



ARKANSAS
Department of Environmental Quality

September 24, 2008

Dennis Brunson, Pretreatment Coordinator
City of Hot Springs
P. O. Box 700
Hot Springs, Arkansas 71901

Re: City of Hot Springs (Permit Number: AR0033880 AFIN: 26-00145) Pretreatment Program
Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Brunson:

Please find enclosed the finished report for the audit/assessment conducted by me from August 26 through 28, 2008. Please make the report available for review by appropriate City officials. You and the City officials should discuss and evaluate the recommendations and required actions in the report. Please respond in writing within thirty (30) days with the City's proposed actions to my findings in the report.

The department and I thank you for your cooperation during the audit. The recommendations in the attached audit/assessment are intended to aide the City of Hot Springs pretreatment personnel with achieving the objectives of the Clean Water Act.

If you or any of your associates have questions , please do not hesitate to contact this office.

Sincerely,

Rufus J. Torrence
ADEQ Pretreatment Engineer

Encl: Audit/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w attmt)
Eric Flemings / ADEQ Field Services (w/o attmt)
Cindy Garner / ADEQ NPDES Enforcement (w/o attmt)

NPDES PERMIT FILE
NPDES # AR0033880
AFIN # 26-00145
Permit PN
Correspondence
Technical Backup
9/24/08 Date Scanned

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT
CITY OF HOT SPRINGS, ARKANSAS
NPDES PERMIT #AROO33880**

September 24, 2008

**PREPARED BY: RUFUS TORRENCE
NPDES PRETREATMENT ENGINEER**

ADEQ

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- C) Recommended POTW Actions for Improved Implementation or Enforcement of the Pretreatment and Pollution Prevention Programs
- 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

Attachments A,B,C,D,E,F,G & H: 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) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

An audit/assessment was performed August 26 through August 28, 2008, of the Pretreatment Program implemented by City of Hot Springs, Arkansas. Participants included:

Rufus Torrence	ADEQ/Pretreatment Engineer
Dennis Brunson	Hot Springs/Pretreatment Coordinator
Bill Garner	Hot Springs/Pretreatment Assistant
Ron Wacaster	Hot Springs/Facilities Operation Manager
Steve Mallett	Hot Springs/Public Works Director

The goals of the audit/assessment were:

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

Hot Springs' Pretreatment Program was originally approved 9/30/88. The most recent modification (approved Feb 25, 2002) included incorporation of an enforcement response plan and revisions to the pretreatment ordinance.

The City's POTW consists of actuated grit chambers; primary clarification; diffused aeration basins; secondary clarification; mixed media filtration; chlorination and de-chlorination before discharge to Lake Catherine. The POTW design flow is 12 MGD and the influent averages about 11.5 MGD with I & I problems. The effluent has not exhibited a pattern of toxicity; however, there were sublethal toxicity to the Pimephales promelas (Fathead Minnow) in June 2006 and sublethal and lethal toxicity to the Ceriodaphnia dubia (Water Flea) in March 2006.

The plant receives approximately 0.4 MGD from 10 significant industries; 3 are categorical industrial users. Sludge is composted with yard waste and race track straw and then given away to the public. The City plans to discontinue accepting straw waste from the race track.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to five (5) 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 Attachments (A – H).

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 Hot Springs' Pretreatment Program. The auditor has paraphrased with CFR citations the actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program. A narrative explanation of the finding will follow the citations.

1) [Repeat Deficiency from 2004 Audit] Under **40 CFR 403.8(f)(1)** "The POTW shall operate pursuant to legal authority enforceable in Federal, State or local courts"; under **40 CFR 403.8(f)(1)(iii)** the POTW must "Control through permit,..., the contribution to the POTW by each industrial User to ensure compliance with applicable Pretreatment Standards and Requirements...[the permit] must be enforceable and contain... [**40CFR403.8(f)(1)(iii)(D)**] Effluent limits based on applicable general pretreatment standards in part 403 of this chapter, categorical pretreatment standards, local limits".

During the file review, the auditors noted that Mid-America [40CFR437 Centralized Waste Treater-Subpart C] and Alliance [presently deemed non-categorical] permits (see attachments C & D) contained effluent limits which were not based on either categorical pretreatment standards or the approved local limits shown in ordinance #4577 (Section 9-3-43.4). The effluent limits in the permits are not enforceable in either Federal, State or local courts. The POTW must not issue permits with limits which have no documented technical basis and, hence, are not enforceable.

2) Under **40 CFR 403.8(f)(5)** "The POTW shall develop and implement an enforcement response plan...The plan shall...Describe the types of escalating enforcement responses the POTW will take...and the time periods within which responses will take place".

During the checklist review, the auditor noted that the City placed National Park Medical Center in SNC (significant noncompliance) on July 1, 2007. Follow-up sampling from July 2007 to the present indicate that this SIU is still non-compliant. According to the Enforcement Response Plan (ERP), "All violations meeting the criteria for significant noncompliance will be addressed with an enforceable order within thirty (30) days of the identification of significant noncompliance". The ERP specifies that the UM (Utility Mgr) was suppose to issue an AO (Administrative Order) and fine by August 1, 2007.

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

1) During the site visit to Triumph Airborne the auditor noted that the POTW is sampling a “combined wastestream” (sanitary and regulated process streams). The POTW should use the combined wastestream formula found in 40CFR403.6(e) to adjust Airborne permit limits. However, if the sanitary flow is less than 1% of the total stream, the POTW may continue with the same permit limits by documenting the “de minimis” sanitary stream.

2) [Repeat Recommendation from 2004 Audit]. The POTW is not requesting local SIUs to develop BMP’s (Best Management Plans) for Pollution Prevention. The auditors recommend that the request be included in the permit application.

3) The 40CFR403.12(p) hazard waste notification to each industrial user is required only once; however, past experiences suggest that POTW personnel should make the notification on a regular basis as sometimes the SIUs forget about the notification. A helpful suggestion is to include the notification in the permit; by placing the notification in the permit someplace, the POTW would have a routine which would not only refresh existing SIU notifications but also help avoid overlooking giving the notification to new SIUs. The last audit emphasized this notification, also.

4) [Repeat Recommendation from 2004 Audit]. Include a fact sheet in each IU file identifying pertinent information such as: processes/flows with schematics, basis for permit limits, rationale for being deemed “Significant”, IU contact, monitoring frequency, parameters monitored for, picture of actual sampling point, brief chronological history (including start-up date) of IU etc. Note that a fact sheet is not optional for SIUs with equivalent limits based on production based standards; ARKEX is a SIU with equivalent limits based on 40CFR467 standards. ARKEX permit must contain a fact sheet which shows how the equivalent limits were calculated.

5) The Pretreatment Program may collect addition funds to help with implementation. The auditors recommends at a minimum that the POTW recover cost from the SIUs for additional monitoring to investigate noncompliance.

6) Send a copy of the reporting requirements located in 40 CFR 403.12(p) & (j) to all hazardous waste generators shown on the ADEQ website at:

http://www.adeq.state.ar.us/hazwaste/rcra2/facil_sum.asp#Display

(Instructions: Enter “Hot Springs” in the box next to the title “Location City” and click “Search” to see the list.)

7) The City should incorporate compliance monitoring into “CityWorks” to not only track SIUs for compliance but also calculate significance noncompliance (SNC) in accordance with 40CFR403.8(f)(2)(viii).

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

- 1) Comply with most the most recent changes to 40 CFR 403 (commonly referred to as the “Streamlining Rule Changes” promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply.

The following is a summary of changes required by the Streamlining Rule.

1. Updated removal credits provisions relating to Overflows [§ 403.7(h)]
 2. Slug control requirements must be included in SIU control mechanisms [§ 403.8(f)(1)(iii)(B)(6)]
 3. SIUs must be evaluated for the need for a plan or other action to control slug discharges within a year from the final rule’s effective date or from becoming an SIU [§ 403.8(f)(2)(vi)]
 4. Expand SNC to include additional types of Pretreatment Standards and Requirements [§ 403.8(f)(2)(viii)(A-C)]
 5. SIU reports must include BMP compliance information [§ 403.12(b), (e), (h)]
 6. Require periodic compliance reports to comply with sampling requirements and require non-categorical SIUs to report all monitoring results [§ 403.12(g)(3), (6)]
 7. Require notifications of changed discharge to go to the Control Authority [§ 403.12(j)]
- 2) Reassess the current local limits to comply with Part III paragraph 8.b in the City’s NPDES permit (AR0033890).

* * * * *

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: City of Hot Springs NPDES #: AR0033880
Mailing address: P. O. Box 700, 71901
Permit Signatory: Steve Mallett Title: Director of Utilities
Telephone: (501) 321-6999 FAX NUMBER: (501) 321-6967
Pretreatment Contact: Dennis Brunson Title: Pretreatment Coordinator
Address: 320 Davidson, 71901
Telephone (501) 262-1881 ext. 15 E-Mail address: wastewater@cityhs.net
Pretreatment program approval date: September 30, 1988
Dates of approval of any substantial modifications: ERP approved Feb 25, 2002
Month Annual Pretreatment Report Due: January
Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: August 26-28, 2008
(ASSESSMENT)
Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
<u>Rufus Torrence</u>	<u>Pretreatment Engineer</u>	<u>(501) 682-0626</u>

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* <u>Dennis Brunson</u>	<u>Pretreatment Coordinator</u>	<u>(above)</u>
<u>Ron Wacaster</u>	<u>Facilities Operations Manager</u>	<u>same</u>

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
<u>PCI</u>	<u>May/2007</u>	
<u>PCI</u>	<u>Jun/2006</u>	<u>None Apparent</u>
<u>PCI</u>	<u>Dec/2004</u>	<u>Insufficient Staff</u>

YES NO

___ x 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:

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

.....

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

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
<u>*AR0033880</u>	<u>Hot Springs</u>	<u>02/01/08</u>	<u>01/31/08</u>

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant:

Location Address: 320 Davidson Drive

Expiration Date of NPDES Permit: Same

Treatment Plant Wastewater Flow: Design- 12 MGD; Actual (Average) - 11.1 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs	: <u>10</u>	# of CIUs	: <u>3</u>
Industrial Flow (mgd):	<u>0.4</u>	Industrial Flow (%)	: <u>3.6</u> %

Level of Treatment

Type of Process(es):

Primary	<input checked="" type="checkbox"/>	<u>Actuated grit chambers; primary clarification;</u>
Secondary	<input checked="" type="checkbox"/>	<u>Diffused aeration basins; secondary clarification;</u>
Tertiary	<input checked="" type="checkbox"/>	<u>Tertiary Sand Filters; Belt Press Dewatering</u>

Method of Disinfection: Chlorination

Dechlorination ☒ YES ☐ NO

Effluent Discharge

Receiving Stream Name: Lake Catherine

Receiving Stream Classification: Impoundment of the Ouachita River

Receiving Stream Use: Fishable/Swimmable

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

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>1246</u> dry tons/yr.
<input type="checkbox"/> Lagoon Storage	<input type="checkbox"/> dry tons/yr.
<input checked="" type="checkbox"/> Other (specify) <u>Compost*</u>	<input type="checkbox"/> dry tons/yr.

*All the sludge goes to a compost station; only a portion of the sludge is distributed to the public.

List of toxic pollutant limits in NPDES permit: NH3-N; TRC; T. Phos;

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for
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:
☒ * ☐ ☐
**CA currently allows the public to haul sludge but the NPDES permit requires compliance with 40 CFR part 503 for land application.*
 Issuing Authority: _____
 Issuance Date: _____
 Expiration Date: _____

List pollutants that are specified in current sludge permit:
Not Applicable

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 is no pattern but the effluent had a sublethal failure (minnows) in 06/2004 and both lethal and sublethal failures (fleas) in 03/2006.*

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

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

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

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

Not currently evaluating

YES NO N/A
☐ ☒ ☐ Has the POTW begun tracking the trends in the above samples?
☒ ☐ ☐ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
TSS & BOD	I&I

YES NO
☐ ☐ ☐ N/A 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

 x 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)]

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

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
<u>2-25-02</u>	<u>Ord #4577 adopted the pret code 11/96</u>	<u>2-25-02</u>

2. Modifications in Progress:

Date Requested	Nature of Modification
<u>None</u>	

YES NO

 x Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:

 ✓ 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: 9/30/88 [WENDB-PTIM]
 Date of most recent Ordinance approved by the Control authority: 11/18/96
 Date of most recent Pretreatment Program modification approval: 2-25-02

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

YES NO

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

*City has adopted O&G ordinance.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ x 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: _____

___ x Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no: *Hot Spgs actual "city limits" are difficult to align with the collection system; there are residential districts which are outside jurisdictional boundaries.*

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

___ N/A Have provisions been made for the incorporation of Pollution Prevention (P²) policies by contributing jurisdictions?

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

	<u>Name of Jurisdiction</u>	<u>Number of CIUs</u>	<u>Number of Other SIUs</u>	<u>Type of Agreement</u>
1.	<u>N/A</u>	_____	_____	_____
2.	_____	_____	_____	_____
3.	_____	_____	_____	_____
4.	_____	_____	_____	_____

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

Problems

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

Briefly describe other problems: _____

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

<u>IU Name</u> (None)	<u>Problem</u>	<u>NPDES Permit Violation</u>	
		<u>Yes</u>	<u>No</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)] *CA has access to "CityWorks"; this is a citywide computer network which alerts the CA by email when a new IU moves into town.*

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

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

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

What methods are used to update the IWS:

- ☒ Review of newspaper/phone book
- ☐ Review of plumbing/building permits
- ☒ Review of water billing records
- ☒ Permit reapplication requirements
- ☒ Onsite inspections
- ☒ Citizen involvement
- ☒ Other (specify) Vehicle Patrols

How often is the survey to be updated? Every 2 to 3 years

Are there any problems that the Control Authority has in identifying and categorizing SIUs: _____

YES NO

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

Name of IU	Type of Industry	Is the IU Permitted?
_____	_____	_____
_____	_____	_____
_____	_____	_____

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

- a. 8 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 3 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 5 Noncategorical SIUs
- d. 2 Other regulated nonsignificant IUs (Describe) Waste Haulers
- 10 TOTAL of a. + d.

YES NO

If not, the Control Authority has defined "significant industrial user" to mean: The CA has defined "significant industrial user" the same as EPA's [403.3(t)] but the recent Streamlining update has added new language in [403.3(v)].

YES NO

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

None How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [WENDBs-NOCM] If there are any SIUs without current (unexpired) permits, please complete the information below:

PERMIT
EXPIRATION
DATE

IU NAME

YES NO

<input checked="" type="checkbox"/>	Does the Control Authority accept trucked septage wastes?
<input checked="" type="checkbox"/>	Does the Control Authority accept other trucked wastes?
<input checked="" type="checkbox"/>	Does the Control Authority have a control mechanism for regulating <u>trucked</u> wastes? If yes, answer the following:

YES	NO
<u>N/A</u>	Does Control Mechanism designate a discharge point? [403.5(b)(8)]
<u>N/A</u>	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 applied to waste haulers:

Pollutant	Limit
*	*

Describe the discharge point(s) (including security procedures):

*The Control Authority has a waste manifest system that requires only Sanitary wastewater be hauled to POTW

✓ 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 applied to UST cleanup sites:

Pollutant	Limit
<i>BTEX</i>	20 mg/l

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?

May 2000 Date Notified US Mail Method of Notification

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

<u>x</u>	Federal Register	<u> </u>	Journals, Newsletters
<u>x</u>	Meetings, Training	<u>x</u>	Internet
<u>x</u>	Government Agencies	<u>x</u>	Other <u>PCs</u>

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
<u>CA is in the process of evaluating existing local limits to ensure</u>			
<u>compliance with current water quality standards.</u>			
<u> </u>			
<u> </u>			

SECTION II: PROGRAM ANALYSIS AND PROFILE

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?		Local Limits Adopted?		Numerical Limit Adopted*** (mg/l)
	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"/>	1.11
Cadmium (Cd)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.59
Chromium-Total	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	17.43
Copper (Cu)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	16.65
Cyanide (CN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.45
Lead (Pb)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.53
Mercury (Hg)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.037
Molybdenum (Mo) *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	**	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Nickel (Ni)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	10.07
Selenium (Se) *	<input type="checkbox"/>	<input checked="" type="checkbox"/>	**	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Silver (Ag)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	0.47
Zinc (Zn)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	**	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	34.08

* - If necessary for the sludge disposal option chosen.

**Control Authority is in the process of reassessing the current local limits developed in 1995.

***Ref: Tab E ord #4577 sect 9-8-43.4

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	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

N/A

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

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

TYPE OF ALLOCATION

	Uniform Concentration	Mass	Hybrid
Arsenic (As)	<input checked="" type="checkbox"/>		
Cadmium (Cd)	<input checked="" type="checkbox"/>		
Chromium-Total	<input checked="" type="checkbox"/>		
Copper (Cu)	<input checked="" type="checkbox"/>		
Cyanide (CN)	<input checked="" type="checkbox"/>		
Lead (Pb)	<input checked="" type="checkbox"/>		
Mercury (Hg)	<input checked="" type="checkbox"/>		
Molybdenum (Mo)			
Nickel (Ni)	<input checked="" type="checkbox"/>		
Selenium (Se)			
Silver (Ag)	<input checked="" type="checkbox"/>		
Zinc (Zn)	<input checked="" type="checkbox"/>		

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

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	<u>1/year</u>	1/year	<u>[Ref: Tab D Sect K.8]</u>
Other SIUs	<u>1/year</u>	1/year	<u>" " " "</u>
Sampling:			
CIUs	<u>2/year</u>	1/year	<u>[Ref: Tab D Sect K.7]</u>
Other SIUs	<u>2/year</u>	1/year	<u>" " " "</u>
Reporting:			
CIUs	<u>2/year</u>	2/year	<u>[Ref: Tab E 9-3-47.4(a)]</u>
Other SIUs	<u>2/year</u>	2/year	<u>" " " "</u>
Self-Monitoring:			
CIUs	<u>2/year¹</u>	2/year	<u>[Ref: Ord 9-3-46.2(a)(4)]</u>
Other SIUs	<u>2/year¹</u>	2/year	<u>[" Ord 9-3-47.4(a)]</u>

¹Ordinance shows minimum of 2/year but allows CA to increase frequency in individual permits.

#	%	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)]

- NOIN- this is a count of SIUs that are either not inspected OR not sampled in the past 12 months. This is NOT a count of SIUs that were both not sampled and not inspected. Do not count repetitive SIU names more than once. 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)

SECTION II: PROGRAM ANALYSIS AND PROFILE

Does the Control Authority routinely split samples with industrial personnel:

YES NO

✓ If requested?

✓ 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>AA flame/furnace; ICAP</u>	<u>American Interplex</u>
Cyanide	<u>Spectrophotometric</u>	<u>"</u>
Organics	<u>GC/MS</u>	<u>"</u>
Other	<u>BOD; TSS; Tot Phos</u>	<u>In house</u>

Were all wastewater samples analyzed by 40 CFR 136 methods?

* 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:
CA relies on ADEQ certification program

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

5days Conventional
" Metals
" Organics

☒ Is there an established protocol clearly detailing sampling location and procedures? **GIS in place now.*

☒ Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

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

YES NO

☒ Scheduled compliance monitoring
☒ Unscheduled compliance monitoring
☒ Demand monitoring for IU compliance
☒ IU self-monitoring
Other: _____

YES NO

☒ Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

I. ENFORCEMENT

YES NO

☒ Is the Control Authority definition of SNC consistent with EPA's?
[403.8(f)(2)(vii)] **But does not include Streamlining updates [Sect 9-3-50].*
☒ Does the Control Authority have a written enforcement response plan (ERP)?
[403.8(f)(5)]. If yes, does the plan: **[Tab H Enforcement Response 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.
**ERP para 1. Purpose*

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	\$ 1000 /day/violation
Imprisonment	
<input checked="" type="checkbox"/> Termination of Service	
Other: _____	

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: *(None at this time)*

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: [Section 9-3-47.8]

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

YES NO N/A

✓* Does the pattern of enforcement conform to the ERP?
*Not enough violations to establish a pattern

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
Nat Park Med	7-1-2007	NOV only	8-19-08*		X**

*See attachment A-1/1

*Nat Park Medical Center was non-compliant for O&G (150 mg/l local limit) in July 2007; the CA instructed the IU to install a grease trap in Nov 2007. The IU remains non-compliant for O&G (300mg/l on 7-22-08) since the CA samples only twice/year; hence, several months passed and the IU did not clean the grease trap properly so the IU was non-compliant again. The auditor instructed the CA to resample within 30 days when the IU is non-compliant to not only comply with regs but avoid having only one non-compliant sample in a six-month period (this automatically places the IU in SNC).

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

#	%	
1	10	Pretreatment Standards [WENDB-PSNC] (Local Limits/Categorical Standards)
0		Self-monitoring requirements [WENDB-MSNC]
0		Reporting requirements [WENDB-PSNC]
0		Pretreatment compliance schedule [WENDB-SSNC]
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [WENDB-SNIN]

YES NO

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

Has the Control Authority experienced any of the following:

YES NO EXPLAIN and ID Industrial User

<input checked="" type="checkbox"/>	Interference [WENDB]	_____
<input checked="" type="checkbox"/>	Pass through [WENDB]	_____
<input checked="" type="checkbox"/>	Fire or explosions?	_____
	(incl. flash point viol.)	_____
<input checked="" type="checkbox"/>	Corrosive structural damage?	_____
	(incl. pH <5.0).	_____
<input checked="" type="checkbox"/>	Flow obstructions?	_____
<input checked="" type="checkbox"/>	Excessive flow	_____
	or pollutant	_____
	concentrations?	_____
<input checked="" type="checkbox"/>	Heat problems?	_____
<input checked="" type="checkbox"/>	Interference due to oil	_____
	or grease?	_____
<input checked="" type="checkbox"/>	Toxic fumes?	_____
<input checked="" type="checkbox"/>	Illicit dumping of	_____
	hailed 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?

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

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

	Number	Amount
Civil	0	\$ _____
Administrative	0	\$ _____
Total	0	\$ _____

[WENDB-IUPN]

SECTION III: INDUSTRIAL USER FILE REVIEW

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO
☒ ☐ Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES NO
☒ ☐ computerized
☒ ☐ hard copy
☐ ☐ OTHER: _____

Are the following files computerized:

YES NO
☒ ☐ Control Mechanism Issuance
☐ ☒ Inspection and Sampling schedule
☒ ☐ Monitoring Data
☒ ☐ IU Compliance Status Tracking
☒ ☐ Other: Telephone ROCs

Can IU monitoring data can be retrieved by:

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

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

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

☐ ☒ Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: _____

☒ ☐ Are all records maintained for at least 3 years?

K. RESOURCES

YES NO

If yes, describe and show below the source(s) of funding for the program:
The PC needs assistance from the City Engineer with writing permits.

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

YES NO

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

YES NO

✓	Sampling equipment	Iscos, pH meters
✓	Safety equipment	Standard List
✓	Vehicles	Pretreatment Pick-Up
✓	Analytical equipment	Standard conv pollutant equip

SECTION III: INDUSTRIAL USER FILE REVIEW

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
City has requested O&G BMPs from some IUs

2. Has the source of any toxic pollutants been identified?
If yes, what was found?
n/a

3. Has the POTW implemented any kind of public education program? If yes, describe:
Plant Tours
PowerPoint Presentations on O&G program

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

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

6. Has the POTW used any of the various "Guides to Pollution Prevention" as examples to their industrial and commercial users as ways to eliminate or reduce pollutants? No
If yes, which of the "Guides to Pollution Prevention" were used?

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Mid-America Distillations, Inc File/ID No. C-0006
Industry Address 847 Blacksnake Rd 71913 / PO Box 2880 71914
Industry Description Petroleum Refining, Amine Distillation & Distribution of Oil
Industrial Category Centralized Waste Treater 40 CFR 437 SIC Code: 2992
Ave. Total Flow (gpd) 8300 Ave. Process Flow (gpd) 1700

Industry visited during audit: YES

Comments: Recycling of used oils & purification of industrial chemicals; discharges
24 hours 7 days/ week but runs only two shifts (1st & 2nd). Process A-Amine & Glycol
Dehydration; Process B-WasteWater Treating

FILE #: 2 Industry Name Triumph Fabrications File/ID No. C-0003
Industry Address 1923 Central 71901
Industry Description Manufacture Aircraft Parts
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3728
Ave. Total Flow (gpd) 36100 Ave. Process Flow (gpd) 21,300

Industry visited during audit: YES

Comments: Aircraft parts forming, cleaning, heat treating aluminum; anodizing &
conversion coating of aluminum; penetrant inspection and painting.

FILE #: 3 Industry Name ARKEX, Inc File/ID No. C-0004
Industry Address 153 Extrusion Place
Industry Description Extrudes aluminum shapes through dies
Industrial Category Aluminum Extruder 40 CFR 467 SIC Code: 3354
Ave. Total Flow (gpd) Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments: This industry is planning to close with no plans to reopen; however, the
Control Authority still has an active permit on file.

FILE #: 4 Industry Name Triumph Airborne Str File/ID No. C-0001
Industry Address 115 Centennial Drive
Industry Description Phosphates aluminum and titanium parts for military aircraft
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3728
Ave. Total Flow (gpd) 200,000 Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments: _____

FILE #: 5 Industry Name Alliance Rubber Co File/ID No. C-0004
Industry Address 210 Carpenter Dam Road
Industry Description Manufacture Rubber Bands from Natural and Synthetic Rubber
Industrial Category Rubber Mfgr 40 CFR N/A SIC Code: 3069
Ave. Total Flow (gpd) Ave. Process Flow (gpd)

Industry visited during audit: YES

Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

Y => Yes N => No N/A => Not Applicable

	<u>Mid-A</u>	<u>Triumph</u>	<u>ARKEX</u>	<u>Airborne</u>	<u>Alliance</u>
1. Is the IU considered "significant" by the Control Authority?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Is the user subject to categorical pretreatment standards?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>N</u>
a. New source or existing source (NS or ES)?	<u>ES</u>	<u>ES</u>	<u>ES</u>	<u>NS</u>	<u>N/A</u>
b. Is this IU one identified as having P ² potential?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
If yes, what is the application date?	<u>3-10-08</u>	<u>6-9-08</u>	<u>12-16-05</u>	<u>7-10-08</u>	<u>2-25-08</u>
Does it ask for Pollution-Prevention information?	<u>Y¹</u>	<u>Y¹</u>	<u>Y¹</u>	<u>Y¹</u>	<u>Y¹</u>
2. Does the file contain a permit?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Permit Expiration Date?	<u>3-1-11</u>	<u>7-1-11</u>	<u>4-1-09</u>	<u>8-1-11</u>	<u>3-1-11</u>
Is a fact sheet included?	<u>N</u>	<u>N</u>	<u>N²</u>	<u>N</u>	<u>N</u>

Comments: 1. Page 8 of 18 asks about TOMPs; this is the only reference to P2.
 2. ARKEX has equivalent limits based on 40CFR467 production-based standards; permits with equivalent limits must have a fact sheet to show how the limits were determined

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => N N/A => Not Applicable

	<u>Mid-A</u>	<u>Triumph</u>	<u>ARKEX</u>	<u>Airborne</u>	<u>Alliance</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>	<u>CP³</u>
b. Expiration date?	<u>CP</u>	<u>CP</u>	<u>CP</u>	<u>CP</u>	<u>CP</u>
c. Statement of nontransferability?	<u>5-G</u>	<u>4-F</u>	<u>4-F</u>	<u>4-F</u>	<u>4-F</u>
d. Appropriate discharge limitations?	<u>N⁴</u>	<u>2-A</u>	<u>?⁵</u>	<u>2-A</u>	<u>N⁴</u>
e. Appropriate self-monitoring requirements?	<u>4-F⁶</u>	<u>3-D⁶</u>	<u>3-D⁶</u>	<u>3-D⁶</u>	<u>3-D⁶</u>
f. Sampling frequency?	<u>2-F⁷</u>	<u>2-B⁷</u>	<u>2-B⁷</u>	<u>2-B⁷</u>	<u>2-B⁷</u>
g. Sampling locations?	<u>2-F</u>	<u>2-B</u>	<u>2-B</u>	<u>2-B</u>	<u>2-B</u>
h. Requirement for flow monitoring?	<u>4-F</u>	<u>3-D</u>	<u>3-D</u>	<u>3-D</u>	<u>3-D</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
j. Applicable IU reporting requirements?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
k. Standard conditions for:					
Right of Entry?	<u>5-C</u>	<u>4-B</u>	<u>4-B</u>	<u>4-B</u>	<u>4-B</u>
Records retention?	<u>5-F</u>	<u>4-C</u>	<u>4-C</u>	<u>4-C</u>	<u>4-C</u>
Civil and Criminal Penalty provisions?	<u>6-A</u>	<u>6-A</u>	<u>6-A</u>	<u>6-A</u>	<u>6-A</u>
Revocation of permit?	<u>5-I</u>	<u>4-H</u>	<u>4-H</u>	<u>4-H</u>	<u>4-H</u>
l. Compliance schedules/progress reports	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
m. General/Specific Prohibitions?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>

Comments: 3. CP => Cover Page; cover page cites Ord #4577

4. Permit contains "technology transfer" local limits from 40CFR433 guidelines; these transfer limits do not appear in the ordinance.

5. Permit does not contain a fact sheet which shows how equivalent limits for ARKEX were determined.

6. The above referenced "Reporting Requirements" paragraphs require monthly reports.

7. The sampling frequency is stated in the above referenced paragraphs.

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => N N/A => Not Applicable

	<u>Mid-A</u>	<u>Triumph</u>	<u>ARKEX</u>	<u>Airborne</u>	<u>Alliance</u>
C. <u>Application of Standards</u>					
1. Has the IU been properly categorized?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>Y</u>	<u>Y</u>	<u>N⁸</u>	<u>Y</u>	<u>N⁹</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>N/A</u>	<u>N/A</u>	<u>N⁸</u>	<u>N/A</u>	<u>N/A</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>N/A</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>N/A</u>
7. Is the Control Authority applying a bypass provision to this IU?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>

Comments: 8. ARKEX permit did not contain a fact sheet which shows how equivalent limits were calculated.

9. Alliance permit had 40CFR433 limits as local limits instead of the local limits shown in the ordinance.

10. Tab "Section D-5" in the approved program has "Section K: Implementation Procedures" which shows paragraph 6 which references 9-3-47.4 in ordinance for frequency.

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => N N/A => Not Applicable

Mid-A Triumph ARKEX Airborne Alliance

D. Compliance Monitoring

Sampling

- | | | | | | |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| 1. Does the file contain Control Authority sampling results for the industry? | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| 2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)] | <u>Y¹⁰</u> | <u>Y¹⁰</u> | <u>Y¹⁰</u> | <u>Y¹⁰</u> | <u>Y¹⁰</u> |
| 3. Does the sampling report(s) include: [403.8(f)(2)(vi)] | | | | | |
| a. Name of sampling personnel? | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| b. Sample date and time? | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| c. Sample type? | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| d. Wastewater flow at the time of sampling? | <u>N</u> | <u>N</u> | <u>N</u> | <u>N</u> | <u>N</u> |
| e. Sample preservation procedures? | <u>Y¹¹</u> | <u>Y¹¹</u> | <u>Y¹¹</u> | <u>Y¹¹</u> | <u>Y¹¹</u> |
| f. Chain-of-custody records? | <u>Y¹¹</u> | <u>Y¹¹</u> | <u>Y¹¹</u> | <u>Y¹¹</u> | <u>Y¹¹</u> |
| g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs] | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| 4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements? | <u>N/A</u> | <u>Y</u> | <u>?</u> | <u>Y</u> | <u>N/A</u> |
| 5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples? | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |
| 6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)] | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> | <u>Y</u> |

Comments:

11. The CA files C-of-C records in an "overall" file since more than one SIU results are shown on a single report for the contract lab (American Interplex).
12. ARKEX submitted a letter which indicated that the plant was closed.

SECTION III: INDUSTRIAL USER FILE REVIEW

	Y => Yes	N => N	N/A => Not Applicable		
	<u>Mid-A</u>	<u>Triumph</u>	<u>ARKEX</u>	<u>Airborne</u>	<u>Alliance</u>
<u>Inspections</u>					
7. Does the IU file contain inspection reports?	Y	Y	N ¹²	Y	Y
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	Y	Y	N ¹²	Y	Y
b. Date of last Inspection	11-29-07	12-15-07	N/A ¹²	12-4-07	11-13-07
9. Does the inspection report(s) include: [403.8(f) (2) (vi)]					
a. Inspector Name(s)	Y	Y	N ¹²	Y	Y
b. Inspection date and time?	Y	Y	N ¹²	Y	Y
c. Name and title of IU official contacted?	Y	Y	N ¹²	Y	Y
d. Verification of production rates?	N/A	N/A	N/A	N/A	N/A
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	Y	Y	N ¹²	Y	Y
f. Evaluation of pretreatment facilities?	Y	Y	N ¹²	Y	Y
g. Evaluation of self-monitoring equipment and techniques?	Y	Y	N ¹²	Y	Y
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f) (2) (v)]	N ¹³	N ¹³	N ¹³	N ¹³	N ¹³
i. Manufacturing facilities?	N	N	N	N	N
j. Chemical handling and storage procedures?	N	N	N	N	N
k. Chemical spill prevention areas?	N	N	N	N	N
l. Hazardous waste storage areas and handling procedures?	N	N	N	N	N
m. Sampling procedures?	Y	Y	N ¹²	Y	Y
n. Laboratory procedures?	Y ¹⁴	Y ¹⁴	Y ¹⁴	Y ¹⁴	Y ¹⁴
o. Monitoring records?	Y	Y	N ¹²	Y	Y
p. Evaluation of Pollution Prevention opportunities?	N	N	N	N	N
q. Control Authority inspector signature?	Y	Y	N ¹²	Y	Y

SECTION III: INDUSTRIAL USER FILE REVIEW

	Y => Yes	N => N	N/A => Not Applicable		
	<u>Mid-A</u>	<u>Triumph</u>	<u>ARKEX</u>	<u>Airborne</u>	<u>Alliance</u>
<u>IU Self-Monitoring and Reporting</u>					
10. Does the file contain self-monitoring reports?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
11. Does the file include:					
a. BMR?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>N/A</u>
b. 90-Day Report?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>N/A</u>
c. All periodic reports?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
d. Compliance schedule reports?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
12. Did the IU report on all required parameters?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
13. Did the IU comply with the required sampling frequency(s)?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
14. Did the IU report flow?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
15. Did the IU comply with the required reporting frequency(s)?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
16. For all SIUs, are self-monitoring reports signed and certified?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</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>N/A</u>
18. Has the IU developed a Slug Control and Prevention Plan?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</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>N/A</u>
b. Did POTW respond to the spill?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

Comments: 13. CA inspection reports do not cite any evaluation of slug plans but CA requires them.

14. Inspection report contains vague and brief reference to lab procedures.

SECTION III: INDUSTRIAL USER FILE REVIEW

Y => Yes N => N N/A => Not Applicable

E. Enforcement	<u>Mid-A</u>	<u>Triumph</u>	<u>ARKEX</u>	<u>Airborne</u>	<u>Alliance</u>
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
b. IU self-monitoring results?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</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>N/A</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</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>N/A</u>
6. Was the IU notified of all violations?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
8. Did the Control Authority follow its approved ERP?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
10. Is there a compliance schedule? If yes:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</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>N/A</u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>N¹⁵</u>	<u>N¹⁵</u>	<u>N¹⁵</u>	<u>N¹⁵</u>	<u>N¹⁵</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	Y => Yes	N => N	N/A => Not Applicable		
	<u>Mid-A</u>	<u>Triumph</u>	<u>ARKEX</u>	<u>Airborne</u>	<u>Alliance</u>
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
b. TRC	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
c. Pass through/Interference	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
d. Spill/slug loads	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
e. Reporting	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
f. Compliance schedule	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
g. others (specify)	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
13. Was the SIU published for SNC?	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>
Date of publication.	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>	<u>N/A¹⁵</u>

Comments: 15. None of these SIUs had violations so the CA did not calculate SNC; however, the CA is lacking in this capability and is looking into computer software to perform this function automatically.

REPORTABLE NONCOMPLIANCE (RNC)¹ for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Hot Springs NPDES #: AR0033880

Date of Audit: Aug 26-28, 2008 Date entered into QNCR: _____

(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.

¹40 CFR Part 123.45(a)(iii)(G)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Hot Springs NPDES #: AR0033880

Name, address and phone number of industry:
Triumph Fabrications 1923 Central Ave 71901 (501) 321-9325

Type of industry: 40CFR433 Metal Finisher
(Include regulatory citation if CIU)

Date/Time of visit: August 27, 2008 from 8:30 to 10:20 am

Industry contacts: Perry Williams, Facilities Manager

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

Additional comments: 1. CA needs to sample as close as possible to Custody Transfer. 2. Has TOMP and plans water reduction.

(See industry description on back)

Visit conducted by: Torrence/Brunson

Date: 9-19-08


(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Hot Springs NPDES #: AR0033880

Industry name: Triumph Fabrications

Additional comments:

INDUSTRY DESCRIPTION

Chem-Fab is a 40CFR433 categorical metal fabrication industry that manufactures military and commercial aircraft parts. The Central Ave facility treatment process consist of two 1500 gal batch dump tanks, one 5000 gal batch dump tank, one 950 gal chrome reduction tank, on pH neutralization tank, one 60 gpm flocculation clarifier, one 1120 gal sludge holding tank and one 2 cu ft filter press. Process water is pumped from phosphoric anodize, dichrome seal, chromic anodize, alodine, amchem, echant, ridoline and sulfuric anodize into batch dump tanks. These tanks are set up in series. These waters are metered into a chrome reduction tank. The process water from the spray rinse, cold rinse and diluted dichromate are pumped to the chrome reduction tank. This water is chemically treated with sulfuric acid and sodium metabisulfite for the purpose of sludge removal. After treatment, this water is pumped to a 2025 gal pH neutralization tank. These combined waters are treated with sodium hydroxide and ferrous sulfate in order to neutralize the pH. This water is pumped to a clarifier. Polymer is introduced to cause flocculation. After settling, the sludge is pumped to the filter press to be dewatered. Water from the filter press is returned to the pH neutralization tank. Water that overflows from the clarifier weir is discharged to the city's collection system. The Central Ave facility discharges about 55,500 gallons per day.

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Hot Springs NPDES #: AR0033880

Name, address and phone number of industry:
Alliance Rubber Company 210 Carpenter Dam Road 71903
(501) 262-8134

Type of industry: 40CFR428 Rubber Extruder
(Include regulatory citation if CIU)

Date/Time of visit: August 27, 2008 from 10:38 to 11:18 am

Industry contacts: Trevor Hamilton, Safety/Training Coor

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

Additional comments: 1. DAF

2. Recycled some used water to process and reduce zinc discharge.
(See industry description on back)

Visit conducted by: Torrence/Brunson Date: 9-19-08


(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Hot Springs NPDES #: AR0033880

Industry name: Alliance Rubber Company

Additional comments:

INDUSTRY DESCRIPTION

Alliance is a rubber band industry that processes natural and synthetic rubber. This process include mixing of rubber bales and chemical compounds to form rubber tubing by extrusion. The rubber tubing is then vulcanized in salt solution and then rinse and cut into rubber bands. Other operations include manual and automated packaging of bands, warehousing and shipping. The industry has a DAF "Dissolved Air Floatation" system treatment process. This system consist of the following: 1 automatic surface skimmer, 1 full width float skimmer, 1 white recycle return pump, 1 primary air/water injection valve, a V-bottom sludge removal auger, 1 sludge collection tank, 1 air saturation tank, 1 chemical & reagent mix two cell contact tank, 1 flash mixer and 1 flocculation mixer. In the DAF system, air is introduced into the water so that small air bubbles attach to particles. This causes the solids to float to the surface where they are removed by skimming. Chemicals are used to increase the efficiency. This industry discharges about 32,500 gallons per day.

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Hot Springs NPDES #: AR0033880

Name, address and phone number of industry:
ARKEX, Inc 153 Extrusion Place (501) 262-6603

Type of industry: 40CFR467 Aluminum Extruder
(Include regulatory citation if CIU)

Date/Time of visit: August 27, 2008 from 1:24 to 1:32 pm

Industry contacts: (Not Applicable)

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

Additional comments:

Plant Closed

Visit conducted by: Torrence/Bohme/Brunson

Date: 9-19-08


(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Hot Springs NPDES #: AR0033880

Industry name: ARKEX, Inc

Additional comments:

INDUSTRY DESCRIPTION

Plant Closed

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Hot Springs NPDES # AR0033880

Name, address and phone number of industry:

Mid-America Distillations 847 Blacksnake Road 71913
(501)767-7776 ext 23

Type of industry: 40CFR437 Centralized Waste Treater
(Include regulatory citation if CIU)

Date/Time of visit: August 27, 2008 from 1:44 to 2:53 pm

Industry contacts: Keith Mangham, Plant Manager

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

Additional comments: 1. Due to the nature of CWTs they have inherent P2 activities in their main processes (i.e., recycling spent solutions).

(See back for industry description)

Visit conducted by: Torrence/Brunson

Date: 9-19-08


(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Hot Springs NPDES #: AR0033880

Industry name: Mid-America Distillations

Additional comments:

INDUSTRY DESCRIPTION

Mid-America Distillations, Inc is a 40CFR437 Centralized Waste Treater that refines used petroleum products and specialty products. Products are recovered and returned to the customers for reuse in the generating process, blended into other products or used as a substitute for virgin material. Products are transported by tanker and/or rail cars. Any water in the products is removed through distillation; this water is transported off site by tanker or treated in the treatment process. Water is pumped from the process area and/or scrubber system into a oily water separator tank. The oil is pumped to a fuel oil tank and the water is a emulsion separator tank. This emulsion is treated with sulfuric acid. The oil from this tank is pumped also to the fuel oil tank. The water is pumped from this separator to a pH adjustment tank for metals removal. The flocculent is added during agitation. After agitation, a polymer is added to cause settling. The water is pumped through a filter press coated with diatomaceous earth to remove solids. After this process, the water is discharged into the city's collection system. The dewatered sludge is drummed and shipped. This industry discharges about 1320 gals/day.

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Hot Springs NPDES #: AR0033880

Name, address and phone number of industry:

Airborne Nacelle Services, Inc. 115 Centennial Dr 71913
(501) 262-1555 Ext. 132

Type of industry: 40CFR433 Metal Finisher

(include regulatory citation if CIU)

Date/Time of visit: August 27, 2008 from 3:00 to 3:45 pm

Industry contacts: Ed Allbritton & Rob Rostan, Facilities Mgrs

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

Additional comments:

1. Airborne is currently sampling both regulated process and sanitary wastewater streams. Airborne is confirm that the sanitary wastestream is a "de minimis" stream.
2. The auditors suggested that Airborne reuse rinse water before discharging to POTW.

(See back for industry description)

Visit conducted by: Torrence/Brunson Date: 9-19-08


(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Hot Springs NPDES #: AR0033880

Industry name: Airborne Nacelle Services, Inc

Additional comments:

INDUSTRY DESCRIPTION

Airborne is a 40CFR433 categorical industry that repairs aircraft structural parts. Parts are disassembled, repaired and/or overhauled in accordance with the manufacturer's specifications and FAA air directives. These parts require abrasive blasting, sheet metal repair, priming and painting, core replacement. The etch line is used to phosphatize and anodize parts. Process water comes from three DI rinse tanks, three pre-rinse tanks, one Phosphoric anodize tank, one Deoxide Amchem tank and one clean ridoline tank. The treatment process is design to remove specific pollutants from the process water before the water is discharged to the collection system. The treatment process consist of a rinse water collection system, one 900 gal chrome reduction tank, one 900 gal pH neutralization tank, flocculation section, 40 gpm clarifier, one 2500 gal sludge thickening tank and a filter press. The reaction tanks are used to pre-treat separate chrome or acid streams to precipitate the metals. The metals are removed from the solution by reducing hexavalent to trivalent chrome and adjusting pH. Hexavalent chrome is reduced to trivalent by addition of sodium metabisulfite. The pH in the acid system is controlled by a pH meter and chemical feed pumps which pump liquid caustic or sulfuric acid, as required. In addition to the chemicals that are added, other chemicals may be added which are flow dependent. The chemicals may be a flocculating agent or a polymer, which is added to the flash mixer. Sludge settles out in the clarifier. The sludge is pumped into a filter press for dewatering and disposal as hazardous waste. The water that overflows from the clarifier is discharged to the city's collection system. The industry discharges about 15,500 gallons per day.



City of Hot Springs
Municipal Utilities
WWTP
320 Davidson Drive
Hot Springs, AR 71902
501-262-1881
501-262-0339 fax

August 19, 2008

National Park Medical Center
Attn: Noah Williams
1910 Malvern Ave.
Hot Springs, AR 71901

Re: Notice of Violation

Dear Mr. Williams,

This is to inform you that a grab sample was collected on July 22, 2008. The laboratory result revealed the parameter Oil & Grease at 300 mg/l. This exceeds the 150 mg/l maximum limit allowed by your industry's discharge permit. This constitutes a violation of the daily maximum and monthly average. An explanation in accordance to your discharge permit must be submitted to this office within ten (10) days concerning this matter.

If you have any questions and/or comments, please contact this office at 262-1881 ext 15. Thank you.

Sincerely,

Dennis R. Brunson
Pretreatment Coordinator

C: Ron Wacaster, Facilities Operations Manager
Steve Mallett, Utilities Director

A - 1/1

Hot Springs Municipal Utilities
Discharge Permit

Industry: Triumph Fabrications-Hot Springs

Mailing Address: 1923 Central Ave.

Representative: Michael Corballis

Title: Environmental Manager

Permit: C-0003

The above industry is authorized to discharge industrial wastewater into Hot Springs Municipal Utilities Collection System at Nevada and Kay St. in accordance with any applicable provisions of the City of Hot Springs Ordinance 4577, (EPA) Environmental Protection Agency Regulation 40 CFR 403, any applicable provisions of (ADEQ) Arkansas Department of Environmental Quality and other conditions set forth in this permit.

This permit shall become effective 2 July 2008 and shall expire 1 July 2011.


Pretreatment Coordinator

B- 1/9

SECTION 1 WASTEWATER DISCHARGE PROHIBITIONS

- A. The industry shall not discharge the following substances into the Hot Springs Municipal Utilities collection system.
- a. Any liquids, solids or gases which by reason of their nature or quantity are or may be sufficient either alone to cause an explosion or be injurious in any other way to the wastewater treatment facility, the operation of the wastewater treatment facility or the collection system. Prohibited materials include, but not limited to: gasoline, kerosine, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, and sulfides and any other substances which the City, States or EPA has deemed a fire hazard to the system.
 - b. Solids or viscous substances which may cause obstruction or interference with the operation of the wastewater treatment facility such as, but not limited to greases, garbage with a particle greater than one half (1/2") in any dimensions, animal guts, or tissues, paunch manure, bones, hair, hides, or fleshings, entrails, whole blood, feathers, ashes, cinders, sand, spent hops, waste paper, wood plastics, gas, tar asphalt residues from refining, or processing of fuel or lubricating oil, mud, glass grinding or polishing wastes.
 - c. Any wastewater having a pH of less than 6.0 s.u. or greater than 11.0 s.u. or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the wastewater collection system and treatment facility.
 - d. Any waste containing toxic pollutants in sufficient quantity, either singularly or by reaction with other pollutants to injure or interfere with any wastewater treatment process, constitutes a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or exceed the limitations set forth in a categorical pretreatment standard.
 - e. Any noxious or malodorous liquids, gases or solids which either singularly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry for maintenance and repair.
 - f. Any substance which may cause the POTW'S effluent or any product of the POTW such as residues, sludges or scum to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the treatment facility cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the solids waste disposal act, or state criteria applicable to the sludge management method being used.

B- 2/9

- g. Any substance which will cause the POTW to violate it's NPDES and/or state disposal system permits or the receiving water quality standards.
- h. Any wastewater substance with objectionable color not removed in the treatment process such as, but not limited to, waste and vegetable tanning solutions.
- i. Any wastewater substance having a temperature which will inhibit biological activity at the POTW treatment facility resulting in interference, but in no case wastewater with a temperature at the introduction into the POTW which exceed 40 degrees centigrade (104 fahrenheit) unless approval from the control authority is granted to discharge at a higher temperature.
- j. Any pollutants, including oxygen demanding pollutants released and/or pollutant concentration which a industry knows or has reason to know will cause interference to the treatment facility. In no case shall a slug load have a flow rate containing a concentration or quantities of pollutants that exceed for anytime period longer than what is determined by the control authority at the time of discharge.
- k. Any wastewater substance containing any radioactive waste or isotopes of such half-life or concentration as may exceed limits established by the control authority in compliance with applicable state or federal regulations.
- l. Any wastes which causes a hazard to human life or creates a public nuisance.

SECTION 2 WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

A. The industry shall not exceed the limitations allowed by each parameter listed below.

<u>Parameter</u>	<u>Daily Max. (mg/l)</u>	<u>Monthly Ave. (mg/l)</u>	<u>Sample Type</u>
T Cadmium	0.69	0.26	24hr Composite
T Chromium	2.77	1.71	24hr Composite
T Copper	3.38	2.07	24hr Composite
T Lead	0.69	0.43	24hr Composite
T Nickel	3.98	2.38	24hr Composite
T Silver	0.43	0.24	24hr Composite
T Zinc	2.61	1.48	24hr Composite
T Cyanide	1.20	0.65	Grab

Total Toxic Organics (TTO) 2.13

- B. The industry shall collect a sample and have it analyze by an approved laboratory for metal parameters listed in section 2-A at least but not limited to twice per week. Cyanide will be analyzed twice per month. Each sample will be collected at the industry's designated sampling point: sampling port next to clarifier inside of building 13 facility east of the preliminary treatment process.
- C. The control authority will monitor the industry's wastestream for parameters listed in section 2-A at least but not limited to twice per year.
- D. The control authority may monitor the industry's wastestream for other pollutants of concern.
- E. The industry will measure its regulated wastestream and any unregulated wastestream with control authority approved flow measuring device (s). Restroom wastestreams are exempted from this requirement.

B- 4/9

SECTION 3 REPORTING REQUIREMENTS

- A. The industry shall notify the control authority immediately of any accidental spill or slug discharge. The notification shall include the location of the discharge, type of waste, concentration, volume and corrective actions taken. Notification shall initially be made by telephone to 262-1881. Within five (5) days of notification, the industry will submit a detailed report describing the cause of the discharge and action to be taken. Preventive measures should be included to prevent future occurrence.
- B. The industry shall notify the control authority within twenty-four (24) hours after discovering any upsets in operations which results in the industry being temporary out of compliance. A detailed report shall be submitted to the control authority within five (5) working days of notification and shall describe the cause of the upset and its impact on the industry's compliance status, the duration and extent of the compliance, including quantities and concentrations, dates, times of the noncompliance, and if noncompliance is continuing, when compliance is reasonably expected to occur, and all steps taken or to be taken to prevent reoccurrence.
- C. The industry shall notify the control authority prior to the introduction of new wastewater or pollutants, any substantial change in the volume or characteristic of the wastewater being discharged to the collection system, or any new construction or process modifications involving plumbing changes. This notification shall be written and sent to the control authority for approval before any changes can occur.
- D. The industry will submit monthly self monitoring reports. This report will contain a certification statement, laboratory analyses of parameters listed in section 2-A and monthly average and daily maximum flow of effluent. All monitoring and laboratory analyses must be performed according to 40 CFR 136 or EPA approved standard methods. Monthly reports will be submitted to the control authority within fifteen (15) days after the last day of the monitoring month.
- E. Any pollutant that is monitored more frequently than required by section 2-B of this permit, the results of this monitoring will be included in the monthly report.
- F. The industry will notify the control authority of any violations of the pretreatment standards specified in section 2-A of this permit. If sampling performed by the industry indicates a violation, the industry will notify the control authority by telephone within one (1) business day of the first indication of violation (s).
- G. All written reports required by this permit will be submitted to the following address: Hot Springs Municipal Utilities / 320 Davidson Dr. / Hot Springs, Ar. 71902.

B-5/9

SECTION 4 STANDARD CONDITIONS

- A. The industry shall comply with all general prohibitive discharge standards listed in section 1 of this permit.
- B. The industry shall allow duly authorized representatives of the control authority, bearing the proper credentials and identification to enter the premises at reasonable hours for the purpose of inspecting, sampling, or records inspection. Reasonable hours are considered anytime the industry is operating any process which results in the discharge of wastewater to the collection system.
- C. The industry shall retain all records relative to monitoring, analysis and operations of any process or treatment system which results in the discharge of wastewater to the collection system for a minimum of three (3) years 40 CFR 403.12[1].
- D. The industry shall not increase the use of potable or process waters or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in section 2 of this permit.
- E. All reports required by this permit shall be sign by a principal executive officer of at least the level of vice-president, or his designee. Where the signatory responsibilities have been delegated, a letter signed by the principal executive officer stating that this responsibility has been delegated and to whom is has been delegated must be submitted to the control authority 40 CFR 403.12[1].
- F. This permit is issued to a specified industry for a specific operation and is not assignable to another discharger or transferable to another location without the prior written approval of the control authority.
- G. The terms and conditions of this permit are subject to modification by the control authority at anytime in response to changes in the pretreatment code, modification or promulgation of new categorical pretreatment standards, State of Arkansas Regulations, and/or issuance of special or administrative orders, any permit modifications which results in new conditions or limitations will include a reasonable time schedule for compliance, if necessary.
- H. This permit may be revoked by the control authority if it is determined that the industry has violated any provision of this permit, City of Hot Springs Pretreatment Code, State of Arkansas Regulations, or EPA Regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application of any report required by this permit shall be cause for permit revocation.

B- 6/9

- I. Failure to resolve any violation of this permit, pretreatment code, State of Arkansas Regulations, or EPA Regulations may result in the control authority seeking applicable fines and penalties as outlined in the City of Hot Springs Pretreatment Code.
- J. The provisions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.
- K. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any invasion of personal rights, nor any infringement of federal, state or local regulation.
- L. The industry shall dispose of any sludge or spent chemicals in accordance with Section 405 of the Clean Water Act and subtitles C and D of the Resource Conservation and Recovery Act, 40 CFR 403.18 [F](2){iii}.
- M. All reports and data related to the requirements of this permit shall be available for public inspection at the Hot Springs Municipal Utilities Wastewater Treatment Facility, 320 Davidson Drive, except for that information that is deemed confidential in accordance with the provision of the pretreatment code.
- N. An expired permit will continue to be effective and enforceable until the permit is reissued if:
 - 1. Industry has submitted a complete permit application at least sixty (60) days to the expiration date if the user's existing permit.
 - 2. The failure to reissue the permit, prior to expiration of the previous permit is not due to any action or failure to act on the part of the industry.
- O. The control authority will conduct an inspection of the industry's facilities and treatment process at least but not limited to once per year.

B-7/9

SECTION 5 SPECIAL CONDITIONS

- A. Concerning TTO monitoring: the industry may submit a Toxic Organic Management Plan for control authority approval. Once the plan has been approved by the control authority and implemented by the industry, monitoring requirements for TTO will be adjusted 40 CFR 433.12.
- B. The industry shall include in its monthly report a certification statement stating that no toxic organics are dumped into its wastestream 40 CFR 433.12{a}.
- C. During composite sample collection, the industry will keep composite sample preserved with ice or refrigeration.
- D. The industry shall have a licensed operator on duty for its waste treatment process. The operator must be licensed by the Arkansas Department of Environmental Quality and receive approved training each year in order to maintain their license.

SECTION 6 PENALTY

- A. STATE OF ARKANSAS: ACT 884 1991; AN ACT TO AMEND ARKANSAS CODE 8-4-103 TO ALLOW GOVERNMENTAL ENTITIES OPERATING PUBLICLY OWNED WASTEWATER TREATMENT WORKS THE AUTHORITY TO COLLECT CIVIL OR CRIMINAL PENALTIES UP TO THE AMOUNT OF ONE THOUSAND DOLLARS (1,000) PER DAY FOR EACH VIOLATION BY INDUSTRIAL USER; AND FOR OTHER PURPOSES.

B- 8/9

SECTION 7 DEFINITION OF SIGNIFICANT NONCOMPLIANCE

Industrial user is in significant noncompliance if its violation meets one or more of the following criteria 40 CFR 403.8:

- A. Chronic violations of wastewater discharge limits, defined as those in which sixty-six(66%)percent or more of all measurements taken during a six (6) month period exceed the daily maximum limits on the average limit for the same pollutant parameters.
- B. Technical Review Criteria (TRC) violations, defines as those in which thirty-three(33%)percent or more of all of the measurements for each pollutant parameter taken during a six(6) month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC. (TRC= 1.4 for BOD, TSS, fats, oil & grease and 1.2 for all other pollutants except pH).
- C. Any other violation of a pretreatment effluent limit (daily maximum limit or longer term average) that the control authority determines has caused alone or in combination with other discharges, interference or pass through including endangering the health of the POTW personnel or the general public.
- D. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW'S exercise or its emergency authority to halt or prevent such a discharge.
- E. Failure to meet within ninety(90)days after the schedule date, compliance schedule milestone contained in a local control mechanism or enforcement and/or for starting construction, completing construction, or attaining final compliance.
- F. Failure to provide within thirty(30)days after the due date required reports, such as baseline monitoring reports, and reports of compliance with compliance schedules.
- G. Failure to accurately report noncompliance.
- H. Any other violation or group of violations which the control authority determines will adversely affect the operation or implementation of the local pretreatment program.

B- 9/9

HOT SPRINGS MUNICIPAL UTILITIES
DISCHARGE PERMIT

Industry: Mid-America Distillations, Inc.

Representative: Keith Mangham

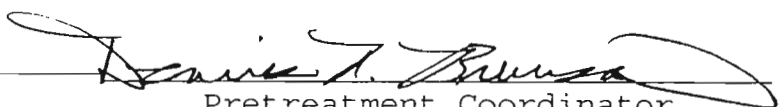
Mailing Address: P.O. Box 2880, Hot Springs, Ar. 71914

Title: Facility Manager

Permit#: C-0006

The above industry is authorized to discharge industrial wastewater into Hot Springs Municipal Utilities' collection system at 700 Blacksnake Road, Hot Springs, Ar. in accordance with any applicable provisions of the City of Hot Springs Ordinance 4577, Environmental Protection Agency (EPA) General Regulation 40 CFR 403, Arkansas Department of Pollution Control & Ecology and other conditions set forth in this permit.

This permit shall become effective 2 March 2008, and shall expire 1 March 2011.


Pretreatment Coordinator

C- 1/11

SECTION 1 WASTEWATER DISCHARGE PROHIBITIONS

- A. The industry shall not discharge the following substances into the Hot Springs Municipal Utilities' collection system.
- a. Any liquids, solids or gases which by reason of their nature or quantity are or may be sufficient alone to cause an explosion or be injurious in any other way to the collection system, wastewater treatment facility or to the operation of the wastewater treatment facility. Prohibited materials include, but not limited to: gasoline, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, sulfides and any other substances which the City, State or EPA has deemed a fire hazard to the system.
 - b. Solids or viscous substances which may cause obstruction or interference with the operation of the wastewater treatment facility such as, but not limited to: greases, garbage with a particle greater than one half inch (1/2) in any dimensions, animal organs or tissues, paunch manure, bones, hair, hides or fleshings, entrails, whole blood, feathers, ashes, cinders, sand, spent hops, waste paper, wood plastics, tar asphalt residues from refining, processing of fuel, lubricating oils, mud, glass grinding or polishing wastes.
 - c. Any wastewater having a pH less than 6.0 s.u. or greater than 11.0 s.u. or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment and/or personnel of the wastewater collection system and treatment facility.
 - d. Any waste containing toxic pollutants in sufficient quantity, either singular or by reaction with other pollutants to injure or interfere with any wastewater treatment process, constitutes a hazard to humans or animals or create a toxic effect in the receiving waters of the POTW, or to exceed the limitations set forth in a categorical pretreatment standard.
 - e. Any noxious malodorous liquids, gases or solids which either singularly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry for maintenance and repair.

C-2/11

- f. Any substance which may cause the POTW'S effluent or any other product of the POTW such as residues, sludges, or scum to be unsuitable for reclamation or reuse or to interfere with the reclamation process. In no case shall a substance discharged to the collection system cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations affecting sludge use or disposal criteria, guidelines or regulations affecting sludge use or disposal development pursuant to the solids waste act or state criteria applicable to the sludge management method being used.
- g. Any substance which will cause the POTW to violate it's NPDES and/or states disposal system permit or the receiving water quality standards
- h. Any wastewater substance with objectionable color not removed in the treatment process such as, but not limited to: dye waste and vegetable tanning solutions.
- i. Any wastewater substance having a temperature which will inhibit biological activity at the POTW treatment facility resulting in interference, but in no case wastewater with a temperature at the introduction into the POTW which exceed 40 degrees centigrade (104 fahrenheit) unless approval from POTW representative is granted to discharge at a higher temperature.
- j. Any pollutants, including oxygen demanding pollutants released and/or pollutant concentration which a industry knows or has reason to believe will cause interference to the POTW treatment facility. In no case shall a slug load have a flow rate or contain concentration or quantities of pollutants that exceed for anytime period longer than what is determined by the POTW representative at the time of discharge.
- k. Any wastewater substance containing any radioactive waste or isotopes of such half-life or concentration as to exceed limits established by the POTW and applicable state or federal regulations.
- l. Any wastes which causes a hazard to human life or create a public nuisance.

C - 3/11

SECTION 2 WASTEWATER DISCHARGE LIMITATION AND MONITORING REQUIREMENTS

A. The industry's wastestream B shall not exceed the categorical limitations allowed by each metal parameter listed below.

<u>Parameter</u>	<u>Daily Max. (mg/l)</u>	<u>Monthly Ave. (mg/l)</u>	<u>Type of Sample</u>
T Chromium	0.947	0.487	24hr Composite
T Copper	0.405	0.301	24hr Composite
T Lead	0.222	0.172	24hr Composite
T Zinc	6.95	4.46	24hr Composite
T Antimony	0.237	0.237	24hr Composite
T Barium	0.427	0.281	24hr Composite
T Cobalt	56.4	18.8	24hr Composite
T Molybdenum	3.50	2.09	24hr Composite
T Tin	0.249	0.146	24hr Composite

B. The industry's wastestream B shall not exceed the categorical limitations allowed by each organic parameter listed below.

<u>Parameter</u>	<u>Daily Max. (mg/l)</u>	<u>Monthly Ave. (mg/l)</u>	<u>Type of Sample</u>
Bis(2-ethylhexyl phthalate	0.267	0.158	24hr Composite
Carbazole	0.392	0.233	24hr Composite
n-Decane	5.79	3.31	24hr Composite
Fluoranthene	0.787	0.393	24hr Composite
n-Octadecane	1.22	0.925	24hr Composite

C - 4/11

C. The industry's wastestream A shall not exceed the categorical limitations allowed by the metal parameter listed below.

<u>Parameter</u>	<u>Daily Max. (mg/l)</u>	<u>Monthly Ave. (mg/l)</u>	<u>Type of Sample</u>
T Molybdenum	1.01	0.965	24Hr Composite

D. The industry's wastestream A shall not exceed the categorical limitations allowed by each organic parameter listed below.

<u>Parameter</u>	<u>Daily Max. (mg/l)</u>	<u>Monthly Ave. (mg/l)</u>	<u>Type of Sample</u>
o-Cresol	1.92	0.561	24hr Composite
p-Cresol	0.698	0.205	24hr Composite
2,3 Dichloroaniline	0.0731	0.0361	24hr Composite
2,4,6 Trichlorophenol	0.155	0.106	24hr Composite

E. The industry's wastestreams A shall not exceed the local limitation allowed by each parameter listed below.

<u>Parameters</u>	<u>Daily Max. (mg/l)</u>	<u>Monthly Ave. (mg/l)</u>	<u>Type of Sample</u>
T Chromium	1.71	0.80	24hr Composite
T Copper	0.45	0.31	24hr Composite
T Lead	0.69	0.43	24hr Composite
T Zinc	2.13	1.48	24hr Composite
T Nickel	1.51	0.78	24hr Composite
COD	10,000	10,000	24hr Composite
Oil & Grease	150	150	Instantaneous Grab

C-5/11

- F. The industry shall monitor its wastestream A at the primary sampling point: effluent discharge point next to cooling tower southeast of treatment process under shed south of main storage building. Twice per quarter monitoring conditions of the industry's wastestream A shall apply to metal pollutant parameters listed in sections 2-C & E of this permit. Twice per year monitoring conditions of the industry's wastestream A shall apply to organic pollutant parameters listed in section 2-D of this permit. Once per month monitoring conditions of the industry's wastestream A shall apply to conventional pollutant parameters listed in section 2-E of this permit.
- G. The control authority will monitor the industry's wastestream for parameters listed in sections 2-C,D,& E randomly. This monitoring may be performed at the industry's primary sampling point. The control authority may also monitor at the industry's secondary sampling point: outfall northside inside of manhole next to railroad track and fence south of facility on the Property of Delta Plastics, Inc.
- H. The control authority may monitor the industry's wastestream A for other pollutants of concern.
- I. All monitoring and sampling analyses must be performed in accordance with 40 CFR 136 or EPA approved standard methods.
- J. The daily maximum pollutant loading will be 1,500lbs and monthly average of 1,500lbs for chemical oxygen demand parameter.

SECTION 3 SPECIAL CONDITIONS

- A. If the industry decides to start discharging from wastestream B, the control authority must be notified in writing. Modifications to the current permit will be made to reflect all monitoring requirements and/or conditions. Until such time, there will be a zero discharge on wastestream B. This zero discharge shall be reported in the monthly reports to the control authority.
- B. The industry shall have a licensed operator on duty for its waste treatment process. The operator must be licensed by the Arkansas Department of Environmental Quality and receive approved training each year in order to maintain their license.

C-6/11

SECTION 4 REPORTING REQUIREMENTS

- A. The industry shall notify the control authority immediately of any accidental spill or slug discharge. The notification shall include the location of the discharge, type of waste, concentration, volume and corrective action taken. Notification shall initially be made by telephone to 262-1881. Within five (5) days of notification, the industry will submit a detailed written report describing the cause of the discharge and actions taken. Preventive measures should be included to prevent future occurrence.
- B. The industry shall notify the control authority within twenty four (24) hours after discovering any upset in operations which results in the industry being temporarily out of compliance. A detailed written report shall be submitted to the control authority within five (5) working days of notification and shall describe the cause of upset and its impact on the industry's compliance status, the duration and extent of the noncompliance, including quantities and concentrations, dates and times of noncompliance, if noncompliance is continuing, when compliance is reasonably expected to occur, and all steps taken or to be taken to prevent reoccurrence.
- C. The industry shall notify the control authority prior to the introduction of new wastewater or pollutants, any substantial change in the volume or characteristic of the wastewater being discharged to the collection system, or any new construction or process modifications involving plumbing changes. This notification shall be written and sent to the control authority for approval before any changes can occur.
- D. All written reports required by this permit will be submitted to the following address: Hot Springs Municipal Utilities / 320 Davidson Dr. / Hot Springs, Ar. 71902.
- E. A certification statement reviewed and signed by an authorized representative indicating whether pretreatment standards are being met on a consistent basis, and, if not, whether additional operation and maintenance and/or additional pretreatment is required for the industrial user to meet the pretreatment standards and requirements. This certification will be included in each monitoring report sent to the control authority [40 CFR 403.12(b)(viii)(6)].

C-7/11

- F. The industry will submit a monthly self monitoring report for the appropriate parameters monitored in accordance to conditions outlined in section 2-D of this permit. This report will also contain daily and monthly ave flows for the reporting month. This report will be due within fifteen (15) days after the last day of there reporting month.

SECTION 5 STANDARD CONDITIONS

- A. The industry shall comply with all the general prohibitive discharge standards outlined in section 1 of this permit.
- B. The industry shall adhere to the slug/spill prevention plan submitted to the control authority. Emergency notification signs shall be located in the work area.
- C. The industry shall allow duly authorized representatives of the control authority, bearing proper credentials and identification, to enter the premises at reasonable hours for the purpose of inspecting, sampling or records inspection. Reasonable hours are considered anytime the industry is operating any process which results in the discharge of wastewater to the collection system.
- D. The industry shall not increase the use of potable or process water or, in any way, attempt to dilute a discharge as partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in section 2 of this permit.
- E. All reports required by this permit shall be sign by a principal executive officer of at least the level of vice president, or his designee. Where the signatory responsibilities have been delegated, a letter signed by the principal executive officer stating that this responsibility has been delegated and to whom it has been delegated to. This letter must be submitted to control authority. [40 CFR 403.12 (1)].
- F. The industry shall retain all records relative to monitoring, analyses and operations of any process or treatment system for a minimum of three (3) years (40 CFR 403.12{1}).
- G. This permit is issued to the industry for a specific operation and is not assignable to another discharger or transferable to another location without the prior written approval of the control authority.

C- 8/11

- H. The terms and conditions of this permit are subject to modification by the control authority at any time in response to the changes in the pretreatment code, modification or promulgation of any federal regulation including promulgation of new categorical pretreatment standards, state regulations, and/or issuance of special or administrative orders. Any permit modifications which results in new conditions or limitations will include a reasonable time schedule for compliance, if necessary.
- I. This permit may be revoked by the control authority if it is determined that the industry has violated any provision of this permit City of Hot Springs Sewer Use Ordinance, State of Arkansas regulations, or EPA regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application of any report required by this permit shall be cause for permit revocation.
- J. Failure to resolve any violation of this permit, City of Hot Springs Sewer Use Ordinance, State of Arkansas Regulations, EPA regulations may result in the control authority seeking applicable fines and penalties as outlined in the City of Hot Springs Sewer Use Ordinance.
- K. The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.
- L. The issuance of this permit does not convey any property rights in either real or personal property or any exclusive privileges, nor does it authorized any invasion of personal rights, nor any infringement of federal, state, or local regulations.
- M. The industry shall dispose of any sludge or spent chemicals in accordance with Section 405 of the Clean Water Act, [40 CFR 403.8(f)(2)(iii)].
- L. All reports and data related to the requirements of this permit shall be available for public inspection at the Hot Springs Municipal Utilities Wastewater Treatment Facility, 320 Davidson Dr., except for that information that is deemed confidential in accordance with [40 CFR 403.14 (2)].

C-9/11

M. An expired permit will continue to be effective and enforceable until the permit is reissued if:

1. Industry has submitted a complete permit application at least sixty (60) days prior to the expiration date of the user's existing permit.
2. The failure to reissue the permit, prior to expiration of the previous permit is not due to any action or failure to act on the part of the industry.

N. The control authority will conduct an inspection of the industry's facilities, treatment process and records related to it's wastestream at least "but not limited to" once per year.

SECTION 6 PENALTY

A. STATE OF ARKANSAS: ACT 884 1991; AN ACT TO AMEND ARKANSAS CODE S 8-4-103 TO ALLOW GOVERNMENTAL ENTITIES OPERATING PUBLICLY OWNED WASTEWATER TREATMENT WORKS THE AUTHORITY TO COLLECT CIVIL OR CRIMINAL PENALTIES UP TO THE AMOUNT OF ONE THOUSAND DOLLARS (1,000) PER DAY FOR EACH VIOLATION BY INDUSTRIAL USER AND FOR OTHER PURPOSES.

C- 10/11

SECTION 7 DEFINITION OF SIGNIFICANT NONCOMPLIANCE

Industrial user is in significant noncompliance if its violation meets one or more of the following criteria [40 CFR 403.8]:

- A. Chronic violations of wastewater discharge limits, defined as those in which sixty-six(66%) percent or more of all measurements taken during a six (6) month period exceed the daily maximum limits or the average limit for the same pollutant parameters.
- B. Technical Review Criteria (TRC) violations, defines as those in which thirty-three(33%)percent or more of all of the measurements for each pollutant parameter taken during a six (6) month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC.(TRC = 1.4 for BOD, TSS Fats, Oil & Grease and 1.2 for all other pollutants except pH).
- C. Any other violation of a pretreatment effluent limit (daily maximum limit or longer term average) that the control authority determines has caused alone or in combination with other discharges, interference or pass through including endangering the health of the POTW personnel or the general public.
- D. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such a discharge.
- E. Failure to meet within ninety (90) days after the schedule date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance.
- F. Failure to provide within thirty (30) days after the due date required reports, such as baseline monitoring reports, and reports of compliance with compliance schedules.
- G. Failure to accurately report noncompliance.
- H. Any other violation or group of violations which the control authority determines will adversely affect the operation or implementation of the local pretreatment program.

C-11/11

Hot Springs Municipal Utilities
Discharge Permit

Industry: Alliance Rubber Co.

Mailing Address: P.O. Box 730

Representative: Trevor Hamilton

Title: Safety/Training Coordinator

Permit: C-0004

The above industry is authorized to discharge industrial wastewater into Hot Springs Municipal Utilities Collection System at 210 Carpenter Dam Rd. in accordance with any applicable provisions of the City of Hot Springs Ordinance 4577, (EPA) Environmental Protection Agency Regulation 40 CFR 403, any applicable provisions of (ADEQ) Arkansas Department of Environmental Quality and other conditions set forth in this permit.

This permit shall become effective 2 March 2008 and shall expire 1 March 2011.


Pretreatment Coordinator

D-1/7

SECTION 1 WASTEWATER DISCHARGE PROHIBITIONS

- A. The industry shall not discharge the following substances into the Hot Springs Municipal Utilities collection system.
- a. Any liquids, solids or gases which by reason of their nature or quantity are or may be sufficient either alone to cause an explosion or be injurious in any other way to the wastewater treatment facility, the operation of the wastewater treatment facility or the collection system. Prohibited materials include, but not limited to: gasoline, kerosine, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, and sulfides and any other substances which the City, States or EPA has deemed a fire hazard to the system.
 - b. Solids or viscous substances which may cause obstruction or interference with the operation of the wastewater treatment facility such as, but not limited to greases, garbage with a particle greater than one half ($\frac{1}{2}$ ") in any dimensions, animal guts, or tissues, paunch manure, bones, hair, hides, or fleshings, entrails, whole blood, feathers, ashes, cinders, sand, spent hops, waste paper, wood plastics, gas, tar asphalt residues from refining, or processing of fuel or lubricating oil, mud, glass grinding or polishing wastes.
 - c. Any wastewater having a pH of less than 6.0 s.u. or greater than 11.0 s.u. or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment, and/or personnel of the wastewater collection system and treatment facility.
 - d. Any waste containing toxic pollutants in sufficient quantity, either singularly or by reaction with other pollutants to injure or interfere with any wastewater treatment process, constitutes a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or exceed the limitations set forth in a categorical pretreatment standard.
 - e. Any noxious or malodorous liquids, gases or solids which either singularly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry for maintenance and repair.

- f. Any substance which may cause the POTW'S effluent or any product of the POTW such as residues, sludges or scum to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the treatment facility cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the solids waste disposal act, or state criteria applicable to the sludge management method being used.
- g. Any substance which will cause the POTW to violate it's NPDES and/or state disposal system permits or the receiving water quality standards.
- h. Any wastewater substance with objectionable color not removed in the treatment process such as, but not limited to, waste and vegetable tanning solutions.
- i. Any wastewater substance having a temperature which will inhibit biological activity at the POTW treatment facility resulting in interference, but in no case wastewater with a temperature at the introduction into the POTW which exceed 40 degrees centigrade (104 Fahrenheit) unless approval from the control authority is granted to discharge at a higher temperature.
- j. Any pollutants, including oxygen demanding pollutants released and/or pollutant concentration which a industry knows or has reason to know will cause interference to the treatment facility. In no case shall a slug load have a flow rate containing a concentration or quantities of pollutants that exceed for anytime period longer than what is determined by the control authority at the time of discharge.
- k. Any wastewater substance containing any radioactive waste or isotopes of such half-life or concentration as may exceed limits established by the control authority in compliance with applicable state or federal regulations.
- l. Any wastes which causes a hazard to human life or creates a public nuisance.

D- 3/7

SECTION 2 WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

A. The industry shall not exceed the local limitations allowed by each metal parameter listed below.

<u>Parameter</u>	<u>Daily Max. (mg/l)</u>	<u>Monthly Ave. (mg/l)</u>	<u>Sample Type</u>
T Copper	3.38	2.07	24hr Composite
T Zinc	2.61	1.48	24hr Composite
T Lead	0.69	0.43	24hr Composite
T Chromium	2.77	1.71	24hr Composite
T Cadmium	0.59	0.26	24hr Composite
T Nickel	3.98	2.38	24hr Composite
T Silver	0.49	0.24	24hr Composite
T Mercury	0.76	0.03	24hr Composite

B. The industry shall not exceed the local limitations allowed by each conventional parameter listed below.

COD	5,000	5,000	24hr Composite
Oil & Grease	150	150	Grab

C. The industry shall collect a sample and have it analyzed by an approved laboratory for parameters listed in section 2-A at least but not limited to twice per quarter and parameters listed in section 2-B at least but not limited to twice per month. Monitoring location will be upper outfall inside of manhole next to ditch and fence on the westside of facility.

D. The control authority will collect a sample and have it analyzed by an approved laboratory for pollutant parameters, regulated by daily and monthly limits listed in section 2-A at least but not limited twice per year.

E. The control authority may monitor the industry's wastestream for other pollutants of concern.

D-4/7

SECTION 3 REPORTING REQUIREMENTS

- A. The industry shall notify the control authority immediately of any accidental spill or slug discharge. The notification shall include the location of the discharge, type of waste, concentration, volume and corrective actions taken. Notification shall initially be made by telephone to 262-1881. Within five (5) days of notification, the industry will submit a detailed report describing the cause of the discharge and action to be taken. Preventive measures should be included to prevent future occurrence.
- B. The industry shall notify the control authority within twenty-four (24) hours after discovering any upsets in operations which results in the industry being temporary out of compliance. A detailed report shall be submitted to the control authority within five (5) working days of notification and shall describe the cause of the upset and its impact on the industry's compliance status, the duration and extent of the compliance, including quantities and concentrations, dates, times of the noncompliance, and if noncompliance is continuing, when compliance is reasonably expected to occur, and all steps taken or to be taken to prevent reoccurrence.
- C. The industry shall notify the control authority prior to the introduction of new wastewater or pollutants, any substantial change in the volume or characteristic of the wastewater being discharged to the collection system, or any new construction or process modifications involving plumbing changes. This notification shall be written and sent to the control authority for approval before any changes can occur.
- D. The industry will submit a monthly self monitoring report for the appropriate parameters monitored in accordance to conditions outlined in section 2-C of this permit. This report will also contain daily and monthly ave flows for the reporting month. All monthly self monitoring reports will be submitted to the control authority within fifteen (15) days after the last day of the monitoring month.
- E. Any pollutant that is monitored more frequently than required by section 2-B of this permit, the results of this monitoring will be included in the monthly report.

D-5/7

- F. The industry will notify the control authority of any violations of the pretreatment standards specified in section 2-A of this permit. If sampling performed by the industry indicates a violation, the industry will notify the control authority by telephone within one (1) business day of the first indication of violation (s).
- G. All required written reports will be submitted to Hot Springs Municipal Utilities, 320 Davidson Dr., Hot Springs, Ar. 71902.

SECTION 4 STANDARD CONDITIONS

- A. The industry shall comply with all general prohibitive discharge standards listed in section 1 of this permit.
- B. The industry shall allow duly authorized representatives of the control authority, bearing the proper credentials and identification to enter the premises at reasonable hours for the purpose of inspecting, sampling, or records inspection. Reasonable hours are considered anytime the industry is operating any process which results in the discharge of wastewater to the collection system.
- C. The industry shall retain all records relative to monitoring, analysis and operations of any process or treatment system which results in the discharge of wastewater to the collection system for a minimum of three (3) years 40 CFR 403.12[1].
- D. The industry shall not increase the use of potable or process waters or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in section 2 of this permit.
- E. All reports required by this permit shall be sign by a principal executive officer of at least the level of vice-president, or his designee. Where the signatory responsibilities have been delegated, a letter signed by the principal executive officer stating that this responsibility has been delegated and to whom is has been delegated must be submitted to the control authority 40 CFR 403.12[1].
- F. This permit is issued to a specified industry for a specific operation and is not assignable to another discharger or transferable to another location without the prior written approval of the control authority.

D-6/7

SECTION 7 DEFINITION OF SIGNIFICANT NONCOMPLIANCE

Industrial user is in significant noncompliance if its violation meets one or more of the following criteria 40 CFR 403.8:

- A. Chronic violations of wastewater discharge limits, defined as those in which sixty-six(66%)percent or more of all measurements taken during a six (6) month period exceed the daily maximum limits on the average limit for the same pollutant parameters.
- B. Technical Review Criteria (TRC) violations, defines as those in which thirty-three(33%)percent or more of all of the measurements for each pollutant parameter taken during a six(6) month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC.(TRC= 1.4 for BOD, TSS, fats, oil & grease and 1.2 for all other pollutants except pH).
- C. Any other violation of a pretreatment effluent limit (daily maximum limit or longer term average) that the control authority determines has caused alone or in combination with other discharges, interference or pass through including endangering the health of the POTW personnel or the general public.
- D. Any discharge of a pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the POTW's exercise or its emergency authority to halt or prevent such a discharge.
- E. Failure to meet within ninety(90)days after the schedule date, compliance schedule milestone contained in a local control mechanism or enforcement and/or for starting construction, completing construction, or attaining final compliance.
- F. Failure to provide within thirty(30)days after the due date required reports, such as baseline monitoring reports, and reports of compliance with compliance schedules.
- G. Failure to accurately report noncompliance.
- H. Any other violation or group of violations which the control authority determines will adversely affect the operation or implementation of the local pretreatment program.

D-7/7

HOT SPRINGS MUNICIPAL UTILITIES
PERMIT APPLICATION FORM

Note: Please read all attached instructions prior to completing this application.

SECTION A- GENERAL INFORMATION

I. Facility Name Triumph Fabrications Hot Springs

a. Operator's Name Tony Johnson

b. Is the operator identified in 1.a, the owner of the facility?

Yes [] No [X]

If no, provide the name and address of the operator and submit a copy of the

contract and/or other documents indicating the operator's scope of responsibility for the facility. Triumph

2. Facility Address:

Street: 115 Nevada.

City: Hot Springs

State: AR

Zip: 71901

3. Business Mailing Address:

Street or P.O. Box: 1923 Central Ave

City: Hot Springs

State: AR

Zip: 71901

4. Designated signatory authority of the facility:

[Attach similar information for each authorized representative

Name: Tony Johnson

Title: President

Address: 1923 Central Ave.

City: Hot Springs AR 71901

Phone: 501-622-4281

E - 1/27

Name: Rob Rostan
Title: Facilities Manager
Address: 1923 Central Ave
City: Hot Springs AR 71901
Phone: 501 622-4308

Name: Michael L. Corballis
Title: Environmental Manager
Address: 1923 Central Ave.
City: Hot Springs AR 71901
Phone: 501-622-4267 Mobile 501-617-0240

5. Designated facility contact:

Name: Michael Corballis
Title: Environmental Manager
Phone: Office 501-622-4267 Mobile 501-617-0240

SECTION B- BUSINESS ACTIVITY

1 If your facility employs or will be employing processes in any of the industrial categories or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), place a check beside the category of business activity (check all that apply).

Industrial Categories

- ☐ Aluminum Forming
- ☐ Asbestos Manufacturing
- ☐ Battery Manufacturing
- ☐ Can Making
- ☐ Carbon Black
- ☐ Coal Mining
- ☐ Coil Coating
- ☐ Copper Forming
- ☐ Electric and Electronic Components Manufacturing
- ☒ Electroplating Anodizing Aluminum
- ☐ Feedlots
- ☐ Fertilizer Manufacturing
- ☐ Foundries (Metal Molding and Casting)
- ☐ Glass Manufacturing
- ☐ Grain Mills
- ☐ Inorganic Chemicals
- ☐ Iron and Steel
- ☐ Leather Tanning and Finishing
- ☐ Metal Finishing
- ☐ Nonferrous Metals Forming
- ☐ Nonferrous Metals Manufacturing
- ☐ Organic Chemicals Manufacturing
- ☐ Paint and Ink Formulating
- ☐ Paving and Roofing Manufacturing
- ☐ Pesticides Manufacturing
- ☐ Petroleum Refining
- ☐ Pharmaceutical
- ☐ Plastic and Synthetic Materials Manufacturing
- ☐ Plastics Processing Manufacturing
- ☐ Porcelain Enamel
- ☐ Pulp, Paper, and Fiberboard Manufacturing
- ☐ Rubber
- ☐ Soap and Detergent Manufacturing
- ☐ Steam Electric
- ☐ Sugar Processing
- ☐ Textile Mills
- ☐ Timber Products

A facility with processes inclusive in these business areas may be covered by Environmental Protection Agency's (EPA) categorical pretreatment standards. These facilities are termed "categorical users".

2. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

Triumph Fabrications Hot Springs manufactures Aircraft Parts. In the manufacturing process the following operations Are used: Cleaning, Masking, Chemical Milling Aluminum, Titanium, Anodizing, Conversion Coating, painting, and Heat treating

3. Indicate applicable Standard Industrial Classification (SIC) for all processes. If more than one applies, list in descending order of importance.

A 3728

b.

c.

d.

e.

f.

4. Product Volume

PRODUCT YEAR (Brandname) (Level with others) (and no u.l)	PAST CALENDER YEAR Amounts Per Day (Daily Units)		ESTIMATE THIS CALENDER Amounts Per Day (Daily Units)	
	Average	Maximum	Average	Maximum
Air Craft Parts	NA*	NA*	NA*	NA*

* Not Available Production is Measures in sales \$ per Month

SECTION C- WATER SUPPLY

1. Water Sources: *(Check as many as are applicable)*

☐ Private Well

☐ Surface Water

☒ Municipal Water Utility *(Specify City):* Hot Springs

☐ Other *(Specify):* _____

2. Name on the water bill:

Name: Chem-Fab Corporation

Street: 115 Nevada Ave

City: Hot Springs

State: AR

Zip: 71901

3. Water service account number _____

4. List average water usage on premises:

(New facilities may estimate)

Type	Average Water Usage (GPD)	Indicate Estimate (E) or Measured (M)
Contact cooling water		
Non-contact cooling water		
Boiler feed		
Process	58,000	E
Sanitary	400	E
Air pollution control	14,400	E
Contained in product		
Plant/equipment washdown		
Irrigation/lawn watering		
Other		
Total	72,800	E

SECTION D- SEWER INFORMATION

1. a. For an exiting business:

Is the building presently connected to the public sanitary sewer system?

☒ Yes: Sanitary sewer account number _____

☐ No: Have you applied for a sanitary sewer hookup? ☐ Yes ☐ No

b. For new business: Will you be occupying an exiting vacant building (such as in an industrial park)? ☐ Yes ☐ No

Have you applied for a building permit if a new facility will be constructed? ☐ Yes ☐ No

Will you be connected to the public sanitary sewer system? ☐ Yes ☐ No

2. List size, descriptive location, and flow of each facility sewer which connects to the city's sewer system. (If *more than three*, attach additional information on another sheet).

Sewer Size	Descriptive Location of Sewer Connection or discharge Point	Average Flow (GPD)
6"	See Facility Drawing	56,800

SECTION E - WASTEWATER DISCHARGE INFORMATION

1. Does (or will) this facility discharge any wastewater other than from restroom to the city sewer?

☒ Yes, If the answer to this question is yes, complete the remainder of the application.

☐ No, If the answer to this question is no, skip to Section 1.

Provide the following information on wastewater flow rate. [New facilities may estimate]

a. Hour/Day Discharged (e.g., 8 hours/day):

M 24 T 24 W 24 TH 24 F 24 SA 24 SU 24

b. Hours of Discharge (e.g., 9 a.m. to 5 p.m.)

M T W TH F SA SU

c. Peak hourly flow rate (GPD) 116,800

d. Maximum daily flow rate (GPD): 80,000

e. Annual daily average (GPD): 58,400

3. If batch discharge occurs or will occur, indicate:[New facilities may estimate]
- Number of batch discharges NA per day
 - Average discharge per batch NA (GPD)
 - Time of batch discharges NA at
(days of weeks) (hours of day)
 - Flow rate NA gallons/minute
 - Percent of total-discharge NA
4. Schematic Flow Diagram -- For each major activity in which wastewater is or will be generated, draw a diagram of the flow of materials, products, water, and wastewater from the start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate waste streams. Include the average daily volume and maximum daily volume of each waste stream [*new facilities may estimate*]. If estimates are used for flow data this must be indicated. Number each unit process having wastewater discharges to the community sewer. Use these numbers when showing this unit processes in the building layout in Section H. This drawing must be certified by a State Registered Professional Engineer.

Facilities that checked activities in question 1 of Section B are considered categorical industrial users and should skip to question 6.

5. For Non-Categorical Users Only: List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each plant process. Include the reference number from the process schematic that corresponds to each process, [*New facilities should provide estimates for each discharge*].

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

Answer questions 6 & 7 only if you are subject to categorical pretreatment standards.

6. For Categorical Users: Provide the wastewater discharge flows for each of your processes or proposed processes. Include the reference number from the process schematic that corresponds to each process. [New facilities should provide estimates for each discharge].

No.	Regulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
1	Chem-Milling/Anodizing	58,400	80,000	Continuous
2	Scrubbers	14,400	14,400	Continuous

No.	Unregulated Process	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)
1	Sanitary Sewer	400		Continuous

7. For Categorical Users Subject to Total Toxic Organic (TTO) Requirements:

Provide the following (TTO) information.

- Does (or will) this facility use any of the toxic organics that are listed under the TTO standard of the applicable categorical pretreatment standards published by EPA? ☒ Yes ☐ No
 - Has a baseline monitoring report (BMR) been submitted which contains TTO information? ☒ Yes ☐ No
 - Has a toxic organics management plan (TOMP) been developed?
☒ Yes, (Please attach a copy) ☐ No
8. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current: Flow Metering ☒ Yes ☐ No ☐ N/A
Sampling Equipment ☒ Yes ☐ No ☐ N/A

Planned: Flow Metering ☐ Yes ☒ No ☐ N/A
Sampling Equipment ☐ Yes ☒ No ☐ N/A

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

9. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Consider production processes as well as air or water pollution treatment processes that may affect the discharge.

[Y] Yes [] No (skip question 10)

10. Briefly describe these changes and their effects on the wastewater volume and characteristics: (Attach additional sheets if needed)

2 Additional filter presses

11 additional chemical process tanks

1 sludge dryer

11. Are any materials or water reclamation systems in use or planned? [X] Yes [] No (skip question 12)

12. Briefly describe recovery process, substance recovered, percent recovered, and the concentration in the spent solution, Submit a flow diagram for each process: (Attach additional sheets if needed)

Caustic Etch Recovery System Recovery 75% See attached Drawing.

SECTION F - PRIORITY POLLUTANT INFORMATION

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

I. Metals & Inorganics

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
1. Antimony			X	
2. Arsenic			X	
3. Asbestos			X	
4. Beryllium			X	
5. Cadmium			X	
6. Chromium	X			
7. Copper	X			
8. Cyanide	X			
9. Lead	X			
10. Mercury			X	
11. Nickel			X	
12. Selenium			X	
13. Silver			X	
14. Thallium			X	
15. Zinc	X			

II. Phenol and Cresols

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
16. Phenol (s)			X	
17. Phenol, 2-chloro			X	
18. Phenol, 2,4-dichloro			X	
19. Phenol, 2,4,6-trichloro			X	
20. Phenol, pentachloro			X	
21. Phenol, 2-nitro			X	
22. Phenol, 4-nitro			X	
23. Phenol, 2,4-dinitro			X	
24. Phenol, 2,4-dimethyl			X	
25. m-Cresol, 4,6-dinitro			X	
26. o-Cresol, 4,6-dinitro			X	

III. Monocyclic Aromatics (Excluding Phenols, Cresols, and Phthalates)

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
27. Benzene			X	
28. Benzene, chloro			X	
29. Benzene, 1,2-dichloro			X	
30. Benzene, 1,3-dichloro			X	
31. Benzene, 1,4-dichloro			X	
32. Benzene, 1,2,4-trichloro			X	
33. Benzene, hexachloro			X	
34. Benzene, ethyl			X	
35. Benzene, nitro			X	
36. Toluene	X			
37. Toluene, 2,4-dinitro			X	
38. Toluene, 2,6-dinitro			X	

IV. PCB's Related & Compounds

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
39. PCB-1016			X	
40. PCB-1221			X	
41. PCB-1232			X	
42. PCB-1242			X	
43. PCB-1248			X	
44. PCB- 1254			X	
45. PCB-1260			X	
46.2-Chloronaphthalene			X	

V. Ethers

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
47. Ether, bis(chloromethyl)			X	
48. Ether, bis(2-chloroethyl)			X	
49. Ether, bis(2-chlorosopropyl)			X	
50. Ether, 2-chloroethyl vinyl			X	
51. Ether, 4-bromophenol phenyl			X	
52. Ether, 4-chlorophenyl phenyl			X	
53. Bis(2-chloroethoxy) methane			X	

VI. Nitrosamines and other Nitrogen-Containing Compounds

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
54. Nitrosamine, dimethyl			X	
55. Nitrosamine, diphenyl			X	
56. Nitrosamine, di-n-propyl			X	
57. Benzidine			X	
58. Benzidine, 3,3-dichloro			X	
59. Hydrazine, 1,2-diphenyl			X	
60. Acrylonitrile			X	

VII. Halogenated Aliphatics

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
61. Methane, bromo			X	
62. Methane, chloro			X	
63. Methane, dichloro	X			
64. Methane, chlorodibromo			X	
65. Methane, dichlorobromo			X	
66. Methane, tribromo			X	
67. Methane, trichloro			X	
68. Methane, tetrachloro			X	
69. Methane, trichlorofluoro			X	
70. Methane, dichlorodifluoro			X	
71. Ethane, 1,1-dichloro			X	
72. Ethane, 1,2-dichloro			X	
73. Ethane, 1,1,1-trichloro			X	

74. Ethane 1,1,2-trichloro			X	
75. Ethane, 1,1,2,1-tetrachloro			X	
76. Ethane, hexachloro			X	
77. Ethane, chloro			X	
78. Ethane, 1,1-dichloro			X	
79. Ethane, trans-dichloro			X	
80. Ethane, trichloro			X	
81. Ethane, tetrachloro			X	
82. Propane, 1,2-dichloro			X	
83. Propane, 2,4-dichloro			X	
84. Butadiene, hexachloro			X	
85. Cyclopentadiene, hexachloro			X	

VIII. Phthalate Esthers

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
86. Phthalate, di-c-methyl			X	
87. Phthalate, di-n-ethyl			X	
88. Phthalate, di-n-butyl			X	
89. Phthalate, di-n-oGtyl			X	
90. Phthalate, bis(2-ethylhexyl)	X			
91. Phthalate, butyl benzyl			X	

IX. Polycyclic Aromatic Hydrocarbons

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
92. Acenaphthene			X	
93. Acenaphthylene			X	
94. Anthracene			X	
95. Benzo (a) anthracene			X	
96. Benzo (b) fluoranthene			X	
97. Benzo (k) fluoranthene			X	
98. Senzo (ghi) perylene			X	
99. Benzo (a) pyrene			X	
100. Chrysene			X	
101. Dibenzo (a,n,) anthracene			X	
102. Fluoranthene			X	
103. Fluorene			X	
104. Indeno (1,2,3-cd) pyrene			X	
105. Naphthalene	X			
106. Phenanthrene				
107. Pyrene				

X. Pesticides

Chemical Compound	Known Present	Suspected Present	Known Absent	Suspected Absent
108. Acrolein			X	
109. Aldrin			X	
110. BHC (alpha)			X	
111. BHC (beta)			X	
112. BHC (gamma) or lindane			X	
113. BHC (delta)			X	
114. Chlorodane			X	
115. DDD			X	
116. DDE			X	
117. DDT			X	
118. Dieldrin			X	
119. Endosulfan (alpha)			X	
120. Endosulfan (beta)			X	
121. Endrin			X	
122. Endrin aldehyde			X	
123. Heptachlor			X	
124. Heptachlor epoxide			X	
125. Isophorone			X	
126. TCDD (or dioxin)			X	
127. Toxaphene			X	

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

SECTION G - TREATMENT

1. Is any form of wastewater treatment (see *list below*) practiced at this facility? ☒ Yes
☐ No
2. Is any form of wastewater treatment or changes to a existing wastewater treatment planned for this facility within the next three years?
☒ Yes, describe: ☐ No
3. Treatment devices or processes used or proposed for treating wastewater or sludge (check as many as appropriate).
 - ☐ Air flotation
 - ☐ Centrifuge
 - ☒ Chemical precipitation
 - ☐ Chlorination
 - ☐ Cyclone Filtration
 - ☒ Flow equalization
 - ☐ Grease or oil separation, type: _____
 - ☐ Grease trap
 - ☐ Grinding filter

- ☐ Grit removal
- ☐ Ion exchange
- ☒ Neutralization, pH correction
- ☐ Ozonation
- ☐ Reverse Osmosis
- ☐ Screen Sedimentation
- ☐ Septic tank
- ☐ Solvent separation
- ☒ Spill protection
- ☒ Sump
- ☐ Biological treatment, type: _____
- ☐ Rainwater diversion or storage
- ☒ Other chemical treatment, type: Chromium Reduction _____
- ☐ Other physical treatment, type: _____
- ☐ Other, type: _____

4. Description

Describe the pollutant loadings, flow rates, design capacity, physical size, and operating procedures of each treatment facility checked above.

See Attached Drawing

5. Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by-product disposal method, waste and byproduct volumes, and design and operating conditions.

6. Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.

NA

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7. Do you have treatment a operator? ☒ Yes ☐ No

If yes, Name: Chem-Fab has 7 Full time Waste Treatment Operators

Title: under the direction of the Environmental Manager Michael Corballis

Phone: 501-622-4267 Mobile 501617-0240

Full time: 24 hrs/day (specify hours)

Part time: _____ (specify hours)

8. Do you have a manual on the correct operation of your treatment equipment?

☒ Yes ☐ No

9. Do you have a written maintenance schedule for your treatment equipment? ☒ Yes

☐ No

SECTION H - FACILITY OPERATIONAL CHARACTERISTICS

1. Shift Information

Work Days	Mon	Tues	Wed	Thur	Fri	Sat	Sun
Shifts per work day:	3	3	3	3	3	2	As needed
Empl's 1 st shift:	364	364	364	364	364		
Empl's 2 nd shift:	87	87	87	87	87		
Empl's 3 rd shift:	13	13	13	13	13		
Shift 1 st start time	7:00AM	7:00AM	7:00AM	7:00AM	7:00AM	5:00AM	As needed
Shift 1 st end time	3:00PM	3:00PM	3:00PM	3:00PM	3:00PM	1:00PM	As needed
Shift 2 nd start time	3:00PM	3:00PM	3:00PM	3:00PM	3:00PM	1:00AM	As needed
Shift 2 nd end time	11:00PM	11:00PM	11:00PM	11:00PM	11:00PM	9:00PM	As needed
Shift 3 rd start time end time	11:00PM 7:00AM	11:00PM 7:00AM	11:00PM 7:00AM	11:00PM 7:00AM	11:00PM 7:00AM		11:00PM 7:00AM

2. Indicate whether the business activity is:

☒ Continuous through the year, or

☐ Seasonal - Circle the month of the year during which the business activity occurs:

Jan Feb Mar Apr Ma Jun Jul Aug Sep Oct Nov Dec

Comments: _____

3. Indicate whether the facility discharge is:

☒ Continuous through the year, or

☐ Seasonal - Circle the months of the year during which the business activity occurs:

Comments:

Jan Feb Mar Apr Ma Jun Jul Aug Sep Oct Nov Dec

4. Does operation shut down for vacation, maintenance, or other reasons?

☐ Yes, indicate reasons and period when shutdown occurs:

☒ No

4. List types and amounts (mass or volume per day) of raw materials used planned for use (attach list if needed)-

Aluminum and Titanium metal amounts not available

6. List types and quantity of chemicals used or planned for use (attach list if needed). Include copies of Manufacturer's Safety Data Sheets (if available) for all chemicals identified:

Chemical	Quantity
See inventory list attached	

7. Building Layout - Draw to scale the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), public sewers, and each facility sewer line connected to the public sewers. Number each sewer and show existing and proposed sampling locations. This drawing must be certified by a State Registered Professional Engineer.

A blue print or drawing of the facilities showing the above items may be attached.

SECTION I - SPILL PREVENTION

1. Do you have chemical storage containers at your facility? ☒ Yes ☐ No

If yes, please give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to a sewer or storm drain. Indicate if buried metal containers have cathodic protection.

See Facility Drawing

2. Do you have floor drains in your manufacturing or chemical storage area (s)? ☒ yes ☐ No If yes, Where do they discharge to?

Waste Water Treatment System

5. If you have chemical storage containers, bins, or ponds in manufacturing areas, could an accidental; spill lead to a discharge to: (*check all that apply*).

☐ an onsite disposal system

☐ public sanitary sewer system (e.g. *through a floor drain*)

☐ storm drain to ground

☐ other, specify

☒ not applicable, no possible discharge to any of the above routes

4. Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or slug discharges from entering the control authority's collection system? ☒ Yes, [please enclose a copy with the application] ☐ No ☐ N/A, Not applicable since there are no floor drains and/or the facility discharge (s) only domestic waste.

6. Please describe below any previous spill events and remedial measures taken to prevent their reoccurrence.

SECTION J -NON-DISCHARGED WASTES

1. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system? ☒ Yes, please describe ☐ No, skip the reminder of Section J

Waste Generated	Quantity (per year)	Disposal method
Waste Paint	3200 lbs	RINECO
Filter Press Cake (F019)	240,000	Chemical Waste Management
Spent Process Solutions	30,000 gal	Alpha Omega Recycling
Spent Caustic	15000 hal	Maxon

2. Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site

3. If any of your wastes are sent to an off-site centralized waste treatment facility, identify the waste and the facility.

3. If an outside firm removes any of the above checked wastes, state the name (s) and address (es) of all waste haulers:

Name	Address	Permit No:
TRIAD		OKD981588791
Universal Transport		ARD983267279

5. Have you been issued any Federal, State, or Local environmental permits? ☒ Yes ☐ No If yes, please list the permit (s):

EPA ID # ARD010304475

Storm Water Permit ARR00A218

SECTION K - AUTHORIZED SIGNATURES

Compliance Certification:

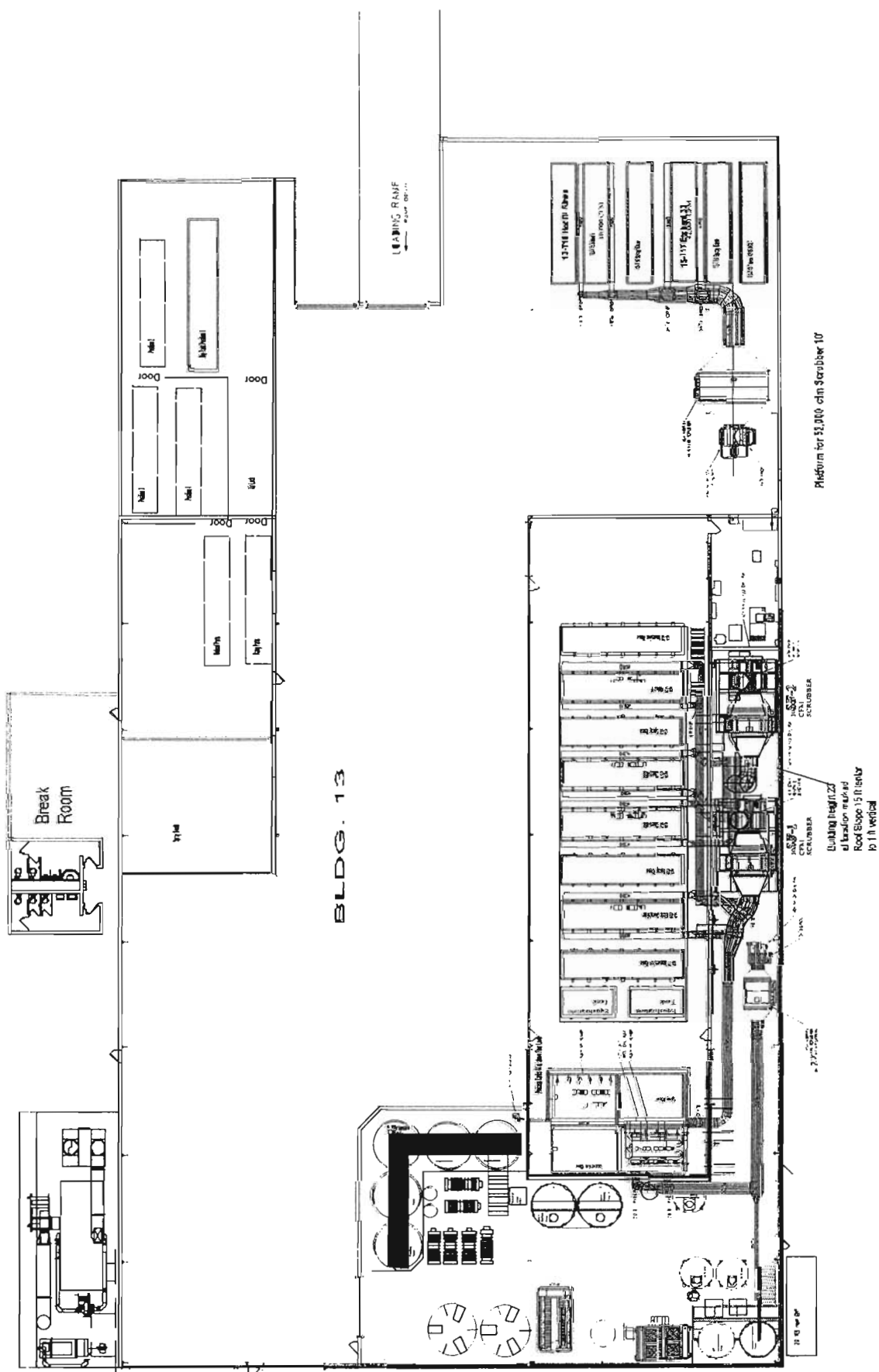
1. Are all applicable Federal, State, or Local pretreatment standards and requirements being met on a consistent basis? ☒ Yes ☐ No
 ☐ Not yet discharging
2. If No:
 - a. What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.
 - c. Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note that if the control authority issues a permit to the applicant, it may establish a schedule for compliance different from the one submitted by the facility.

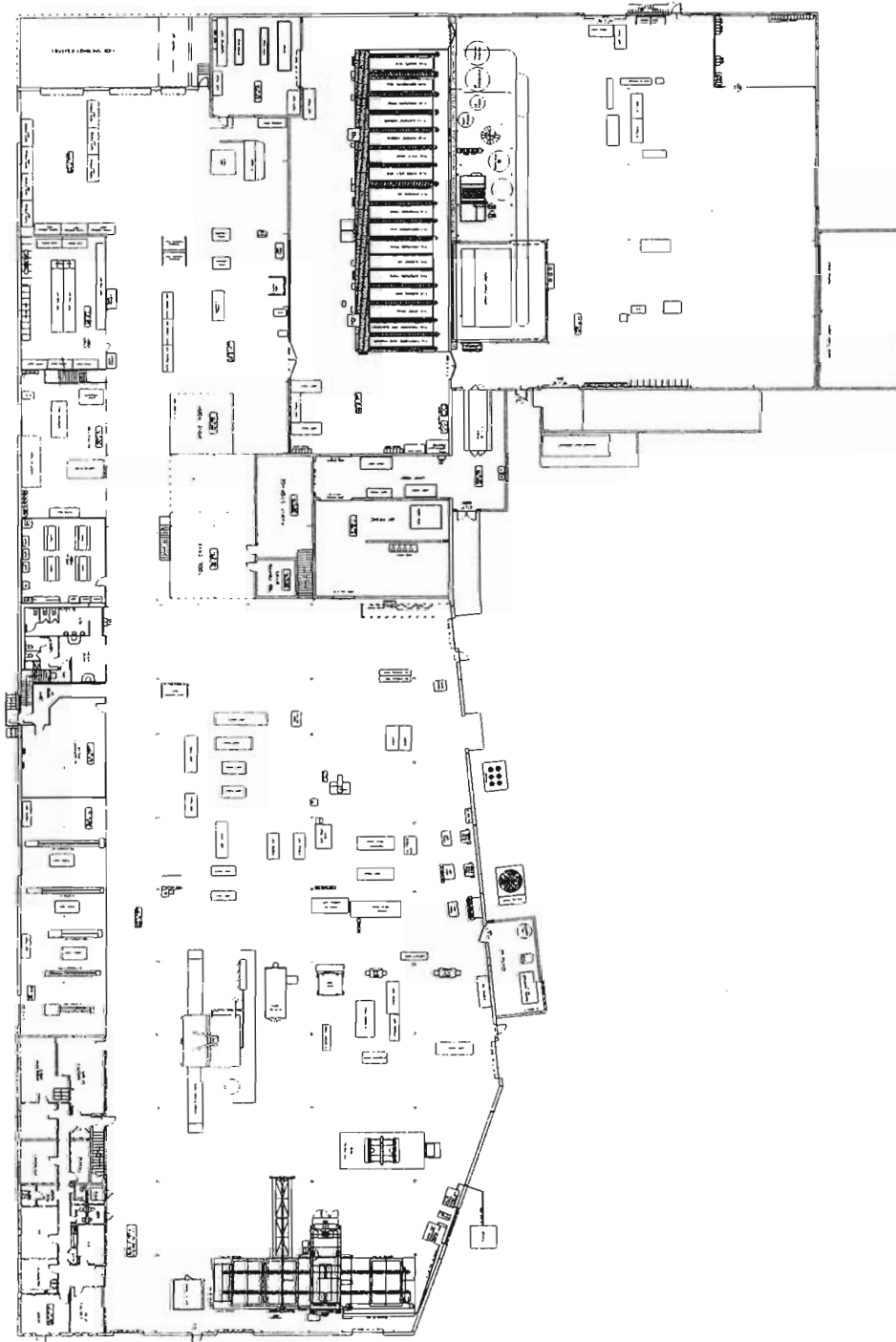
Milestone Activity	Completion Date
NA	

Authorized Representative Statement:

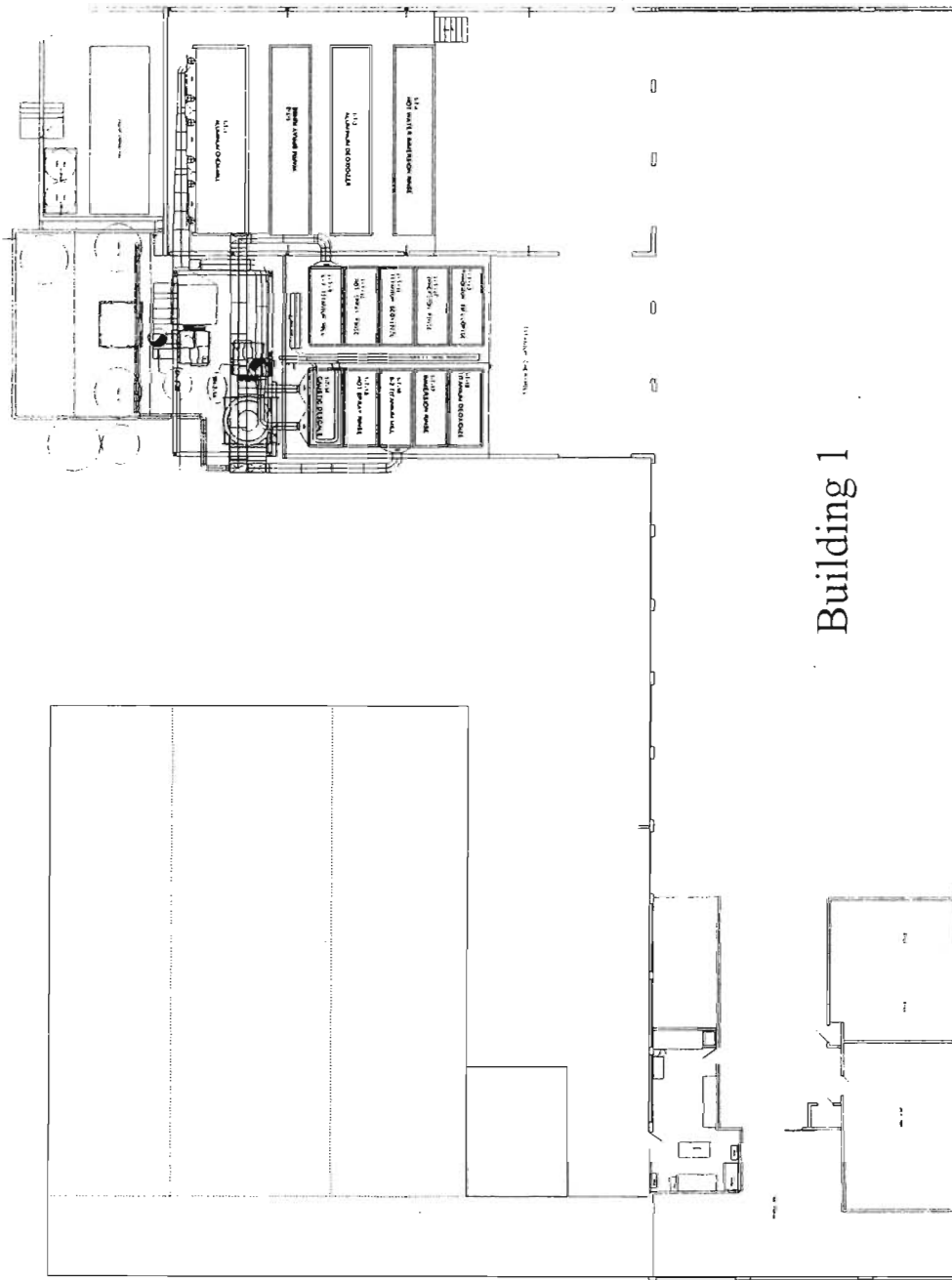
I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage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

<u>Mark A. Johnson</u>	<u>President</u>	
Name (s)	Title	
<u>[Signature]</u>	<u>6/9/07</u>	<u>501-622-4281</u>
Signature	Date	Phone





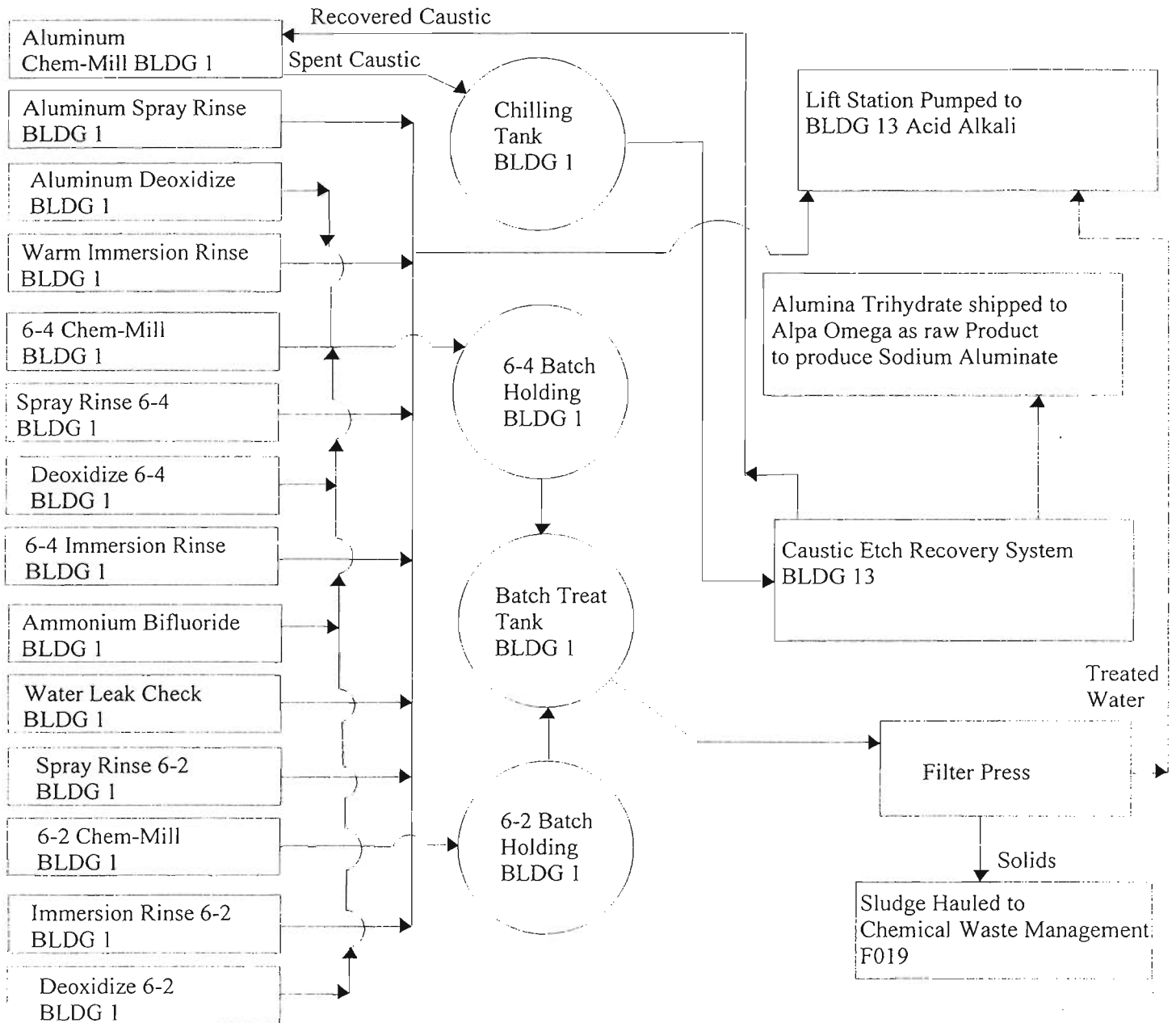
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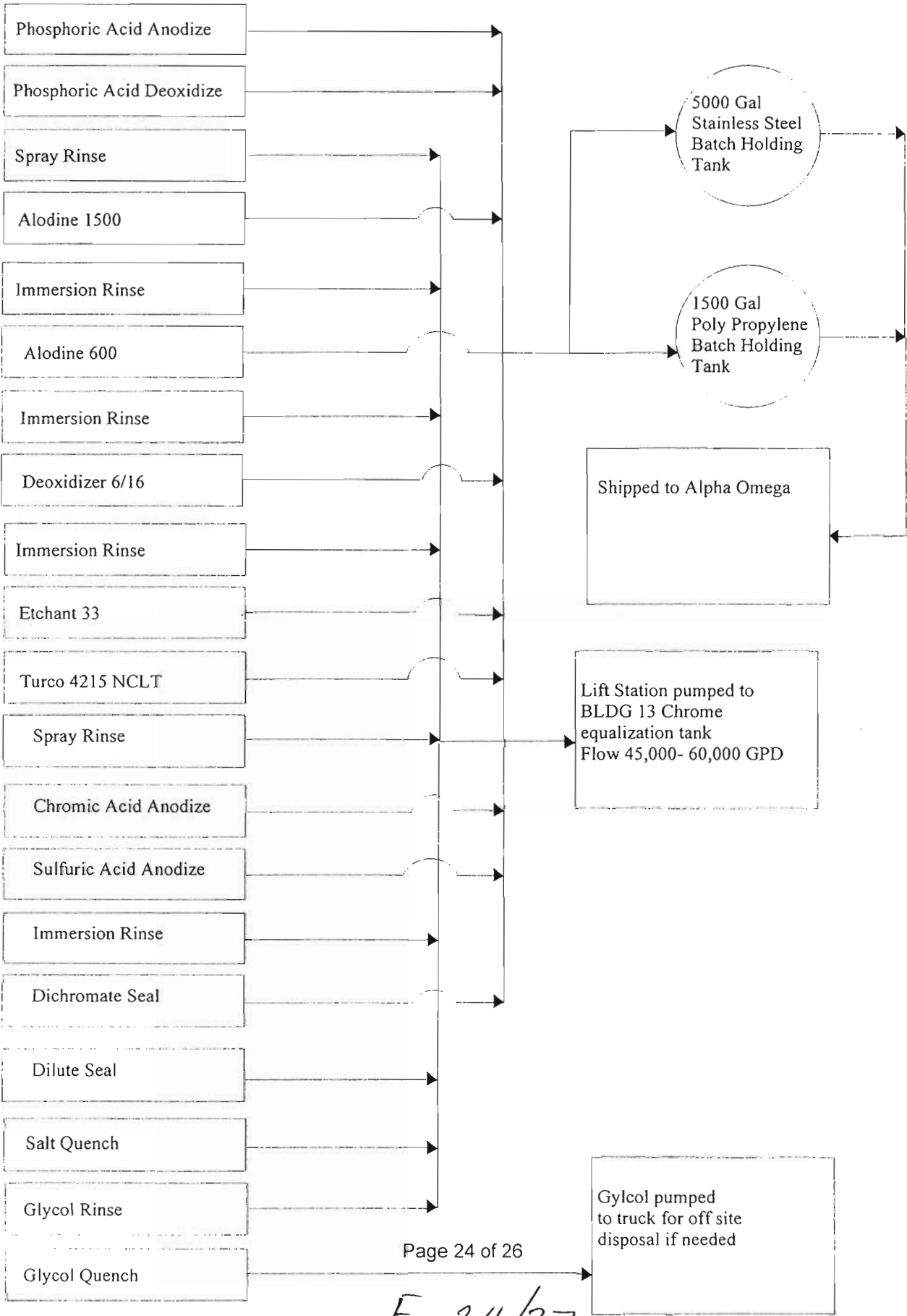
Building 1

E-22/27

BLDG 1 Waste Flow
115 Nevada

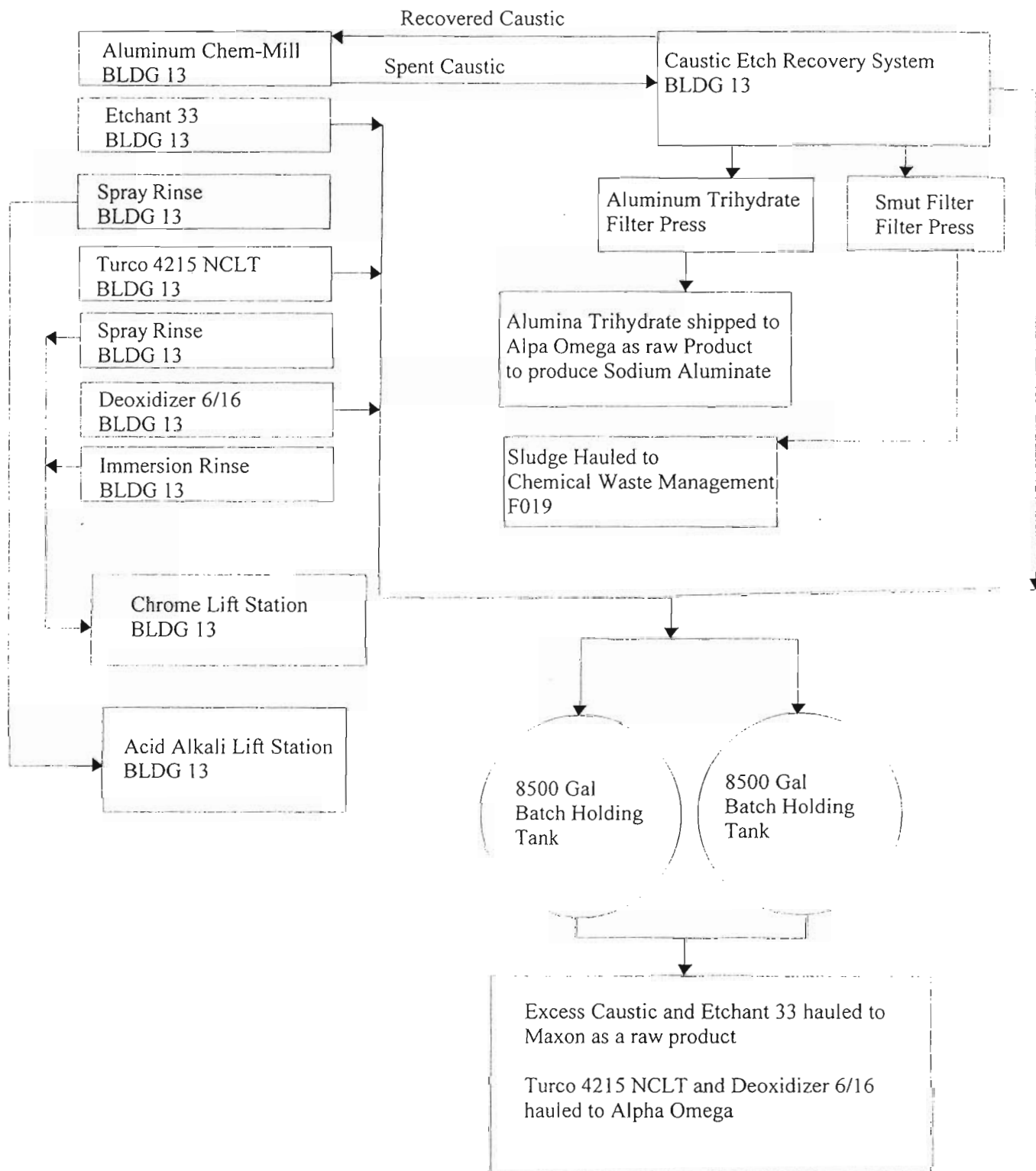


Process Tank	Process Description	Chemical
1-T-1, 13-T-2	Aluminum Chem-Mill	Triethanolamine 99 LFG 85
1-T-1, 13-T-2	Aluminum Chem-Mill	Sodium Sulfide
1-T-1, 13-T-2	Aluminum Chem-Mill	50% Rayon Grade Caustic
1-T-10	6-2 Titanium Chem-Mill	Hydrofluoric Acid
1-T-13	Ammonium Bifluoride Tank	Ammonium Bifluoride
1-T-3 and 1-T-12	Deoxidizer Chem-Mill	Nitric Acid
1-T-9	6-4 Titanium Chem-Mill	Hydrofluoric Acid
1-T-9	6-4 Titanium Chem-Mill	Nitric Acid
1-T-9	6-4 Titanium Chem-Mill	Glychol Ether EB
13-T-1 and 2-T-9	Etchant 33	Etchant 33
13-T-4 and 2-T-10	Turco 4215 NCLT	Turco 4215 NCLT
13-T-6 and 2-T-7	Deoxidizer 6/16	Deoxidizer 16
13-T-6 and 2-T-7	Deoxidizer 6/16	Deoxidizer 6
13-T-6 and 2-T-7	Deoxidizer 6/16	Nitric Acid
13-T-6 and 2-T-7	Deoxidizer 6/16	Dexidizer 7-17 Toner
2-T-1	Phosphoric Acid Anodize	Phosphoric Acid
2-T-12	Chomic Acid Anodize	Chromic Acid
2-T-13	Sulfuric Acid Anodize	Sulfuric Acid
2-T-15	Dichromate Seal	Sodium Dichromate
2-T-16	Dilute Seal	Potassium Dichromate
2-T-16	Dilute Seal	Chromic Acid
2-T-1A	Phosphoric Acid Deoxidize	Phosphoric Acid
2-T-3	Alodine 1500	Alodine 1500
2-T-5	Alodine 600	Toner 22
2-T-5	Alodine 600	Nitric Acid
2-T-5	Alodine 600	Alodine 600
2A-T-1 and 2A-T-2	Heat Treat Salt Tanks	Potassium Nitrate
2A-T-1 and 2A-T-2	Heat Treat Salt Tanks	Sodium Nitrate
2A-T-1 and 2A-T-2	Heat Treat Salt Tanks	Potassium Dichromate
Moco Oven	Quench	UCON Quenchant A
Moco Oven	Quench	Uconex 315
Waste Treatment		Mal Clear 7736 Polmer
Waste Treatment		Sulfuric Acid
Waste Treatment		Sodium Hydroxide
Waste Treatment		Sodium Meta Bisulfite



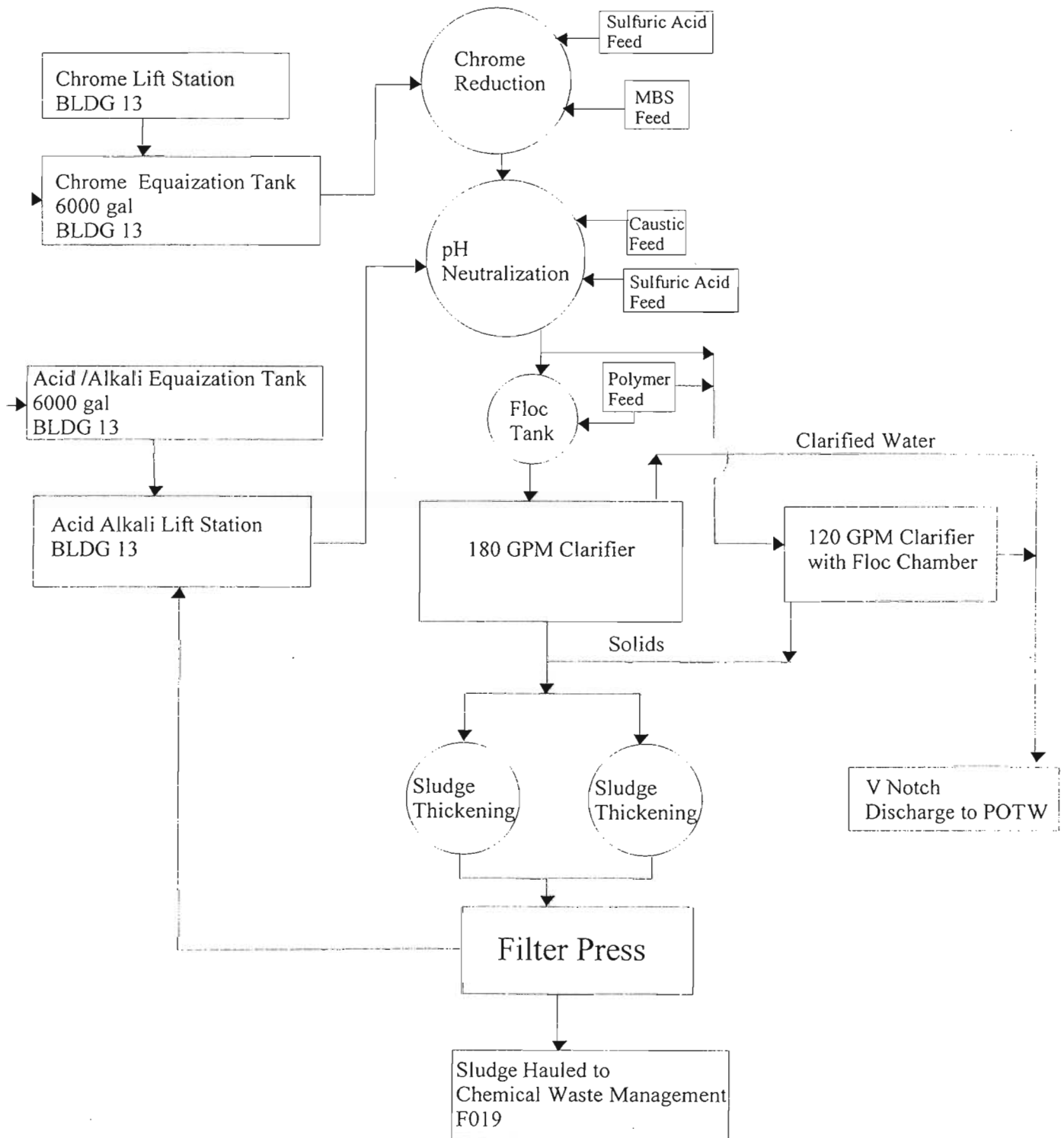
E-24/27

BLDG 13 Waste Flow
115 Nevada St



E-25/27

BLDG 13 Waste Water System



Hot Springs Municipal Utilities
Inspection Checklist

Facility Name: Triumph Fabrications-Hot Springs
Date/Time: 15 December 06 0930hrs

Does the industry have a copy of its current wastewater discharge permit on file and available for inspection? Yes.

GENERAL CONDITIONS

1. Is the industry in compliance with all conditions of it's permit? Yes
2. Has the industry's permit been modified for good cause since permit was granted? No.
4. Has the industry's permit been assigned or transferred to new owner and/or operator since the permit has been issued? No.
5. Has the industry increased or decreased the use of potable or process water? No.
6. Is the industry discharging wastewater to the collection system:
 - a. Having a temperature higher than 104°F (40°C)? No.
 - b. Containing more than 150 mg/l of fats, oil & grease? No.
 - c. Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases, pollutants with a closed cup flashpoint of less than one hundred forty (140°F) degrees fahrenheit (60°C), or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the collection system? No.
 - d. Containing any garbage that has not been ground by house hold type or other suitable garbage grinders? No.
 - e. Containing any ashes, cinder, sand, mud, straw, shaving, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or other solids or viscous, substances capable of causing obstructions or interference with proper operation of the sewer system? No.
 - f. Having a pH lower than 6.0 s.u. or higher than 12.5 s.u., or having any other corrosive property capable of causing damage or hazard to structures, equipment or personnel of the sewer system?
No

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- g. Containing toxic or poisonous substances, such as wastes containing sufficient quantity to injure or interfere with any wastewater treatment process, to constitute hazards to humans or animals, or to create any hazard in waters which receive treated effluent from the collection system treatment facility. No.
- h. Containing noxious or malodorous gases or substances capable of creating a public nuisance; including pollutants which may result in the presence of toxic gases, vapors, or fumes? No.
- i. Containing solids of such character and quantity that special and unusual attention is required for their handling? No.
- j. Containing any substances which may affect the treatment facility's effluent and cause violation of the NPDES permit requirements? No.
- k. Containing any substances which would cause the treatment facility to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines of regulations developed under Section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Water Act, the Toxic Substance Control Act or other regulations or criteria for sludge management and disposal as required by the state? No.
- l. Containing color which is not removed in the treatment process? No.
- m. Containing any medical or infectious wastes? No.
- n. Containing any radioactive wastes or isotopes? No.
- o. Containing any pollutant, including BOD pollutants, released at a flow rate and/or concentration which would cause interference with the treatment facility? No.

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POLLUTION CONTROLS

1. Does the industry operate a pretreatment process or pretreat it's wastewater? Yes, facility treatment process consist of one 120 gal clarifier, one 180 gal clarifier, one pH neutralization tank, one chrome reduction tank, two 7500 gal batch tanks, two 1500 gal sludge tanks, two bulk dewatering tanks and one 5 cu/ft filter press, the old treatment process has two 3,300 gal cone bottom treatment tanks, one 5,000 gal storage tank, one 7 cu/ft filter press and a Caustic Etch Recovery system. The Central St facility pumps its process water to the Nevada St facility's waste treatment process from the following: one 4,000 spray rinse tank, two 4,000 gal immersion tanks, two 30-50 gpm spray rinses, one 5,000 gal diluted seal tank, one 6,600 gal salt quench tank and one 6,600 Glycol rinse tanks. The Nevada St milling facility pumps its process water to the waste treatment facility from the following: one 30-50 gpm Aluminum spray rinse, one 18,000 gal Aluminum Deoxidizer tank, one 18,000 gal hot rinse tank, two 2,100 gal Titanium chem-milling tanks, and two 2,100 gal immersion rinse tanks and two 2,100 gal Titanium Deoxidize tanks. Additional Central St process water from the following is shipped to Alpha Omega for recycling: one 3,000 gal Phosphoric Acid Anodize tank, one 3,000 gal, Phosphoric Acid Deoxidize tank and one 4,000 gal Alodine tank. In the Nevada St process, the 15,000 gal Aluminum Chem-mill tank process water is pumped to a Caustic Etch Recovery System. This system retrieves recovered caustic which is sent back to the chem-milling tank, Aluminum Trihydrate is retrieved and shipped as a raw product to Alpha Omega to produce Sodium Aluminate. The Smut sludge is hauled to Chemical Waste Management. Excess Caustic is hauled off as raw product to Maxon. Process water from the 15,000 gal Etchant tank is shipped as a raw product to Maxon. Process water from a 15,000 gal Turco tank and a 15,000 gal Deoxidizer tank are shipped as raw products to Alpha Omega. After the chemical treatment, the regular process water is pumped through a 5 cu/ft filter press into the city's collection system. The sludge from the filter press is dumped into two 20 yd dumpsters and hauled off site as hazardous waste. If there is a high flow in the process, this particular system has the capability to return sludge to the old treatment process for additional treatment and return back to the new process for final treatment.

BYPASS OF TREATMENT FACILITIES

1. Has the industry bypass treatment facilities? No, facility has a containment area for accidental spills of process water.

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FACILITY ACTIVITY REDUCTION REQUIREMENTS

1. Is the industry's experiencing any reduction of efficiency of operation, loss or failure of all or part of the treatment facility? Yes, polishing filters were taken out because of loss in efficiency. Additional holding tanks were installed and reconfigured and additional filter press was installed.

REMOVED SUBSTANCES

1. Is the industry disposing of solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewater in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act? Yes, Caustic solutions containing Aluminum are recycled at Alpha Omega in Longview, TX and Maxton in Memphis, TN. Hazardous wastes transported to Waste Management in Lake Charles, LA.. Waste oils are transported Waste Services in Little Rock, AR.
2. Is the industry complying with any additional local and state standards including such standards or requirements that may be come effective during the term of this permit? Yes.

PROCESS CONTROL LABORATORY

1. Does the industry have it's own laboratory for pretreatment process controls? Yes.
2. Is the process control laboratory certified by the State of Arkansas? Yes, Analytical Products Group, Inc. certified the lab and the state approved the certification.
3. Number of pretreatment techs on staff? 4 certified, 2 in training

REPRESENTATIVE SAMPLING

1. Is all equipment used for sampling and analysis routinely calibrated, inspected and maintained to ensure their accuracy and verified by records of maintenance or calibration? Yes.

FLOW MEASUREMENTS

1. Is flow measurement required by the industry's permit? Yes, installed flow meter on process waters Bldg 2. City water meters are read for bldg 1 and bldg 13.
2. Does the industry utilize wastewater flow meter (s) or water meter (s) to determine its discharge? Yes.

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3. Are Appropriate flow measurement devices installed, calibrated and maintained to ensure that the accuracy of the measurements are consistent with the records of verification of maintenance and calibration? Yes, Industry maintain records of verification of maintenance and calibration.
4. Has the industry submitted a written certification of the flow measurement device (s) calibration by an independent source qualified to install and/or calibrate flow measurement equipment and has been granted permission by the control authority to use device (s)? Yes.

SELFMONITORING SAMPLES

1. Is the industry monitoring wastestream (s) for the required parameters? Yes.
2. Are all parameters being sampled at the designated sampling point? Yes.
3. Are pollutant (s) monitored more frequently than required by the industry's permit? Yes, All heavy metals.
4. Are test procedures prescribed in 40 CFR 136 or as otherwise approved by EPA or as specified in the industry's permit used? Yes, Standard Methods 18th Ed. Industry has been inform to use current approved Standard Methods 20th Ed.
5. Is all sampling conducted for selfmonitoring being performed by a certified, independent laboratory acceptable to the control authority? No.

AUTOMATIC RESAMPLING

1. Did results of the industry's wastewater analysis indicate a violation of it's permit? No.

ACCIDENTAL DISCHARGE REPORT

1. Did the industry have any occurrence of an accidental discharge of substances or any slug loads or spills that may enter the public sewer? No.
2. Did the industry immediately notify the control authority upon the occurrence? N/A.
3. Did the industry's notification include location of discharge, date, time, type of waste, including concentration and volume and corrective taken? N/A.

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4. Did the industry submit to the control authority a detailed written report within five (5) days following the accidental discharge?
N/A.
5. Did the report contain a description and cause of the upset, slug load or accidental discharge, the cause, and impact on the industry's compliance status, including the location of discharge, type, concentration and volume of the waste? N/A.
6. Did the report contain the duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur? Yes.
7. Did the report contain all steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions or noncompliance? Yes.

REPORTS/COMPLIANCE SCHEDULE REQUIREMENTS

1. Is the industry under a compliance schedule with the control authority? No.

RECORDS RETENTION

1. Is the industry retaining records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the industry's permit, and records of all data used to complete the application for permit, for a period of at least three (3) years from the date of the sample, measurement, report or application? Yes.
3. Do records of sampling and analyses include:
 - a. The date, time, exact place, and method of sampling or measurement, and preservation techniques or procedures? Yes
 - b. Who performed the sampling or measurements? Yes.
 - c. The date (s) analyses were performed? Yes.
 - d. Who performed analyses? Yes.
 - e. The analytical techniques or methods used? Yes.
 - f. The results of such analyses? Yes.

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OPERATING UPSETS

1. Did the industry experience any upset in operations that placed the industry in a temporary state of noncompliance with the provisions in their discharge permit? No.
2. Did the industry inform the control authority within twenty-four (24) hours of becoming aware of the upset? N/A.
3. Did the industry submit a written report of the upset to the control authority within five (5) days? N/A.

PLANNED CHANGES

1. Has the industry had any facility expansion, production increase, or process modification which results in new or substantially increased discharges or a change in the nature of the discharge? No.
2. Did the industry give notice to the control authority 90 days prior to the above planned changes? No.

SIGNATORY REQUIREMENTS

1. Do all applications reports, or information submitted to the control authority contain the certification statement signed by the authorized representative? Yes.

VIOLATION PENALTIES/COST RECOVERIES

1. Has the industry been liable and billed for cost incurred for any cleaning, repair, or replacement work caused by any violation or discharge that caused any expense, loss, or damage to or otherwise inhibited the control authority's wastewater operations? No.

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CATEGORICAL REQUIREMENTS

1. Is the industry subject to categorical standards? Yes.
2. Did the industry submit to the control authority a report on compliance to the pretreatment standards of the industry's federal category, stating whether or not applicable pretreatment standards are being met on a consistent basis? Yes.
3. Was the report submitted within 90 days after the compliance date, or in the case of new source following commencement of the introduction of wastewater into the POTW? Yes.
4. Did report indicate the nature and concentration of all regulated pollutants in the facility's regulated streams and a statement of whether compliance is consistently achieved, and if not, what additional operation, maintenance and/or pretreatment is necessary to achieve compliance? Yes.
5. Did the industry submit a monthly compliance report to the control authority? Yes.
6. Did the report indicate the precise nature and concentration of regulated parameters, daily and monthly average flow rate, methods used by the industry to sample and analyze the data, and a certification that these methods were followed according to 40 CFR 136 or EPA approved standard methods? Yes.
7. Does the industry have production based limits? No.
8. Are TTO's known to be on the premises? Yes.
9. Were TTO's tested twice per year or a previously submitted Toxic Organic Management Plan (TOMP) certification stating the plan is being carried out accompany each monthly report? Yes

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Inspection Report Summary

Industry: Triumph Fabrications Hot Springs

Representative: Michael Corballis

Has the industry been given any new information pertaining to pretreatment by the control authority? No

Inspection Summary:

The waste treatment process can generate a waste stream of 120 to 180 gals per minute. This process has one 120 gpm clarifier, one 180 gpm clarifier, one 3,000 gal pH neutralization tank, one 3,000 gal Cr reduction tank, two 7500 gal batch tanks, two 1500gal sludge tanks, two 3,000 poly tanks, two 3,300 gal cone bottom tanks, one 5,000 gal storage tank, two bulk dewatering tanks, one 7 cu/ft filter press, one 5 cu/ft filter press. A lift station pumps the waste stream from the batch treatment process to the new treatment process for final treatment. Depending the rate of chem-milling operations, wastestream from new treatment process is pumped back to the batch treatment process for sludge dewatering and returned to the new treatment process for final treatment.

Recommended Action (s):

No recommendations are needed at this time.

Finding (s):

The industry has gone to a single source discharge.

Required Action (s):

The industry must revise and submit to the control authority the following: RCRA, TOMPs and Slug Control Plans.

Report completed by:  Date/Time: 15 Dec 07 0930 hrs

F - 9/9



December 12, 2007
Control No. 115196
Page 1 of 6

City of Hot Springs
ATTN: Mr. Dennis Brunson
320 Davidson Drive
Hot Springs, AR 71901

Dear Mr. Dennis Brunson:

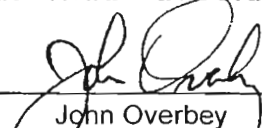
Project Description: One (1) water sample(s) received on December 10, 2007
Industrial Monitoring
P.O. No. 07-3632

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on December 10, 2007. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By


John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

City of Hot Springs
320 Davidson Drive
Hot Springs, AR 71901

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 1°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

COMMENTS

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

G-2/7

City of Hot Springs
320 Davidson Drive
Hot Springs, AR 71901

ANALYTICAL RESULTS

AIC No. 115196-1

Sample Identification: 33-07 National Park Medical Center 14November07, 0945hrs

Analyte	Method	Result	RL	Units	Batch	Qualifier
Oil and Grease	EPA 1664A	10	5	mg/l	B4865	

G-3/7



City of Hot Springs
320 Davidson Drive
Hot Springs, AR 71901

SAMPLE PREPARATION REPORT

AIC No. 115196-1

Analyte

Oil and Grease

Date/Time
Prepared By

-

Date/Time
Analyzed By

11DEC07 0940 281

Dilution

Batch

B4865

Qualifier

G-477

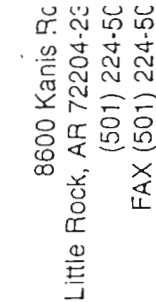
City of Hot Springs
320 Davidson Drive
Hot Springs, AR 71901

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Oil and Grease	40.05 mg/l	88.4/88.1	78-114	0.283	18	B4865	

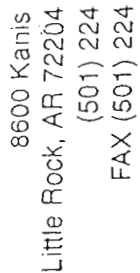
LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC Sample	Qual
Oil and Grease	EPA 1664A	< 5	mg/l	5	5	B4865-1	



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33-07

G-7/7

Slug Control Plan

Industrial User: Triumph Fabrications Hot Springs

Address: 1923 Central Ave Hot Springs
Hot Springs Arkansas 71901

Emergency Contact: Michel Corballis Title: Environmental Manager

Work Phone: 501-622-4267 Emergency Phone: 501-617-0240

Secondary Contact: Rob Rostan Title: Facilities Manager

Work Phone: 501-622-4308 Emergency Phone: 501-538-7441

DEFINITION:

A discharge of any pollutant at a flow rate and/or pollutant concentration that could violate any of the prohibited discharge standards, whether or not such violation actually occurs.

1. Identify potential slug discharge sources

MATERIAL 115 NEVADA ST BLDGS 1& 13

TYPE OF MATERIAL	VOLUME	DISCHARGE	POTENTIAL POLLUTANTS OF CONCERN
1-T-1 Aluminum Chem-Mill	22,000 gal	Caustic Recovery system	pH, Copper, Zinc
1-T-2 Spray Rinse	30-50 gpm	pH Neutralization Tank BLDG 13	pH, Copper, Zinc
1-T-3 Aluminum Deoxidizer	18000 gal	BLDG 1 Spent 6-4 Batch Holding	pH
1-T-4 Hot Rinse	18000 gal	pH Neutralization Tank BLDG 13	pH
1-T-5 6-4 Titanium Chem-Mill	2100 gal	BLDG 1 Spent 6-4 Batch Holding	pH
1-T-6 Spray Rinse	30-50 gpm	pH Neutralization Tank BLDG 13	pH
1-T-7 Titanium Deoxidizer	2100 gal	BLDG 1 Spent 6-4 Batch Holding	pH
1-T-8 Immersion Rinse	2100 gal	pH Neutralization Tank BLDG 13	pH
1-T-9 Ammonium Bifluoride	2100 gal	BLDG 1 Spent 6-2 Batch Holding	pH
1-T-10 Titanium Descale	2100 gal	BLDG 1 Batch Holding Cone Tank 1, 2	pH
1-T-11 Spray Rinse	30-50 gpm	pH Neutralization Tank BLDG 13	pH
1-T-12 6-2 Titanium Chem-Mill	2100 gal	BLDG 1 Spent 6-2 Batch Holding	pH
1-T-13 Immersion Rinse	2100 gal	pH Neutralization Tank BLDG 13	pH
1-T-14 Titanium Deoxidize	2100 gal	BLDG 1 Spent 6-4 Batch Holding	pH
BLDG 1 Batch Holding Cone Tank 1	3100 gal	Filter Press BLDG 1	pH Chromium, Copper, Zinc
BLDG 1 Batch Holding Cone Tank 2	3100 gal	Caustic Recovery System	pH, Copper, Zinc
BLDG 1 Batch Holding White Tank	5000 gal	Caustic Recovery System	pH, Copper, Zinc
BLDG 1 Spent 6-4 Batch Holding	3000 Gal	BLDG 1 Batch Holding Cone Tank 1	pH
BLDG 1 Spent 6-2 Batch Holding	3000 Gal	BLDG 1 Batch Holding Cone Tank 1	pH

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MATERIAL 115 NEVADA ST BLDGS 1&13 CONT.

TYPE OF MATERIAL	VOLUME	DISCHARGE	POTENTIAL POLLUTANTS OF CONCERN
BLD 1 Caustic Bulk Storage Tank	10000 gal	1-T-1 Aluminum Chem-Mill, BLDG 1 Batch Holding Cone Tank 1	pH
BLDG 1 Triethanolamine 99 LFG 85 Bulk Storage Tank	3000 gal	1-T-1 Aluminum Chem-Mill	pH
BLDB 1 Nitric Acid Bulk Storage Tank	4000 gal	1-T-3 Aluminum Deoxidizer, 1-T-7 Titanium Deoxidizer, 1-T-14 Titanium Deoxidize	pH
13.-T1	15000 gal	Immersion Rinse	pH, Copper, Zinc
13-T2 Aldox V	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH, Copper, Zinc, Iron
13-T-3 Spray Rinse	30-50 gpm	BLDG 13 pH Neutralization Tank	pH, Copper, Zinc
13-T-4 Aluminum Chem Mill	15000 gal	Caustic Recovery System	pH, Copper, Zinc
13-T-5 Aluminum Chem Mill	15000 gal	Caustic Recovery System	pH, Copper, Zinc
13-T-6 Spray Rinse	30-50 gpm	BLDG 13 pH Neutralization Tank	pH, Copper, Zinc
13-T7 Aldox V	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH, Copper, Zinc, Iron
13.-T8	15000 gal	Immersion Rinse	pH, Copper, Zinc
13-T9 Aluminum Chem Mill	15000 gal	Caustic Recovery System	pH, Copper, Zinc
13-T10 Spray Rinse	30-50 gpm	BLDG 13 pH Neutralization Tank	pH, Copper, Zinc
13-T12 Aldox V	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH, Copper, Zinc, Iron
13.-T11	15000 gal	Immersion Rinse	pH, Copper, Zinc
13-T-13 Turco 4215 NCLT	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH
13-T-14 Spray Rinse	30-50 gpm	BLDG 13 Chrome Reduction Tank	pH, Copper, Zinc, Chromium
13-T15 Aldox V	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH, Copper, Zinc, Iron
13-T-16 Spray Rinse	30-50 gpm	BLDG 13 Chrome Reduction Tank	pH, Copper, Zinc, Chromium
13-T-17 Etchant 33	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH, Copper, Zinc
13-T-18 Immersion Rinse	15000 gal	BLDG 13 Chrome Reduction Tank	pH, Copper, Zinc, Chromium
BLDG 13 Bulk Caustic Storage	6000 gal	13-T-2 Aluminum Chem Mill	pH
BLDG 13 Triethanolamine 99 LFG 85 Bulk Storage Tank	3000 gal	13-T-2 Aluminum Chem Mill	pH
BLDG 13 Sludge Thickening Tank	2200 Gal	Filter Press BLDG 13	pH, Copper, Zinc, Chromium
BLDG 13 Batch Treat Tank	2200 gal	Filter Press BLDG 13, BLDG 1 Batch Holding Cone Tank 1	pH, Copper, Zinc, Chromium
BLDG 13 Batch Holding Tank 1	8500 gal	Truck Shipped Off Site, Filter Press Process Tanks BLDG 13, 1-T-1 Aluminum Chem-Mill	pH, Copper, Zinc, Chromium

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BLDG 13 Batch Holding Tank 2	8500 gal	Truck Shipped Off Site, Filter Press Process Tanks BLDG 13, 1-T-1 Aluminum Chem-Mill	pH, Copper, Zinc, Chromium
BLDG 13 Chrome Reduction Tank	3000 gal	BLDG 13 pH Neutralization Tank	pH, Copper, Zinc, Chromium
BLDG 13 pH Neutralization Tank	3000 gal	BLDG 13 Clarifier	pH, Copper, Zinc, Chromium
BLDG 13 Clarifier	120 gpm	City Sewer, BLDG 13 Sludge Thickening Tank	pH, Copper, Zinc, Chromium
Filter Press BLDG 13	5 Cu ft	BLDG 13 pH Neutralization Tank, 20 Yd Roll Off for site disposal	pH, Copper, Zinc, Chromium
Filter Press BLDG 13	10 Cu ft	BLDG 13 pH Neutralization Tank, 20 Yd Roll Off for site disposal	pH, Copper, Zinc, Chromium
Filter Press BLDG 13	10 Cu ft	Caustic Recovery System	pH, Copper, Zinc, Chromium
Filter Press BLDG 13	10 Cu ft	Caustic Recovery System	pH, Copper, Zinc, Chromium
Filter Press BLDG 13	10 Cu ft	Caustic Recovery System	pH, Copper, Zinc, Chromium
Filter Press BLDG 13	7 Cu ft	BLDG 13 pH Neutralization Tank, 20 Yd Roll Off for site disposal	pH, Copper, Zinc, Chromium
Spent Caustic Holding Tank	8500 gal	Processing Tank Excess Caustic Hauled to Maxon	pH, Copper, Zinc, Chromium
Regenerated Caustic Holding Tank	8500 gal	Chem-Mill Tank	pH, Copper, Zinc, Chromium
Processing Tank	8500 gal	Crystallizers	pH, Copper, Zinc, Chromium
Crystallizer 1	8500 gal	Regenerated Caustic Holding Tank Solide to Aluminum Trihydrate Filter Press	pH, Copper, Zinc, Chromium
Crystallizer 2	8500 gal	Regenerated Caustic Holding Tank Solide to Aluminum Trihydrate Filter Press	pH, Copper, Zinc, Chromium
Crystallizer 3	8500 gal	Regenerated Caustic Holding Tank Solide to Aluminum Trihydrate Filter Press	pH, Copper, Zinc, Chromium
Crystallizer 4	8500 gal	Regenerated Caustic Holding Tank Solide to Aluminum Trihydrate Filter Press	pH, Copper, Zinc, Chromium
BLDG 13 Batch Maskant Mixing Tank	300 gal	Isolated from City Sewer. Spills drummed and shipped off site	Flammable Organic Chemicals
BLDG 13 Toluene Storage Tank	4000 gal	Containment Pit isolated from city sewer. Spills drummed and shipped off site	Flammable Organic Chemicals
BLDG 13 Acetone Storage Tank	3000 gal	Containment Pit isolated from city sewer. Spills drummed and shipped off site	Flammable Organic Chemicals

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MATERIAL 1923 CENTRAL AVE BLDG 2

TYPE OF MATERIAL	VOLUME	DISCHARGE	POTENTIAL POLLUTANTS OF CONCERN
2-T-1 Phosphoric Acid Anodize Tank	3000 gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH, Copper, Chromium
2-T-1A Phosphoric Acid Deoxidize Tank	3000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH Copper Chromium
2-T-2 Spray Rinse	4000 Gal	BLDG 13 Chromium Reduction Tank	pH, Copper, Chromium
2-T-3 Alodine 1500	4000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH, Chromium
2-T-4 Immersion Rinse	4000 Gal	BLDG 13 Chromium Reduction Tank	pH, Chromium
2-T-5 Alodine 600	4000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH, Chromium
2-T-6 Immersion Rinse	4000 Gal	BLDG 13 Chromium Reduction Tank	pH, Chromium
2-T-7 Deoxidizer 6-16	4000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH, Chromium
2-T-8 Immersion Rinse	4000 Gal	BLDG 13 Chromium Reduction Tank	pH, Copper, Zinc
2-T-9 Etchant 33	4000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH, Copper, Zinc
2-T-10 Turco 4215 NCLT Tank	4000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH
2-T-11 Spray Rinse	30-50 gpm	BLDG 13 Chromium Reduction Tank	pH, Chromium
2-T-12 Chromic Anodize	4000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH, Chromium
2-T-13 Sulfuric Acid Anodize Tank	4000 Gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH
2-T-14 Immersion Rinse	4000 Gal	BLDG 13 Chromium Reduction Tank	pH, Chromium,
2-T-15 Dichromate Seal	5000 gal	BLDG 2 Stainless Steel Batch Holding Tank or Poly Tank	pH, Chromium
2-T-16 Dilute Seal	5000 gal	BLDG 13 Chromium Reduction	pH, Chromium
BLDG 2 Stainless Steel Batch Holding Tank	4000 gal	Ship off site to Alpha Omega	pH, Chromium, Copper, Zinc
BLDG 2 Poly Holding Tank	1500 gal	Ship off Site to Alpha Omega	pH, Chromium, Copper, Zinc
BLDG 2 Batch Treatment Tank	1500 gal	Ship off site to Alpha Omega	pH, Chromium, Copper, Zinc
MOCO Quench tank 20% Glycol	6600 gal	No discharge to POTW Sump pump locked out during production	COD
MOCO Rinse Tank	6600 gal	Standard Operation Procedures	COD
5 Caustic Recovery Tanks	42500 gal	Recycle caustic to 1-T-1 and 13-T-2 Chem-Mills	pH Copper Zinc

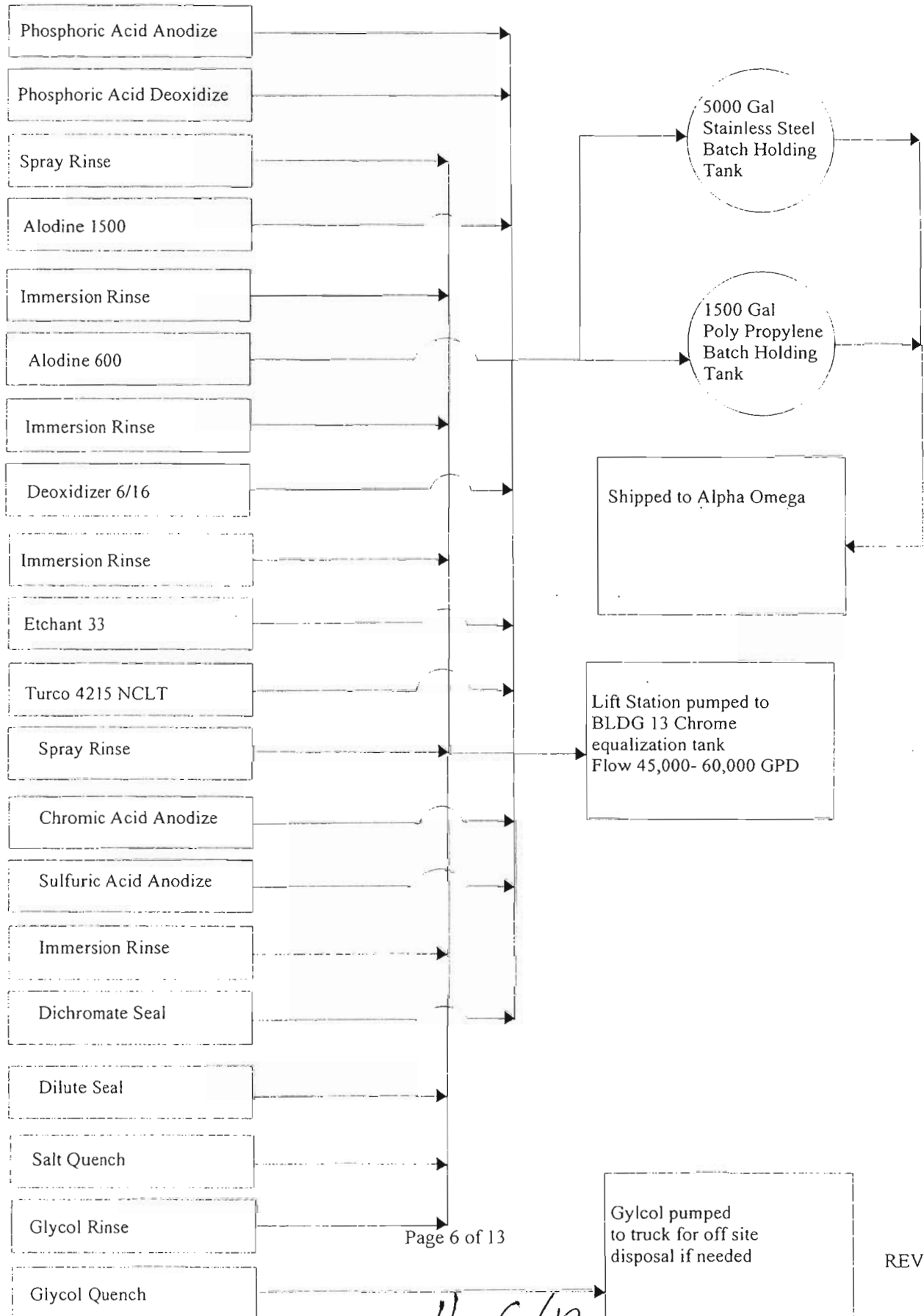
11-4/12



Triumph Fabrications -
Hot Springs

A Triumph Group Company

Building 2
1923 Central Ave



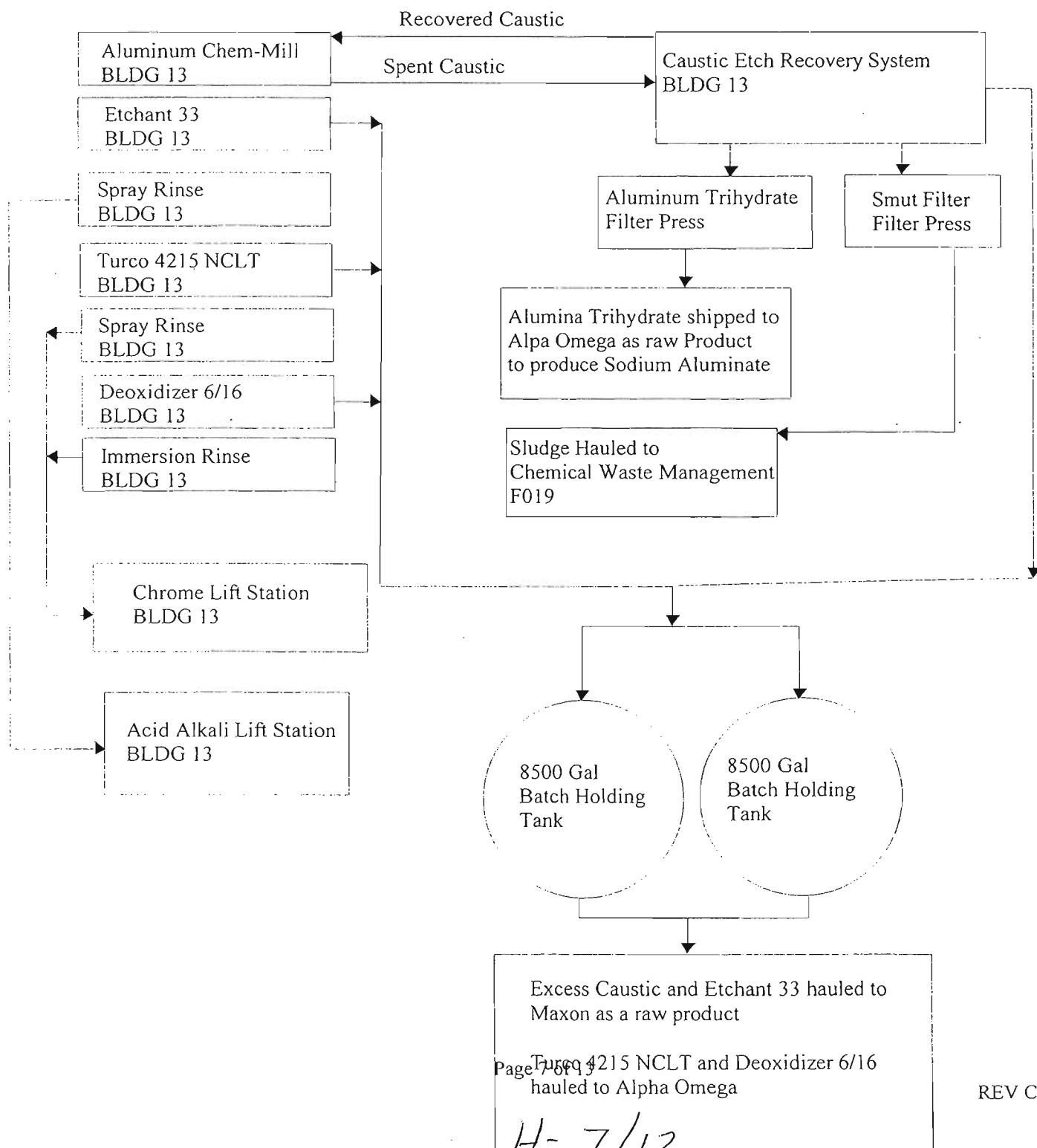
REV C 8/4/08



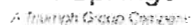
Triumph Fabrications -
Hot Springs

A Trium Group Company

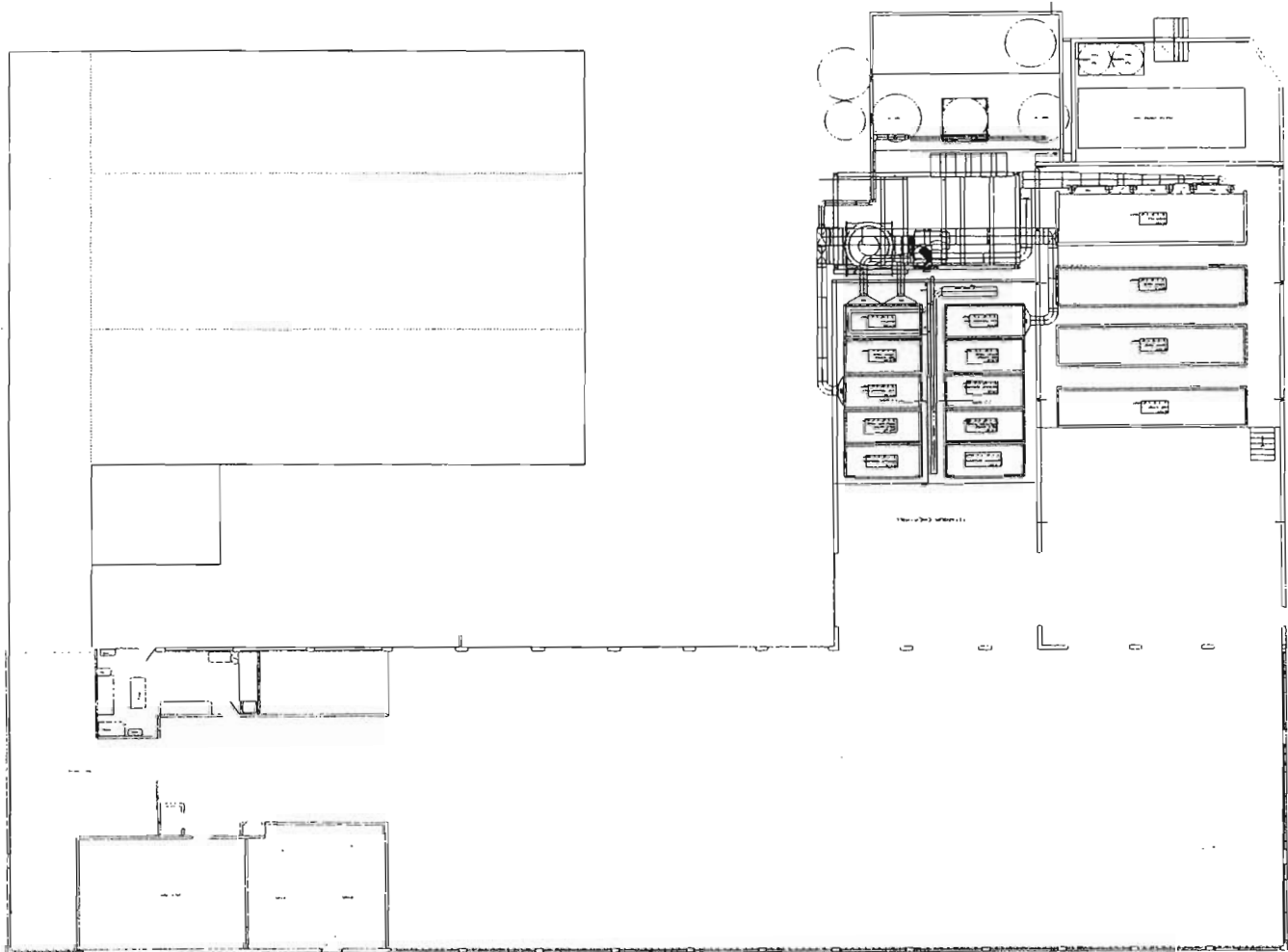
BLDG 13 Waste Flow
115 Nevada St



H- 7/12



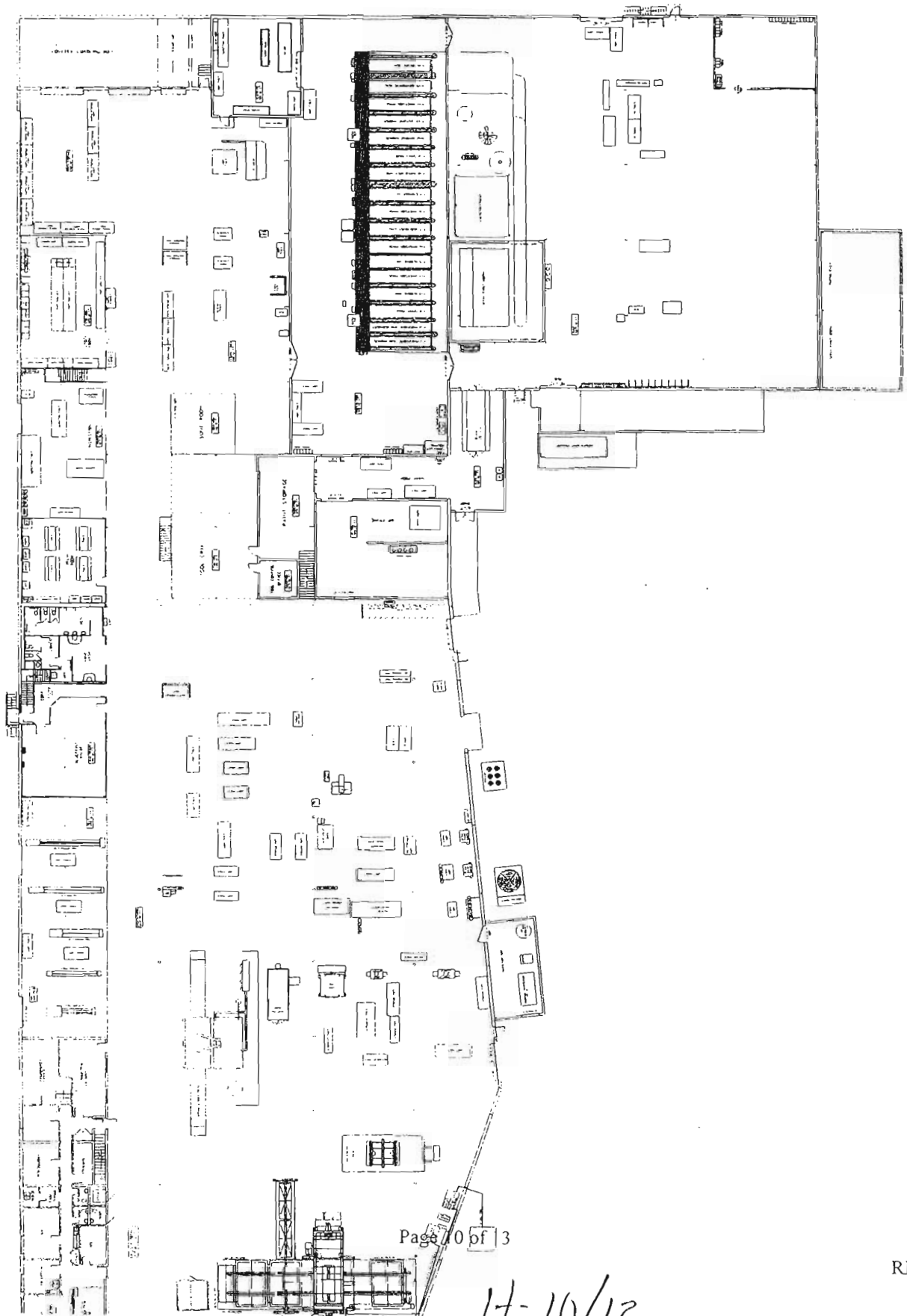
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H-9/12



Triumph Fabrications -
Hot Springs
A Triumph Group Company



17-10/12



Triumph Fabrications -
Hot Springs

A Triumph Group Company

Triumph Fabrications Hot Springs Environmental Control Systems TTO Plan

Triumph Fabrications Hot Springs has submitted a Notification of Hazardous Waste Activity, and has been assigned the following EPA ID#s

EPA ID#	Location
ARD010304475	1923 Central AV

Building 2 1923 Central Ave

The rinse waters from the anodize line flow to a lift station which pumps to Building 13 waste water treatment system. The waste water treatment system separates chrome rinses, and acid /alkali rinses. The chrome rinses are directed to a chrome reduction system, where hexavalent chromium is automatically reduced to trivalent chromium. The overflow from this system flows into the acid/alkali along with the acid /alkali rinses. The pH is adjusted to precipitate the heavy metals in the acid/alkali system. The stream then flows to a flocculent system, which adds polymer. The overflow from the flocculent system is directed to a clarifier, then directed to the mixed media filtering system which discharges to the POTW. The sludge is directed to a sludge thickening system prior to being filter pressed.

The treatment system also contains a batch holding system. Process solutions that have to be dumped are pumped into a batch holding tank. Batches dumps are shipped to Alpha Omega for recycling

The filter cake from the filter press is managed as a hazardous waste EPA Waste Code F019. All shipments are manifested on a Uniform Hazardous Waste Manifest, transportation is handled by Universal Transport. Disposal is handled by Waste Management in Sulphur LA.

Paint and solvent cleaning wastes are removed from the process areas daily by the painter. The paint and solvent waste are managed as hazardous waste EPA Waste Codes D001 D007 D035 F003 F005. All shipments are Manifested on a Uniform Hazardous Waste Manifest, transportation is handled by TRIAD EPA ID# OKD98158871. Disposal is handled by RINECO EPA ID# ARD981057870.

Building 1 and 13 1-15 Nevada

Masking operations containing toxic organic compounds are separated from any drain to the POTW or storm water. Spills of maskant chemicals are cleaned up with vermiculite, drummed up and shipped to RINECO.

The rinse waters from the Chem-Milling flow to a package treatment system capable of handling 180 gpm. The package treatment system separates chrome rinses, and acid /alkali rinses. The chrome rinses are directed to a chrome reduction system, where hexavalent chromium is automatically reduced to trivalent chromium. The overflow from this system flows into the acid/alkali along with the acid /alkali rinses. The pH is adjusted to precipitate the heavy metals in the acid/alkali system. The stream then flows to a flocculent system, which adds polymer. The overflow from the flocculent system is directed to a clarifier, then directed to the mixed media filtering system which discharges to the POTW. The sludge is directed to a sludge thickening system prior to being filter pressed.

The treatment system also contains a batch holding system. Process solutions that have to be dumped are pumped into a batch holding tank. Batch dumps are shipped to Alpha Omega for Re3cycling

The State of Arkansas requires an annual Hazardous Waste Report, which is submitted March 1. Copies of all reports are filled in the BLDG 7

The computer program also tracks our Title 313 chemicals from the painting process. Tier 1 and Tier 2 reports are submitted annually in March, and R forms are submitted in July

Aluminum Chem Milling solutions are periodically pumped to a caustic recovery system located in BLDG 13. The recovered caustic is pumped back to the Chem-Mill tanks and the Aluminum Trihydrate is shipped to Alpha Omega for Recycling

H- 11/12



Triumph Fabrications -
Hot Springs

A Titanium Chem-Mill Company

Titanium Chem- Milling Solutions are periodically dumped into a separate batch treatment system. This waste is neutralized and is processed through a filter press. TCLP analyses has been performed on the resulting filter press cake and determined to be non-hazardous by Arkansas Department of Pollution Control And Ecology. Disposal is handled through Waste Service of Little Rock.

Triumph Fabrications Hot Springs has Storm Water Permits for both facilities. The permit identification numbers are as follows:

115 Nevada ARR00A217

1923 Central ARR00A218

The storm water regulations have required us submit DMR forms under the VB1 category develop and implement a pollution prevention plan. The pollution prevention plan had to be consistent with other plans that were in existence at the Storm water regulations came into effect. Triumph Fabrications Hot Springs was operating pollution control equipment as described above prior to the implementation of the storm water regulations. This document is part of the pollution prevention plan, and will be updated as necessary.

Retaining walls were designed to prevent accidental discharges into the storm water and to the city sewer. The installation of the retaining walls was completed the retaining walls for Chem-Mill 11/1/93.

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge, no dumping of concentrated toxic organics into the waste waters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the control authority.

Reference 40 CFR Part 403.13(e)

Michael L. Corballis

Date

8/25/08

Michael L. Corballis
Environmental Manager

H-12/12