

# ADEQ

ARKANSAS  
Department of Environmental Quality

JUN 30 2014

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

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

Dear Mr. Phillips,

Please find enclosed the finished report for the audit/assessment conducted May 28 – 30, 2014. The contents should be made available for review by appropriate PLWC officials. Discussions and an evaluation should be made concerning the required actions and recommendations. Please respond in writing within thirty (30) days from the date on this correspondence with your corrective actions regarding the deficiencies cited and any recommendations PLWC would care to act on.

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

Please keep in mind the cross training discussion we had during the first day of the audit.

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

Please feel free to contact this office with any questions at [gilliam@adeq.state.ar.us](mailto:gilliam@adeq.state.ar.us) or 501.682.0625.

Sincerely,



Allen Gilliam  
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

cc: Rudy Molina/EPA 6WQ-PO  
Jason Bolenbaugh/NPDES Inspector Supervisor  
Crain Uyeda/NPDES Enforcement Branch Manager

E-drive/NPDES/NPDES/Pretreatment\Reports

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

**NPDES PERMIT #AR0033766**

**June 25, 2014**

**PREPARED BY: ALLEN GILLIAM  
ADEQ STATE PRETREATMENT COORDINATOR**

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- A) Introduction;
- B) Summary of Findings with Required Actions
- C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs and
- D) Required Program Modifications to the Approved Pretreatment Program Necessary to Bring the Program Into Compliance with the Letter or Intent of the Current Regulatory Requirements

## LIST OF ATTACHMENTS

### Pretreatment Program Audit/Assessment Checklist:

Section I: General Information

Section II: Program Analysis and Profile

Section III: Industrial User File Review

Reportable Noncompliance (RNC) Worksheet

SIU Site Visit Summaries

Attachment(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 May 28 through May 30, 2014, of the Pretreatment Program implemented by Paragould Light, Water 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 and;
- \* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

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

Paragould's Pretreatment Program was originally approved 3/16/84. Program modifications were approved and incorporated into their NPDES permit on 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.

Streamlining revisions were made to the National Pretreatment Regulations in October '05. The City submitted modifications to their Program on 10/6/09. They were reviewed, approved on 3/22/13 and incorporated into its NPDES permit making it current with 40 CFR 403.

The City's wastewater treatment plant has a design flow of 6.0 MGD and includes oxidation ditches, final clarification, re-aeration, chlorination, de-chlorination and aerobic sludge digestion. An average of 255 dry tons of EQ biosolids were given to the public last year.

An average flow of 3.0 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 0.36 MGD from 5 significant industries, 3 of which are categorical (2 other metal finishers do not discharge regulated wastewater).

The effluent has shown no pattern of sub-lethality or lethality in either species in the last three (3) years (15 tests) although there was a short period of sublethality shown in both species in April and May of 2013 and sublethality in the fathead minnow in January of 2013.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to three (3) 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 the City. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

## B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Paragould's Pretreatment Program. Actions required by PLWC to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program will be paraphrased citations of the same. A narrative explanation of the finding will follow.

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

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

The "Effluent Limitations" page (see Atch. A-3b) must contain the BMPs such as "Implement

approved TOMP”. These could also be further described in Part III of PLWC’s SIU permits (see beginning on Attach. A-3e).

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

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

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

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

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

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

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

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

It was discussed with PLWC’s Pretreatment personnel to begin issuing formal notices of violations

and escalating this enforcement option to consent orders if Nidec continues to violate its zinc limitations. It is felt more formal enforcement options may help the facility understand the gravity of continuing zinc violations even though they have not met the criteria of significant non-compliance.

2) Recommend investigating the stormwater (and other possible dilution) flows at Tenneco. There was some confusion between PLWC's Pretreatment rep and the Tenneco representative where the parking lot's stormwater was connected to. The Tenneco rep thought it was tied in with regulated wastewater before treatment. This is depicted on their wastewater flow schematic as well as what appears as dilution coming from their "water cooler drain" and boilers' blowdown prior to treatment.

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

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

5) Recommend sending the hazardous waste notification in 40 CFR 403.12(p) to the generators on the ADEQ list provided to the City's Pretreatment rep during the audit. Some of these small businesses move around the country often, may be connected to the City one year and then closed down the next.

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

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

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

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

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

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

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

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

**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**

There are no Program modifications deemed necessary at this time.

\* \* \* \* \*

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



# PRETREATMENT AUDIT CHECKLIST

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

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

### SECTION I: GENERAL INFORMATION

**A. GENERAL INFORMATION**

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

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

Permit Signatory: Darrell Phillips Title: General Manager/CEO

Telephone: 870.239.7700 FAX NUMBER: 870.239.7798

Pretreatment Contact: Lisa Ellington Title: Env. Services Manager

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 & 3/22/13

Month Annual Pretreatment Report Due: March

Pretreatment Year Dates: 3/1 - 2/28 Date(s) of Audit: 5/28-5/30/14  
 (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>3/13</u>	<u>"In compliance"</u>

**SECTION I: GENERAL INFORMATION**

YES NO

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

If yes, describe the required corrective action: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

         Is the Control Authority currently in SNC or RNC?

.....

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

**SECTION I: GENERAL INFORMATION**

**B. TREATMENT PLANT INFORMATION**

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

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

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: same

Location Address: 401 Grant Lane

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 6.0 MGD; Actual (Avg): 3.0 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 5 # of CIUs : 4

Industrial Flow (mgd): 0.36 Industrial Flow (%): 11.95 %

Level of Treatment

Type of Process(es):

Primary \_\_\_\_\_

Secondary  Oxidation ditches; aeration basins; final

Tertiary \_\_\_\_\_ clarification; re-aeration, aerobic sludge and digestion

Method of Disinfection: Chlorination

Dechlorination  YES  NO

Effluent Discharge

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

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

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

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

Method of Sludge Disposal:

Quantity of Sludge:

<input type="checkbox"/> Land Application	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Incineration	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Monofill	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Public Distribution	<u>255</u> dry tons/yr. (EQ)
<input type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input type="checkbox"/> Other (specify)	<input type="checkbox"/> dry tons/yr.

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

**SECTION I: GENERAL INFORMATION**

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

YES NO  
 \_\_\_  Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:  
 Issuing Authority: n/a  
 Issuance Date: "  
 Expiration Date: "

List pollutants that are specified in current sludge permit:  
City produces EQ biosolids; therefore, no permit necessary

YES NO N/A  
 \_\_\_ \_\_\_ Has the Control Authority submitted results of whole effluent biological toxicity testing.  
 \_\_\_  \_\_\_ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There was a brief period in April and May '13 showing sublethality in both species. January '13 showed sublethality in the water flea. A TRE was not triggered.

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>4</u>	<u>4</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 - 12/13</u>	<u>O&amp;M problems with the chlorinator and the sulfanator.</u>
_____	_____

YES NO  
 \_\_\_  Has the treatment plant sludge violated the TCLP Test?

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

- Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c) (3)]
- Have any non-substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.  
See below.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation #2013-04 Nature of Modification	Date Incorporated in NPDES Permit
3/22/13	City submitted modifications their complete Pretreatment Program to be current with the required Streamlining revisions to 40 CFR 403	3/22/13

2. Modifications in Progress:

Date Requested	Nature of Modification
n/a	

YES NO

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

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

Date of original Pretreatment Program approval: 3/16/84 [WENDB-PTIM]  
 Date of most recent Ordinance approved by the Control authority: 2/25/13  
 Date of most recent Pretreatment Program modification approval: 3/22/13

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?  
 \* Pretreatment Ord. has P2 as one of its "purposes"

## SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

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

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

    n/a Have provisions been made for the incorporation of Pollution Prevention (P<sup>2</sup>) policies by contributing jurisdictions?

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

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. <u>   </u> <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>      </u> N/A
<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 <sup>2</sup> 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:

IU Name	Problem	NPDES Permit Violation	
		Yes	No
<u>   </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)] "ongoing"(see attachment A-1 for example). Last one completed in '12.

      If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P<sup>2</sup> activity?

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

      If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P<sup>2</sup> activity and the distribution of P<sup>2</sup> reference materials to the IUs which qualify?

What methods are used to update the IWS:

- Review of newspaper/phone book
- Information from PLWC electrical hook-ups/connections
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) Green County Mfg. Directory, Chamber of Commerce, and the AR Mfg's Directory

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

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.     5 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b.     4 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c.     1 Noncategorical SIUs
- d.     3 Other regulated nonsignificant IUs (Describe) 2 zero discharge metal finishers & 1 non-significant IU who generates CN
- 8 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(v)(1)(i-ii)]

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

**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  

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

IU NAME	PERMIT EXPIRATION DATE
<hr/>	

**YES NO**

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

**YES NO**

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

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

Pollutant	Limit
n/a	
<hr/>	<hr/>
<hr/>	<hr/>

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	
<hr/>	<hr/>



## SECTION II: PROGRAM ANALYSIS AND PROFILE

### G. Application of Pretreatment Standards and Requirements

YES NO

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

12/09 Date Notified Method of Notification letter

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

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

YES NO

Is the Control Authority in the process of making any changes to its local limits or have limits changed since the last PCI, Audit or Annual Report?  
\*Changes already made to its MAILs.

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
<u>See below for new MAILs.</u>			

YES NO

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

	Headworks Analysis Completed?		Local Limits Needed?		MAHLs/TBLIs Adopted (by Resolution)		3/13 Program's Numeric MAILs in Program (lb/day)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.00
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.048
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	22.035
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	3.458
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.334
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.41
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.003
Molybdenum (Mo) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.112
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.323
Selenium (Se) *	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	0.00
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1.442
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	8.17

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

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

YES NO

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

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

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

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

## SECTION II: PROGRAM ANALYSIS AND PROFILE

### H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

<u>Program Aspect</u>	<u>Approved Program</u>	<u>Federal Requirement</u>	<u>Explain Difference</u>
<b>Inspections:</b>			
CIUs	<u>1/yr</u>	1/year	_____
Other SIUs	<u>"</u>	1/year	_____
<b>Sampling:</b>			
CIUs	<u>12-24/yr</u>	1/year	<u>Common practice</u>
Other SIUs	<u>4</u>	1/year	<u>"</u>
<b>Reporting:</b>			
CIUs*	<u>n/a</u>	[City performs IUs' self monitoring] 2/year	<u>*Metal Finishers send in Cert. statement 2/yr</u>
Other SIUs	<u>"</u>	2/year	_____
<b>Self-Monitoring:</b>			
CIUs	<u>"</u>	2/year	_____
Other SIUs	<u>"</u>	2/year	_____

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

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

Does the Control Authority routinely split samples with industrial personnel:

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

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

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

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

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

       Does the POTW use QA/QC for sampling and analysis? If yes, describe:  
Blanks, spikes and duplicates every 10% on their own. In-house, they follow  
EPA's DMR-QA Study and Phenova's test procedures quarterly

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

5 dys Conventionals  
2 wks Metals  
2 wks Organics

       Is there an established protocol clearly detailing sampling location and procedures?

        Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: n/a

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

YES NO

        Scheduled compliance monitoring  
         Unscheduled compliance monitoring  
       n/a\* Demand monitoring for IU compliance  
        IU self-monitoring  
              Other: \_\_\_\_\_

*\*City does monitoring*

YES NO

        Has the Control Authority identified any violation of the prohibited discharge standards [403.5(a)&(b)] in the last reporting year? If yes, describe below.

**I. ENFORCEMENT**

YES NO

       Is the Control Authority definition of SNC consistent with EPA's? [403.8(f) (2) (vii)]

       Does the Control Authority have a written enforcement response plan? [403.8(f) (5)]. If yes, does the plan:

YES NO

       Describe how the Control Authority will investigate instances of noncompliance

       Describe the Control Authority's types of escalating enforcement responses and the periods for each response

       Identify by Title the Official(s) responsible for implementing each type of enforcement response

       Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

## SECTION II: PROGRAM ANALYSIS AND PROFILE

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

<input checked="" type="checkbox"/> Notice or letter of violation	<input checked="" type="checkbox"/> Administrative Order
<input checked="" type="checkbox"/> Setting of compliance schedule	<input checked="" type="checkbox"/> Revocation of permit
<input checked="" type="checkbox"/> Injunctive relief	<input checked="" type="checkbox"/> Fines (maximum amount):

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

Imprisonment  
 Termination of Service  
 Other: \_\_\_\_\_

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

YES NO

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

Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].  
 Comment: Since the City does the compliance monitoring, they send the IU a "notice of non-compliance" with the requirement to respond within 15 days

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

YES NO N/A

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

Complete the following table for SIUs identified as SNC.

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

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

#	%	
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]

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

YES NO

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

Has the Control Authority experienced any of the following:

YES NO

EXPLAIN and ID Industrial User

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

YES NO

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

0 How many SIUs are currently on compliance schedules?

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

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

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

**J. DATA MANAGEMENT/PUBLIC PARTICIPATION**

YES NO

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

- YES NO computerized
- YES NO hard copy
- OTHER: \_\_\_\_\_

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

Are the following files computerized:

- |                                     |                                     |  |
|-------------------------------------|-------------------------------------|--|
| <u>YES</u>                          | <u>NO</u>                           |  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Control Mechanism Issuance   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Inspection and Sampling schedule (on a calendar)   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Monitoring Data  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | IU Compliance Status Tracking  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Other: <u>Inspection reports &amp; IU survey data (to be expanded further)</u>   |
|                                     |                                     | Can IU monitoring data can be retrieved by:  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Industry name  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Pollutant type   |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Industrial category or type  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | SIC Code   |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | IU discharge volume  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Geographic location  |
| <input type="checkbox"/>            | <u>n/a</u>                          | Receiving treatment plant (i.e.if > one plant in the system)   |
| <input type="checkbox"/>            | <input type="checkbox"/>            | Other (specify) _____  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Does the POTW have provisions to address claims of confidentiality?<br>[403.8(f)(1)(vii)]  |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Have IUs requested that data be held confidential?<br>How is confidential information handled by the Control Authority?<br>_____ |
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Are there significant public or community issues impacting the POTW's<br>pretreatment program?<br>If yes, please explain: _____  |
| <input checked="" type="checkbox"/> | <input type="checkbox"/>            | Are all records maintained for at least 3 years?   |

**K. RESOURCES**

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

~2.5

**YES** NO

- Have any problems in program implementation been observed which appear to be related to inadequate funding?  
If yes, describe and show below the source(s) of funding for the program:  
\_\_\_\_\_  
\_\_\_\_\_

Percent of Total Funding

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

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

**SECTION II: PROGRAM ANALYSIS AND PROFILE**

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

<u>YES</u>	<u>NO</u>		<u>If no, explain</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Legal assistance	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Permitting	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	IU inspections	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample collection	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sample analyses	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Data analysis, review and response	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Enforcement	_____
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Administration (inc. record keeping/data management)	_____

Does the Control Authority have access to adequate:

<u>YES</u>	<u>NO</u>		<u>If yes then list and if no, explain</u> <i>(Each IU has their own sampler)</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sampling equipment	16 automatic Iscos, 5 flow meters 2 portable pH meters, 2 in-house
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Safety equipment	standard list
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vehicles	2
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Analytical equipment	AA flame, graphite furnace, 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.):  
"Can the Grease Program", recycle bins are located in Paragould for paper, plastics and glass.  
\_\_\_\_\_  
\_\_\_\_\_
2. Has the source of any toxic pollutants been identified? No  
If yes, what was found?  
n/a17  
\_\_\_\_\_  
\_\_\_\_\_
3. Has the POTW implemented any kind of public education program? If yes, describe:  
Chemical magic show; water/wastewater model; local civic club presentations; PSAs on local cable system ("Can the Grease, proper disposal of unused/expired pharmaceuticals, etc); the PLWC website has info relating to water conservation, "change a light" program and how to properly dispose of pharmaceuticals.  
\_\_\_\_\_
4. Does the POTW have any pollution prevention success stories for industrial users documented? no. If yes, please attach.
5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?  
PLWC plans to document IUs' P2 activities and the success the industries have had in these activities.  
\_\_\_\_\_
6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? NO  
If yes, which of the "Guides to Pollution Prevention" were used? PLWC  
have most of the guides but haven't provided them to applicable businesses.  
\_\_\_\_\_

### SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Nidec Motor File/ID No. 89-05  
Industry Address: 1000 S. 2<sup>nd</sup> Avenue 72450  
Industry Description: Mfg of fractional hp electric motors  
Industrial Category Al die casting 40 CFR 464 SIC/NAICS codes: 3621/335312  
Avg. Total Flow (gpd) ~16,500 Avg. Process Flow (gpd) ~13,000

Industry visited during audit: YES

Comments: \_\_\_\_\_

FILE #: 2 Industry Name Tenneco Inc. (Monroe) File/ID No. 93-01  
Industry Address: 1601 Hwy 49B North 72450  
Industry Description: Mfg. of automotive shock absorbers and struts  
Industrial Category Metal Finisher 40 CFR 433 SIC/NAICS Codes: 3714/336330  
Avg. Total Flow (gpd) 156,000 Avg. Process Flow (gpd) ~150,000

Industry visited during audit: YES

Comments: \_\_\_\_\_

FILE #: 3 Industry Name LA Darling File/ID No. 12-02  
Industry Address: 1401 Hwy 49B North 72450  
Industry Description: Mfg. metal display fixtures/racks for retail customers  
Industrial Category Metal finisher 40 CFR 433 SIC/NAIC Codes: 2542/337215  
Avg. Total Flow (gpd) ~15,000 Avg. Process Flow (gpd) ~11,000 to 12,000

Industry visited during audit: YES

Comments: \_\_\_\_\_

FILE #: 4 Industry Name Prestolite File/ID No. 89-06  
Industry Address 1 Prestolite Drive 72450  
Industry Description Mfg. copper wire, wire harnesses & wire cable  
Industrial Category Metal Finisher 40 CFR 433 SIC/NAICS Code: 3357/3471  
Avg. Total Flow (gpd) 250,000 Avg. Process Flow (gpd) No discharge of regulated  
wastewater

Industry visited during audit: NO

Comments: Time constraints did not allow for a site visit to this facility

## SECTION III: INDUSTRIAL USER FILE REVIEW

### A. Industrial User Characterization

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

### B. Control Mechanism

1. Does the file contain an application for a control mechanism? (See <i>Attch. A-2 for example</i> )	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
If yes, what is the application date?	<u>5/10</u>	<u>6/10</u>	<u>1/12</u>	<u>3/11</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 Permit? (See <i>Attch. A-3 for example</i> )	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
Permit Expiration Date?	<u>6/15</u>	<u>12/15</u>	<u>1/17</u>	<u>3/16</u>	<u>      </u>
Is a fact sheet included? (See <i>Attch. A-4 for example</i> )	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
3. Has the SIU been issued a control mechanism containing: [403.8(f) (1) (iii) (A)-(E)]					
a. Legal Authority Cite?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
b. Expiration date?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
c. Statement of nontransferability?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
d. Appropriate discharge limitations?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
e. Appropriate self-monitoring requirements?	<u>2</u>	<u>2</u>	<u>2</u>	<u>1</u>	<u>      </u>
f. Sampling frequency?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>

Comments: 1) IU has Metal Finishing w.w., but does not discharge it and has a "no discharge" permit; 2) City does all monitoring

## 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>1</u>	<u>1</u>	<u>1</u>	<u>1</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>2</u> <u>Timed</u>	<u>"</u>	<u>"</u>	<u>3</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>4</u>	<u>4</u>	<u>4</u>	<u>4</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 <sup>2</sup> aspect included?	<u>no</u>	<u>no</u>	<u>no</u>	<u>no</u>	<u>    </u>
<u>C. Application of Standards</u>					
1. Has the IU been properly categorized?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>    </u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>    </u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>    </u>

Comments: 1) Sampling frequency determined by the City; 2) "Composite" sampling needs to be defined as "timed" in permits; 3) IU has a "No discharge" permit; 4) "Termination of discharge" mentioned as an enforcement option.

**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>n/a</u>	<u>n/a</u>	<u>n/a</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>
<b>D. <u>Compliance Monitoring</u></b>					
<b><u>Sampling</u></b>					
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>✓</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>1</u>	<u>        </u>

comments: 1) IU is a "no discharge of regulated wastewater" facility.

**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? (See Attachment A-3g for example certification statement)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u>Timed</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u>      </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]  <u>Inspections</u> (See Attch. A-5 for example)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
7. Does the IU file contain inspection reports?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
b. Date of last Inspection	<u>2/14</u>	<u>2/14</u>	<u>2/14</u>	<u>1/12*</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>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
f. Evaluation of pretreatment facilities?	<u>1</u>	<u>1</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>

Comments: 1) A good narrative of the pretreatment equipment condition could be included such as: "rusted supports or pumps, leaking fittings/valves, wastewater puddles visible in the area, etc." or "adequate O&M has kept the pretreatment equipment in good operating order"; \*IU has a no discharge permit and City only inspects it once or twice per permitting cycle.

**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 discharge control plan & need to develop? 403.8(f) (2) (vi)	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
i. Manufacturing facilities?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>
j. Chemical handling and storage procedures?	<u>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>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
o. Monitoring records?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
p. Evaluation of Pollution Prevention opportunities?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>
q. Control Authority inspector signature?	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>      </u>

**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>n/a</u>	<u>      </u>
11. Does the file include:					
a. BMR?	<u>archived "</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u>      </u>
b. 90-Day Report?	<u>arch.</u>	<u>"</u>	<u>"</u>	<u>"</u>	<u>      </u>
c. All periodic reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
d. Compliance schedule reports?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
12. Did the IU report on all required parameters?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
13. Did the IU comply with the required sampling frequency (s)?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>

Comments: 1) Process descriptions are in fact sheets that IU reps have reviewed and submitted: 2) More questions could be added regarding chemical handling procedures.

**SECTION III: INDUSTRIAL USER FILE REVIEW**

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
14. Did the IU report flow?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
15. Did the IU comply with the required reporting frequency(s)?	<u>1</u>	<u>1</u>	<u>1</u>	<u>1</u>	<u>      </u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
17. Did the IU report all changes in its discharge? [403.12(j)]	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>2</u>	<u>2</u>	<u>2</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>✓</u>	<u>✓</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
b. IU self-monitoring results?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>n/a</u>	<u>      </u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>(3) 5</u>	<u>1</u>	<u>0</u>	<u>0</u>	<u>      </u>

Comments: 1) TOMP certification statements are sent in semi-annually; 2) Some SCPs may not have been necessary; 3) IU is working with the City and its chemical rep to rectify treatment of the zinc problem.



## SECTION III: INDUSTRIAL USER FILE REVIEW

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

Comments: 1) City may consider escalating its enforcement options beyond phone calls and informal letters of non-compliance to more formal enforcement options per their Enforcement Response Plan such as a legal Notice of violation or even a Consent Order to send a message to Nidec its zinc excursions have gone on long enough.

# REPORTABLE NONCOMPLIANCE (RNC) for the Pretreatment Audit Checklist

## (MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Paragould NPDES #: AR0033766

Date of Audit: 5/28 - 5/30/14 Date entered into ICIS: 6/25/14  
(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
NO	Other violations of concern	II

### SIGNIFICANT NONCOMPLIANCE (SNC)

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

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

Control Authority: City of Paragould NPDES #: AR0033766

Name, address and phone number of industry:

Nidec Motor (formerly Emerson), 1000 S. 2<sup>nd</sup> Ave., 870.239.2171  
 Type of industry: Mfg & Assembly of electric motors  
 Date/Time of visit: 5/29/14 / 9:00 a.m.

Aluminum Die Caster CFR 464

Industry contacts: Doug Robeson, Maintenance General Manager  
 "Harry", Treatment Supv.

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

Facility hasn't substantially changed its operations since the last (12/10) audit's site visit. IU manufactures & assembles fractional (1/4 to 1/2) hp. electric motors. Two relatively new (robotic) Al casting machines have been bought, but used sparingly for even smaller fractional hp motors. They'll cast the Al for electric motors for power steering for cars/trucks. One has only been used for some motor end caps with the other used just for samples. Metal Finishing core operations under CFR 433 were out-sourced before the latest audit.

Visit conducted by: Gilliam/Ellington Date: 5/29/14

*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: Nidec

Additional comments: Most of the IU's raw material includes Al ingots, coiled Cu, brass, steel and epoxy varnish. IU aluminum die casts end shields and rotors' core laminations for assembly of their final product. Facility has about 28 casting machines: typical open/close mold casting operations which are covered under 40 CFR 464.15. Associated wastewater is drained to a central sump then pumped to the pretreatment area. Permit limits are based on the facility's '08 thru '11 avg production and flow from each of its subprocesses and "unregulated" (not dilute) wastewater sources (raw material loading/scrap metal storage areas & their above ground tank farm). Wastewater strictly from the die casting ops are separately treated. The cutting machine fluids are recirculated thru a large tank where it is centrifuged to help separate/remove tramp oil and extend the life of the cutting fluids. Any waste oils are collected in their "tank farm" and hauled off-site for proper disposal. Some of the remaining IU's operations consist of machining, coiled steel punching (for the stator and rotor laminations then annealed), cutting/machining/grinding of steel rods into the motor shafts and assembly. All w.w. first enters a 21,000 gallon equalization tank. It's continually mixed with caustic (and some other chems not identified) added for pH control. W.W. from it is sent to an ultra-filtration unit. "Clean" water is sent to another circular concrete sump (~5' deep) which, when filled up, is pumped to another tank where hydrogen peroxide is injected (T. Phenol removal). As it fills it gravity feeds into another settling tank from which the w.w. is discharged to the City. City rep and this auditor discussed visually observing the general housekeeping of the tanks, pipes, valves, supports, etc for being well-maintained with no rust or leaking appurtenances. Some chemical storage (barrels) were stored in the "treatment" room. Some are on spill containment "tubs", some were on barrel dollies laid over with spigots/valves for filling up hand carried buckets. Some chemicals are also pumped via overhead piping also. IU has had repeatedly violated their Zn limit over the last yr and is working with their chemical supplier to rectify the problem. Adequate sampling site with pH meters.

Visit conducted by: Gilliam/Ellington Date: 5/29/14



(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:

Tenneco, 1601 Hwy 49B 72450, 870.236.5308

Type of industry: Mfg. of vehicle shock absorbers and struts  
 40 CFR 433.15

Date/Time of visit:

5/29/14 / 10:15 a.m.

Industry contacts: Clifton Ritter, Mgr. of Facilities & EHS and  
 Gerald Hobbs, Env. Tech.

	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: Tenneco bought out Monroe and is still conducting the same operations it was the during the last audit's site visit years ago. Vehicle shocks and struts are being built. Some of its raw material consists of steel rods and "sheets", rubber bushings, hydraulic oil, lube oil, water based paint and various treatment chemicals. IU is producing 55,000 shocks/day and 12,000 struts/day.

Visit conducted by: Gilliam/Ellington Date: 5/29/14

*Allan 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: Tenneco

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Cylinders and tubes from the sheet steel are formed on a series of "mills" to desired diameter and induction or seam welded. Process area has no floor drains direct to the City. Numerous tanks/"processes" include cylinder soap (slightly caustic) wash and rinse; Zn phosphate and several rinses; caustic paint hook strippers followed by fresh water rinses; piston washers and rinses; small parts washers and rinses; air shock washer with rinses and a 4 stage shock paint washer with rinses. Counter-current rinses are in use for make-up water in some of the wash stages. "Dirty" rinsewater is pumped up and overhead to the batch treatment part of the treatment system. Between the IU's schematic and their process description, it was difficult to ascertain what chemicals were actually being used in their 4 or 5 stage "wash" tanks. The IU rep indicated the 5 stage strut paint washer had an alkaline cleaner, rinse, Fe phosphate, fresh water rinse followed by a final sealant. All 5 of these "stages" were depicted in one long rectangular tank on their schematic. Process WW is sent to one of 2 batch tanks. Oil is skimmed and then sent thru an oil/water separator where they recycle it. pH is lowered in a tank with the plant's WW prior to flowing to a sloped/aerated EQ tank where it can be recirculated or pumped to the clarifier (>100,000 gallons) which gives the operator ~8 hrs to correct any problems. Alum, lime and polymers are mixed as necessary in the clarifier to precipitate any solids and metals. Sludge from the bottom of the clarifier is pumped to a holding tank, then to the filter press. Filtrate is sent back to one of the 1<sup>st</sup> two holding sumps to be treated again. Filter cake is sent to a local landfill. Sampling point is in a bucket under a >10" pipe (which is well mixed because of large flow volume) inside a concrete floor level sump which has a direct discharge to the City. In the "treatment" room, IU does have different monitors for tank levels, pH and flows. Seems there was some confusion regarding stormwater (parking lot run-off) flows being mixed with regulated flows that needed looking into.

Visit conducted by: Gilliam/Ellington Date: 5/29/14



(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, 1401 Hwy. 49B 72450, 870.239.6421

Type of industry: Mfg metal display fixtures Date/Time of visit:

Metal Finishing - CFR 433 5/29/14 / 2:30 p.m.

Industry contacts: Jasper Sharpe, Facility Mgr.

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

Additional comments:

Facility has not substantially changed operations or processes since the last audit's site visit conducted years ago except they stopped using the "Atotech" cleaning system and went to the fluorozirconic acid wash (conversion coating) system. They still manufacture store fixtures/shelves and supporting braces (hot and cold rolled steel) which are powder coated.

Visit conducted by: Gilliam/Ellington Date: 5/29/14

*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: L.A. Darling

Additional comments:

IU now brings the pre-formed square/rectangular steel tubing (support legs), cuts them to customer specs, "breaks" support brackets and other component parts. These "component" parts are further formed, cut, tig/mig arc welded, undergo grinding, polishing, metal "piercing", etc. Some pre-machining of parts is already completed when this IU receives them. Parts are sent thru either a 3 or a 5 stage "wash" booth system. 1<sup>st</sup> stage of the 5 stage is a caustic cleaner (tetrapotassium pyrophosphate - TKPP) followed by a fresh water rinse followed by the fluorozirconic acid ("paint-lok" w/a pH of ~5 s.u.) stage. Parts are then sent through another fresh water rinse followed by a final sealant; then thru a dry-off oven prior to the powder coat paint booth then back through the curing oven. Counter current flow rinsing is used where necessary. Workpieces are cooled and then assembled or sent off to customers for their assembly. Treatment is not necessary to meet the Metal Finishing standards in 40 CFR 433. Only pH adjustment is made when necessary before discharge to the City. Adequate sampling point. Very minimal chemical storage with most being hand carried from barrels or sacks in back to the appropriate work stations. IU rep familiar with its permit requirements and the City rep was knowledgeable of IU's processes.

Visit conducted by: Gilliam/Ellington Date: 5/29/14



(signature of auditor conducting visit)



# Attachment A1

*Handed to me during  
5/30/14 Audit*

Paragould Light, Water & Cable  
Wastewater Treatment Plant  
Industrial Waste Questionnaire Summary  
2012

Industry Name	Contact Person	Type of Business	Type of Discharge	Processes Used	Chemicals used in Process	Pretreatment Used	Hazardous Waste	Further Action
Advertising Express	NOT AN ACTIVE WATER CUSTOMER							
Affordable Medical Supply	NOT AN ACTIVE WATER CUSTOMER							
Allen Engineering	Scott Sugg	Manufacturing/Assembly	Industrial	Copper/Aluminum Forming; Metal Finishing (Plating, Anodizing, Coating, Etching) Metals Products Manufacturing; Machining - Sheet Metal Shop	Solvents (Biosolve), Gasoline and Diesel, Motor Oil	Grease Trap	Paint Thinner (picked up by Excel from Memphis, TN). They also pick up used oil, antifreeze and used cleaner	None
American Fabrications	NOT AN ACTIVE WATER CUSTOMER							
American Railcar	Bret Broadway	Manufacturing/Assembly	Domestic	Metal Products Manufacturing; Painting/Finishing	Inks/Dyes/Paints (epoxy and water-based); Solvents (MEK); Flammables/Explosives (paints and thinners); Grease/Oils (used in compressors)	None	Paint Related (picked up by Rineco from Benton, AR); also used oil is picked up by FCC Environmental	None
AMMC	Dennis Ellington	Healthcare	PERMITTED INDUSTRY					
Anchor Packaging								
AXIS								
BML/Basic Physicians Supply								
Camco Machine Shop	NOT CONNECTED TO CITY SEWER SYSTEM							
Capman Screen Printing	Robert Mitchell	Sales/Distribution Printing	Domestic	None		None	None	None
Caps Plus Embroidery								
Chris Oaks Auto Repair								
Coldstream Fisheries	Joey Pillow	Fish Farm	Domestic	None		None	None	None
College Book Store & Press	NOT AN ACTIVE WATER CUSTOMER							
Cupples Sign Company	Jeff Cupples	Manufacturing/Assembly	Domestic	Metal Products Manufacturing; Painting/Finishing		None	None	None
Delta Asphalt of Arkansas	NOT DELIVERABLE AS ADDRESSED							
Double L Trailer Mfg.	NOT DELIVERABLE AS ADDRESSED							
Dr. Pepper/7-Up/RC								
Elder Manufacturing Company	Regina Everett	Distribution Storage/Warehouse	Domestic	None	None	None	None	None
Fabco Machine Shop	Bob Clark	Manufacturing/Assembly	NOT IN CITY OF PARAGOULD - DISCHARGE GOES TO SEPTIC SYSTEM					
Fairview Automated Burnouts	NOT AN ACTIVE WATER CUSTOMER							
Frito Lay	NOT DELIVERABLE AS ADDRESSED							
Garlock Rubber (Goodrich Corp)	Ray Noel	Rubber Extruder	PERMITTED INDUSTRY					
Gerdau Corporation	Bobby Ferrell	Manufacturing/Assembly	Domestic	Iron/Steel Manufacturing		None	None	None

Paragould Light, Water & Cable  
Wastewater Treatment Plant  
Industrial Waste Questionnaire Summary  
2012

Gillmore's	Sherry Hensley	Manufacturing/Assembly	Domestic	None		None	None	None
Glenn Corp	NO LONGER IN BUSINESS - PREMISES OCCUPIED BY PARAGOULD DOORS, INC.							
Greene County Optics	NOT DELIVERABLE AS ADDRESSED							
HDICNC Machining Inc.	THIS LOCATION IS NOW PARAGOULD CYCLES & ACCESSORIES							
Hedger Brothers Ready Mix	Keith White		Domestic	Cement Manufacturing	Solvents (Cleaning); Diesel; Grease/Oils (Trucks); Metals/Inorganics	None	None	None
Helena Chemical	NOT AN ACTIVE WATER CUSTOMER							
Hillcrest Tool & Die	NOT AN ACTIVE WATER CUSTOMER							
Hunter Machine Shop	Mark Clark	Machine Shop	DOES NOT OPERATE IN CITY OF PARAGOULD					
Hutco, Inc.	Harold Hutcheson	HUTCO HAS A PRIVATE SEPTIC THAT IS NOT CONNECTED TO PLWC SEWER SYSTEM						
Isom's Machine Shop & Welding	NOT DELIVERABLE AS ADDRESSED							
J&S Woodcrafts	NOT AN ACTIVE WATER CUSTOMER							
Jenkins Lamp & Shade	Jack E. Cox, Sr.	Manufacturing/Assembly Sales/Distribution Storage/Warehouse	Domestic; uses septic system	None		None	None	None
Keasler's Body Company	THIS LOCATION IS NOW CHRIS OAKS AUTO REPAIR							
KEG Screen Printing								
KNL Holdings, LLC								
Knockout Graphix	NOT DELIVERABLE AS ADDRESSED							
Kueter's Fish Company	CLOSED BUSINESS - NOT CONNECTED TO PLWC COLLECTION SYSTEM							
LA Darling Company	Mark Niemeier	Metal Finisher	PERMITTED INDUSTRY					
Lakeside Metal Specialties	NOT AN ACTIVE WATER CUSTOMER							
Magic Touch	Hal Rees	NO LONGER IN BUSINESS - BUILDING HAS BEEN EMPTY FOR 5 YEARS						
Mann's Tool Specialties	Tony Mann	Manufacturing/Assembly	Domestic	Metal Products Manufacturing; Machining - Steel Metal Shop		None	None	None
Martin Sprocket & Gear	Darrel Pillow	Metal Finisher	PERMITTED INDUSTRY					
McCarroll Printing Company								
McCoy's Signs & Pinstriping								
MMI - Trutec (Permitted for Cyanide Release)	Joel Kendrick	Manufacturing/Assembly	Industrial	Metal Heat Treated Process	Sulfuric Acid (for pH adjustment; Grease/Oils (RP Metal Kote 22, Mineral Spirits)	pH Correction	None	None
NEAR Ready Mix								
New Creation Designs								
Nidec Motor Corp	Rodney Williams	Aluminum Diecaster	PERMITTED INDUSTRY					
Nuckles & Son Septic	NOT AN ACTIVE WATER CUSTOMER							
Paragould Cycles & Accessories								
Paragould Daily Press								
Paragould Laundry	NOT AN ACTIVE WATER CUSTOMER							
Paragould Vault Company	Casey Rogers	Manufacturing/Assembly Sales/Distribution Storage/Warehouse	Industrial	Cement Manufacturing		None	None	None
Peerless Corp	NOW KNL HOLDINGS							

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Paragould Light, Water & Cable  
Wastewater Treatment Plant  
Industrial Waste Questionnaire Summary  
2012

Pillow's Fish & Bait Shop								
Pillow Fish Farm								
Prestolite Wire Corp	Ed Tolleson	Metal Finisher				PERMITTED INDUSTRY		
Randy's Dry Cleaners						NOW MAGIC TOUCH DRY CLEANERS		
Ranger Tool & Die Inc.	John Wallace	Job Shop	Domestic	Metal Products Manufacturing		None	None	None
Razorback Concrete	Scotty Hickson	Production/Delivery ready-mixed concrete		Auto/Truck Wash		None	None	None
Roto Rooter (Hedge's Inc.)	Randy Hedge	Sewer/Drain Cleaning Service	Domestic	None		None	None	None
Samuel Gin	Alvin B. Samuel	Cotton Gin		None		None	None	None
Shamco Metal Recycling						NOW SHAPIRO BROTHERS		
Shapiro Brothers, Division of MW Recycling	Martin Buchman	Manufacturing/Assembly	Domestic	Metal Products Manufacturing	Solvents (Cleaners); Flammables/Explosives (Diesel Fuel, Oils); Grease/Oils; Metals/Inorganics	None	None	None
Sheet Metal Shop								
Sign-Tech	Mark Roberts	Manufacturing/Assembly Retail Sales	Domestic	Copper/Aluminum Forming; Electrical/Electronic Component Manufacturing; Iron/Steel Manufacturing' Machining - Sheet Metal Shop; Painting/Finishing, Paint/Ink Formulation; Photo Processing		None	None	None
Smith Drug Company	Wade Lewis	Sales/Distribution	Domestic	None		None	None	None
Smith Precision Machining	Stan Smith	Machine Shop	Domestic	Machining		None	None	None
Teleflora						NOT DELIVERABLE AS ADDRESSED		
Tenneco Automotive	Richard Bowers	Metal Finisher				PERMITTED INDUSTRY		
Turbo Ice Company	Jim McCounnaughhay	Ice Manufacturing Car Wash	Industrial	Auto/Truck Wash	None	None	None	None
Turner Holdings, LLC	Shane May	Sales/Distribution Auto Services - Truck Storage/Warehouse Vehicle/Equipment Wash	Domestic	Auto Body Shop - Vehicle Repair; Auto/Truck Wash; Distribution of Milk Products		None	None	None
Utility Trailer								
Walgreens								

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Paragould Light, Water & Cable  
Wastewater Treatment Plant  
Industrial Waste Questionnaire Summary  
2012

Walsh Heartland	NOT DELIVERABLE AS ADDRESSED							
Wellsco	NOT DELIVERABLE AS ADDRESSED							
White Printing & Office Supplies	Joe Schreit	Retail Sales; Offset Printing	Industrial	None	Inks/Dyes/Prints (Printing Inks, Toners); Solvents (V-120, Rogersol); Grease/Oils; Metals/Inorganics; Mercury/Silver Compounds (Film); Ethers	None	None	None
Wilbert Burial Vaults	NOW PARAGOULD VAULT COMPANY, INC.							
Wonder Industries								

A-1d

Attachment A-2

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

<p><u>PLWC use only:</u> Date Permit Application mailed to the industrial user: <u>04/22/2010</u> LE Date completed Permit Application received by PLWC: <u>06/30/2010</u> LE</p>
---

Please complete the following:

Check one:

Permit application for renewal of an existing permit.

Current Permit Number: 93-01

Current permit Expiration Date: 12/14/2010

Application for a new permit.

---

1. Firm Name Tenneco, Inc.  
Mailing Address 1601 Hwy 49 B North  
City, Zip Code Paragould, AR 72450  
Facility Address (same)  
City, Zip Code \_\_\_\_\_  
Telephone Number: (870) 239-8531  
Fax Number: (870) 236-5465  
Web Site Address: www.tenneco.com

2. SIC Number(s): 3714  
NAICS Number(s): 336330

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

RCRA Generator, Storm Water Pollution Prevention Permit,  
Clean Air Act Permit, Aboveground Storage Tank Permit

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>Waste Treatment</u> Operation	<u>66,000</u>	<u>180,000</u>
Process Wastewater from _____ Operation	<u>—</u>	<u>—</u>
Domestic Wastewater (Sanitary)	<u>2,800</u>	<u>3,700</u>
Noncontact Cooling Water	<u>—</u>	<u>—</u>
Total (process and sanitary)	<u>68,800</u>	<u>183,700</u>

List any periodic or seasonal variations:

Rainfall can cause an increase in discharge from W.T.P.

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>240</u>	<u>SS. only</u>
TSS	mg/L	30-Day Average	300	<u>80</u>	<u>150</u>
pH	S.U.	1-Day Maximum	5.5-11.5	<u>8.0</u>	<u>—</u>
Oil & Grease	mg/L	1-Day Maximum	100	<u>15</u>	<u>30</u>
Temperature	°C	1-Day Maximum	65	<u>22</u>	<u>—</u>

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

4c. EPA Regulated Priority Pollutants: *Refer to MSDS section. Zinc and Lead compounds are indicated with flags.*  
 List any Priority Pollutants (Attachment 1) that are know to be present in the wastestream of processes found at your facility in the spaces provided below. Refer to you facilities MSDS for further information.

<u>Priority Pollutant (Name):</u>		<u>Concentration:</u>
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____
_____	30 Day Average 1 Day Maximum	_____ _____

(Attach additional sheets as needed.)

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

<u>Chemical Name</u>	<u>Amount used per day</u>	<u>Amount Stored at Facility</u>
Refer to MSDS sections attached to the application.		
Specific chemicals used are indicated on the wastewater flow diagram.		

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

"WASTE TREATMENT" diagram and "WASTE WATER FLOW DIAGRAM" diagram

- 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.

Assembling shocks and struts and manufacturing component parts to each.

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

	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>
Shocks					
Struts	1,013,702	1,166,818	1,393,072	1,496,645	1,505,571
	(2010 YTD: 6,575,808)				

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

Steel Rods	Lubricating Oil
Sheet Steel	Water-based Paint
Rubber Bushings	Cardboard Packaging
Hydraulic Oil	

A-Z d



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 <sup>st</sup> :	<u>7 AM to 3 PM</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2 <sup>nd</sup> :	<u>3 PM to 11 PM</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3 <sup>rd</sup> :	<u>11 PM to 7 AM</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 <sup>st</sup> :	<u>7 to 3</u>	<u>7 to 3</u>	<u>7 to 3</u>	<u>7 to 3</u>	<u>7 to 3</u>	<u>7 to 3</u>	<u>7 to 3</u>
2 <sup>nd</sup> :	<u>3 to 11</u>	<u>3 to 11</u>	<u>3 to 11</u>	<u>3 to 11</u>	<u>3 to 11</u>	<u>3 to 11</u>	<u>3 to 11</u>
3 <sup>rd</sup> :	<u>11 to 7</u>	<u>11 to 7</u>	<u>11 to 7</u>	<u>11 to 7</u>	<u>11 to 7</u>	<u>11 to 7</u>	<u>11 to 7</u>

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?

EPA Categorical standards are listed on the following page.

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

Permit Application for New Permit or Permit Renewal  
Certification Statement

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

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

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

Certified by: *Lisa Detlefsen* Date: 6-29-2010  
Authorized Representative\*  
Name if Signee: Lisa Detlefsen Title: Regional EHS Manager  
(Please Print)

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

Lisa Detlefsen (870) 236-5343

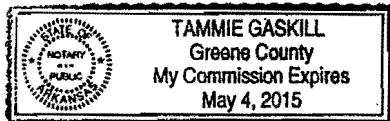
Corporate Acknowledgement

State of Arkansas )

County of Greene )

Before me, the undersigned authority, on this day personally appeared Lisa Detlefsen  
of Jenneco  
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 29 day of June, 20 10.



Jammie Gaskill  
Notary Public in and for Greene County, Arkansas.

\*An authorized representative may be:

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

**PLEASE NOTE:**

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

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

Explain:

Current permit limitations  
are consistently met.

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:

Not applicable.

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.

Not required.

11. Describe any Pollution Prevention (P<sub>2</sub>) Project activities which are either planned or have been implemented:

- Reuse of stripped groundwater.
- Closed loop cooling water system
- Parts Washer water reuse and filtering

12. Describe any Best Management Practices (BMP) activities which are either planned or have been implemented: EMS Policies = Control & Management of the following areas

- Chemical Labeling
- Solvent Management
- Paints & Flammables
- Material Purchases

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

ISO14001 EMS is active with certification (Third Party)  
maintained since April 2004.

Attachment 1

Priority Pollutants

01. Acenaphthene
02. Acrolein
03. Acrylonitrile
04. Aldrin/Dieldrin
05. Antimony and compounds (*compounds* include organic and inorganic.)
06. Arsenic and compounds
07. Asbestos
08. Benzene
09. Benzidine
10. Beryllium and compounds
11. Cadmium and compounds
12. Carbon tetrachloride
13. Chlordane (technical mixture and metabolites)
14. Chlorinated benzenes (other than di-chlorobenzenes)
15. Chlorinated ethanes (including 1,2-di-chloroethane, 1,1,1-trichloroethane, and hexachloroethane)
16. Chloroalkyl ethers (chloroethyl and mixed ethers)
17. Chlorinated naphthalene
18. Chlorinated phenols (other than listed elsewhere; includes trichlorophenols and chlorinated cresols)
19. Chloroform
20. 2-chlorophenol
21. Chromium and compounds
22. Copper and compounds
23. Cyanides
24. DDT and metabolites
25. Dichlorobenzenes (1,2-, 1,3-, and 1,4-di-chlorobenzenes)
26. Dichlorobenzidine
27. Dichloroethylenes (1,1-, and 1,2-dichloroethylene)
28. 2,4-dichlorophenol
29. Dichloropropane and dichloropropene
30. 2,4-dimethylphenol
31. Dinitrotoluene
32. Diphenylhydrazine
33. Endosulfan and metabolites
34. Endrin and metabolites
35. Ethylbenzene
36. Fluoranthene
37. Haloethers  
(other than listed elsewhere; includes chlorophenylphenyl ethers, bromophenylphenyl ether, bis(dichloroisopropyl) ether, bis-(chloroethoxy) methane and polychlorinated diphenyl ethers)
38. Halomethanes (other than listed elsewhere; includes methylene chloride, methylchloride, methylbromide, bromoform, dichlorobromomethane)
39. Heptachlor and metabolites
40. Hexachlorobutadiene
41. Hexachlorocyclohexane
42. Hexachlorocyclopentadiene
43. Isophorone
44. Lead and compounds

Priority Pollutants - continued

45. Mercury and compounds
46. Naphthalene
47. Nickel and compounds
48. Nitrobenzene
49. Nitrophenols (including 2,4-dinitrophenol, dinitroresol)
50. Nitrosamines
51. Pentachlorophenol
52. Phenol
53. Phthalate esters
54. Polychlorinated biphenyls (PCBs)
55. Polynuclear aromatic hydrocarbons (including benzanthracenes, benzopyrenes, benzofluoranthene, chrysenes, dibenz-anthracenes, and indenopyrenes)
56. Selenium and compounds
57. Silver and compounds
58. 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD)
59. Tetrachloroethylene
60. Thallium and compounds
61. Toluene
62. Toxaphene
63. Trichloroethylene
64. Vinyl chloride
65. Zinc and compounds

Attachment 2

Pretreatment Compliance Schedule Instructions

- A. The compliance schedule shall contain a list of the major events leading to compliance. The expected dates of completion of such events shall also be given.
- B. The completion dates of any two (2) successive events shall not exceed nine (9) months.
- C. Within fourteen (14) business days after the completion of each event, the Industrial User shall submit a progress report to the approval authority (PLWC) indicating the following:
  - i. The date the event was completed
  - ii. If the event was not completed as scheduled, the reason for the delay.
  - iii. Steps taken by the Industrial User to return to the established schedule.

Comments:

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Compliance Schedule/ Certification Statement

The following compliance schedule must be certified by a Qualified professional and reviewed by an authorized representative of the Industrial User.

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.

Compliance Schedule Certification Statement:

We declare that we have examined this report and to the best of our knowledge and belief that it is true, correct, and complete.

Certified by: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_  
 Title: \_\_\_\_\_  
 (Qualified Professional)

Certified by: \_\_\_\_\_ Date: \_\_\_\_/\_\_\_\_/\_\_\_\_  
 Title: \_\_\_\_\_  
 (Authorized Representative)



Attachment 3

CLWC Laboratory/Industrial Pretreatment  
Billing Rate Schedule

I. Pretreatment Permit Fee: \$ 500.00/Year (Billed in February of each year)

II. Excessive Strength Surcharge Formula:

$$S = (V_{ww}) (8.34) [C_{BOD_5} (BOD_5 - 300) + C_{SS} (SS - 300) + C_{O\&G} (O\&G - 100)]$$

Where:

S = Surcharge in dollars

$V_{ww}$  = Volume of Wastewater in millions of gallons

8.34 = Weight of water in pounds per gallon

$C_{BOD_5}$  = Unit charge for BOD<sub>5</sub> in dollars per pound (currently \$0.149/pound)

BOD<sub>5</sub> = Monthly average five-day BOD of IU's wastewater, in mg/l (300 mg/l or more)

300 = Concentrations in mg/l above which both BOD<sub>5</sub> and SS are considered unusually high and above which may be assessed a surcharge

$C_{SS}$  = Unit charge for SS in dollars per pound (currently \$0.251/pound)

SS = Monthly average suspended solids content of IU's wastewater, in mg/l (300 mg/l or more)

$C_{O\&G}$  = Unit charge for O&G in dollars per pound (currently \$0.25/pound)

O&G = Daily Oil and Grease content of IU's wastewater, in mg/l (100 mg/l or more)

100 = Concentrations in mg/l above which O&G are considered unusually high and above which may be assessed a surcharge

III. Sampling and Analysis Fees:

Biochemical Oxygen Demand	\$	25.30
Total Suspended Solids	\$	11.50
pH/Temperature	\$	4.60
Metals (Flame AA/metal)	\$	16.10
Metals (Graphite Furnace/metal)	\$	32.20
Metals Digestion (per sample)	\$	10.00
Cyanide	\$	39.10
Phenolics	\$	32.20
Sampler/Rental	\$	46.00
Grab samples/day	\$	17.25
Contract laboratory (FOG, TTO, etc.)	\$	Set by contract laboratory

Charges are subject to revision

Sampling and analyses are performed in compliance with 40 CFR Part 136.



**INDUSTRIAL WASTE DISCHARGE PERMIT**

**PERMIT NO. 93-01**

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

Tenneco, Inc.  
1601 Highway 49B North  
Paragould, Arkansas 72450

is authorized to discharge industrial wastes from activities classified by SIC No. 3714 (NAICS No. 336330) from premises at the above address to the Paragould Wastewater Collection System in accordance with application for permit submitted June 30, 2010 to Paragould Light, Water and Cable, effluent limitations, monitoring requirements, and conditions set forth in Parts I through VII hereof.

This permit shall become effective February 6, 2012.

This permit and authorization to discharge shall expire at midnight on December 14, 2015.

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

Signed this second day of February, 2012.

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

Lisa Ellington, Environmental Services Manager

**PERMIT NO. 93-01**  
**PART I - EFFLUENT LIMITATIONS**

OUTFALL NO. 001 – PROCESS WASTEWATER AFTER PRETREATMENT: Process wastewater regulated by National Categorical Standard for Metal Finishers – 40 CFR 433.15, Pretreatment Standards for Existing Sources. Effluent from groundwater remediation treatment is reused in the Rod Quench Process, after which it goes to the Cooling Tower, and eventually through the pretreatment system. Pretreated wastewater is discharged continuously from this outfall<sup>1</sup>. This wastestream shall be monitored for the following listed pollutants, as set forth by Part II – Monitoring Requirements.

<u>Pollutant Parameter</u>	<u>Maximum for Any One Day</u>	<u>Maximum For Monthly Average</u>	<u>Sample Type</u>
Cadmium (T), mg/l	0.69 <sup>2</sup>	0.26 <sup>2</sup>	Composite
Chromium (T), mg/l	2.77 <sup>2</sup>	1.71 <sup>2</sup>	Composite
Copper (T), mg/l	3.38 <sup>2</sup>	2.07 <sup>2</sup>	Composite
Cyanide (T), mg/l	1.20 <sup>2</sup>	0.65 <sup>2</sup>	Grab
Lead (T), mg/l	0.69 <sup>2</sup>	0.43 <sup>2</sup>	Composite
Nickel (T), mg/l	3.98 <sup>2</sup>	2.38 <sup>2</sup>	Composite
Silver (T), mg/l	0.43 <sup>2</sup>	0.24 <sup>2</sup>	Composite
Zinc (T), mg/l	2.61 <sup>2</sup>	1.48 <sup>2</sup>	Composite
TTO's, mg/l	2.13 <sup>2</sup>		Comp/Grab
pH, S.U.	5.5 – 11.5 <sup>3</sup>		Grab
Oil & Grease, mg/l	100 <sup>3</sup>		Grab
Heat (Temperature)	104° F (40° C) <sup>3</sup>		Grab
1,2-Dichloroethane, ug/l	5 <sup>4</sup>		Grab
1,1-Dichloroethane, ug/l	7 <sup>4</sup>		Grab
1,1,1-Trichloroethane, ug/l	200 <sup>4</sup>		Grab
Trichloroethylene, ug/l	5 <sup>4</sup>		Grab
All Other VOC Analytes quantified by Modified EPA Method 8240 <sup>a</sup> for determining Volatile Organics in Water		Report Only	Grab

<sup>1</sup>The expected, estimated, average process flow from Outfall No. 001 is 100,000 GPD.

<sup>2</sup>Process Wastewater per 40 CFR 433.15, Pretreatment Standards for Existing Sources – Metal Finishers.

<sup>3</sup>Local Sewer Use Ordinance

<sup>4</sup>Analysis of these parameters conducted only if wastewater from remediation project goes through pretreatment system. Remediation waste considered an unregulated wastestream at this outfall.

OUTFALL NO. 002 – EFFLUENT DOMESTIC SANITARY SEWAGE FLOW<sup>1</sup>: Effluent domestic sanitary sewage flow shall be randomly monitored for the following listed pollutants as set forth by Part II – Monitoring Requirements.

<u>Pollutant Parameter</u>	<u>Maximum for Any One Day</u>	<u>Maximum Monthly Average</u>	<u>Sample Type</u>
BOD <sub>5</sub> , mg/l		300 <sup>2,3</sup>	Composite
TSS, mg/l		300 <sup>2,3</sup>	Composite
pH, S.U.	5.5 – 11.5 <sup>2</sup>		Grab
Oil & Grease, mg/l	100 <sup>2,3</sup>		Grab
Heat (Temperature)	104° F (40° C) <sup>2</sup>		Grab
Cadmium (T), mg/l			Composite
Chromium (T), mg/l			Composite
Copper (T), mg/l			Composite
Cyanide (T), mg/l			Grab
Lead (T), mg/l			Composite
Nickel (T), mg/l			Composite
Silver (T), mg/l			Composite
Zinc (T), mg/l			Composite
TTO's, mg/l			Comp/Grab

<sup>1</sup> The expected, estimated, average domestic sanitary sewage flow from Outfall No. 002 is 8,500 GPD.

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

<sup>3</sup> Maximum allowed concentration without paying surcharge for excessive strength wastewater

OUTFALL NO. 003 – TREATED EFFLUENT FROM ON-SITE GROUNDWATER REMEDIATION PROJECT<sup>1</sup>: Effluent from groundwater remediation treatment shall be randomly monitored for the following listed pollutants as set forth by Part II – Monitoring Requirements only when this wastewater is being discharged directly to the Paragould Sewer System.

<u>Pollutant Parameter</u>	<u>Maximum for Any One Day</u>	<u>Sample Type</u>
1,2-Dichloroethane, ug/l	5 <sup>2</sup>	Grab
1,1-Dichloroethane, ug/l	7 <sup>2</sup>	Grab
1,1,1-Trichloroethane, ug/l	200 <sup>2</sup>	Grab
Trichloroethylene, ug/l	5 <sup>2</sup>	Grab
All Other VOC Analytes quantified by Modified EPA Method 8240 <sup>a</sup> for determining Volatile Organics in Water	Report Only	Grab
pH, S.U.	5.5 – 11.5 <sup>3</sup>	Grab
Oil & Grease, mg/l	100 <sup>3</sup>	Grab
Heat (Temperature)	104° F (40° C) <sup>3</sup>	Grab

<sup>1</sup>Stripped groundwater is resused in the Rod Quench Process, after which it goes to the Cooling Tower finally to the wastetreatment system; no discharge from this outfall; samples taken at this location only if wastewater is discharged from outfall.

<sup>2</sup>Limits for VOCs are stipulated by 40 CFR 257 – Criteria for Classification of Solid Waste Disposal Facilities and Practices, Appendix I

<sup>3</sup>Local Sewer Use Ordinance

**PERMIT NO. 93-01**

**PART II - MONITORING REQUIREMENTS**

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

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

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

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

- 3) Tenneco shall pay to PLWC the costs of the required sampling and analyses.

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

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

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

- 7) The Tenneco sampling points shall be:

Outfall No. 001 – Effluent Pretreated Process Wastewater. Monitoring station over manhole on discharge outfall from Tenneco Pretreatment Facility located approximately five (5) feet southwest of solids contact clarifier.

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Part II - Monitoring Requirements (Continued)

Outfall No. 002 – Effluent Domestic Sanitary Sewage: Monitoring station over manhole on domestic sanitary sewer outfall located approximately two hundred thirty (230) feet southeast of southeast corner of the Tenneco manufacturing building.

Outfall No. 003 – Treated Effluent from on-site Groundwater Remediation Project: Sampling cock on effluent line between effluent pump and effluent pump for taking grab samples for analyses of volatile organics, pH, Oil & Grease, and temperature.

In lieu of the requirement for monitoring Outfall No. 001 and Outfall 002 for TTO, Tenneco may certify that no toxic organic compounds are stored, used or generated by the industry or that toxic organic compounds are controlled by the continued implementation of a solvents management plan approved by the PLWC Manager, except that VOC analysis will be conducted each time compliance monitoring is performed provided wastewater from remediation goes through pretreatment system. To qualify for waiver of monitoring for TTO, the certification on the page 7 of this permit shall be provided by Tenneco each time compliance monitoring is performed by PLWC. However, Tenneco's Outfall No. 003 must be monitored for the TTO's as set forth by Part II – Effluent Limitations – Outfall No. 003 – Treated Effluent from On-Site Groundwater Remediation Project if discharge occurs at the outfall.

- 8) Tenneco shall notify PLWC when discharge occurs at Outfall 003. In addition, Tenneco shall submit to PLWC the certification statement located on page 8 of this permit twice a year (January and July) certifying that no discharge of wastestreams from the remediation operation at Outfall 003 to the Paragould Sewer System has occurred during the previous three month period, and no discharge is planned within the next 90 days.
- 9) Samples shall be taken on production and/or cleanup days. The day of the week on which the samples are taken may be varied and shall be determined by the PLWC Manager.

**PERMIT NO. 93-01**

**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 PLWC.

I further certify that this facility is implementing the toxic organic management plan submitted to PLWC.

\_\_\_\_\_  
(Company Name)

\_\_\_\_\_  
(Typed Name of Official)

\_\_\_\_\_  
(Signature of Official)

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

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

**CORPORATE ACKNOWLEDGMENT**

STATE OF ARKANSAS     )  
COUNTY OF \_\_\_\_\_ )

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

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

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

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

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A-3g



**PERMIT NO. 93-01**  
**NO DISCHARGE CERTIFICATION STATEMENT**

I certify that process wastewaters from the Groundwater Remediation Project at Tenneco (Outfall 003) have not been directly discharged into the Paragould Sewer System during the period from \_\_\_\_\_ to \_\_\_\_\_. Furthermore, I certify that no planned discharge of process wastewaters from Tenneco's Outfall 003 will occur during the period from \_\_\_\_\_ to \_\_\_\_\_. If a discharge is scheduled, Tenneo will inform PLWC before discharge commences.

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

\_\_\_\_\_  
Signature

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

\_\_\_\_\_  
Title

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

**CORPORATE ACKNOWLEDGMENT**

STATE OF ARKANSAS     )

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

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

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

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

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

**PERMIT NO. 93-01**

**PART III - CONDITIONS OF PERMIT**

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

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

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

**PERMIT NO. 93-01****PART IV – STATEMENT OF BASIS FOR PERMIT LIMITS****Outfall 001:**

Metal and Cyanide limits as set by 40 CFR 433.15 – Pretreatment Standards for Existing Sources, Metal Finishers.

<b>Pollutant or pollutant property</b>	<b>Maximum for any 1 day</b>	<b>Monthly average shall not exceed</b>
	<b>Milligrams per liter (mg/l)</b>	
Cadmium (T)	0.69	0.26
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13	

Limits for pH, Temperature and Oil & Grease as stipulated by the Paragould Sewer Use – Pretreatment Ordinance.

**Outfall 002:**

Limits for pH, Temperature and Oil & Grease as stipulated by the Paragould Sewer Use – Pretreatment Ordinance.

**Outfall 003:**

Limits for VOCs as set by 40 CFR 257 – Criteria for Classification of Solid Waste Disposal Facilities and Practices, Appendix I: Maximum Contaminant Levels Promulgated under the Safe Drinking Water Act.

**Maximum Contaminant Levels (MCLs)**

Chemical	MCL ( $\mu\text{g/l}$ )
1,2-Dichloroethane	5
1,1-Dichloroethylene	7
1,1,1-Trichloroethane	200
Trichloroethylene	5

Limits for pH, Temperature and Oil & Grease as stipulated by the Paragould Sewer Use – Pretreatment Ordinance.

**PERMIT NO. 93-01**

**PART V – PROHIBITIONS**

- 1) **General Prohibitions**  
No industrial user shall introduce or cause to be introduced into the POTW any pollutant or wastewater which causes pass-through or interference.
  
- 2) **Specific Prohibitions**  
In addition to the General Prohibitions listed above, the following pollutants may not be introduced into the POTW:
  - a) Pollutants which create a fire or explosive hazard in the municipal wastewater collection and POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140° F (60° C) using the test methods specified in 40 CFR 261.21;
  - b) Any wastewater having a pH of less than 5.5 S.U. or more than 11.5 S.U., or otherwise causing corrosive structural damage to the POTW, equipment, or endangering Paragould Light, Water & Cable personnel;
  - c) Solid or viscous substances in amounts which will cause obstruction of the flow in the POTW resulting in interference, but in no case solids greater than one-half (1/2) inches (1.27 centimeters) in any dimension;
  - d) Any wastewater containing pollutants, including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentrations which, either singly or by interaction with other pollutants, will cause interference with either the POTW, or any wastewater treatment or sludge process, or which will constitute a hazard to humans or animals;
  - e) Any wastewater having a temperature greater than 150° F (65° C), or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater which causes the temperature at the introduction into the treatment plant to exceed 104° F (40° C);
  - f) Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass-through;
  - g) Any pollutants which result in the presence of toxic gases, vapors or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

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

3) Prohibition of Bypass

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

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



**PERMIT NO. 93-01**

**PART VI – VIOLATIONS AND SUSPENSIONS**

1) **Significant Violations**

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

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

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Part VI – Violations and Suspensions (Continued)

## 2) Emergency Suspensions

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

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

## 3) Termination of Discharge

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

- a) Violation of wastewater discharge permit conditions.

- b) Failure to accurately report wastewater constituents and characteristics of the discharge.

Permit No. 93-01

Part VI – Violations and Suspensions (Continued)

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

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

**PERMIT NO. 93-01**

**PART VII – TRANSFER OF PERMIT**

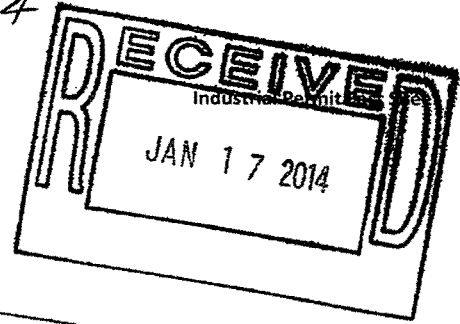
Wastewater discharge permits may be reassigned or transferred to a new owner and/or operator only if the permittee gives at least thirty (30) days advance notice to the Paragould Light and Water Commission and the Paragould Light and Water Commission approves the wastewater discharge permit transfer.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

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

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

*Attachment A-4*

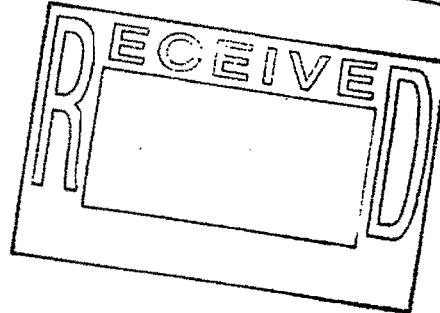
Paragould Light, Water & Cable



**PERMIT FACT SHEET**

**Effective Date of Latest Permit- May 1, 2012**

**Today's Date- January 6, 2014**



**A. FACILITY INFORMATION**

**Name of Facility: Nidec Motor Company**

**Facility Mailing Address: 1000 South 2<sup>nd</sup> Avenue**

**Facility Location Address: 1000 South 2<sup>nd</sup> Avenue**

**City, State, Zip Code: Paragould, Arkansas, 72450**

**Website: \_\_\_\_\_**

**Contact Person Name and Title: J.R. Gore; Manger of Technical Services**

**Telephone Number and Extension: 870-239-2171-220**

**Email Address: jr.gore@nidec-motor.com**

**Facility PLWC Permit Number: 89-05**

**Other Permits held by Facility: Hazardous Waste Generator, Minor Source Air Permit, Storm Water Discharge Permit for Industrial Users.**

**SIC Code and/or NAICS Code: 335312(NAICS), 3621 (SIC)**

**B. DESCRIPTION OF FACILITY OPERATIONS**

**This facility is primarily engaged in the manufacturing of:**

**Electric Motor used in laundry products, parts for other manufacturing facilities.**

Describe the process operations conducted at the facility [from receiving materials to shipment of finished product(s)].

This operation insources base materials such as coil steel, steel bar stock, aluminum alloy ingots, pure aluminum ingots, coil brass, coil copper, raw plastics, silver contacts, magnets, and aluminum and copper wire. The coil steel is punched in various shapes and sizes to make up the steel laminations used in stators/ rotors, bearing cap covers, and various small parts. The laminations are punched in 200 to 350 ton presses and then sent to heat treat for annealing. From annealing the laminations are sent the assembly line or packed to ship to another location. The other steel products are punched in the feeder departments and shipped to other facilities. The steel bar stock is cut and machined in the shafts department and packed and shipped to other facilities. The aluminum alloy is melted in 60,000lb furnaces and fed into die cast machines to develop a casting described as an endshield (part of a motor frame). These endshields are packed into containers and sent to other facilities. The bar stock is brought into the plant in 5000 lb bundles of 12 ft long bars of various sizes where it is cut, machined, and ground to meet all the specifications of the many customers products. All of the shafts and rods are packed and sent to other facilities. The pure aluminum ingot is melted in a 22,000 lb furnace and insert die cast into a lamination stack to produce a rotor for the induction motor. All die cast rotor are shipped to other facilities. The coil brass stock is punched and formed into electrical switch parts where in some variations a copper arm is attached and a silver contact is added. All switch parts are packed and shipped to other facilities. The raw plastics materials are used to manufacture gears, pulleys, fans, switch housings, coil insulators, rotors, and wire caps. All items except rotors and wire caps are packaged and shipped to other facilities while the rotors and wire caps are moved to the BPM motor assembly line. The magnets are used in the BPM rotor and the assembly is shipped to the customer from this plant. The aluminum and copper wire is used to wind the stator of the BPM motor. Upon the completion of winding the stator assembly is dipped and baked with special epoxy varnish, has its leads connected, tested, and shipped to the customer.

A-4b

**Date facility began operations: August 1956**

**Days and Hours of**

Day of Week	Hours of Operation	A Shift # Employees	B Shift # Employees	C Shift # Employees
Sunday				
Monday	24			
Tuesday	24			
Wednesday	24			
Thursday	24			
Friday	24			
Saturday				

**Number of employees: Hourly 217 Salary 29**

### **C. PROCESS UNIT OPERATION/FLOW INFORMATION**

Describe the process unit operations that generate industrial process wastewater. Include a schematic of the facility (similar to the example schematic on page 5).

1. Die casting aluminum; waste water is generated from using water to quench die cast parts.
2. Waste water generated from 3 containment areas:
  - a. Barrel and Scrap metal containment
  - b. Rail car containment
  - c. Bulk oil tank containment.
3. Waste water generated from air compressor condensate.

The total amount of process wastewater generated from the above operations is 14,400 gallons per day, based on 24 hours per day for either a 3 day or 4 day work week.

*A-4c*

**D. DILUTION/AUXILIARY OPERATION/FLOW INFORMATION**

There are no dilution waste streams that combine with process wastewater.

Yes

If Yes, please complete the remainder of this section. If No, please skip the remainder of this section.

The dilution waste streams are generated from rain water from the Tank Farm (an average of 47 gpd) and rainwater from the Lamination Train Shed/Scrap metal storage (average 20 gpd). Average values stated are taken from the 2013 wastewater flow certification. The facility is permitted for 450 gallons per day from the Scrap Metal Storage/Train Shed and up to 150 gpd from the Tank Farm.

The dilution waste streams combine with the wastewater in the equalization tank in the treatment room. The total dilution flow is 67 gallons per day. Additional non process waste streams are introduced into the lift station where all waste water enters the City sewer system. These waste streams include non-contact cooling water (33,242 gpd), cooling tower blowdown (100 gpd), part washer/tumbler (291 gpd), and sanitary wastewater (3,346 gpd). These flows are taken from the 2013 waste water certification diagram.

**E. FLOW MEASURING DEVICE**

Location of Meter- At the discharge from the filtration unit.

Type of Meter- Magnetic Flow Meter

Make of Meter- Great Lakes Instruments Model 675F

*A 4d*



**F. PRETREATMENT UNIT OPERATIONS**

Describe the pretreatment system operations conducted at the facility.

1. Treat water with ferric chloride to remove metals.
2. Add caustic soda to bring PH to a level of 9.5.
3. Water is processed through ultra filtration unit.
4. Water is treated with Hydrogen Peroxide to remove Phenols.
5. Water is discharged to sanitary sewer.

**G. POLLUTION PREVENTION / BEST MANAGEMENT PRACTICES**

This facility has implemented the following pollution prevention practice(s) and/or best management practice(s). [Insert a description of all pollution prevention practices and /or best management practices]

Nidec Paragould has both a Spill Prevention Control and Countermeasure Plan (SPCC) and a Toxic Organic Management Plan (TOMP) in place. Pollution prevention practices include:

Use of containment and sumps around storage tanks and for drums and totes of chemicals, oils and lubricants.

Training of employees in spill prevention and spill response.

Waste reduction practices are always being evaluated and reassessed.

Corporate and consultant inspections and audits provide an outside view of chemical storage and management practices as they relate to regulatory requirements.

H. Signatory Requirements

According to 40 CFR 403.12(1), periodic compliance reports must be signed by an authorized facility representative<sup>1</sup>. This facility has designated the following individuals as authorized facility representative(s).

Name J.R. Gore

Title MGR. ENG. SERVICES

Name Patricia Williams

Title Plant Manager

J. Fact Sheet Certification Statement

This fact sheet must be certified by an authorized representative of the Industrial user.

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

Certified by: J.R. Gore

Date: 1-15-14

Authorized Facility Representative

Printed Name of Signee: J. R. GORE

authorized representative may be: If the user is a corporation:

- a. The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any person who performs similar policy or decision-making functions for the corporation; or
- b. The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility.

If the User is a partnership or sole proprietorship:

- a. General partner; or
- b. Proprietor.

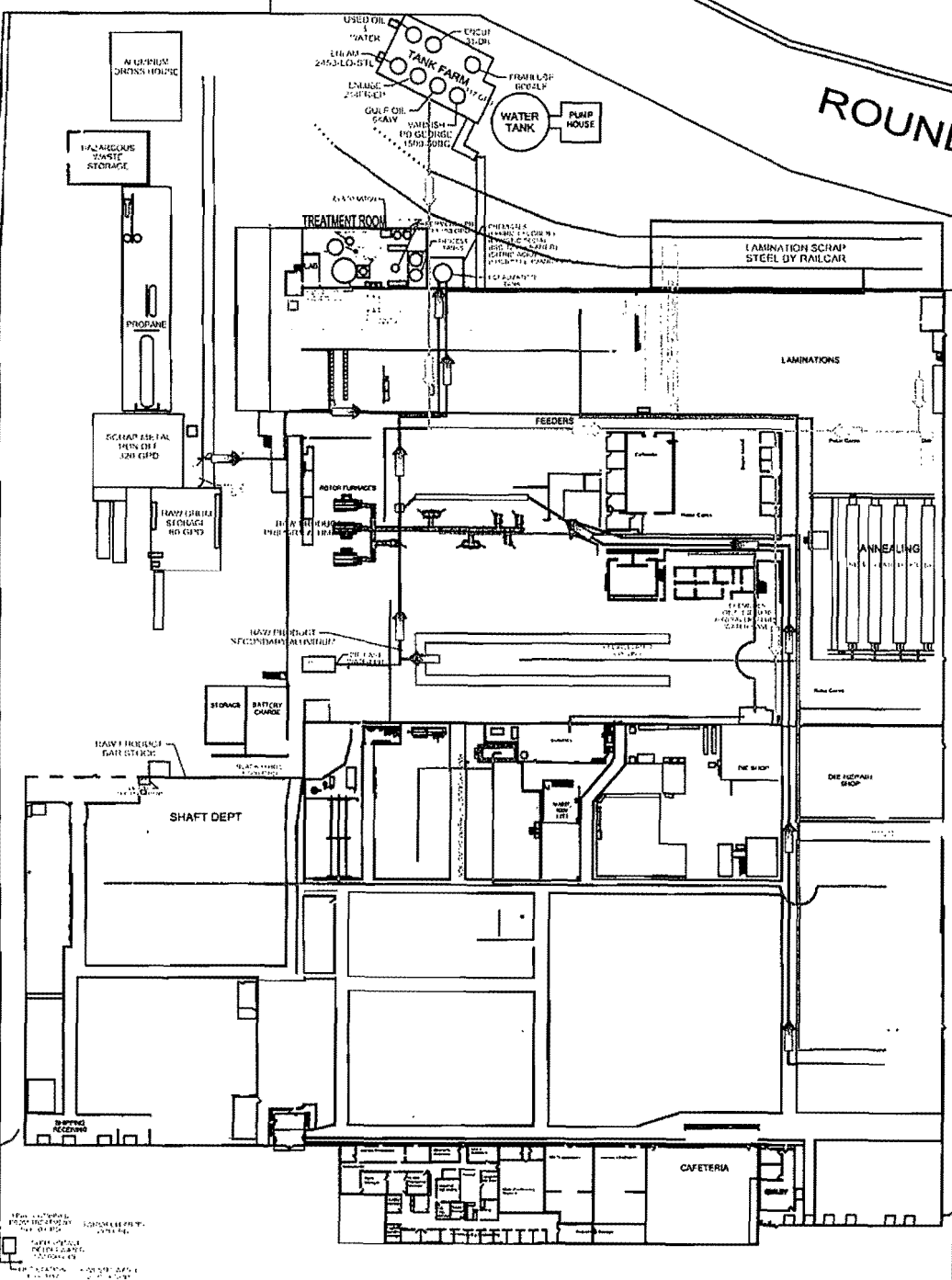
A-4F

ROUNDHOUSE ROAD

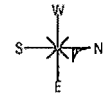
A-4g

SCOTT ST

EAST PARK ST



— RECIRCULATED WATER  
 --- WASTE WATER  
 - - - OIL



# NIDEC MOTOR CORP PARAGOULD, AR



TOTAL COOLING TOWER BLOWDOWN  
 7,100 GPD  
 COOLING CARE CHEMICALS  
 COOLING CARE 2065 "TR"  
 COOLING CARE 2209 "YR"  
 SCORGUARD 8391

NEW MATERIALS FROM PRODUCTION  
 TO BE STORED IN THIS AREA  
 SUPER-COOLING  
 POLYURETHANE  
 COOLING OIL  
 WATER  
 1000 C/PD

Attachment A5

PARAGOULD LIGHT, WATER & CABLE  
INDUSTRIAL USER INSPECTION REPORT

DATE OF INSPECTION: 02/26/14

TIME OF INSPECTION: 1:30 PM

INSPECTED BY: Lisa Ellington  
INDUSTRIAL REPRESENTATIVE: Richard Bowers, Operator  
PHONE NUMBER: 236-5398

NAME & ADDRESS OF INDUSTRIAL FACILITY:

Tenneco Automotive  
1601 Highway 49B North  
Paragould, AR 72450

PLWC PERMIT INFORMATION:

Permit #: 93-01  
Effective: 12/15/2010  
Expires: 12/14/2015  
  
SIC #: 3714 (Motor Vehicle Parts and Accessories)  
NAISC #: 336330 (Motor Vehicle Steering and Suspension Components Manufacturing)

TOMP is on file to certify out of TTO testing; SPCC is in effect.

OTHER ENVIRONMENTAL PERMITS:

RCRA Generator, Storm Water, Air, Above Ground Storage Tank

BACKGROUND INFORMATION:

Previously permitted under the name of Monroe Auto Equipment; production under the Monroe name began in 1970.

Tenneco manufactures and assembles automotive shocks and struts.

Richard Bowers  
Printed Name of Industrial Representative

Richard Bowers  
Signature

Lisa Ellington  
Printed Name of PLWC Representative

Lisa Ellington  
Signature

CHANGES IN PROCESSES, PRODUCTS, CHEMICALS OR PRETREATMENT SYSTEM SINCE LAST INSPECTION ON 02/22/2013:

No changes to processes, pretreatment or waste treatment

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

Not applicable

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

IF NO, LIST VIOLATIONS AND DATE OCCURRED:

Trichloroethylene result of 29 µg/L; limit is 5 µg/L

LAST DATE OF CALIBRATION FOR FLOW MONITORING EQUIPMENT:

Pumps rates of flow meters are checked for accuracy once per quarter.

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

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

POLLUTION PREVENTION PRACTICES AND ACTIVITIES IN PLACE:

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

Water is recycled in several areas of the plant

Have 10 (8 are currently used) recovery wells for groundwater recovery; goes to stripper area (water from stripper reused in rod grinders and for polymer make-up)

Recycle anything that can be recycled (cans, paper, steel, pallets, cardboard, light bulbs, etc.)

A5b

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 or equipment failures       | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO |
| C) | Sludges and solids adequately disposed (landfilled)         | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO |
| D) | All treatment units in service                              | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO |
| E) | Consulting Engineer   | <input checked="" type="checkbox"/> YES | <input type="checkbox"/> NO |
|    | Name: In-house  |   |                             |
| 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 checked="" type="checkbox"/> YES | <input type="checkbox"/> NO | <input type="checkbox"/> n/a            |

Lab Name	American Interplex	
Lab Address	Little Rock, Arkansas	Murfreesboro, Tennessee
Reason for Use:	Stormwater	VOC

TCLP analysis completed on all individual wastestreams once a year

\*Tenneco has a generator on site, which is tested monthly; runs entire WWTP and emergency lights in plant.

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

A-5c

TOXIC ORGANICS MANGEMENT PLAN:

- A) Description of observed regulated processes and discharges.

Tenneco has 5-stage one zinc phosphatizing line consisting of clean, rinse, phosphating, second rinse and rust prevention tanks. Metal finishing wastewater from machining of rods, struts and absorbers; all wastewater is pretreated before discharge; daily pH readings are taken from all processes in wastewater treatment.

- B) Description of stored chemicals.

Stored chemicals include alum, polymer, muratic acid, lime, sulfuric acid, potassium hydroxide, sodium hydroxide, sodium hypochlorite, caustic soda; all chemicals are stored in the tank farm and are contained. Storage area behind the plant used for flammables and chemicals with a potential for freezing; is all contained.

- C) Description of chemical handling procedures.

No change in chemical handling procedures since last inspection.

Most chemicals delivered by truck; unloaded by forklift and taken to storage area; when needed chemicals are taken by forklift to area needed. Shock oil is delivered by rail tanker; pumped to storage tanks; then pumped to area needed; maximum discharge is 27 to 28 gallons/minute for no longer than 4 minutes; forklift operators are trained and certified annually.

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

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

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

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

Tenneco has a SPCC plan on file; also has an equalization tank as well as a 100,000 gallon emergency storage tank in case of an accidental spill or slug discharge; Tenneco has their own spill response team.

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

No chemicals stored near any floor drains; all floor drains are routed to treatment plant or cooling tower. Floor drains in janitor closet and bathrooms have been capped and plugged.

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

Safety Kleen picks up all waste paints, solvents, parts washers and oils; also paint stripper sludge if necessary; all other sludge is landfilled.

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

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

- K) Evaluation of TOMP need.

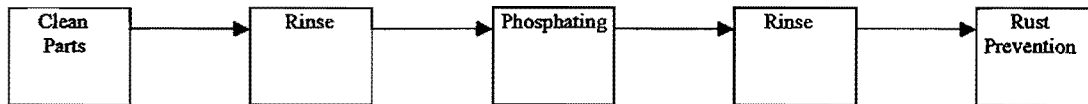
Tenneco has both a SPCC and TOMP on file.

A5d

**PHYSICAL DESCRIPTION OF MANUFACTURING PROCESSES:**

Tenneco manufactures shock absorber (6 lines) and strut (2 lines) products for cars and trucks. Operations include machining, grinding, metal stamping & forming, welding, painting, powdered metal operations, assembly and packaging. There is no discharge from the air stripper (all discharge is used as cooling water in tower, then to grinder and polymer make-up for waste treatment).

**5-stage phosphatizing line**



**WASTEWATER GENERATING OPERATIONS AND FLOWS:**

Machining Operations - ~100,000 gpd  
Cooling Water - ~15,000 gpd  
Parts Washing - varies depending on parts being manufactured

**OTHER SOURCES OF WASTEWATER:**

Domestic - ~8,500 gpd

**REGULATED WASTESTREAM(S):**

Metal Finishing - 40 CFR 433.15

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

Approximate number of employees: ~1,209 hourly; 48 salary  
Number of shifts: 3 shifts (1 full; 2 partial)  
Average number of hours/week: Plant - 6 days/week; WTP - 24/7; support works 24/7

**DESCRIPTION OF PRETREATMENT SYSTEM(S):**

2 skimmers (wicks) used to remove oil (Tenneco uses ~26,000 gallons of oil/week); pH adjustments (using H<sub>2</sub>SO<sub>4</sub>, NaOH or alum added if needed); pH in clarifier is between 7 and 8 S.U. (prefer high 7 for metals treatment); caustic soda added to keep pH between 8.5 and 9 S.U. (primarily for Zinc treatment).

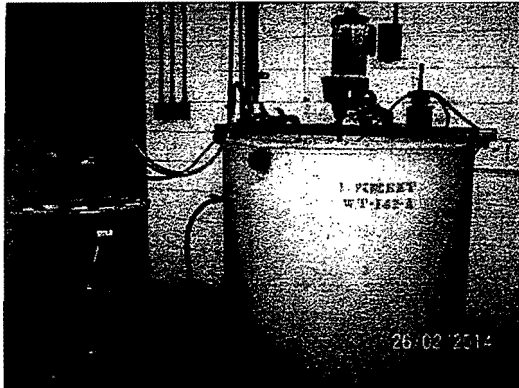
**COMMENTS:**

RESPONSIBLE OFFICIAL: Mike Peters, Regional Plant Manager  
Richard Hartness, Plant Manager

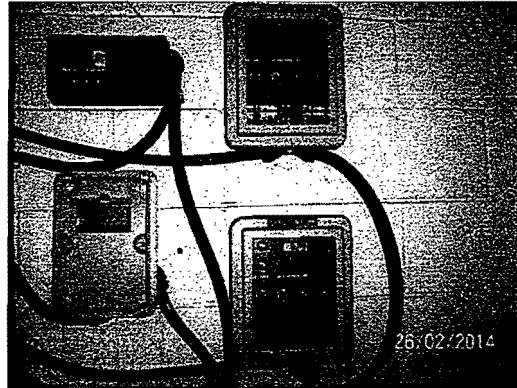
A-5e



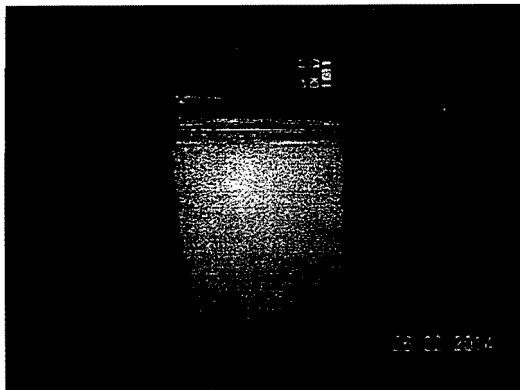
Tenneco Pictures taken February 26, 2014



Chemical addition to WWTP



Continuous pH monitoring



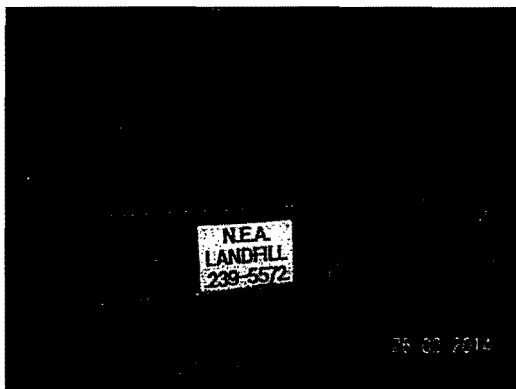
Sampler for process discharge



Process outfall



WWTP Clarifier



WWTP Sludge

A-5f