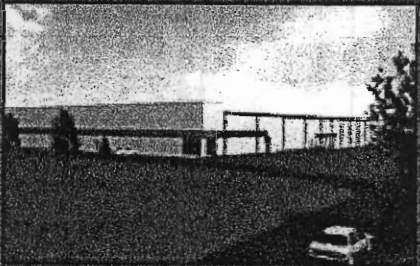
Coldstream Fisheries, Inc.
2800 East Kingshighway
Paragould, AR 72450
870-236-2517
Cheddy Williamson, President
Manufacture: Gold Fish, Minnows
Employ: 30

Emerson Electric Company
1000 South 2nd Avenue
P.O. Box 520
Paragould, AR 72451
870-239-2171
Derwood Biles, Plant Manager
Don Wagster, Human Resources Manager
Manufacture: Electric Motors
Employ: 1175

Fabco Machine Co
1200 Greene 628 Rd.
Paragould, AR 72450
870-586-0743
Bob Clark
Employ: 6

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NEW SPECULATIVE BUILDING



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- ☼ TOURISM

Economic Development Corpora

Existing Manufacturers (continued)

Garlock Rubber Technologies

Purcell Road
P. O. Box 1000
Paragould, AR 72451
870-239-4051
Jim Miller, Vice President of Operations
Tonja Gibson, Human Resource Manager
Manufacture: Rubber Conveyor Belts and Sheet Rubber
Employ: 106

Gerduau Ameristeel Corporation

1301 Jones Road
Paragould, AR. 72450
870-239-5010
Richard Quenzer, Plant Manager
Susan Hardin, Human Resource Manager
Manufacture: Railroad Spikes
Employ: 33

HutCo, Inc.

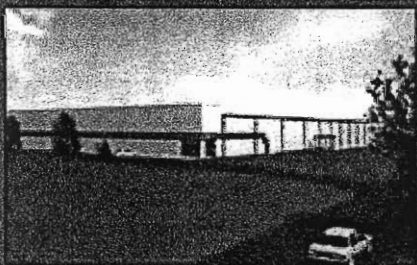
6409 West Kingshighway
Paragould, AR 72450
870-239-7181
Harold Hutchinson, President
Manufacture: Precision Machine Shop w/CNC & Metal Fabricating
Employ: 15

Jenkins Lamp & Shade

412 Unity Road
Paragould, AR 72450
Jack Cox, President
Manufacture: Lamp & Lamp Shades
Employ: 6

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NEW SPECULATIVE BUILDING



Paragould, Arkansas
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Existing Manufacturers Continued



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Telephone: 870-231-1111

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- ☼ TOURISM

Economic Development Corporation

Existing Manufacturers (continued)

Keasler Body Company
4207 West Kingshighway
Paragould, AR 72450
870-236-2607
Haley Rieck, Gene Parkinson Owners
Manufacture: Van Bodies, Refrigerated Trucks
Employ:7

L.A. Darling Co.
Highway 49 North
P.O. Box 970
Paragould, AR 72451
870-239-9564
Tom Weiss, President
Mark Broadway, Plant Manager
Gary Gossett, Human Resource Manager
Manufacture: Tubular Garment Racks
Employ: 850

Martin Sprocket & Gear
1205 South 3rd Ave.
Paragould, AR 72450
870-239-8558
Graham Huff, Plant Manager
Darrell Pillow, Human Resource Manager
Manufacture: Sprockets & Gears
Employ:170

MMI-Trutec, Inc
2609 N. 12th Avenue
Paragould, AR 72450
870-236-6920
General Manager, John Wallace
Human Resources, Janet Hale
Manufacture: Heat Treat-Nitride
Employ:21

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NEW SPECULATIVE BUILDING

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100,000 sq. ft. (expandable)
Conventional steel building
Easy customization
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Existing Manufacturers Continued

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Paragould Regional Chamber
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 Telephone: 870.236.7656

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Economic Development Corpora

Existing Manufacturers (continued)

Razorback Concrete Company
 Airport Road
 P. O. Box 134
 Paragould, AR 72450
 870-236-7656
 Keith Ingram, President
 Glen Howard, Assistant Manager
 Manufacture: Concrete & Ready Mix
 Employ 19

RC & 7-Up Bottling Company
 2001 West Kingshighway
 P.O. Box 859
 Paragould, Ar. 72450
 870-239-8765
 Herb Bland, Plant Manager
 Preston Bland, Human Resources
 Manufacture: Dr. Pepper Products
 Employ: 120

Shamco Metal Recycling
 110 East Hunt
 P.O. Box 430
 Paragould, AR 72451
 870-236-6944
 Marty Buchman, President
 Manufacture: Scrap Metal
 Employ:14

Smith Precision Machining
 101 West Monroe
 Paragould, AR 72450
 870-236-7300
 Stan Smith, President
 Susan Newsom, Human Resources/Book Keeping
 Machine Shop
 Employ:13

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NEW SPECULATIVE BUILDING

Paragould, Arkansas
 100,000 sq. ft. (expandable)
 Conventional steel building
 Easy customization
 Click here for more details.

Existing Manufacturers Continued



Paragould

REGIONAL CHAMBER OF COMMERCE
Moving in the right direction

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Paragould Regional Chamber
300 West Court Street, Paragould, AR 72450
Telephone: 870-239-3607

Navigate



HOME



CHAMBER OF COMMERCE



CITY OF PARAGOULD



ECONOMIC DEVELOPMENT



COMMUNITY



RELOCATION



TOURISM

Economic Development Corpora

Existing Manufacturers (continued)

Spectrum Finishing, Inc.

P.O. Box 607
Paragould, AR 72451
870-239-3607
Jeff Ryan, President
Tim Ryan, CEO
Manufacture: Powder Coatings
Employ:32

Teleflora Florist Service

3309 East Kingshighway
Paragould, AR 72450
870-236-7731
David Sluder, Vice President
Todd Janski, Human Resources
Service: Flower Wire Service
Employ: 200

Tenneco Automotive, Inc.

1601 Highway 49B
Paragould, AR 72450
870-239-8531
Earl Hamlett, Plant Manager
Harold Diggs, Human Resources
Manufacture: Shock Absorbers and Struts
Employ: 1,016

Tool Specialists

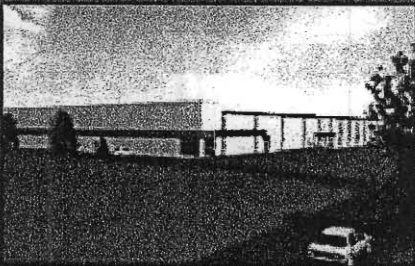
1819 Bolton
Paragould, AR 72451
870-236-2143
Tony Mann, President
Manufacture: Tool & Die

Turner Dairies

P.O. Box 337, 301 S. 2nd Ave.
Paragould, AR 72450
870-239-2143
Shane May, Manager
Distribution of Dairy Products
Employ:55

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NEW SPECULATIVE BUILDING



Paragould, Arkansas

100,000 sq. ft. (expandable)
Conventional steel building
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Paragould

REGIONAL CHAMBER OF COMMERCE
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Paragould Regional Chamber
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-  HOME
-  CHAMBER OF COMMERCE
-  CITY OF PARAGOULD
-  ECONOMIC DEVELOPMENT
-  COMMUNITY
-  RELOCATION
-  TOURISM

Economic Development Corpora

Existing Manufacturers (continued)

Utility Trailer Manufacturing Company

2921 Highway 49B
P.O. Box 1606
Paragould, AR 72451
870-236-9195

David Neighbors, Plant Manager
Scott Maxwell, Human Resources
Manufacture: Trailers
Employ: 440

Walsh Heartland

P.O. Box 400
Paragould, AR 72451-0400
870-215-5000

Fran Romine, General Manager
Wade Lewis, Director of Operations
Sarah Carter, Human Resource Manager
Service: Pharmaceutical Distribution

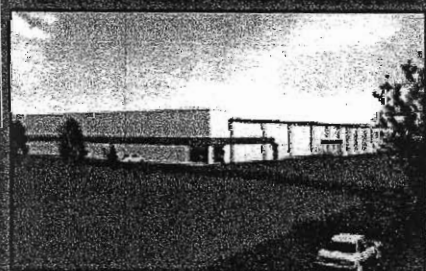
Wellsco Graphic Solutions Center

1707 Linwood Drive
Paragould, AR 72450
870-236-1080

Jim Wells, President
Service: Telecommunications Service

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NEW SPECULATIVE BUILDING



Paragould, Arkansas

100,000 sq. ft. (expandable)
Conventional steel building
Easy customization
Click here for more details.

Attachment A-Z

NOTICE
BAW TAI

2004
of 10

July 7, 2004

«Title» «FirstName» «LastName»

«JobTitle»

«Company»

«Address1»

«City», «State» «PostalCode»

Re: Hazardous Waste Reporting Requirements

Dear «Title» «LastName»:

Please find enclosed the requirements of 40 CFR Part 403.12 (j) and (p), which provides guidance to hazardous waste generators. Your company is listed with the State of Arkansas as a potential hazardous waste generator.

In order to comply with Pretreatment Regulations, I am required to send you these provisions for reporting the release of hazardous waste into the Paragould Sewer System. Please take time to become familiar with the regulations to ensure your company is in compliance.

If you have any question, please contact me at 239-7795.

Sincerely,

Lisa Gilbreath
Manager
Environmental Services

Enclosure

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

<u>CLWC use only:</u> Date Permit Application mailed to the industrial user: <u>7/6/04</u> Date completed Permit Application received by CLWC: <u>8/9/04</u>
--

Please complete the following:

Check one:

Permit application for renewal of an existing permit.

Current Permit Number: 92-01

Current permit Expiration Date: 11/30/04

Application for a new permit.

1. Firm Name SPECTRUM FINISHING, INC.

Mailing Address P.O. Box 607

City, Zip Code PARAGOULD, AR 72451

Facility Address 1203 E. GOLDSMITH ROAD

City, Zip Code PARAGOULD, AR 72450

Telephone Number: 870-239-3607

Fax Number: 870-239-3188

Web Site Address: _____

2. SIC Number(s): 3479

NAICS Number(s): _____

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

GENERAL STORM WATER RUNOFF PERMIT AR000AB16

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

	Projected for next five (5) years	
	Flow (gallons per day):	
<u>Discharged to Paragould Sewer</u>	<u>Average Daily (30-day)</u>	<u>Maximum Daily (1 day)</u>
Process Wastewater from <u>PRETREATMENT</u> Operation	<u>13,000</u>	<u>13,000</u>
Process Wastewater from _____ Operation	_____	_____
Domestic Wastewater (Sanitary)	<u>1,000</u>	<u>1,000</u>
Noncontact Cooling Water	<u>0</u>	<u>0</u>
Total (process and sanitary)	<u>14,000</u>	<u>14,000</u>

List any periodic or seasonal variations:

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.

<u>Parameter</u>	<u>Units</u>		<u>Sewer Use Ordinance Limit</u>	<u>Concentration</u>	
				<u>Average Daily (30-day)</u>	<u>Maximum Daily (1 day)</u>
BOD5	mg/L	30-Day Average	300	<u>N/A</u>	<u>N/A</u>
TSS	mg/L	30-Day Average	300	<u>N/A</u>	<u>N/A</u>
pH	S.U.	1-Day Maximum	5.5-11.5	<u>8.61</u>	<u>9.33</u>
Oil & Grease	mg/L	1-Day Maximum	100	<u>15.35</u>	<u>57.0</u>
Temperature	°C	1-Day Maximum	65	<u>32.83</u>	<u>47.3</u>

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

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>
PHOSPHORIC ACID	32 OZ.	< 8 GALLONS
IRON PHOSPHATE	5 GALLONS	< 110 GALLONS
ALKALINE CLEANER (POWDER)	20 #	< 1200 #

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 CLWC Wastewater Collection System. Also, include the details of the proposed monitoring access facilities.

SEE ATTACHED DRAWING. MONITORING STATION IS 4' METERING MANHOLE WITH 3" PARSHALL FLUME, 6" INLET AND OUTLET ADAPTERS AND HINGED COVER. INCLUDED IS (1) ISCO MODEL 4230 FLOW METER WITH BUBBLER AND PLOTTER.

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.

SPECTRUM FINISHING, INC. POWDER COATS PRODUCTS FOR OTHER MANUFACTURERS. THE PROCESS CONSISTS OF RECEIVING PARTS FROM CUSTOMER, CLEANING PARTS IN A 5 STAGE IRON PHOSPHATE WASH SYSTEM, POWDER COATING VIA ELECTROSTATIC SPRAY GUNS, CURING IN A GAS OVEN, AND RETURNING PRODUCT TO THE CUSTOMER

6b. Describe any products manufactured or assembled at the plant by type and amount.

JOB SHOP - DOES NOT APPLY

6c. Describe the type and amount of raw materials used at the facility.

NONE

A-3d

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

<u>Shift</u>	<u>Hours</u>	<u>Day of the Week</u>						
		<u>Mon</u>	<u>Tue</u>	<u>Wed</u>	<u>Thu</u>	<u>Fri</u>	<u>Sat</u>	<u>Sun</u>
1 st :	6:00 to 2:30	(✓)	(✓)	(✓)	(✓)	(✓)	()	()
2 nd :	_____ to _____	()	()	()	()	()	()	()
3 rd :	_____ to _____	()	()	()	()	()	()	()

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

<u>Shift</u>	<u>Day of the Week:</u>						
	<u>Mon</u>	<u>Tue</u>	<u>Wed</u>	<u>Thu</u>	<u>Fri</u>	<u>Sat</u>	<u>Sun</u>
1 st :	6:00 to 2:30	6:00 to 2:30	6:00 to 2:30	6:00 to 2:30	6:00 to 2:30	_____ to _____	_____ to _____
2 nd :	_____ to _____	_____ to _____	_____ to _____	_____ to _____	_____ to _____	_____ to _____	_____ to _____
3 rd :	_____ to _____	_____ to _____	_____ to _____	_____ to _____	_____ to _____	_____ to _____	_____ to _____

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?

40 CFR 433

EPA Categorical standards are listed on the following page.

A-3e

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: *[Signature]* Date: 8-9-04
Authorized Representative*
Name if Signee: JEFFREY I. RYAN Title: PRESIDENT
(Please Print)

Name and phone number of person to contact regarding permit information:
JEFF RYAN 870-239-3607

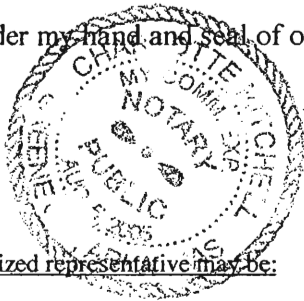
Corporate Acknowledgement

State of Arkansas)

County of GREENE)

Before me, the undersigned authority, on this day personally appeared Jeff Ryan
of Spectrum Finishing
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 9th day of August, 2004.



Notary Public in and for GREENE County, Arkansas.

*An authorized representative may be:

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

A-30

PLEASE NOTE:

The following questions (numbers 9 - 13) deal with current NPDES or CLWC 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:

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?

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.

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

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

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

CL & W SEWER

MONITORING
STATION

5 STAGE PRETREATMENT SYS

6" PROCESS WASTE LINE

REST
ROOMS

4" SANITARY WASTE

A-3h

5-STAGE PRETREATMENT SYSTEM DISCHARGE

DISCHARGE POINT 1:

Waste water from a mild Alkaline cleaner is neutralized and discharged twice per year. Parts pass through this spraying stage and dirt and oil are removed during the cleaning process. The tank holds (3352) gallons. There is no discharge other than the semi-annual clean-up.

DISCHARGE POINT 2:

Waste water from a clear-water rinse continuously overflows into the sewer system. This tank holds (1235) gallons.

DISCHARGE POINT 3:

Waste water from an Iron Phosphate is neutralized and discharged twice per year. Parts pass through this spraying stage and an Iron Phosphate coating is applied to the surface of the product. This tank holds (1911) gallons. There is no discharge other than the semi-annual clean-up.

DISCHARGE POINT 4:

Waste water from a clear-water rinse continuously overflows into the sewer system. This tank holds (1029) gallons.

DISCHARGE POINT 5:

Waste water from an Acidic, non-chromium rinse is neutralized and discharged once per month. Parts run through this spraying stage and a final acidic coating is applied to the surface of the product. This tank holds (1029) gallons. There is no discharge other than monthly clean-up.

CityLightWater

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electric · water · cable · internet

870-239-7700
Fax: 870-239-7798

INDUSTRIAL WASTES DISCHARGE PERMIT

PERMIT NO. 92-01

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,

Spectrum Finishing, Inc.
1203 E. Goldsmith Road
PO Box 607
Paragould, Arkansas 72450

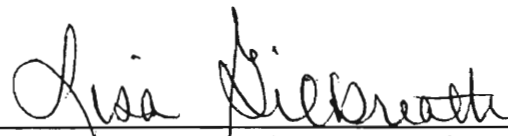
is authorized to discharge industrial wastes from activities classified by SIC No. 3479 from premises at the above address to the Paragould Wastewater Collection System in accordance with application for permit submitted to Paragould City Light, Water and Cable on August 9, 2004, effluent limitations, monitoring requirements, and conditions set forth in Parts I, II and III hereof.

This permit shall become effective November 1, 2004.

This permit and authorization to discharge shall expire at midnight on October 31, 2009.

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

Signed this eighth day of October, 2004.



Lisa Gilbreath, Environmental Services Manager

PERMIT NO. 92-01**PART I - EFFLUENT LIMITATIONS**

OUTFALL NO. 001 – PROCESS WASTEWATER AFTER PRETREATMENT: Pretreated Process wastewater regulated by National Categorical Standard for Metal Finishers – 40 CFR 433.17, Pretreatment Standards for New Sources. An average of 10,000 GPD of pretreated wastewater is discharged continuously from this outfall. This wastestream shall be monitored for the following listed pollutants, as set forth by Part II – Monitoring Requirements.

<u>Pollutant Parameter</u>	<u>Maximum for Any One Day</u>	<u>Maximum For Monthly Average</u>
Cadmium (T), mg/l	0.11 ¹	0.07 ¹
Chromium (T), mg/l	2.77 ¹	1.71 ¹
Copper (T), mg/l	3.38 ¹	2.07 ¹
Cyanide (T), mg/l	1.20 ¹	0.65 ¹
Lead (T), mg/l	0.69 ¹	0.43 ¹
Nickel (T), mg/l	3.98 ¹	2.38 ¹
Silver (T), mg/l	0.43 ¹	0.24 ¹
Zinc (T), mg/l	2.61 ¹	1.48 ¹
TTO's, mg/l ³	2.13 ¹	
pH, S.U.	5.5 – 11.5 ²	
Oil & Grease, mg/l	100 ²	
Heat (Temperature)	150° F (65° C) ²	

¹Process wastewater per 40 CFR 433.17, Pretreatment Standards for New Sources – Metal Finishers.

²Local Sewer Use Ordinance

A-4b

PERMIT NO. 92-01**PART II - MONITORING REQUIREMENTS**

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

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

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

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) Spectrum shall pay to Paragould CLWC the costs of the required sampling and analyses.
- 4) Spectrum may, upon their request, obtain a portion of the samples for their analyses. The splitting of samples shall be performed only by authorized Paragould CLWC personnel.

- 5) The sampling of process wastewater shall be randomly performed at frequency determined by Paragould CLWC. 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) Spectrum shall keep daily records of total and process wastewater discharged to the Paragould CLWC Wastewater Collection System. Daily records of total and process wastewater discharged to the Paragould CLWC Wastewater Collection System, shall, upon request, be reported in writing to the CLWC Manager or his designated representative.

A 4c

Part II - Monitoring Requirements (Continued)

- 7) The Spectrum sampling point shall be:
- Outfall No. 001 – Effluent Pretreated Process Wastewater. Monitoring facility on Spectrum's process wasteline located approximately 20 feet outside the back (South side) center of the Spectrum building.
- 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 Paragould CLWC Manager.
- 9) In lieu of the requirements for monitoring for TTO, Spectrum may certify that no toxic organic compounds are stored, used or generated by the industry or that toxic organic compounds are controlled by the implementation of a solvents management plan approved by the Paragould CLWC Manager. To qualify for waiver of monitoring for TTO, the certification on the following page shall be provided by Spectrum each time compliance monitoring is performed by Paragould CLWC.

A-4d

PERMIT NO. 92-01

TOTAL TOXIC ORGANICS CERTIFICATION STATEMENT

Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since the last scheduled compliance monitoring for TTO by Paragould CLW&C.

I further certify that this facility is implementing the toxic organic management plant submitted to Paragould CLW&C.

(Typed Name)

(President, Secretary, Treas. or Vice-Pres.)

Date of Signature _____

CORPORATE ACKNOWLEDGMENT

STATE OF ARKANSAS)
COUNTY OF _____)

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

Given under my hand and seal of office on this _____ day of _____, 20____.

Notary Public in and for _____
County, Arkansas

My commission expires: _____.

A. 4e

PERMIT NO. 92-01**PART III - CONDITIONS OF PERMIT**

- 1) Spectrum Finishing, Inc. (Spectrum)) shall pay to Paragould CLWC an annual amount of \$500.00, which represents the costs incurred by CLWC 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 Paragould CLWC Manager prior to construction.
- 3) Spectrum shall notify the Paragould CLWC 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 Paragould CLWC Dispatcher (telephone no. 239-7785). Immediate appropriate action shall be taken by Spectrum to mitigate any adverse effects of spills/slug loadings.
- 4) Spectrum shall notify the Paragould CLWC 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) Spectrum 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) Spectrum shall, in compliance with 40 CFR 403.12(P)(1), notify the Manager of Paragould CLWC, EPA Region VI Waste Management Division and the Arkansas Department of Pollution Control and Ecology Hazardous Waste Division in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR 261.
- 7) For the purpose of determining whether the Paragould Municipal Code and/or any permit or order issued thereunder is being met and whether Spectrum is complying with all requirements thereof, the CLWC Manager and/or his authorized representative shall have access to production, materials storage and wastewater pretreatment areas of the Spectrum plant. Such access shall include ready access to all parts of the premises for the purpose of inspection,

A-4f

sampling, records examination and copying, and the performance of any additional duties. Spectrum 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 CLWC Manager or his designated representative. Access shall be during production and/or cleanup shifts. Upon presentation of suitable identification, the CLWC Manager or his designated representative shall be permitted to enter without delay, for the purposes of performing the above duties.

- 8) This permit may be reopened by Paragould City Light and Water any time during the effective duration for revisions to discharge limitations, monitoring and/or reporting requirements or conditions.
- 9) Provided that Spectrum has submitted acceptable application for renewal at least three months prior to the expiration date of this permit set forth on the permit cover sheet, this permit shall remain in effect, beyond the expiration date, until the CLWC Manager has either issued a renewal permit or has notified the permittee in writing that renewal of the permit is denied.
- 10) Spectrum 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.
- 11) 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.
- 12) 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 and Water personnel.;

A-4 g

Permit No. 92-01
Part III - Conditions of Permit (Continued)

- c) Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in interference, but in no case solids greater than one half (1/2) inches (1.27 centimeters) in any dimension;
- d) Any wastewater containing pollutants, including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with 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;

A-4h

Part III - Conditions of Permit (Continued)

- 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.
- 13) **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,

A-41

Permit No. 92-01
Part III - Conditions of Permit (Continued)

- 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;
 - 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.

A-43

14) 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.

15) 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;

A-4 K

- 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.

16) **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.

A-48

17) Prohibition of Bypass

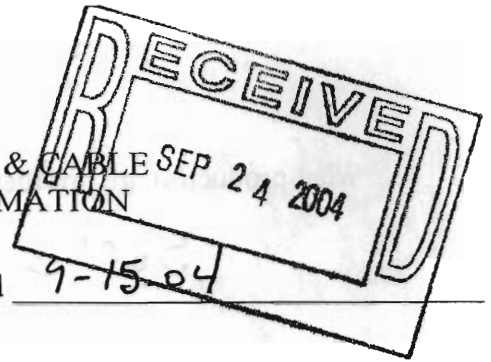
Bypass means the intentional diversion of wastestreams from any portion of an Industrial User's treatment facility. Bypass is prohibited and enforcement action may be taken against an Industrial User unless:

- 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.

A-4m

Attachment A5

PARAGOULD CITY LIGHT, WATER & CABLE
INDUSTRIAL FACT SHEET INFORMATION



Date Completed

9-15-04

Facility Name

7up RC Bottling

Facility Address

2001 West Kroy highway

Mailing Address

PO BX 859

Paragould, Ar 72451

Website

n/a

Contact Person(s)

Joe Williams

Phone Number

1-870-236-8765

Fax Number

1-870-236-3781

E-mail Address

JAW@Mellowmood.biz

CLWC Permit Number

89-03 207 002321

Effective Dates

4-17-2000 ;

SIC Number(s)

2084

NAISC Number(s)

312111

Date Production Began

Oct, 1966

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

Discharge from Cad line area, B&B area, 20 liter filler area,
20oz filler area, Syrup area, Warehouse area to CLW 8" pipe located
at Lab @ 50 gal per minute when batching out.
est. 7,500 gal/day

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.

What product(s) are produced at this facility?

Soft drinks

What raw products are used?

Water, HFCS (corn syrup), CO₂, Citric Acid, phosphoric Acid, Sodium Benzoate, Sodium Citrate, Potassium Citrate, Polyethylene Glycol.

What are the hours of operation at your facility?

Shift	Day of the Week						
	Monday	Tuesday	Wednesday	Thursday	Friday	Peak Season Saturday	Sunday
1 st	6 to 4	6 to 4	6 to 4	6 to 4	6 to 4	6 to 4	to
2 nd	to	to	to	to	to	to	to
3 rd	to	to	to	to	to	to	to

How many employees work on each shift?

Shift	Day of the Week						
	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
1 st	32	32	32	32	32		
2 nd							
3 rd							

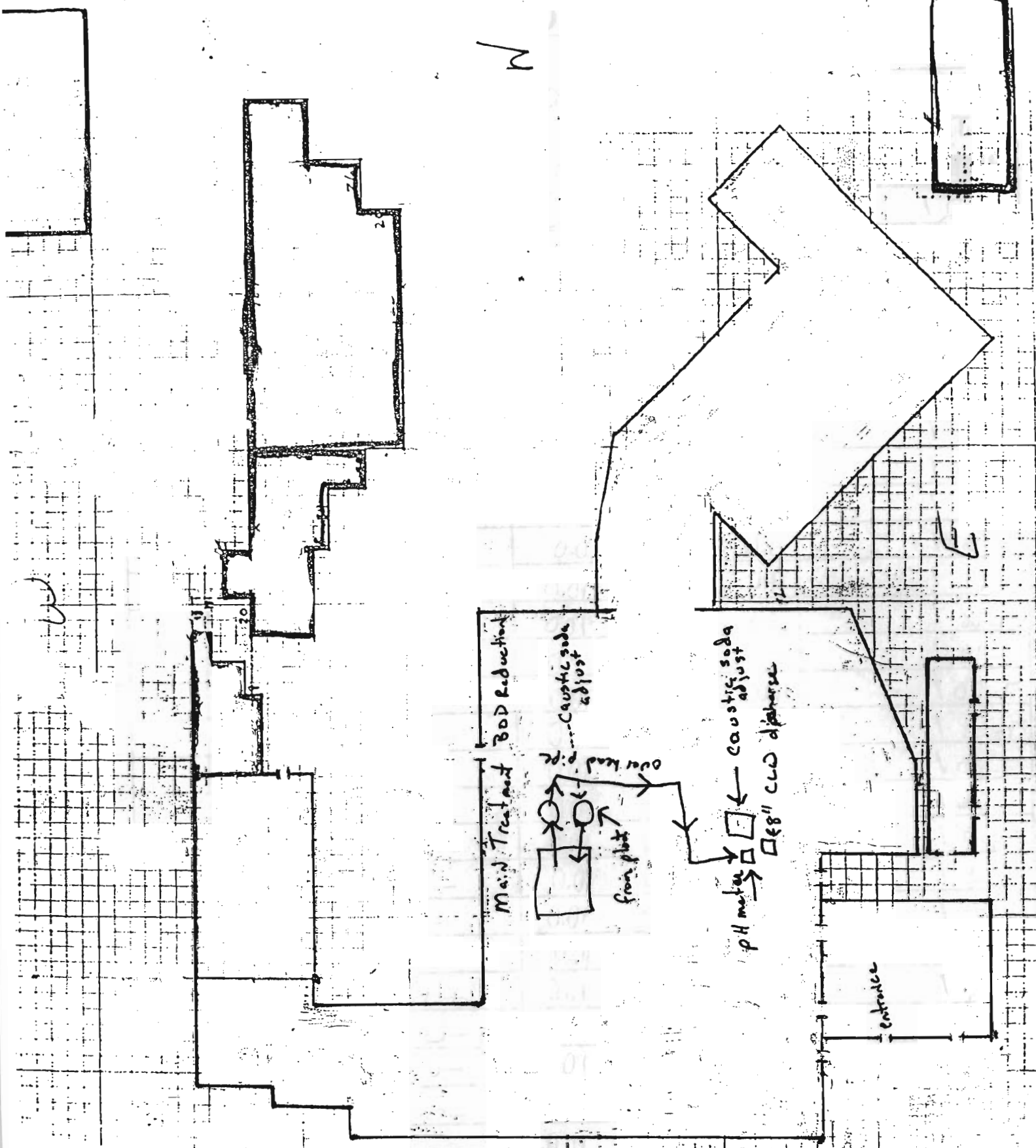
What, if any, pretreatment equipment is used at this facility?

Oil separator, Air bubbles, Caustic soda

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	6 to 6	6 to 6	6 to 6	6 to 6	6 to 6	to	to
2 nd	to	to	to	to	to	to	to
3 rd	to	to	to	to	to	to	to

A-5b



N

Main Treatment BOD Reduction

Caustic soda adjust

overhead pipe

from plot

Caustic soda adjust

pH meter

48" CWJ discharge

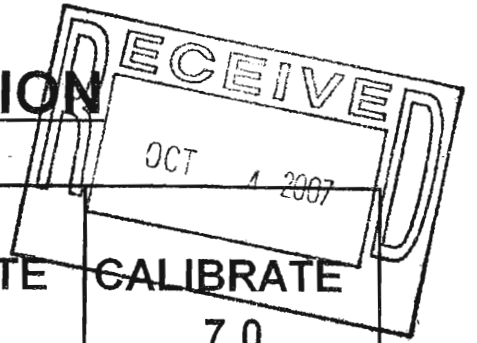
entrance

A-5c

S

7-UP /
Dr. Pepper Bottling

p H METER CALIBRATION



DATE TIME / INITIAL	INITIAL READING OF pH BUFFER 4.0 / 7.0 / 10.0	CALIBRATE 4.0	CALIBRATE 7.0
7-2 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-3 /	4.0 / 6.8 / 10.0	- 0 -	- 0.2 -
7-5 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-4 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-9 /	4.0 / 7.1 / 10.0	- 0 -	+ .1 -
7-10 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-11 /	4.1 / 7.0 / 10.0	+ .1	- 0 -
7-12 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-13 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-16 /	4.0 / 6.9 / 10.0	- 0 -	- 0.1
7-17 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-18 /	3.9 / 7.0 / 10.0	- .1	- 0 -
7-19 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-20 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-24 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-25 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-26 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-27 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-30 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
7-31 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
8-1 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
8-2 /	4.1 / 7.0 / 10.0	+ .1	- 0 -
8-6 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
8-7 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
8-8 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
8-9 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -
8-10 /	4.0 / 7.0 / 10.0	- 0 -	- 0 -

p H METER CALIBRATION

DATE TIME / INITIAL	INITIAL READING OF pH BUFFER	CALIBRATE	CALIBRATE
	4.0 / 7.0 / 10.0	4.0	7.0
8-13 /	4.0 / 7.1 / 10	-0-	+1-
8-14 /	4.0 / 7.0 / 10	-0-	-0-
8-15 /	4.0 / 7.0 / 10	-0-	-0-
8-16 /	4.0 / 7.0 / 10	-0-	-0-
8-17 /	4.0 / 7.0 / 10	-0-	-0-
8-20 /	4.0 / 7.0 / 10	-0-	-0-
8-21 /	4.0 / 7.0 / 10	-0-	-0-
8-22 /	4.0 / 7.0 / 10	-0-	-0-
8-23 /	4.0 / 7.0 / 10	-0-	-0-
8-24 /	4.1 / 7.0 / 10	+1-	-0-
8-27 /	4.0 / 7.0 / 10	-0-	-0-
8-28 /	4.0 / 7.0 / 10	-0-	-0-
8-29 /	4.0 / 7.0 / 10	-0-	-0-
8-30 /	4.0 / 7.0 / 10	-0-	-0-
8-31 /	4.0 / 6.9 / 10	-0-	-1-
9-4 /	4.0 / 7.0 / 10	-0-	-0-
9-5 /	4.0 / 7.0 / 10	-0-	-0-
9-6 /	4.0 / 7.0 / 10	-0-	-0-
9-7 /	4.0 / 7.0 / 10	-0-	-0-
9-10 /	4.0 / 7.0 / 10	-0-	-0-
9-11 /	4.0 / 7.0 / 10	-0-	-0-
9-12 /	4.0 / 7.0 / 10	-0-	-0-
9-13 /	4.0 / 7.0 / 10	-0-	-0-
9-14 /	4.0 / 7.0 / 10	-0-	-0-
9-17 /	4.0 / 7.0 / 10	-0-	-0-
9-18 /	4.0 / 7.0 / 10	-0-	-0-
9-19 /	4.0 / 7.1 / 10	-0-	+1

A-6b

p H METER CALIBRATION

DATE TIME / INITIAL	INITIAL READING OF pH BUFFER 4.0 / 7.0 / 10.0	CALIBRATE 4.0	CALIBRATE 7.0
9-20 /	4.0 / 7.0 / 10	-0-	-0-
9-21 /	4.0 / 7.0 / 10	-0-	-0-
9-24 /	3.9 / 7.0 / 10	-.1-	-0-
9-25 /	4.0 / 7.0 / 10	-0-	-0-
9-26 /	4.0 / 7.0 / 10	-0-	-0-
9-27 /	4.0 / 7.0 / 10	-0-	-0-
/	/ /		
/	/ /		
/	/ /		
/	/ /		
/	/ /		
/	/ /		
/	/ /		
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/	/ /		

A-6c

Daily pH Readings

Month of

Date	Time	pH	Date	Time	pH	Date	Time	pH	Date	Time
-2	6:00	6.1	7-6	6:00	5.7	7-11	6:00	5.6	7-16	6:00 - 6.6
	7:00	6.6		7:00	7.1		7:00	6.6		7:00 - 5.7
	8:00	5.9		8:00	6.3		8:00	6.3		8:00 - 7.0
	9:00	5.6		9:00	6.8		9:00	7.1		9:00 - 6.3
	10:00	6.7		10:00	7.6		10:00	7.7		10:00 - 6.9
	11:00	8.0		11:00	6.9		11:00	6.8		11:00 - 5.9
	12:00	7.4		12:00	8.1		12:00	8.1		12:00 - 6.1
	1:00	7.5		1:00	6.4		1:00	7.2		1:00 - 7.7
	2:00	6.4		2:00	6.6		2:00	7.0		2:00 - 6.9
-3	6:00	5.8	7-9	6:00	6.9	7-12	6:00	6.4	7-17	6:00 - 5.6
	7:00	6.7		7:00	5.8		7:00	6.0		7:00 - 6.1
	8:00	6.3		8:00	6.3		8:00	6.7		8:00 - 5.9
	9:00	7.2		9:00	7.0		9:00	7.1		9:00 - 6.7
	10:00	7.7		10:00	6.8		10:00	5.9		10:00 - 7.1
	11:00	6.4		11:00	7.9		11:00	6.7		11:00 - 6.3
	12:00	6.6		12:00	7.6		12:00	6.9		12:00 - 6.7
	1:00	5.9		1:00	6.6		1:00	8.2		1:00 - 7.4
	2:00	6.3		2:00	6.8		2:00	7.4		2:00 - 7.0
-5	6:00	7.0	7-10	6:00	7.0	7-13	6:00	6.7	7-18	6:00 - 6.5
	7:00	6.6		7:00	6.3		7:00	7.1		7:00 - 6.2
	8:00	6.8		8:00	6.4		8:00	5.8		8:00 - 7.1
	9:00	5.7		9:00	5.8		9:00	6.3		9:00 - 7.1
	10:00	6.7		10:00	6.7		10:00	6.2		10:00 - 8.1
	11:00	7.6		11:00	7.4		11:00	7.1		11:00 - 7.4
	12:00	6.9		12:00	6.9		12:00	6.9		12:00 - 6.4
	1:00	7.4		1:00	7.1		1:00	8.0		1:00 - 7.2
	2:00	6.7		2:00	7.7	A-6e	2:00	7.4		2:00 - 6.1

Daily pH Readings

Month of

Time	pH	Date	Time	pH	Date	Time	pH	Date	Time
6:00	7.10	7-24	6:00	6.32	7-30	6:00	6.6	8-2	6:00
7:00	5.92		7:00	6.7		7:00	5.8		7:00
8:00	6.41		8:00	6.1		8:00	6.4		8:00
9:00	6.08		9:00	7.4		9:00	5.6		9:00
10:00	7.90		10:00	6.8		10:00	7.1		10:00
11:00	6.22		11:00	7.7		11:00	7.4		11:00
12:00	7.20		12:00	7.1		12:00	6.8		12:00
1:00	7.34		1:00	6.4		1:00	8.0		1:00
2:00	6.36		2:00	6.6		2:00	7.1		2:00
7-20 6:00	6.77	7-25	6:00	5.7	7-31	6:00	6.4	8-6	6:00
7:00	6.01		7:00	6.4		7:00	6.7		7:00
8:00	6.40		8:00	6.9		8:00	5.9		8:00
9:00	5.95		9:00	7.1		9:00	6.6		9:00
10:00	6.40		10:00	6.8		10:00	7.6		10:00
11:00	7.10		11:00	8.0		11:00	6.9		11:00
12:00	5.79		12:00	7.6		12:00	7.1		12:00
1:00	6.44		1:00	6.3		1:00	6.4		1:00
2:00	6.75		2:00	6.7		2:00	6.5		2:00
7-23 6:00	5.46	7-26	6:00	7.1	8-1	6:00	6.0	8-7	6:00
7:00	5.51		7:00	6.3		7:00	6.4		7:00
8:00	5.70		8:00	6.6		8:00	5.7		8:00
9:00	6.29		9:00	5.9		9:00	7.2		9:00
10:00	6.41		10:00	7.1		10:00	6.7		10:00
11:00	7.20		11:00	7.4		11:00	6.9		11:00
12:00	6.75		12:00	6.8		12:00	8.0		12:00
1:00	6.29		1:00	6.4		1:00	6.8		1:00
2:00	6.20		2:00	6.5	A-6f	2:00	7.1		2:00

Daily pH Readings

Month of

Area	Time	pH	Date	Time	pH	Date	Time	pH	Date	Time	
8-8	6:00	6.1	8-13	6:00	6.9	8-16	6:00	5.7	8-21	6:00	7.0
	7:00	6.7		7:00	7.2		7:00	6.7		7:00	5.8
	8:00	6.4		8:00	5.8		8:00	6.3		8:00	6.3
	9:00	7.1		9:00	6.7		9:00	7.2		9:00	6.9
	10:00	6.8		10:00	6.4		10:00	6.9		10:00	7.4
	11:00	8.2		11:00	7.7		11:00	8.1		11:00	6.7
	12:00	6.9		12:00	7.0		12:00	7.4		12:00	7.1
	1:00	6.3		1:00	7.3		1:00	6.7		1:00	8.3
	2:00	6.4		2:00	6.8		2:00	6.8		2:00	7.4
8-9	6:00	5.7	8-14	6:00	6.1	8-17	6:00	6.4	8-22	6:00	6.9
	7:00	6.7		7:00	6.8		7:00	6.7		7:00	8.1
	8:00	6.2		8:00	5.9		8:00	5.9		8:00	7.0
	9:00	6.9		9:00	7.2		9:00	6.8		9:00	6.6
	10:00	5.8		10:00	6.4		10:00	7.0		10:00	5.9
	11:00	7.1		11:00	8.1		11:00	6.1		11:00	6.7
	12:00	6.7		12:00	7.1		12:00	6.7		12:00	7.4
	1:00	7.7		1:00	6.8		1:00	7.6		1:00	7.1
	2:00	5.9		2:00	7.3		2:00	7.2		2:00	6.2
8-10	6:00	6.6	8-15	6:00	6.7	8-20	6:00	6.4	8-23	6:00	5.8
	7:00	6.2		7:00	6.1		7:00	5.8		7:00	6.4
	8:00	7.4		8:00	7.0		8:00	7.1		8:00	7.0
	9:00	6.9		9:00	5.8		9:00	6.7		9:00	6.8
	10:00	8.0		10:00	6.3		10:00	7.7		10:00	7.1
	11:00	5.7		11:00	8.2		11:00	6.9		11:00	6.3
	12:00	6.0		12:00	7.8		12:00	7.2		12:00	6.7
	1:00	6.7		1:00	7.1		1:00	6.4		1:00	6.4
	2:00	6.3		2:00	7.4		2:00	6.8		2:00	5.9

Daily pH Readings

Month of

Core	Time	pH	Date	Time	pH	Date	Time	pH	Date	Time	
-24	6:00	6.6	8-29	6:00	5.9	9-4	6:00	6.7	9-7	6:00	6.6
	7:00	6.0		7:00	6.8		7:00	5.8		7:00	5.9
	8:00	7.1		8:00	6.4		8:00	6.3		8:00	6.1
	9:00	4.8		9:00	8.8		9:00	7.6		9:00	7.6
	10:00	8.4		10:00	7.4		10:00	6.9		10:00	7.0
	11:00	7.2		11:00	7.1		11:00	8.1		11:00	6.7
	12:00	6.6		12:00	7.4		12:00	7.4		12:00	8.1
	1:00	7.1		1:00	6.1		1:00	6.4		1:00	7.4
	2:00	6.1		2:00	7.7		2:00	6.7		2:00	6.8
-27	6:00	5.7	8-30	6:00	6.7	9-5	6:00	5.6	9-10	6:00	5.9
	7:00	6.7		7:00	6.9		7:00	6.3		7:00	6.3
	8:00	6.6		8:00	5.8		8:00	6.7		8:00	7.1
	9:00	7.9		9:00	6.6		9:00	7.2		9:00	6.7
	10:00	7.1		10:00	7.4		10:00	6.9		10:00	8.3
	11:00	8.4		11:00	7.1		11:00	7.1		11:00	7.2
	12:00	6.9		12:00	6.7		12:00	8.4		12:00	7.4
	1:00	7.2		1:00	8.3		1:00	6.9		1:00	6.4
	2:00	6.4		2:00	7.4		2:00	7.1		2:00	6.8
-28	6:00	5.8	8-31	6:00	6.4	9-6	6:00	6.3	9-11	6:00	6.4
	7:00	6.6		7:00	6.9		7:00	6.8		7:00	7.1
	8:00	6.9		8:00	5.8		8:00	5.9		8:00	5.9
	9:00	6.1		9:00	7.1		9:00	7.0		9:00	6.3
	10:00	8.0		10:00	7.7		10:00	6.8		10:00	7.2
	11:00	7.4		11:00	6.5		11:00	7.8		11:00	7.7
	12:00	6.8		12:00	6.9		12:00	6.7		12:00	6.9
	1:00	7.7		1:00	7.4		1:00	7.1		1:00	8.0
	2:00	7.1		2:00	6.3		2:00	6.4		2:00	7.4

Daily pH Readings

Month of

Core	Time	pH	Date	Time	pH	Date	Time	pH	Date	Time	
i-12	6:00	6.7	9-17	6:00	6.5	9-20	6:00	6.7	9-25	6:00	5.6
	7:00	5.7		7:00	6.4		7:00	6.0		7:00	7.0
	8:00	6.4		8:00	5.9		8:00	7.1		8:00	6.8
	9:00	7.6		9:00	7.4		9:00	8.3		9:00	6.7
	10:00	6.9		10:00	6.4		10:00	6.9		10:00	5.7
	11:00	8.0		11:00	7.7		11:00	7.4		11:00	6.1
	12:00	7.3		12:00	6.4		12:00	6.8		12:00	6.9
	1:00	7.4		1:00	8.0		1:00	6.7		1:00	7.7
2:00	6.6	2:00	7.1	2:00	7.2	2:00	6.8				
i-13	6:00	5.9	9-18	6:00	6.3	9-21	6:00	6.6	9-26	6:00	6.3
	7:00	7.0		7:00	6.9		7:00	5.8		7:00	7.0
	8:00	6.6		8:00	5.7		8:00	6.1		8:00	5.9
	9:00	6.8		9:00	7.0		9:00	7.4		9:00	6.4
	10:00	7.3		10:00	6.7		10:00	6.9		10:00	7.1
	11:00	6.4		11:00	7.9		11:00	6.7		11:00	8.3
	12:00	7.7		12:00	8.8		12:00	5.8		12:00	6.9
	1:00	7.1		1:00	6.8		1:00	7.0		1:00	7.4
2:00	6.5	2:00	7.3	2:00	6.7	2:00	6.8				
i-14	6:00	6.9	9-19	6:00	6.1	9-28	6:00	6.1	9-27	6:00	6.5
	7:00	6.1		7:00	6.4		7:00	7.4		7:00	6.1
	8:00	7.0		8:00	5.9		8:00	6.8		8:00	7.0
	9:00	6.8		9:00	7.1		9:00	5.8		9:00	5.8
	10:00	6.3		10:00	6.9		10:00	6.3		10:00	6.4
	11:00	8.1		11:00	8.0		11:00	7.6		11:00	6.7
	12:00	8.4		12:00	6.3		12:00	7.1		12:00	7.1
	1:00	6.9		1:00	6.9		1:00	5.8		1:00	6.7
2:00	7.5	2:00	6.5	2:00	6.1	2:00	6.4				

2004
Industrial Non-Compliance Log

Date	Time	Industry	Non-compliance	Person Contacted	By	Comments
2/2/04	9:13am	7up	pH 12.23	Johnny Houston	AFB	Probe went down.
2/2/04	9:17am	MSK	bill base 140	Darrell Pillow	AFB	left message
2/2/04	8:11am	MSK	Copper 21700 3.520 Mercury = 2.123	Darrell Pillow	AFB	left message
2/11/04	9:07am	7up	silicic ph 3.96	Johnny Houston	AFB	tried to call - no answer - Bill to
2/17/04		7up	8/200 ph 4.56	" "	AFB	pump went down, trying to fix it
1/15/06	7:45am	Emerson	zone outfall 001 av. 5.126ppm	emailed Joel	AFB	emailed
12/5/06	2:04pm	MSK	046 110 11/14/06	Darrell Pillow	AFB	left message
12/17/06	9:12am	Spectrum	pH 12/16/04 4.83	Jeff Ryan	AFB	He will check on it
1/17/06	9:17am	7up/R/C	12/16/04 pH 4.22	Johnny Houston	AFB	emailed JH.
12/20/06	11:29am	Spectrum	12/17/04 zinc 7.652ppm	Joe McCalliffe	AFB	He is looking for what parts were used.

11/11/07
JH or
2/17/04
Crown
PMT.

Attachment #1

CityLightWater

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870-239-7700
Fax: 870-239-7798

August 21, 2006

Mr. Johnny Houston
Quality Control
7-Up RC Bottling Company
P.O. Box 859
Paragould, AR 72450

Re: Slug Discharge Evaluation

Dear Mr. Houston:

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

CityLightWater

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870-239-7700
Fax: 870-239-7798

January 10, 2007

Mr. Johnny Houston
Quality Control
7up RC Bottling Company
P.O. Box 859
Paragould, AR 72450

Dear Mr. Houston:

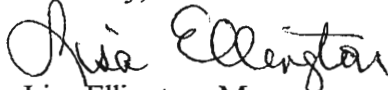
In accordance with the Pretreatment Program adopted by the City of Paragould, we are required you the following Notification of Non-Compliance:

Samples taken: December 6, 2006 contained a pH concentration of 4.22 S.U., which violated the minimum limit of 5.5 S.U.

In addition, this violation also violated the Federal limit of 5.0 S.U.

Please respond back to me within 15 days, in writing, with actions to prevent further instances of non-compliance of this nature. If I can be of any further help, please contact me at 239-7795.

Sincerely,



Lisa Ellington, Manager
Environmental Services

January 30, 2007

Mr. Johnny Houston
Quality Control
7up RC Bottling Company
P.O. Box 859
Paragould, AR 72450

Dear Mr. Houston:

In accordance with the Pretreatment Program adopted by the City of Paragould, we are required you the following Notification of Non-Compliance:


Seven-up RC Bottling Company is in non-compliance for not responding to the following non-compliance in a letter dated January 10, 2007.

Samples taken: December 6, 2006 contained a pH concentration of 4.22 S.U., which violated the minimum limit of 5.5 S.U.

In addition, this violation also violated the Federal limit of 5.0 S.U.

Please respond back to me within 15 days, in writing, with actions to prevent further instances of non-compliance of this nature. If I can be of any further help, please contact me at 239-7795.

Sincerely,


Lisa Ellington, Manager
Environmental Services

A-116

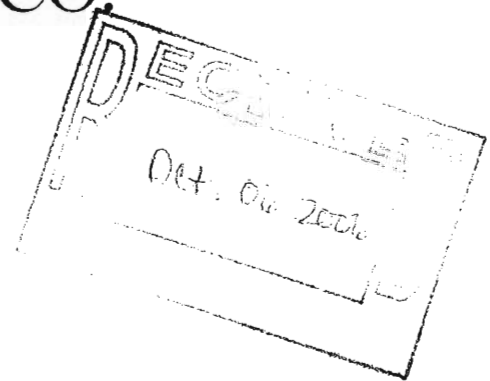
.....

2001 West Kings Highway
P.O. Box 859
Paragould, AR 72451
Phone (870) 236-8765

7 UP, RC BOTTLING CO.

October 5, 2006

Ms. Lisa Gilbreath
Manager Environmental Services
P.O. Box 9
Paragould, AR 72451



Dear Ms. Gilbreath,

This letter is in response to your notification of non-compliance dated aug 02, 2006. The wastewater treatment pump worked ineffectively on aug 2nd, and 3rd.

A new pump has been installed and I hope that this will take care of any future p.H. irregularities.

Thank you for communicating the p.H. problem with us.

If you have any questions, please feel free to contact me at 236-8765.

Sincerely,

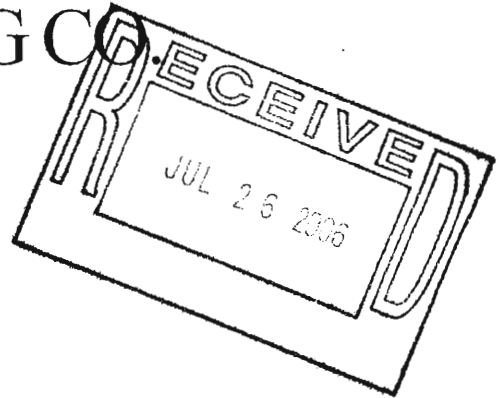
J. Houston

.....

.....

2001 West Kings Highway
P.O. Box 859
Paragould, AR 72451
Phone (870) 236-8765

7 UP, RC BOTTLING CO.



July 25, 2006

Ms. Lisa Gilbreath
Manager Environmental Services
P.O. Box 9
Paragould, AR 72451

Dear Ms. Gilbreath,

This letter is in response to your notification of non-compliance dated JULY 21, 2006. The wastewater treatment system worked ineffectively on JUNE 13TH, and 14TH.

WE had a caustic pump go out, but this has been fixed and should correct the problem

Thank you for communicating the p.H. problem with us.

If you have any questions, please feel free to contact me at 236-8765.

Sincerely,

J. HOUSTON
Manager, Plant & Quality Control

.....

A-11d

CityLightWater

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P.O. Box 9
1901 Jones Road
Paragould, AR 72450

870-239-7700
Fax: 870-239-7798

January 10, 2007

Mr. Jeffery Ryan
President
Spectrum Finishing, Inc.
P.O. Box 607
Paragould, AR 72450

Dear Mr. Ryan:

In accordance with the Pretreatment Program adopted by the City of Paragould, we are required you the following Notification of Non-Compliance:

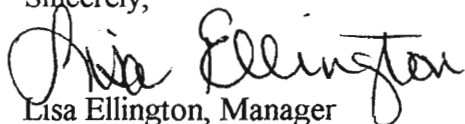
Samples taken: December 6, 2006 contained a Zinc concentration of 7.652 mg/l which violated the maximum daily limit of 2.61 mg/l. In addition, the monthly Zinc average concentration of 4.179 mg/l violated the maximum monthly average of 1.48 mg/l.

December 6, 2006 contained a pH concentration of 4.83 S.U., which violated the minimum limit of 5.5 S.U.

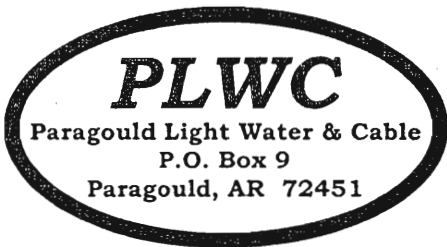
In addition, this violation also violated the Federal limit of 5.0 S.U.

Please respond back to me within 15 days, in writing, with actions to prevent further instances of non-compliance of this nature. If I can be of any further help, please contact me at 239-7795.

Sincerely,



Lisa Ellington, Manager
Environmental Services



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

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

June 20, 2007

Mr. Jeffery Ryan
President
Spectrum Finishing, Inc.
P.O. Box 607
Paragould, AR 72450

Dear Mr. Ryan:


In accordance with the Pretreatment Program adopted by the City of Paragould, we are required you the following Notification of Non-Compliance:

Samples taken: May 16, 2006 contained a Zinc concentration of 2.925 mg/l which violated the maximum daily limit of 2.61 mg/l. In addition, the monthly Zinc average concentration of 1.754 mg/l violated the maximum monthly average of 1.48 mg/l.

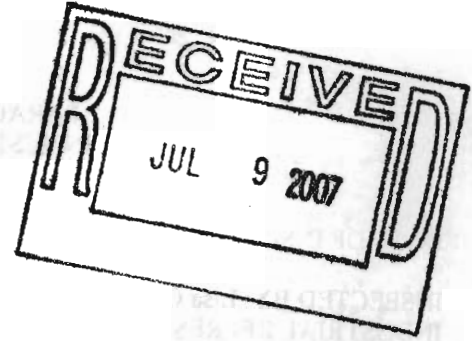
May 16, 2006 contained an Oil & Grease concentration of 120 mg/l, which violated the minimum limit of 100 mg/l.

Please respond back to me within 15 days, in writing, with actions to prevent further instances of non-compliance of this nature. If I can be of any further help, please contact me at 239-7795.

Sincerely,


Lisa Ellington, Manager
Environmental Services

AIF



July 5, 2007

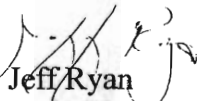
Lisa Ellington
P.O. Box 9
Paragould, AR 72451

Dear Lisa:

This letter is in response to Spectrum Finishing's Non-compliance Notification dated June 20, 2007.

The product responsible for the zinc concentration violation has been identified and the customer has been informed that we can no longer process this part.

The elevated oil and grease reading has been determined to have been caused by a malfunction of the automatic conveyor oiler which was corrected immediately.


Jeff Ryan
President

A-112

PARAGOULD LIGHT, WATER & CABLE
INDUSTRIAL USER INSPECTION REPORT

DATE OF INSPECTION: 08/29/06

TIME OF INSPECTION: 9 am

INSPECTED BY: Lisa Gilbreath and Ashley Barr
INDUSTRIAL REPRESENTATIVE: Darrel Pillow
RESPONSIBLE OFFICIAL: Graham Huff
CONTACT: Darrel Pillow

PHONE NUMBER: 239-8558

NAME & ADDRESS OF INDUSTRIAL FACILITY:

Martin Sprocket & Gear Permit #89-07
1205 S. Third Avenue
Paragould, AR 72450

CHANGES IN PROCESSES, PRODUCTS, CHEMICALS OR PRETREATMENT SINCE LAST
INSPECTION ON 02/15/06:

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:

Oil and Grease: March 9, 2005, August 23, 2005
Copper Daily: December 20, 2005; February 7, 2006
Copper Monthly: February 2006

LAST DATE OF CALIBRATION FOR FLOW MONITORING EQUIPMENT:

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

- | | | |
|---|------------------------------|--|
| A) In-house environmental teams | <input type="checkbox"/> YES | <input 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 type="checkbox"/> YES | <input type="checkbox"/> NO |

Ion exchange unit is closed loop

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 type="checkbox"/> YES | <input checked="" 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: ECCI – Andy Stickler | | |
| 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: 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 |

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 type="checkbox"/> YES | <input checked="" type="checkbox"/> NO | <input type="checkbox"/> n/a |
| Lab Name | | | |
| Lab Address | | | |
| Reason for Use: | | | |

*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.

Process discharge from tumblers, resin impregnator and cleaner lines. Discharge from blacking line is not discharged to sewer system – it is hauled off. MSG also has domestic discharge.

- B) Description of stored chemicals.

31.5% hydrochloric acid, alkaline cleaners, oxyprime. Bought as needed; stored in contained area.

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

Notify PLWC immediately at 239-7795 or 239-7700

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

MSG has hired a consultant to help prepare a TOMP and SPCC

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

Men's bathroom and handwasher area; storm drain located in storage area; drain at dock discharges to ditch; no floor drains located in production area or near stored chemicals.

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

Inter-Rail Systems, Inc. takes solvents, oils and sludges

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

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

- I) Evaluation of TOMP need.

A TOMP may be needed after the completion of the slug evaluation. However MSG has hired a consultant to help prepare both a TOMP and SPCC.

PHYSICAL DESCRIPTION OF MANUFACTURING PROCESSES:

Main production is gears and sprockets. Have 18 cutting machines, 6 press machines for steel, 18 blanking machines, 14 gear hoppers, 14 powder metal presses (use 600 – 800 tons of forces), 7 furnaces, and 13 injection molding machines for plastics. Also have 3 tumblers for cleaning parts (tumblers use MK2132 soap). MSG has a tool and die shop where they can make their own tools. Cleaners used in the shop are hauled off when dirty. MSG produces about 20,000 pieces per day using 2 blacking lines (one for powdered metal and one for steel). Discharge from blacking lines is hauled off by Inter-Rail Systems as hazardous waste.

WASTEWATER GENERATING OPERATIONS AND FLOWS:

Tumbler discharge is about 50 – 75 gpd; no discharge from blacking lines

OTHER SOURCES OF WASTEWATER:

Domestic discharge of about 6,800 to 8,000 gpd

REGULATED WASTESTREAM(S):

Blacking lines – 40 CFR 433.15 – Metal Finisher

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

Steel Bar: stock yard; saw area; cut blanks; form and shape; gear cutter; drilling; tapping and broaching; blacking; final inspection; packaging; warehouse

Powdered Metal: storage; press department where it is formed into briquettes; furnace department; sintering; tumbling department; blacking; boxing; warehouse

Approximate number of employees: 211
Number of shifts: 2 and a partial shift of 6 people for 3rd
Average number of hours/week: 5 days/week, 24 hours/day

DESCRIPTION OF PRETREATMENT SYSTEM(S):

Closed loop system
Ion exchange filters

COMMENTS:

Need to look at containment area to see if an expansion is necessary

A-12d

Paragould Light, Water and Cable
Wastewater Treatment Plant
Industrial Pretreatment

Slug/Spill Evaluation Checklist

SIU Name: Martin Sprocket and Gear, Inc. Date: 08/29/06

Permit No: 89-07 Contact: Darrel Pillow

1. Spill Plan No Applicable

a. Type on file (SPCC, TOMP, Contingency): None Date: _____

b. Number of Spills in the last 3 years: None

2. Chemical Storage See Attached

a. Attach a chemical list, including location of chemical, quantity stored, and container size.

b. Containment: Yes No _____ Describe: 6" Iron glued to floor

Condition: Good Fair _____ Poor _____ N/A _____

c. Drains/Trenches: Yes No _____ Routed to: Storm Drains

Distance from storage tanks or drums (in feet): N/A

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

3. Manufacturing Processes See attached diagram/descriptions

a. Process solutions in tanks

<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 X

If no, is overflow liquid contained? Yes _____ No X

Describe containment: _____

Condition of containment: Good _____ Fair _____ Poor _____ N/A _____

c. Drains/Trenches: Yes _____ No X Routed to: _____

Distance from Process Tanks (in feet): _____

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

4. Pretreatment System N/A

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

b. Calibration frequency of instrumentation and/or equipment (specify): N/A

c. Spare parts on hand: Yes _____ No _____

d. Excess wastewater holding capacity: Yes _____ No _____

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

Yes _____ No _____

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

5. Loading/Receiving Docks

a. Drains/Sumps: Yes _____ No X 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 X No _____

b. Potential to discharge: Yes X No _____

7. Non-Routine Batch Discharges

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

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

b. Name of chemical solution discharged: _____

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>Blackening Soln</u>	<u>4,520 gallons</u>	<u>Inter-Rail System Inc.</u>
<u>Selenium Waste</u>	<u>27,500 gallons</u>	<u>Inter-Rail System Inc.</u>
<u>Oil Waste</u>	<u>10,500 gallons</u>	<u>Inter-Rail System Inc.</u>
<u>Absorbants</u>	<u>10 – 55 gallon drums</u>	<u>Inter-Rail System Inc.</u>

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

Hauled off monthly: stored in oil containment area once drum is full

Recommendations

- a. _____ Existing Spill Plan adequate, Combined Slug/Spill Control Plan not needed
 - b. X 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
-

Signature

Date

rec'd during audit
12/12/07
[Signature]

August 1, 2007

Mr. Darrel Pillow
Martin Sprocket and Gear, Inc.
1205 S. Third Avenue
Paragould, AR 72450

Re: Slug/Spill Evaluation

Dear Mr. Pillow:

In 2006 Paragould Light, Water and Cable (PLWC) conducted a Slug/Spill Evaluation Potential of Martin Sprocket and Gear. After reviewing the information gathered during the evaluation, it has been determined that your facility should implement a Slug/Spill Control Plan. Enclosed are guidelines for your convenience in writing and executing the plan, as well as example plans to help you in this endeavor.

If you have questions or need assistance, please call me at 239-7795.

Sincerely,

Lisa Ellington
Manager
Environmental Services

A-13e