Henderson, Katie

From: Torrence, Rufus
Sent: Wednesday, November 30, 2011 3:01 PM
To: Dennis Brunson
Subject: AFIN 26-00145 AR0033880 Hot Springs Pretreatment Program Modification: Streamlining Revision
Attachments: HTSP Audit Report 20110923.pdf

Dennis,

Referring to Page 5 of 8 in the attached audit report, the City was required to submit the program narrative with the new ordinance by December 5, 2012. Based on our telephone conversation today, the City did not fully understand the scope of the requirement and has not commenced working on the updated program narrative.

The Department will allow the City to submit the updated program narrative on or before January 10, 2012.

Rufus, ADEQ

From: Dennis Brunson [mailto:DBrunson@cityhs.net]
Sent: Wednesday, November 30, 2011 1:42 PM
To: Torrence, Rufus
Subject: Re: Audit Review

Rufus,

As per our conversation today, I will update and submit the program narrative and new attorney's letter by January 10, 2012

Thanks,

Dennis R. Brunson
Pretreatment Coordinator
City of Hot Springs Municipal Utilities WWTP
Industrial Pretreatment Division
dbrunson@cityhs.net
(501) 262-1881#15
(501) 262-0339 Fax
www.cityhs.net

Your Time and Energy is life's monetary currency. You have what you spend it on!

ADEQ

ARKANSAS
Department of Environmental Quality

September 23, 2011

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

Re: City of Hot Springs (AFIN: 26-00145 NPDES Permit Number: AR0033880)
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 30th through September 1st, 2011. The report should be made available for review by appropriate industrial and City officials. Hot Springs staff should discuss and evaluate the findings in this report. Please respond to my required actions and recommendations in writing within thirty (30) days.

The Department appreciates the staff's assistance. The staff appeared very interested in both the Pretreatment and Pollution Prevention Programs. Most of the recommendations in the attached audit/assessment are intended to aide the City's pretreatment program with achieving the objectives of the Clean Water Act.

If the City has questions or concerns, please do not hesitate to contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us .

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: Audit Report/Assessment Checklist

Cc: Rudy Molinda / EPA 6WQ-PM (via e-mail w/o attmt)
Eric Fleming / Mgr-Field Services (w/o attmt)

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF HOT SPRINGS, ARKANSAS

NPDES PERMIT #AROO33880

September 23, 2011

PREPARED BY: Rufus Torrence

ADEQ Water Division Engineer and Auditor

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 Northshore Drive

NORTH LITTLE ROCK, ARKANSAS 72118-5317

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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

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 30th through September 1st, 2011, 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
Richard Penn	Hot Springs / Utilities 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 was 12 MGD. The City is adding blowers to the aeration basin to increase the design flow to 16 MGD. The influent averages about 10 MGD with I & I problems. A CAO and SECAP are in place to address the I & I problems (see Attachment G-1/4 & H-1/2). The effluent has not exhibited a pattern of toxicity. However, there were lethal and sublethal toxicity to the Pimephales promelas (Fathead Minnow) in February 2011 but no lethal or sublethal failures for the Ceriodaphnia dubia (Water Flea) during the past five years.

The plant receives approximately 0.2 MGD from 9 significant industries; 3 are categorical industrial users. Sludge is composted with yard waste and then given away to the public. 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) Under ***40 CFR 403.4*** The City cannot have any local regulations (ordinance/code) that are "*less stringent than any set forth in National Pretreatment Standards, or any other requirements or prohibitions established under the Act...*".

On October 14, 2005 EPA promulgated revisions to 40 CFR 403. These revisions are commonly referred to as the "Streamlining" revisions. Each POTW with an approved pretreatment program must review the local legal authority to ensure that local ordinances/codes are not less stringent than the Streamlining revisions. For national consistency, the Department decided to wait for EPA to develop guidance before reviewing ordinances and approving modifications to Arkansas approved pretreatment programs. In January 2007 EPA published a "Model Pretreatment Ordinance" with the recent Streamlining Revisions.

The City's last revision to the legal authority and pretreatment program were incorporated into NPDES permit #AR0033880 on February 25, 2002. In reference to Part III (page 2) in the City's NPDES permit (effective February 1, 2008), find in section 8.a, "*The Sewer Use Ordinance and the Pretreatment Program have not been modified to come into compliance with the current 40 CFR 403 regulations* [Streamlining Revisions]. *The permittee shall submit all necessary proposed modifications to ADEQ within twelve (12) months of the effective date of this permit.*" The City submitted the first draft ordinance attached to an email [*Z000BTAJ.xml*][1] dated April 1, 2009. The Department reviewed the draft ordinance. Enclosed with a letter [*Z0000O3P.txt*] dated August 24, 2009, the Department sent the City a checklist and a revised draft ordinance. On September 3, 2009 in an attachment to an email [*Z000134NG.xml & Z000134MA.xml*], the City submitted a second draft ordinance to incorporate the Department's revisions. The Department reviewed the second draft ordinance. In a letter [*Z00013BMB.xml*] dated September 25, 2009, the Department sent the City another revised draft ordinance. Attached to an email [*Z000134M5.xml & Z000134KY.xml*] dated December 15, 2009, the City submitted the final draft ordinance. In an email dated July 15, 2011 the City stated their plans to adopt the ordinance (see Attachment J-1/2). In reference to Section D below, the Board of Directors must adopt the draft ordinance by **October 3, 2011**, the City must update the pretreatment program narrative and the complete modification must be submitted to the Department by **December 5, 2011**.

[1] Cite refers to the filename of the document in ADEQ official records known as ZyLAB®.

2) Under **40 CFR 403.5(c)(1)**, "Each *POTW developing a POTW Pretreatment Program...shall develop and enforce specific limits...Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits.*"

The current approved pretreatment program narrative has a local limit development in Attachment L. The City adopted these local limits in Ordinance #4577 and codified the limits in Hot Springs Code; Section 9-3-43.4 (see Attachment K-1/1). These limits are currently effective and enforceable.

At a minimum the City must update the current local limits in conjunction with updating the program narrative to comply with the recent Streamlining revisions to 40 CFR 403. The City is currently applying local limits in some SIU permits (see Attachments B2-2/2 & B3-2/2) which do not appear to have a firm technical basis and may not be enforceable.

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, 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, picture of actual sampling point, brief chronological history (including start-up date) of IU etc. The City may summarize permit limit development in a Statement of Basis and attached this basis to each permit.

5) The Pretreatment Program may collect additional 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) In reference to the 2010 Annual Report (see attachment I-2/2) required by 40 CFR 403.12(i), the City is showing that all CIUs are submitting semi-annual reports required by 40 CFR 403.12(e). However, during the file review, the Auditor confirmed that the CIUs are not submitting semi-annual reports. In accordance with 40 CFR 403.12(g)(1), when the City collects all the information for these reports, the CIUs are not required to submit them. The City must show the correct information in the annual reports.

8) In conjunction with requirement #2 above and the current plant expansion to increase the design flow from 12 MGD to 16 MGD, the City should consider determining MAHLs for conventional pollutants (BOD_5, $CBOD_5$, TSS, NH3-N, etc.).

9) In accordance with 40 CFR 403.3(v)(3), the Control Authority (the City) may at any time, on its own initiative, determine that St. Joseph, Medical Center, Ryan and Kleen listed as "SIUs" are actually "non-significant industrial users". Non-SIUs are not subject to oversight by the Approval Authority (ADEQ). If the City elects to change the designation of these SIUs, please include a brief explanation in the next annual report to declare the new status of these SIUs. The explanation can be in the cover letter.

10) Correct typo ("*receiving waters water quality standards*") in Section 1.A.g in each SIU permit. Refer to Attachment B1-3/9.

11) The City should replace all "technology-transfer" limits with applicable local limits. This is in conjunction with requirement #2 above. Except for mercury, the metal limits in Alliance's permit are 40 CFR 433.15 pretreatment standards (Alliance is not a CIU). See Attachment B2-2/2. Applicable local limits control only specific pollutants which are reasonably expected to be in the IU's discharge. For example, considering only the metals, the City should place in Alliance's permit a limit for only zinc since it is the only metal reasonably expected to be in this IU's discharge.

12) The City should revise the Industrial Monitoring Schedule to show all SIUs subject to sampling requirement. See Attachment F-1/1. The new schedule should have not only a "feed-forward" feature but also a "feed-back" feature. In other words, show dates of forecasted samplings and also the actual dates of sampling.

13) a. In accordance with 40 CFR 403.12(g)(6), the City should remove or revise paragraph 3.C in Hot Springs Packing (HSP) permit (see Attachment B4-2/4). The City must require every SIU, which samples and analyze its wastewater for regulated pollutants using 40CFR136 methods, to report the results to the Control Authority even if the SIU samples more often than required by its permit.

b. Since the City is not interested in limiting the "soluble" organic loading to the POTW, in lieu of placing numeric limits in HSP permit for COD, BOD_5 or TSS, the City may reference a BMP in Section 3 of HSP permit. The BMP should describe how HSP intends to prevent large particles of food from entering the sewer system. The City may refer to EPA Streamlining Fact Sheet #7 (already sent to the City as an attachment to an email dated September 1, 2011) for more details.

14) The SIU permits do not cite the City's legal authority to impose penalties. Section 6 (see Attachment B1-8/9) states that Arkansas law allows the City to impose Civil and Criminal penalties but does not state that the City has the authority to impose penalties. The City should add this language to Section 6, *"In accordance with Hot Springs Codes, the City has the authority to impose administrative fines [§ 9-3-51.6], civil penalties [§ 9-3-52.2] and criminal penalties [§ 9-3-52.3]."*

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

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 adopt a new pretreatment ordinance and update the pretreatment program narrative as required in Section B above.

* * * * * * * * * * * * * * *

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, must be submitted to ADEQ for review and approval.

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: *City of Hot Springs* NPDES #: *AR0033880*
Mailing address: *P O Box 700 71902*

Permit Signatory: *Steve Mallett* Title: *Deputy City Mgr for Public Works & Utilities*

Telephone: *(501) 321-6860* FAX NUMBER: *(501) 321-6967*

Pretreatment Contact: *Dennis Brunson* Title: *Pretreatment Coordinator*

Address: *320 Davidson, 71902*

Telephone *(501) 262-1881 ext. 15* E-Mail address: dbrunson@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 30-Sept 1, 2011* (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Rufus Torrence	*Engineer II (Auditor) / ADEQ*	*(501) 682-0626*

Control Authority representative(s):

	NAME	TITLE	PHONE NUMBER
*	*Dennis Brunson*	*Pretreatment Coordinator*	*(501)262-1881 ext 15*
	Ron Wacaster	*Facilities Operations Manager*	*(501)321-6814*
	Richard Penn	*Utilities Director*	*(501)321-6884*

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*Dec/2009*	*No Major Violations Noted*

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.

**The facility is currently under CAO No. 08-099. See Attachment G-1/4. The main purpose of the CAO is to require the City of Hot Springs to take measures to remedy the I/I and SSOs. The City of Hot Springs submitted a System Evaluation and Capacity Assurance Plan (SECAP) to address the causes of the I/I and SSOs. See Attachment H-1/2. Compliance with the proper operation and maintenance of the wastewater collection system as it applies to dry weather flows was required on January 1, 2011. The City of Hot Springs must achieve full compliance with the proper operation and maintenance of the wastewater collection system, as it applies to capacity related overflows, by January 1, 2018.*

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
*AR0033880	Hot Springs	02/01/08	01/31/08

* 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)- *10.3* MGD

ADEQ has issued a construction permit dated 7-28-2011 to increase design flow to 16 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs: *10* # of CIUs : *3*

Industrial Flow (mgd): *0.2* Industrial Flow (%) : *2* %

Level of Treatment		Type of Process(es):
Primary	✓	*Actuated grit chambers; primary clarification;*
Secondary	✓	*Diffused aeration basins; secondary clarification;*
Tertiary	✓	*Tertiary Sand Filters; Belt Press Dewatering*

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:	
_____	Land Application	_____	dry tons/yr.
_____	Incineration	_____	dry tons/yr.
_____	Monofill	_____	dry tons/yr.
_____	Mun. Solid Waste Landfill	_____	dry tons/yr.
✓	Public Distribution	*908*	dry tons/yr.
_____	Lagoon Storage	_____	dry tons/yr.
_____	Other (specify)	_____	dry tons/yr.

Refer to 2010 Compost Report [Zylab B0000BSMQ.xml] dated 2-1-2011; see page 1 for 7170 cu yds/yr and Compost Facility Permit Mod [Zylab C00005YIU.xml] dated 6-29-2011; Compost Design Narrative paragraph 7. Table 1 on page 1-3 for density and fraction.

$$\left(\frac{1490\frac{lbs-wet}{cu\ yd}}{2000\frac{lbs}{ton}}\right) \times 0.17\ dry\ wt\ fraction \times 7170\ \frac{cu\ yds}{yr} = 908\ dry\ tons/yr$$

List of toxic pollutant limits in NPDES permit: *None*

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 compost (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.

___ x* ___ 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 both lethal and sublethal failures (minnows) in 02/2011.

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

___ x ___ 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)
TRC	I&I

YES NO

___N/A*___ Has the treatment plant sludge violated the TCLP Test?

**The Compost Facility is classified as a "landfill" but is exempted from TCLP testing.*

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)]
✓	___	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

2. Modifications in Progress:

Date Requested	Nature of Modification
4/1/2009	***Update pretreatment ordinance and narrative****

The City must comply with the recent changes in 40 CFR 403 commonly referred to as the "Streamlining Update"; see email from City dated 4-1-2009 in Zylab [Z000BTAJ.xml].

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

City has adopted O&G ordinace.

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 (P^2) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	***N/A***			
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	***N/A***
___	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:

IU Name	Problem	NPDES Permit Violation Yes	No
(None)			

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 P^2 activity? ***CA has no formal P2 program.***

✓ ___ 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)]

___ ***x*** If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 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? ***Ongoing process with small industrial base***

Are there any problems that the Control Authority has in identifying and categorizing SIUs: ***NO***

YES NO

___ ***x*** 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. ***9*** SIUs (As defined by the Control Authority) [ICIS-SIUS]
b. ***3*** Categorical Industrial Users (CIUs) [ICIS-CIUS]
c. ***6*** Noncategorical SIUs
d. ***0*** Other regulated nonsignificant IUs (Describe)
9 TOTAL of a. + d.

****When a new IU moves into the City, the CA must sign off on the new connection. CA maintains an Excel Spreadsheet on all IUs.***

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

F. Control Mechanism Evaluation [403.8(f)(1)(iii)]

YES NO
___ x Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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

What is the maximum term of the control mechanism? ***3 years***

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

IU NAME	PERMIT EXPIRATION DATE
N/A	

YES NO
✓ ___ Does the Control Authority accept trucked septage wastes?
✓ ___ Does the Control Authority accept other trucked wastes?

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

List all pollutants and applicable limits, other than local limits and categorical standards 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
BTEX	***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?

Jan 2009 Date Notified ***US Mail*** Method of Notification

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

x	Federal Register	___	Journals, Newsletters
x	Meetings, Training	***x***	Internet
x	Government Agencies	***x***	Other ***PC/Internet***

YES NO

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

If yes, complete the information below:

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

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? [ICIS-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)	✓		**		✓		1.11
Cadmium (Cd)	✓		**		✓		0.59
Chromium-Total	✓		**		✓		17.43
Copper (Cu)	✓		**		✓		16.65
Cyanide (CN)	✓		**		✓		2.45
Lead (Pb)	✓		**		✓		2.53
Mercury (Hg)	✓		**		✓		0.037
Molybdenum (Mo) *		x	**			x	
Nickel (Ni)	✓		**		✓		10.07
Selenium (Se) *		x	**			x	
Silver (Ag)	✓		**		✓		0.47
Zinc (Zn)	✓		**		✓		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 in current approved program narrative; see ordinance #4577 sect 9-8-43.4.***

YES NO

___ x 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	

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

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

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

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

[1]**Ordinance 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)
1*	11%	Not sampled at least once in the past reporting year?
0	0	Not inspected at least once in the past Pretreatment reporting year?
1*	11%	Not inspected or not sampled at least once in the past reporting year? [ICIS-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)

****The PPS attachment (Section III.5) in the 2010 annual report shows that all 3 CIUs and only 5 SIUs were sampled.***

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:

	Analytical Method *	Name of Laboratory
Metals	***AA flame/furnace; ICAP***	***American Interplex***
Cyanide	***Spectrophotometric***	"
Organics	***GC/MS***	"
Other	***BOD; TSS; Tot Phos***	***In house***

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 Conventionals
" Metals
" Organics

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

___ X 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

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

****Mid-America had an Oil & Grease violation but it did not cause pass through or interference at the POTW and, hence, was not a violation of the prohibited discharge standards [see 40 CFR 403.5(6) for more details]***

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)]

✓	Notice or letter of violation	✓	Administrative Order
✓	Setting of compliance schedule	✓	Revocation of permit
✓	Injunctive relief	✓	Fines (maximum amount):

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

_____ Imprisonment
✓ 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 in City Code (Ord #4577)]***
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 Type	Enforcement Action Date	Return to Compliance? Yes (Date)	No
Not Applicable					

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:

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

YES	NO	
	x	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
	x	Interference [ICIS]	
	x	Pass through [ICIS]	
	x	Fire or explosions? (incl. flash point viol.)	
	x	Corrosive structural damage? (incl. pH <5.0).	
	x	Flow obstructions?	
	x	Excessive flow or pollutant concentrations?	
	x	Heat problems?	
	x	Interference due to oil or grease?	
	x	Toxic fumes?	
	x	Illicit dumping of hauled wastes?	

YES	NO	
✓		**Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]**
0		**How many SIUs are currently on compliance schedules?**
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	$ [ICIS-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
	x	Pollutant type
	x	Industrial category or type
	x	SIC Code
	x	IU discharge volume
	x	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)]
	x	Have IUs requested that data be held confidential? How is confidential information handled by the Control Authority? _____
	x	Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: _____

✓		Are all records maintained for at least 3 years?

SECTION III: INDUSTRIAL USER FILE REVIEW

K. RESOURCES

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

2 FTEs

YES NO

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

		Percent of Total Funding
✓	POTW general operating fund	100
___	IU permit fees	
___	monitoring charges	
___	industry surcharges	
___	other (describe) ___	
	Total	100%

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

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

YES	NO		If no, explain
✓	___	Legal assistance	
✓	___	Permitting	
✓	___	IU inspections	
✓	___	Sample collection	
✓	___	Sample analyses	
✓	___	Data analysis, review and response	
✓	___	Enforcement	
✓	___	Administration (inc. record keeping /data management)	

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	***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 ***Hot Springs Packing Co.*** File/ID No. ***C-0005***
Industry Address ***580 Mid-America Blvd 71913 / PO Box 2312 71914***
Industry Description ***Hog Slaughter and Meat Packing***
Industrial Category ***(Not Applicable)*** 40 CFR ***N/A*** SIC Code: ***2011***
Ave. Total Flow (gpd) _____ Ave. Process Flow (gpd) ***11,233***

Industry visited during audit: ***YES***

Comments: ***This facility was not operating during the visit***

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) _____ Ave. Process Flow (gpd) ***74,544***

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 ***Kleen Linens*** File/ID No. ***C-0007***
Industry Address ***225 Malvern Ave 71901***
Industry Description ***Commercial Launderer***
Industrial Category ***(Not Applicable)*** 40 CFR N/A SIC Code: ***7218***
Ave. Total Flow (gpd) _____ ***Ave. Process Flow (gpd)*** ***13,689***

Industry visited during audit: ***YES***

Comments: ***Auditor recommends reclassified this IU as a NSIU; this facility receives no industrial laundry (only "clean" linens from hospitals).***

FILE #: 4 Industry Name ***Triumph Airborne Str*** File/ID No. ***C-0001***
Industry Address ***115 Centennial Drive 71913***
Industry Description ***Phosphates aluminum and titanium parts for military aircraft***
Industrial Category ***Metal Finishing*** 40 CFR ***433*** SIC Code: ***3728***
Ave. Total Flow (gpd) _____ ***Ave. Process Flow (gpd)*** ***12,232***

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) ***32,500***

Industry visited during audit: ***YES***

Comments: _____

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

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

	Pack	***Tri-Fab***	***Kleen***	***Tri-Air***	***All***
1. Is the IU considered "significant" by the Control Authority?	Y	Y	Y	Y	Y
2. Is the user subject to categorical pretreatment standards?	N	Y	N	Y	N
a. New source or existing source (NS or ES)?	N/A	ES	N/A	NS	N/A
b. Is this IU one identified as having P^2 potential?	N	N	N	N	N

B. Control Mechanism

1. Does the file contain an application for a control mechanism?	Y	Y	Y	Y	Y
If yes, what is the application date?	9-27-10	6-16-11	2-23-11	7-20-11	2-02-11
Does it ask for Pollution-Prevention information?	Y[1]	Y[1]	Y[1]	Y[1]	Y[1]
2. Does the file contain a permit?	Y	Y	Y	Y	Y
Permit Expiration Date?	9-14-14	7-1-14	4-2-14	8-1-14	3-2-14
Is a fact sheet included?	N	N	N	N	N

Comments: *1. **Page 7 of 18 asks about TOMPs; this is the only reference to P2. See Attachment A-7/33 for more details.***

SECTION III: INDUSTRIAL USER FILE REVIEW

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

		Pack	*Tri-Fab*	*Kleen*	*Tri-Air*	*All*
3.	Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a.	Legal Authority Cite?	CP[3]	CP[3]	CP[3]	CP[3]	CP[3]
b.	Expiration date?	CP	CP	CP	CP	CP
c.	Statement of nontransferability?	5-F	4-F	4-F	4-F	4-F
d.	Appropriate discharge limitations?	Y[2]	2-A	N[4]	2-A	N[4]
e.	Appropriate self-monitoring requirements?	4-G	3-D[6]	3-D[6]	3-D[6]	3-D[6]
f.	Sampling frequency?	3-B[5]	2-B[7]	2-B[7]	2-B[7]	2-B[7]
g.	Sampling locations?	2-F	2-B	2-B	2-B	2-B
h.	Requirement for flow monitoring?	N/A	3-D	3-D	3-D	3-D
i.	Types of samples (grab or composite) for self-monitoring?	Y	Y	Y	Y	Y
j.	Applicable IU reporting requirements?	N/A	Y	Y	Y	Y
k.	Standard conditions for:					
	Right of Entry?	5-B	4-B	4-B	4-B	4-B
	Records retention?	5-C	4-C	4-C	4-C	4-C
	Civil and Criminal Penalty provisions?	6-A[8]	6-A[8]	6-A[8]	6-A[8]	6-A[8]
	Revocation of permit?	5-H	4-H	4-H	4-H	4-H
l.	Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	N/A
m.	General/Specific Prohibitions?	Y	Y	Y	Y	Y
n.	Where technologically and economically achievable, are P[2] aspect included?	N	N	N	N	N

Comments:

2. The City may substitute numeric limits with a BMP for HS Packing Co. See Attachment B4-2/4 for limits.

3. CP => Cover Page; cover page cites Ord #4577; See Attachment B1-1/9.

4. Permit contains "technology transfer" local limits from 40CFR433 guidelines; these transfer limits do not appear in the ordinance. See Attachment B2-2/2 & B3-2/2.

5. The City performs monitoring (twice/year) at HS Packing Co. See Attachment B4-2/4.

6. The above referenced "Reporting Requirements" paragraphs require monthly reports. See Attachment B1-5/9.

7. The sampling frequency is stated Section 2 paragraph B; see Attachment B1-4/9.

8. Permit does not cite City's authority to collect penalties. See Attachment B1-8/9.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards	*Pack*	*Tri-Fab*	*Kleen*	*Tri-Air*	*All*
1. Has the IU been properly categorized?	Y	Y	Y	Y	Y
2. Were both Categorical Standards and Local Limits properly applied?	Y	Y	N[9]	Y	N[9]
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	Y	Y	Y	Y	Y
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	N/A	N/A	N/A
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	N/A	N/A	N/A	N/A	N/A
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	N/A	N/A	N/A	N/A	N/A
7. Is the Control Authority applying a bypass provision to this IU?	N	N	N	N	N

Comments: ***9. Alliance & Kleen permits had 40CFR433 limits as "local limits" instead of the local limits shown in the ordinance. See Attachment B3-2/2.***

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

	Pack	*Tri-Fab*	*Kleen*	*Tri-Air*	*All*
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	Y	Y	Y	Y	Y
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	Y[10]	Y[10]	Y[10]	Y[10]	Y[10]
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	Y	Y	Y	Y	Y
b. Sample date and time?	Y	Y	Y	Y	Y
c. Sample type?	Y	Y	Y	Y	Y
d. Wastewater flow at the time of sampling?	N	N	N	N	N
e. Sample preservation procedures?	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
f. Chain-of-custody records?	Y[11]	Y[11]	Y[11]	Y[11]	Y[11]
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	Y	Y	Y	Y	Y
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	N/A	Y	N/A	Y	N/A
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Y	Y	Y	Y	Y
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	Y	Y	Y	Y	Y

Comments:

11. ***The CA files C-of-C records is in an "overall" file since more than one SIU results are shown on a single report for the contract lab (American Interplex). See Attachment D.***

SECTION III: INDUSTRIAL USER FILE REVIEW

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

Inspections	*Pack*	*Tri-Fab*	*Kleen*	*Tri-Air*	*All*
7. Does the IU file contain inspection reports?	Y	Y	Y	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	Y	Y	Y
b. Date of last Inspection	10-11-10	10-28-10	12-1-10	10-27-10	9-22-10
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	Y	Y	Y	Y	Y
b. Inspection date and time?	Y	Y	Y	Y	Y
c. Name and title of IU official contacted?	Y	Y	Y	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	Y	Y	Y
f. Evaluation of pretreatment facilities?	N/A	Y	N/A	Y	Y
g. Evaluation of self-monitoring equipment and techniques?	N/A	Y	Y	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?	N/A	Y	Y	Y	Y
n. Laboratory procedures?	Y[14]	Y[14]	Y[14]	Y[14]	Y[14]
o. Monitoring records?	N/A	Y	Y	Y	Y
p. Evaluation of Pollution Prevention opportunities?	N	N	N	N	N
q. Control Authority inspector signature?	Y	Y	Y	Y	Y

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Pack	***Tri-Fab***	***Kleen***	***Tri-Air***	***All***
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	N/A	Y	Y	Y	Y
11. Does the file include:					
a. BMR?	N/A	Y	N/A	Y	N/A
b. 90-Day Report?	N/A	Y	N/A	Y	N/A
c. All periodic reports?	Y	Y	Y	Y	Y
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	N/A
12. Did the IU report on all required parameters?	Y	Y	Y	Y	Y
13. Did the IU comply with the required sampling frequency(s)?	N/A	Y	Y	Y	Y
14. Did the IU report flow?	N/A	Y	Y	Y	Y
15. Did the IU comply with the required reporting frequency(s)?	N/A	Y	Y	Y	Y
16. For all SIUs, are self-monitoring reports signed and certified?	N/A	Y	Y	Y	Y
17. Did the IU report all changes in its discharge? [403.12(j)]	N/A	N/A	N/A	N/A	N/A
18. Has the IU developed a Slug Control and Prevention Plan?	Y	Y	Y	Y	Y
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	N	N	N	N	N
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	N/A	N/A	N/A	N/A	N/A
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	N/A

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	*Pack*	*Tri-Fab*	*Kleen*	*Tri-Air*	*All*
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	Y	Y	Y	Y	Y
b. IU self-monitoring results?	Y	Y	Y	Y	Y
c. If NS CIU was it compliant within 90 days from commencement of discharge?	N/A	N/A	N/A	N/A	N/A
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	0	0	0
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	N/A	N/A	N/A	N/A	N/A
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	N/A	N/A	N/A	N/A	N/A
5. Were all nondischarge violations identified in the file?	N/A	N/A	N/A	N/A	N/A
6. Was the IU notified of all violations?	N/A	N/A	N/A	N/A	N/A
7. Was follow-up enforcement action taken by the Control Authority?	N/A	N/A	N/A	N/A	N/A
8. Did the Control Authority follow its approved ERP?	N/A	N/A	N/A	N/A	N/A
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	N/A	N/A	N/A	N/A	N/A
10. Is there a compliance schedule? If yes:	N/A	N/A	N/A	N/A	N/A
11. Were there any compliance schedule violations?	N/A	N/A	N/A	N/A	N/A
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	N^{15}	N^{15}	N^{15}	N^{15}	N^{15}

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Pack	***Tri-Fab***	***Kleen***	***Tri-Air***	***All***
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
b. TRC	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
c. Pass through/Interference	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
d. Spill/slug loads	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
e. Reporting	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
f. Compliance schedule	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
g. others (specify)	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
13. Was the SIU published for SNC?	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]
Date of publication.	N/A[15]	N/A[15]	N/A[15]	N/A[15]	N/A[15]

Comments: ***15. None of these SIUs had violations so the CA did not calculate SNC.***

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 30-Sep 1, 2011 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.

[1] 40 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:
Alliance Rubber Company 210 Carpenter Dam Road 71903
(501) 262-8175 thamilton@alliance-rubber.com

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

Date/Time of visit: *August 31, 2011 from 8:30 am to 9:45 am*

Industry contacts: *Trevor Hamilton, Safety/Training Coor*

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

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: _____

(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:
Triumph Airborne Structures, Inc. 115 Centennial Dr 71913
(501) 767-7132

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

Date/Time of visit: ***August 31, 2011 from 2:45 pm to 4:00 pm***

Industry contacts:
Ed Allbritton, Facilities Mgr eallbritton@triumphgroup.com
Clinton D Patton, WW Operator

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

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.***

Visit conducted by: ***Torrence/Brunson*** Date: _____

(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 hexavelent 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 12,500 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:
Triumph Fabrications 1923 Central Ave 71901 (501) 622-4248
Type of industry: ***40CFR433 Metal Finisher***
(Include regulatory citation if CIU)

Date/Time of visit: ***August 31, 2011 from 10:00 am to 11:15 am***

Industry contacts:
Michael Corballis, Env Mgr mcorballis@triumphgroup.com
Jason Haley, Env Spv jhaley@triumphgroup.com

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

Additional comments: ***1. Has TOMP and plans water reduction.***

(See industry description on back)

Visit conducted by: ***Torrence/Brunson*** Date: _____

(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 75,000 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:
Kleen Linens of Arkansas 225 Malvern Ave 71901 (501)321-1234

Type of industry: ***Commercial Launderer***
(Include regulatory citation if CIU)

Date/Time of visit: ***August 31, 2011 from 11:30 am to 12:30 am***

Industry contacts: ***Sam Jones, Owner***

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

Additional comments: 1. The Auditor recommended changing this IU designation to "non-significant industrial user".

2. IU has only surge tank in basement which collects all wastewater. A pump discharges the wastewater to the POTW collection system.

Visit conducted by: ***Torrence/Brunson*** Date: _____

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: ***Hot Springs*** NPDES #: ***AR0033880***

Industry name: ***Kleen Linen***

Additional comments:
INDUSTRY DESCRIPTION

This facility lauders "clean" linen only from nearby hospitals and entrance mats from office buildings. Originally, this IU also lauders industrial uniforms and red rags. Since this IU no longer has industrial accounts, the auditor recommended changing the designation to non-significant industrial user.

During the site visit, the auditor noted that ground water was seeping into the basement. A pump discharged the ground water into the POTW collection system. Since the ground water entered the discharge line downstream from the monitoring location, the Auditor concluded that the ground water was an I&I problem only.

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: ***Hot Springs*** NPDES #: ***AR0033880***

Name, address and phone number of industry:
Hot Springs Packing Co 580 Mid-America Blvd 71913
(501) 767-2363

Type of industry: ***Prepare and Pack Meat***
(Include regulatory citation if CIU)

Date/Time of visit: ***August 31, 2011 from 1:45 pm to 2:30 pm***

Industry contacts:
John Stubblefield, Owner ***john@hotspringspacking.com***
Frank Cooper, Plant Manager ***fc_hspc0251@yahoo.com***

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

Additional comments:

1. The City is planning to impose numerical limits for COD and TSS on this IU. The Auditor recommends instead that the City require this IU to prepare and comply with a BMP to control organic loadings to the POTW.

Visit conducted by: ***Torrence/Brunson*** Date: _____

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: ***Hot Springs*** NPDES #: ***AR0033880***

Industry name: ***Hot Spring Packing Co***

Additional comments:

INDUSTRY DESCRIPTION

This facility no longer slaughters livestock but receives meat parts from outside sources. The meats are blended and seasoned to prepare sausages, wieners, bologna and other products.

Most of the operations are automated and requires only minimum manual assistance.

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 Airborne Structures LLC.**

a. Operator's Name **Triumph Group Inc.**

b. Is the operator identified in 1.a, the owner of the facility?
Yes [**X**] No [ ]
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.

2. Facility Address:
Street: **115 Centennial Drive**

City: **Hot Springs** State: **Arkansas** Zip: **71913**

3, Business Mailing Address: **same as above**
Street or P.O. Box:

City: State: Zip:

4. Designated signatory authority of the facility:
[Attach similar information for each authorized representative; **See Attachment "K"**

Name: **Mike Abram**

Title: **President**

Address: **same as above**

City:

Phone: **501-767-7134**

5. Designated facility contact:
Name: **Ed Allbritton**

Title: **Facilities Manager**

Phone: **501-767-7132**
SECTION B- BUSINESS ACTIVITY

A-1/33

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

[X] Aluminum Forming
[ ] Asbestos Manufacturing
[ ] Battery Manufacturing
[ ] Can Making
[ ] Carbon Black
[ ] Coal Mining
[ ] Coil Coating
[ ] Copper Forming
[ ] Electric and Electronic Components Manufacturing
[X] Electroplating
[ ] Feedlots
[ ] Fertilizer Manufacturing
[ ] Foundries (Metal Molding and Casting)
[ ] Glass Manufacturing
[ ] Grain Mills
[ ] Inorganic Chemicals
[ ] Iron and Steel
[ ] Leather Tanning and Finishing
[X] Metal Finishing
[X] Nonferrous Metals Forming
[ ] Nonferrous Metals Manufacturing
[ ] Organic Chemicals Manufacturing
[ ] Paint and Ink Formulating
[ ] Paving and Roofing Manufacturing
[ ] Pesticides Manufacturing
[ ] Petroleum Refining

[ ] 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):

Aircraft Parts Repairing ,Painting and Phosphoric Anodizing of Aluminum Components.

SEE ATTACHMENT "A"

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
Aircraft Structural Parts	**16**	**40**	**20**	**50**

A-3/33

SECTION C- WATER SUPPLY

1. Water Sources: *(Check as many as are applicable)*
   [ ] Private Well

   [ ]Surface Water

   [X]Municipal Water Utility *(Specify City)*: **Hot Springs,Ar.71913**

   [ ] Other *(Specify)*:

2. Name on the water bill:

Name: **Triumph Airborne Structures, LLC.**

Street: **115 Centennial Drive**

City: **Hot Springs** State: **Arkansas** Zip: **71913**

3. Water service account number **043-1335-01, 043-1320-03, 43-15900 5002, 43-159009200**

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	100	E
Process	7,069	M
Sanitary	21,000	E
Air pollution control		
Contained in product		
Plant/equipment washdown		
Irrigation/lawn watering		
Other		
Total	28,169	

SECTION D- SEWER INFORMATION

1. a. For an exiting business:
Is the building presently connected to the public sanitary sewer system?
[X] Yes: Sanitary sewer account number Same as sect. C-3.
[ ] 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)
4 inch 6 inch	115 Centennial/N.E. Corner 115 Centennial/N. Center	2100 7069
6 inch	101 Centennial/W. Center	313
6 inch	116 Centennial/E. Center	17

SECTION E - WASTEWATER DISCHARGE INFORMATION

1. Does (or will) this facility discharge any wastewater other than from restroom to the city sewer?
[X] 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. [2007]

a. Hour/Day Discharged (e.g., 8 hours/day):
M 8 T 8 W 8 TH 8 F 8 SA SU

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

M 7am - 4pm T 7am - 4pm W 7am - 4pm TH 7am -4pm F 7am - 4pm SA SU

c. Peak hourly flow rate (GPD) 1272

d. Maximum daily flow rate (GPD): 14,496

e. Annual daily average (GPD):

A-5/33

. If batch discharge occurs or will occur, indicate:[New facilities may estimate] **N/A**

a. Number of batch discharges _____per day

b. Average discharge per batch _____(GPD)

c. Time of batch discharges_____at _____
(days *of* weeks) (hours *of day)*

d. Flow rate _____gallons/minute

e. Percent of total-discharge_____

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 wastestreams. Include the average daily volume and maximum daily volume of each wastestream *[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. **SEE ATTACHMENT "B"& "J"**

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.

A-6/33

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	Metal Finishing	7210	14,496	continuous

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

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

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

Provide the following (TTO) information.

a. 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? **[X]** Yes [ ] No

b. Has a baseline monitoring report (BMR) been submitted which contains TTO information? **[X]**Yes [ ] No

c. Has a toxic organics management plan (TOMP) been developed?
[X] Yes, (Please attach a copy) [ ] No

A - 7/33

SEE ATTACHMENT "H"

8. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

Current: Flow Metering [**X**] Yes [ ] No [ ] N/A
Sampling Equipment [**X**] Yes [ ] No [ ] N/A

Planned: Flow Metering [ ] Yes [ ] No [ ] No
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:
Sampling Equipment located at 115 Centennial Dr ; outside @ manhole 12 feet out from center of North Wall

SEE ATTACHMENT "J"

Flow Meter located at 115 Centennial Dr in Wastewater treatment room; through Smaller of two overhead doors on N. Wall.

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. [ ] Yes [**X**] No (skip *question 10)*

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

11. Are any materials or water reclamation systems in use or planned? [ ] Yes [**X**] 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)

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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. Cadimium	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-dinitr				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

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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. Touene, 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. Butadiane, 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) fluoranthane				x
97. Benzo (k) flururanthene				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				x
107. Pyrene				x

X. Pesticides

Chemical Compound	Known	Suspected	Known	Suspected

	Present	Present	Absent	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. Dieidrin				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.

N/A

SECTION G - TREATMENT

1. Is any form of wastewater treatment *(see list below)* practiced at this facility? **[X]** 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: **[X]** No

3. Treatment devices or processes used or proposed for treating wastewater or sludge (check as many as appropriate).

[ ] Air flotation
[ ] Centrifuge
[X] Chemical precipitation
[ ] Chlorination
[ ] Cyclone Filtration
[ ] Flow equalization
[ ] Grease or oil seperation, type: _____

[ ] Grease trap
[ ] Grinding filter
[ ] Grit removal
[ ] Ion exchange

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[X] Neutralization, pH correction
[ ] Ozonation
[ ] Reverse Osmosis
[X] Screen Sedimentation
[ ] Septic tank
[ ] Solvent separation
[X] Spill protection
[ ] Sump
[ ] Biological treatment, type:
[ ] Rainwater diversion or storage
[ ] Other chemical treatment, type:_____

[ ] 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 ATTACHMENT "B"

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

SEE ATTACHMENT"B"

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.

7. Do you have treatment a operator? [X] Yes [ ] No

SEE ATTACHMENT "D"

If yes, Name: Donny Patton

Title: Maintenance Tech

Phone: 501-767-7138

Full time: 7-3:30_____(specify hours)

Part time:_____(specify hours)

8. Do you have a manual on the correct operation of your treatment equipment? [X] Yes [ ] No

9. Do you have a written maintenance schedule for your treatment equipment? [X] Yes [ ] No

SECTION H - FACILITY OPERATIONAL CHARACTERISTICS

1. Shift Information

Work Days	Mon	Tues	Wed	Thur	Fri	Sat	Sun
Shifts per work day:	2	2	2	2	2		
Empl's 1st shift:	135	135	135	135	135		
Empl's 2nd shift:	5	5	5	5	5		
Empl's 3rd shift:	0	0	0	0	0		
Shift 1st start time end time	7am- 3:30p	7am- 3:30p	7am- 3:30p	7am- 3:30p	7am- 3:30p		
Shift 2nd start time end time	3:30p- 12pm	3:30p- 12pm	3:30p- 12pm	3:30p- 12pm	3:30p- 12pm		
Shift 3rd start time end time							

2. Indicate whether the business activity is:
   [X] 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:
[X] 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:

[X] No

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

6. List types and quanitity 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	Quanitity
SEE ATTACHMENT "E"	

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.
SEE ATTACHMENT "J"

SECTION I - SPILL PREVENTION

1. Do you have chemical storage containers at your facility? [X] 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 ATTACHMENT "F"**

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

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

[**X**] an onsite disposal system
[ ] public sanitary sewer system (e.g. *through a floor drain)*
[**X**] 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? [**X**] 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.

SEE ATTACHMENT "I"

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

NO SPILLS HAVE OCCURRED SINCE THE LAST APPLICATION

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	Quanitity (per year)	Disposal method
SEE ATTACHMENT "G"		

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

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

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4. 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:
SEE ATTACHMENT "G"		

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

EPA ID ARD983288499

ADEQ PERMIT 1580-AR-3

WASTEWATER DISCHARGE PERMIT C-0001

SECTION K - AUTHORIZED SIGNATURES

Compliance Certification:

1. Are all applicable Federal, State, or Local pretreatment standards and requirements being met on a consistent basis? [**X**]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
N/A	

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.

Mike Abram Title: **President**

Signature	Date	501-767-7134 Phone
	7-20-11	

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ATTACHMENT "A"

I. INTRODUCTION

(A) Triumph Airborne Structures, LLC. has three facilities engaged in the repair of aircraft structural parts. The facilities are located at: 101, 115 & 116 Centennial Drive, Hot Springs, Arkansas, 71913.

(B) The facilities are approved by the Federal Aviation Administration as Repair Station ANOR321N.

II. Receiving and Preliminary Inspection

(A) Parts are received, assigned a work order number, and inspected by the Receiving Inspector prior to section routing.

(B) Materials are received in accordance with our Hazard Communication Program and rerouted to the appropriate section or storage area.

III. PROCESSES: Triumph Airborne Structures, LLC. has three process sections. The three process sections are heavy structures, bonding and etch line.

(A) Parts received by heavy structures are disassembled and repaired or overhauled in accordance with aircraft manufacturer's specifications and FAA air directives. These parts typically require abrasive blasting, sheet metal repair and painting.

(B) Parts received by bonding are also disassembled and repaired or overhauled in accordance with aircraft manufacturer's specifications and FAA air directive. These parts require structural adhesive bonding under controlled conditions, sheet metal repair, core replacement, abrasive blasting, priming and painting.

(C) The etch line will be used to phosphoric acid anodize parts. Many aircraft parts require phosphoric acid anodizing prior to applying adhesive primer and structural adhesive. The etch line process is illustrated on the process line flow schematic.

ATTACHMENT "B"

1. The treatment system is designed to remove specific pollutants from the process water before being discharged to the environment.

   The system is comprised of a rinse water collection system, chrome reduction section, pH adjustment section, flocculation section, clarifier, sludge thickening section and a filter press.

   The reaction tanks are used to pretreat separate chrome or acid streams to precipitate the metals. This means removing the metals from the liquid state and turning them into a sludge which can be settled in the clarifier. The metals are removed from the solution by reducing hexavalent to trivalent chrome and adjusting the pH.

   Hexavalent chrome is reduced to trivalent chrome by the addition of sodium metabisulfite.

   Sodium metabisulfite additions are controlled by an ORP meter (Oxidation Reduction Potential) and supplied by a chemical feeding pump. Since sodium metabisulfite elevates the pH level, the chrome reduction system is equipped with a pH meter and chemical feed pump to add sulfuric acid.

   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 by metering pumps, other chemicals may be added which are flow dependent. These chemicals may be a flocculating agent or a polymer, which is added to the flash mixer.

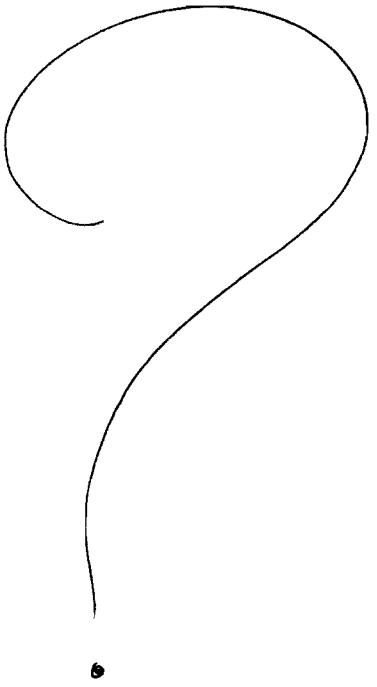
   The clarifier allows particles to settle out forming a sludge which is about 80% pure. The sludge is pumped into the filter press for de-watering and disposal as a Hazardous Waste Solid.

2. System specifications:

Reaction tanks:	Chrome reduction – 900 gal. pH neutralization - 900 gal.
Sludge thickening tank:	2500 gal.
Holding tank:	5000 gal.
Mixing tank:	350 gal.
Clarifier:	40 gpm max, 30 gpm nominal
System:	75 gpm max, 35 gpm nominal

Attachment "C"

No reference to this attachment in application.



ATTACHMENT "D"

WASTEWATER TREATMENT OPERATORS

ED ALLBRITTON	MAINTENANCE DIRECTOR
ROGER LOOPER	MAINTENANCE LEAD
DONNY PATTON	TECHNICIAN (with Industrial WWT License)

ATTACHMENT "E"

C.A.S. NUMBER	NAME OF SUBSTANCE	MAXIMUM INVENTORY
07664939	Concentrated Sulfuric Acid	16,000 lbs.
007647010	Hydrochloric Acid	7,800 lbs.
007664382	Phosphoric Acid	18,200 lbs.
001310732	Sodium Hydroxide, 50% solution	20,000 lbs.
007637905	Sodium Bisulfite	4,000 lbs.
010588019	Sodium Bichromate	3,200 lbs.
001305620	Calcium Hydroxide	1,500 lbs.
007429905	Aluminum	45,260 lbs.
000107879	Methyl Propyl Ketone	1,408 lbs.
67641	Acetone	1,452 lbs.
67630	Isopropyl Alcohol	361 lbs.

ATTACHMENT "F"

1. All process chemicals listed in Attachment "E" with the exception of the last four chemicals are stored on spill skids located in the waste treatment area.

2. Methyl Propyl Ketone, Acetone, and Isopropyl Alcohol are stored in a secured building area with controlled access. The chemicals are on spill containment pallets

3. Aluminum alloys are stored at various points within the plant on any given day.

ATTACHMENT "G"

WASTE	EPA CODES	QUANTITY (LBS/YR)2010	DISPOSAL METHOD
Paint Related Waste NA3082 UN1263	D001 D007 D035 F003 F005	**3899 lbs**	Off-Site disposal TRADEBE Treatment
Waste Water Sludge NA3077	D007 F006 D002	**6320 lbs**	Off-Site disposal TRADEBE Treatment
Phosphoric Acid Filter UN3260	D002	**450 lbs**	Off-Site disposal TRADEBE Treatment
Waste Sodium Dichromate UN1760	D002 D007	**50 lbs**	Off-Site disposal TRADEBE Treatment
Chromic Acid Rags UN3098	D006 D007	**100 lbs**	Off-Site disposal TRADEBE Treatment
Spray Booth Filters NA3077	D006 D007 D035	**5610 lbs**	Off-Site disposal TRADEBE Treatment
Developer Waste NA3082	D008 D011	**4940 lbs**	Off-Site Disposal US Ecology

ATTACHMENT "H"

Triumph Airborne Structures, LLC.
115 Centennial Drive
Hot Springs, AR 71913

Toxic Organic Management Plan

Revision Date: 07/11

I. Site Specific Information

(a) EPA Identification Number: ARD983288499

(b) U.T.M. Coordinates:

Horizontal (E)	Vertical (N)
488,300	3,819,480

(c) Phone Number Day: 501-262-1555
Night: 501-767-9149

(d) Primary Contact: Ed Allbritton
Secondary Contact: Donny Patton

Chemical Inventory

(a) Section 302-Extremely Hazardous Substance

CAS Number	Name of Substance	TPQ (LB)	Amount on Hand (LB)	Maximum Planned Inventory (LB)
007664939	Concentrated Sulfuric Acid	1000	12,000	16,000

(b) Section 302-Hazardous Substance

CAS Number	Name of Substance	CERCLA	Amount	Maximum

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		(RQ-LB)	on Hand (LB)	Planned Inventory (LB)
007647010	Hydrochloric	5000	2600	7800
007664382	Phosphoric Acid	5000	7800	18,200

CAS Number	Name of Substance	TPQ (LB)	Amount on Hand (LB)	Maximum Planned Inventory (LB)
010588019	Sodium Bichromate	10	2000	3200
001305620	Calcium Hydroxide	NA	500	1500

II. Hazardous Waste

(a) Generated On-site

DOT Classification	DOT ID Number	DOT Emergency Guide Number	EPA Hazardous Waste Code	Estimated Monthly Volume (Maximum (LB)
Hazardous Waste Solid, N.O.S.	NA9189	31	F019	9600
Hazardous Waste Solid, N.O.S. (Chromium)	NA3077	42	D007	440
Hazardous Waste Solid, N.O.S	NA3077	32	D006 D007 D035	880
Waste Chromic Acid Solution	UN1755	60	D002 D007	825
Waste Paint Related Material	UN1263	26	D001 D006 D007 D035 F003 F005	2475

(b) Treated On Site

		Method of Treatment
Waste, Chromic Acid Solution	UN1755	Chrome Reduction pH-Neutralization
Hazardous Waste Solid N.O.S. (Chromium)	NA3077	Chrome Reduction pH-Neutralization

(c) Disposed of Off Site

Hazardous Waste Solid N.O.S.	NA9189	Pollution Control Industries 5485 Tay-For Drive Millington, TN 38053
Hazardous Waste Solid N.O.S. (Paint Booth Filters)	NA3077	Pollution Control Industries 5485 Tay-For Drive Millington, TN 38053
Waste, Paint Related Material	UN1263	Pollution Control Industries 5485 Tay-For Drive Millington, TN 38053
Waste,Sulfuric Dichromate UN3264		US Ecology 3277 County Road 69 Robstown,TX 78380

III. Location, Storage & Containment of Hazardous Substances

(a) Location: See Attachment "A"

(d) Storage & Containment of Hazardous Substances

(1) In general, hazardous substances are stored in accordance with the recommendations of the National Fire Protection Association, and the Occupational Safety & Health Administration, and the Environmental Protection Agency.

(2) Flammable liquids are stored in a reinforced concrete structure which has a built in liquid tight retaining wall. The structure is attached to exterior of the main production facility and equipped with equipped with explosion proof lighting and ventilation.

(3) Oxidizers and corrosives are stored in the waste treatment Area on polyethylene spill skids. In addition, the floor of the Waste treatment area has a positive rise on the exterior Perimeter to facilitate containment of any accidental spills. The spilled liquid would flow into and be contained by the Waste treatment sump.

(4) Chlorinated cleaning solvents will be stored separately from Skids will be used for containment purposes.

(5) Flammable and combustible hazardous waste is stored adjacent the waste treatment area on steel spill skids. The waste is protected from direct sunlight and rainfall.

(6) Corrosive waste is stored adjacent to the waste treatment Area on polyethylene spill skids. The waste us protected From direct sunlight and rainfall.

IV. Triumph Airborne Structures, LLC. Phosphoric anodize process line consists of nine rectangular tanks, each having a capacity of 4200 gallons. The tanks are located above a concrete containment sump having a capacity of approximately 9000 gallons. They are:

3 Rinse Tanks (City Water)
3 Rinse Tanks (Deionized Water)
1 Soap Tank (Ridoline 53)
1 Anodize Tank (Phosphoric Acid Solution)
1 Deoxidize Tank (H2SO4 & Na2 Cr2 O7 Solution)

Overflow from any process tank, except the soap tank, is pumped to the 500 gallon holding rank. Rinse water is pumped directly to Chrome reduction tank. Hexavalent chrome is reduced to trivalent chrome in the chromium reduction tank by adding sodium metabisulfite (MBS).

MBS additions are controlled by an ORP meter and provided by a chemical feed pump. MBS will elevate the pH. The chromium reduction system is equipped with a pH meter and a chemical feed pump to add sulfuric acid to maintain the proper pH level. The pH is adjusted in the pH neutralization system. Sodium Hydroxide of sulfuric acid is added by a chemical feed and is controlled by a pH meter. Flocculent or a polymer is added by a chemical feed pump which is flow proportional controlled. The polymer is added in the flash mix section of the clarifier.

Particles which have settled out from the clarifier are collected in the sludge thickening chamber. The filter press is cycled frequently enough to remove the

continuous sludge reduction. The filter press produces a solid hazardous waste (F019) which is disposed of by Waste Services, Inc.

Automatic level controls have been placed on the tanks to prevent accidental overflow.

V. Waste Water and Storm Water Drains

(a) See Attachment B

VI. Policy and Procedure
Triumph Airborne Structures, LLC. has three primary programs which control the Use, storage and disposal of all hazardous substances. They are:

(a) Hazard Communication Program
29CFR1910.1200

(b) Emergency Response and Hazardous Waste Operations
29CFR1910.120

(c) Hazardous Waste Management Program
RCRA Section 3002
40 CFR262
ADEQ REG 23

* The Spill Prevention, Control & Countermeasure Plan is an integral part of the Emergency Response Plan.

Based on my inquiry of the person or persons directly responsible for managing compliance with the Pre-Treatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater 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.

I certify under penalty of law that I have personally examined and am familiar with the information in this report and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in this report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

M l Ab

Mike Abram
President
Triumph Airborne Structures, LLC.

2-20-11

Date

ATTACHMENT "I"

1) Slug Load Plan
2) RCRA/Contingency Plan

June 2011

Triumph Airborne Structures
POTW Slug Load Control Plan

A.Description of Discharge Practices:

Our discharges are all routine in our day to day operations in accordance with our Water Discharge Permit. We have one 3250 gallon bath of Sulfuric Dichromate that we dispose of once a year to an offsite TSD via tanker truck.

B.Description of Stored Chemicals:

Our chemicals are stored in the WWT Room in barrels and 275 gallon totes.The room has a floor slope toward a containment pit.Barrels and 5 gallon pails are on containment pallets.The chemicals stored are Sulfuric ,Caustic, Muriatic,Ridlin 53, and Phosphoric Acid.We also store Sodium Metabisulfite in 50 pound bags and Poly EZE 7736 Polymer in 5 gallon pails..

C.Procedures for Notifying the POTW of a Slug Discharge:

In the event of a slug discharge Ed Allbritton (Facilities Manager) will immediately notify the POTW by phone (501-262-1881) and send a written follow-up notification within five days.

D.Procedures to Prevent Adverse Impact from Accidental Spills:

Attached is our is our RCRA Emergency/Contingency Plan which will cover most of these procedures.In addition maintenance personnel only load and unload chemicals.We also have periodic safety inspections made by our safety consultant Dale Guyse of Environmental Safety and Compliance Inc.

Hot Springs Municipal Utilities
Discharge Permit

Industry: Triumph Airborne Structures, Inc.

Mailing Address: 115 Centennial Drive

Representative: Mike Abrams

Title: Vice President of Operations

Permit: C-0001

The above industry is authorized to discharge industrial wastewater into Hot Springs Municipal Utilities Collection System at 115 Centennial Drive. 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 August 2011 and shall expire 1 August 2014.

Pretreatment Coordinator

BL-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, eithers, 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 (½") 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.

SECTION 2 WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

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

Parameter	Daily Max.(mg/l)	Monthly Ave.(mg/l)	Sample Type
T Cadmium	0.11	0.07	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 parameters listed in section 2-A at least but not limited to twice per month. Each sample will be collected at the industry's designated sampling point: outfall southside inside of manhole behind utility trailers on the northside of facility.

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 exempt from this requirement.

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 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. 71901.

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.

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.

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.

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.

Hot Springs Municipal Utilities
Discharge Permit

Industry: Craighead Cleaners, Inc.

Mailing Address: 225 Malvern Ave.

Representative: Sam Jones

Title: Plant Manager

Permit: C-0007

The above industry is authorized to discharge industrial wastewater into Hot Springs Municipal Utilities Collection System at 225 Malvern Ave. 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 3 April 2011 and shall expire 2 April 2014.

Pretreatment Coordinator

B2-1/2

SECTION 2 WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

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

Parameter	Daily Max.(mg/l)	Monthly Ave.(mg/l)	Sample Type
T Arsenic	1.11	0.60	24hr Composite
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 Control Authority will 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 year and parameters listed in section 2-B at least but not limited to twice per year. Monitoring location will be manhole next to fire hydrant on the westside of facility.

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

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 1 March 2011 and shall expire 2 March 2014.

Dennis D. Brunson
Pretreatment Coordinator

B3-1/2

SECTION 2 WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

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

Parameter	Daily Max.(mg/l)	Monthly Ave.(mg/l)	Sample Type
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 ~ typo 0,43	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 opened discharge pipe on the southside of waste treatment process inside 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.

Hot Springs Municipal Utilities
Discharge Permit

Industry: Hot Springs Packing Co.

Mailing Address: P.O. Box 2312

Representative: John Stubblefield

Title: President

Permit: C-0005

The above industry is authorized to discharge industrial wastewater into Hot Springs Municipal Utilities Collection System at 580 Mid-America Blvd. 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 15 September 2010 and shall expire 14 September 2014.

Pretreatment Coordinator

B4-1/4

SECTION 2 SPECIAL CONDITIONS

A. The industry will have its grease traps cleaned by an approved waste hauler. Cleaning and any maintenance repair records must be maintained and available for review and/or copying by the control authority. Cleaning frequencies will be determined as needed by the control authority.

SECTION 3 WASTEWATER DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

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

Parameter	Daily Max.(mg/l)	Monthly Ave.(mg/l)	Sample Type
COD	Report Analysis	Report Analysis	24hr Composite
TSS	Report Analysis	Report Analysis	24hr Composite
Oil & Grease	150	150	Grab

B. The control authority will 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 year. Monitoring location will be the manhole next to grease interceptors on the northeast corner of facility.

C. The industry has the right to monitor its effluent for parameters listed in section 2-A for its own quality control measures. The industry's self monitoring data will not be considered or in any way used by the control authority in determining the industry's compliance with any applicable parameter limit listed in this discharge permit.

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

E. If the industry desires a split composite sample from the control authority, the industry will be required to sign a chain of custody form before any split sample can be relinquished by the control authority. All analyses performed by the industry or the industry's contract lab will be for the industry record only. ~~Section 2-C will apply to this condition.~~

F. The industry will submit to the control authority a monthly monitoring report. This report will contain the daily and monthly average discharge, date, time, and name of approved waste hauler that cleaned the grease trap. Any routine maintenance repair performed on the grease trap must be reported. The monthly report will be due fifteen (15) days after the last day of each month.

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 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 control authority may submit to the industry quarterly monitoring reports for parameters listed in section 2-A of this permit. All yearly monitoring reports may be submitted to the industry within fifteen (15) days after the last day of the monitoring month.

E. Any pollutant that is monitored more frequently than required by this permit, the results of this monitoring may be included in the yearly report.

F. The control authority will notify the industry of any violations of the pretreatment standards specified in section 2-A of this permit. If sampling performed by the control authority indicates a violation, the control authority may notify the industry by telephone within one (1) business day of the first indication of violations (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. 71901.

SECTION 5 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].

Hot Springs Municipal Utilities
Inspection Report

Facility Name: Triumph Airborne Structures, Inc.
Date/Time: 27 Oct ~~11~~ 10 0900hrs

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? Yes, Industry will be required to have licensed industrial waste operators.

3. Has the industry's permit been assigned or transferred to new owner and/or operator since the permit has been issued? No.

4. Has the industry increased or decreased the use of potable or process water? Increases, The demand on aircraft repair part were significantly increased.

5. 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 other 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.

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.

POLLUTION CONTROLS

1. Does the industry operate a pretreatment process or pretreat it's wastewater? Yes, the process is consisted of a rinse water collection system, chrome reduction, pH adjustment, flocculation, clarifier, sludge thickening section, and filter press. The reaction tanks are used to pretreat separate chrome or acid streams to precipitate the metals. This means removing the metals from the liquid state and turning them into a sludge which can be settled in the clarifier. The metals are removed from the solution by reducing hexavalent chrome to trivalent chrome and adjusting the pH. Sludge is pumped through a filter press for dewatering. The water is discharged to the city's collection system.

BYPASS OF TREATMENT FACILITIES

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

FACILITY ACTIVITY REDUCTION REQUIREMENTS

1. Is the industry's treatment facility experiencing any reduction of efficiency of operation, loss or failure of all or part of the treatment facility? No.

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. All hazardous waste (Paint Sludge, Filter Press Cake, Alodine Wipe Rags, Paint Solids, Fluorescent Bulbs, CeeBee B-55, Ridoline, Sodium Dichromate Paper Bags, Solvents) are currently being picked up by Vopak USA, Inc.

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, Industry currently do not perform lab analyses on its treatment process.

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, Rep has a routine maintenance/calibration check log in place.

FLOW MEASUREMENTS

1. Is flow measurement required by the industry's permit? Yes, accurate flow measurement is required on monthly reports. Industry does have flow measuring equipment on regulated process.

2. Does the industry utilize wastewater flow meter (s) or water meter (s) to determine its discharge? Yes.

3. Are appropriate flow measurement devices installed, calibrated and maintained to ensure that the accuracy of the measurement are consistent with the accepted capability of the type of device being used, including records of verification of maintenance and calibration? Yes, Industrial rep has developed standard procedures for assuring accurate measurement. Calibration/maintenance check log is maintained.

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)? No.

5. Are devices selected capable of measuring flows with a maximum deviation of less than 10% from the true discharge rates throughout the range of expected discharge volumes? Yes, Rep indicated that the actual measurement can be determined by the batch discharge of his tanks.

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? No.

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.

5. Is all sampling conducted for selfmonitoring being performed by a certified, independent laboratory acceptable to the control authority? Yes, American Interplex performs all lab analyses.

6. Is all analyses conducted for self monitoring being performed by a certified, independent laboratory acceptable to the control authority? Yes.

AUTOMATIC RESAMPLING

1. Did results of the industry's wastewater analysis indicate a violation of its 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.

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.

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.

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 the control authority 90 days prior to the above planned changes? N/A

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.

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 floe 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, industry submitted an updated TOMP's plan because of the increase in their discharge.

Inspection Report Summary

Industry: Triumph Airborne Structures, Inc.

Representative: Ed Allbritton

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

Inspection Summary:

Industry currently utilizes Boeing BAC 5555 specifications in their production and treatment process. Industry has developed and is implementing a flow monitoring log to calibrate their treatment process flow. This is performed by using a 50 gal tank. Water is pumped from the tank through the flow meter in order to get a reading. The reading has to be within a 10% range of the true discharge. The treatment process probe is calibrated monthly. Hazardous waste is shipped to Univar. Univar is responsible for all paint waste, flammable liquids and light bulbs. Excel TSD transports bulk sulfuric dichromate, Univar picks up flammables and Environmental Light Recyclers transports light bulbs. The paint waste and flammables are picked up every 60 days. Univarpicks up the waste solvents once per month. American Interplex performs all industrial lab analyses on the industry's wastestream.

Recommended Action (s):

It is recommended that the industry look at other alternative paints and non-solvent based products that are bio-degradable . This would reduced hazardous disposal needs.

Findings/Required Action (s):

Analytical was not reference in the monthly report. Whether it's 40 CFR 136 or latest EPA approved Standard Methods, this must be indicated on the monthly monitoring reports. Composite sample need to be indicated as a 24hr composite sample in the monthly monitoring reports.

There's no indication as to who collected the grab sample and/or 24hr composite sample. There is no tracking from the sampling to the in-house laboratory. Industry must develop and implement a chain of custody form in order to track the samples from the time they are collected and relinquished to the in-house lab. This must also be included in the monthly monitoring reports

Report completed by: [signature] Date/Time: 27 Oct 10 0900hrs

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

This report contains the analytical results and supporting information for samples submitted on July 12, 2010. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.

John Overbey
Laboratory Director

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

SAMPLE INFORMATION

Project Description:
Six (6) water sample(s) received on July 12, 2010
Industrial Monitoring
P.O. No. 10-3166

Receipt Details:
A Chain of Custody was provided. The samples were delivered in one (1) ice chest.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

Laboratory ID	Client Sample ID	Sampled Date/Time	Notes
140075-1	53-2010 National Park Medical Center 1July2010 1430Hrs	01-Jul-2010 1430	
140075-2	54-2010 Triumph Fabrication Hot Springs 7July2010 0915Hrs	07-Jul-2010 0915	
140075-3	55-2010 Triumph Fabrication Hot Springs 7July2010 0935Hrs	07-Jul-2010 0935	
140075-4	56-2010 Triumph Airborne 7July2010 1020Hrs	07-Jul-2010 1020	
140075-5	57-2010 Triumph Airborne 7July2010 1050Hrs	07-Jul-2010 1020	
140075-6	58-2010 National Park Medical Center 9July2010 1310Hrs	09-Jul-2010 1310	

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

Quality Control Statement:
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.

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).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

ANALYTICAL RESULTS

AIC No. 140075-1
Sample Identification: 53-2010 National Park Medical Center 1July2010 1430Hrs

Analyte		Result	RL	Units	Qualifier
Oil and Grease		**13**	5	**mg/l**	
EPA 1664A	Prep: 12-Jul-2010 1532 by 100	Analyzed: 12-Jul-2010 1638 by 100		Batch: B6428	

AIC No. 140075-2
Sample Identification: 54-2010 Triumph Fabrication Hot Springs 7July2010 0915Hrs

Analyte		Result	RL	Units	Qualifier
Arsenic		**< 0.05**	0.05	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Cadmium		**< 0.004**	0.004	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Chromium		**0.16**	0.007	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Copper		**0.11**	0.006	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Lead		**< 0.04**	0.04	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Nickel		**< 0.01**	0.01	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Silver		**< 0.007**	0.007	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Zinc		**0.020**	0.002	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2236 by 270		Batch: S28156	
Mercury		**< 0.0002**	0.0002	**mg/l**	
EPA 245.2	Prep: 13-Jul-2010 0821 by 296	Analyzed: 13-Jul-2010 1430 by 270		Batch: S28161	

AIC No. 140075-3
Sample Identification: 55-2010 Triumph Fabrication Hot Springs 7July2010 0935Hrs

Analyte		Result	RL	Units	Qualifier
Total Cyanide		**< 0.01**	0.01	**mg/l**	
SM4500-CN C,E	Prep: 15-Jul-2010 0909 by 291	Analyzed: 20-Jul-2010 1809 by 258		Batch: W33213	

AIC No. 140075-4
Sample Identification: 56-2010 Triumph Airborne 7July2010 1020Hrs

Analyte		Result	RL	Units	Qualifier
Arsenic		**< 0.05**	0.05	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	
Cadmium		**< 0.004**	0.004	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	
Chromium		**1.4**	0.007	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

ANALYTICAL RESULTS

AIC No. 140075-4 (Continued)
Sample Identification: 56-2010 Triumph Airborne 7July2010 1020Hrs

Analyte		Result	RL	Units	Qualifier
Copper		**0.019**	0.006	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	
Lead		**< 0.04**	0.04	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	
Nickel		**< 0.01**	0.01	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	
Silver		**< 0.007**	0.007	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	
Zinc		**< 0.002**	0.002	**mg/l**	
EPA 200.7	Prep: 12-Jul-2010 1500 by 296	Analyzed: 14-Jul-2010 2251 by 270		Batch: S28156	
Mercury		**< 0.0002**	0.0002	**mg/l**	
EPA 245.2	Prep: 13-Jul-2010 0821 by 296	Analyzed: 13-Jul-2010 1433 by 270		Batch: S28161	

AIC No. 140075-5
Sample Identification: 57-2010 Triumph Airborne 7July2010 1050Hrs

Analyte		Result	RL	Units	Qualifier
Total Cyanide		**< 0.01**	0.01	**mg/l**	
SM4500-CN C,E	Prep: 15-Jul-2010 0909 by 291	Analyzed: 19-Jul-2010 1443 by 258		Batch: W33213	

AIC No. 140075-6
Sample Identification: 58-2010 National Park Medical Center 9July2010 1310Hrs

Analyte		Result	RL	Units	Qualifier
Oil and Grease		**12**	5	**mg/l**	
EPA 1664A	Prep: 12-Jul-2010 1532 by 100	Analyzed: 12-Jul-2010 1638 by 100		Batch: B6428	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Cyanide	0.1 mg/l	88.9	85.0-115			W33213	15Jul10 0909 by 291	19Jul10 1436 by 258		
Arsenic	5 mg/l	101	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Cadmium	5 mg/l	98.4	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Chromium	0.5 mg/l	98.9	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Copper	0.5 mg/l	101	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Lead	5 mg/l	98.0	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Nickel	0.5 mg/l	100	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Silver	0.1 mg/l	94.3	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Zinc	0.5 mg/l	99.0	85.0-115			S28156	12Jul10 1501 by 296	14Jul10 2226 by 270		
Mercury	0.0025 mg/l	93.2	85.0-115			S28161	13Jul10 0821 by 296	13Jul10 1405 by 270		
Oil and Grease	40 mg/l	97.0	78.0-114			B6428	12Jul10 1010 by 100	12Jul10 1429 by 100		

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Cyanide	140075-3	0.1 mg/l	90.9	75.0-125	W33213	15Jul10 0909 by 258	20Jul10 1811 by 258		
	140075-3	0.1 mg/l	89.3	75.0-125	W33213	15Jul10 0909 by 258	20Jul10 1813 by 258		
	Relative Percent Difference:		1.67	20.0	W33213				
Arsenic	140075-2	5 mg/l	99.7	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	5 mg/l	102	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		1.88	20.0	S28156				
Cadmium	140075-2	5 mg/l	95.4	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	5 mg/l	96.4	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		0.974	20.0	S28156				
Chromium	140075-2	0.5 mg/l	94.7	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	0.5 mg/l	97.9	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		2.53	20.0	S28156				
Copper	140075-2	0.5 mg/l	101	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	0.5 mg/l	103	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		1.20	20.0	S28156				
Lead	140075-2	5 mg/l	93.6	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	5 mg/l	95.2	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		1.72	20.0	S28156				
Nickel	140075-2	0.5 mg/l	95.2	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	0.5 mg/l	96.6	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		1.49	20.0	S28156				
Silver	140075-2	0.1 mg/l	86.1	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	0.1 mg/l	88.5	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		2.67	20.0	S28156				
Zinc	140075-2	0.5 mg/l	96.8	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2229 by 270		
	140075-2	0.5 mg/l	98.8	75.0-125	S28156	12Jul10 1501 by 296	14Jul10 2232 by 270		
	Relative Percent Difference:		2.00	20.0	S28156				
Mercury	140076-1	0.0025 mg/l	92.8	70.0-130	S28161	13Jul10 0821 by 296	13Jul10 1409 by 270		
	140076-1	0.0025 mg/l	89.2	70.0-130	S28161	13Jul10 0821 by 296	13Jul10 1412 by 270		
	Relative Percent Difference:		3.96	20.0	S28161				
Oil and Grease	140038-2	40 mg/l	97.5	78.0-114	B6428	12Jul10 1010 by 100	12Jul10 1429 by 100		

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Cyanide	< 0.01 mg/l	0.01	0.01	W33213-1	15Jul10 0909 by 291	19Jul10 1434 by 258	
Arsenic	< 0.05 mg/l	0.05	0.05	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Cadmium	< 0.004 mg/l	0.004	0.004	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Chromium	< 0.007 mg/l	0.007	0.007	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Copper	< 0.006 mg/l	0.006	0.006	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Lead	< 0.04 mg/l	0.04	0.04	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Nickel	< 0.01 mg/l	0.01	0.01	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Silver	< 0.007 mg/l	0.007	0.007	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Zinc	< 0.002 mg/l	0.002	0.002	S28156-1	12Jul10 1501 by 296	14Jul10 2223 by 270	
Mercury	< 0.0002 mg/l	0.0002	0.0002	S28161-1	13Jul10 0821 by 296	13Jul10 1402 by 270	
Oil and Grease	< 5 mg/l	5	5	B6428-1	12Jul10 1010 by 100	12Jul10 1429 by 100	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE OF

Client: Hot Springs Municipal Utilities
Project Reference: Industrial Monitoring
Project Manager: Dennis R. Brunson
Sampled By: Bill Garner

PO No. 10-3166

AIC CONTROL NO: 140675
AIC PROPOSAL NO:
Carrier: Hot Springs Delivery
Received Temperature C: 2

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	SAMPLE MATRIX: WATER	SOIL		NO OF BOTTLES	TRs	TCd	TCr	TCu	TPb	TZn	TAg	TNi	THg	TCn-	O&G		Remarks
3-2010	National Park Medical Center	1 July 2010 1430 HRS	X		X			1											X		
4-2010	Triumph Fabrication Hot Springs	7 July 2010 0915 HRS		X	X			1	X	X	X	X	X	X	X	X	X				
5-2010	Triumph Fabrication Hot Springs	7 July 2010 0935 HRS	X		X			1										X			
6-2010	Triumph Airborne	7 July 2010 1020 HRS		X	X			1	X	X	X	X	X	X	X	X	X				
7-2010	Triumph Airborne	7 July 2010 1050 HRS	X		X			1										X			
8-2010	National Park Medical Center	9 July 2010 1310 HRS	X		X			1											X		
																					Field pH calibration
		Container Type							P	P	P	P	P	P	P	P	P	P	G		on _____ @ _____
		Preservative							N	N	N	N	N	N	N	N	N	B	S		Buffer:

G = Glass P = Plastic V = VOA vials H = HCl to pH2 T = Sodium Thiosulfate
NO = none S = Sulfuric acid pH2 N = Nitric acid pH2 B = NaOH to pH12 Z = Zinc acetate

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: Dennis R. Brunson
Phone: 501-262-1881 Ext 15 Fax: 501-262-0339
Report Attention to: Dennis R. Brunson
Report Address to: Hot Springs Municipal Utilities
320 Davidson Drive
Hot Springs, AR 71902

Relinquished By:	Date/Time	Received By:	Date/Time
Bill Garner	12 July 2010	Allan M	7-12-10 1010
A. Thompson Allan	7-12-10 1010	Tuya Hopton	7-12-10 1200

Comments:

5/01 WS 5981 8/02 FORM 0060

Ed Allbritton
767-7132

August 3, 2011

Mr. Dennis Brunson
Hot Springs Municipal Utilities
320 Davidson Drive
Hot Springs, Arkansas 71901

Re: **July**, 2011 WWT Report
Dear Mr. Brunson:

The following information is submitted as required by permit #C-0001, Section 3(D):

1. Monthly Flow: 373,719 gal.
2. Average Daily Flow 12,055 gal.
3. Maximum Daily Flow 16,291 gal.

Testing for July, 2011:

Project #	Sample #	Sample Date	Sample Time
070611C1	1(Composite)	7/6/2011	845
070611G1	2(Grab)	7/6/2011	845
070711C2	1(Composite)	7/7/2011	845
070711G2	2(Grab)	7/7/2011	845

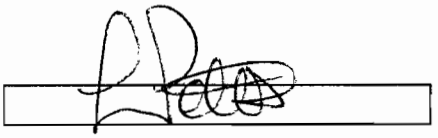
Submitted by: Ed Allbritton, Facility Mgr.
See Enclosures

RECEIVED
AUG 4 2011
Pretreatment
BY:

E-1/4

Based on my inquiry of the person or persons responsible for managing compliance with the Pretreatment standard for Total Toxic Organics(TTO),I certify that,to the best of my knowledge and belief,no dumping of concentrated toxic organics into the wastewater 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.

I certify under penalty of law that I have personally examined and am familiar with this report and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in this report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



8-3-11

FAA Repair Station [illegible]

WASTE WATER REPORT

SAMPLE DATE: 7/6/2011 **TIME:** 845 **PROJECT I.D. #** 070611C1

Composite Sample *Standard Method 3030E 3111B*

	CADMIUM		CHROMIUM		COPPER		LEAD		NICKEL	
STANDARD	1.00		2.00		1.00		20.00		5.00	
SAMPLE	0.0258	SEN 0.028	0.982	SEN 0.027	1.054	SEN 0.077	0.079	SEN 0.190	1.59	SEN.140
STANDARD	1.0 ppm		2		1.0 ppm		20		1.0 ppm	
REREAD	1		1.990		1.000		19.985		1	
RECOVERY	100.00%		99.00%		100.00%		98.00%		100.00%	
DATE	7/6/2011		7/6/2011		7/6/2011		7/6/2011		7/6/2011	
TECH.	kdb		kdb		kdb		kdb		kdb	

	SILVER		ZINC	
STANDARD	2.00		1.00	
SAMPLE	0.092	SEN 0.060	0.7325	SEN..018
STANDARD	2		1	
REREAD	1.99		1	
RECOVERY	99.00%		100.00%	
DATE	7/6/2011		7/6/2011	
TECH	kdb		kdb	

SAMPLE DATE: 7/6/2011 **TIME:** 845 **PROJECT I.D.#** 070611G1

Grab Sample

	CYANIDE
SAMPLE	0.0005
DATE	7/6/2011
TECH.	kdb

*SEN = SENSITIVITY *B.S. = BELOW SENSITIVITY *N.D. = NON-DTECTED

FAA Repair Station #AN0R321N

WASTE WATER REPORT

SAMPLE DATE: 7/7/2011 **TIME:** 845 **PROJECT I.D. #** 070711C1

Composite Sample *Standard Method 3030E 3111B*

	CADMIUM		CHROMIUM		COPPER		LEAD		NICKEL	
STANDARD	1.00		2.00		2.00		20.00		2.00	
SAMPLE	0.0452	SEN 0.028	0.995	SEN 0.027	1.103	SEN 0.077	0.0475	SEN 0.190	0.0785	SEN.140
STANDARD	1.0 ppm		2.0 ppm		2		20		2	
REREAD	1		1.990		2.000		20.000		1.985	
RECOVERY	100.00%		99.00%		100.00%		100.00%		98.00%	
DATE	7/7/2011		7/7/2011		7/7/2011		7/7/2011		7/7/2011	
TECH.	KDB		KDB		KDB		KDB		KDB	

	SILVER		ZINC
STANDARD	2.00		1.00
SAMPLE	0	SEN 0.060	0.935 SEN..018
STANDARD	2.0 ppm		1
REREAD	2		1
RECOVERY	100.00%		100.00%
DATE	7/7/2011		7/7/2011
TECH	KDB		KDB

SAMPLE DATE: 7/7/2011 **TIME:** 845 **PROJECT I.D.#** 070711G2

Grab Sample

	CYANIDE
SAMPLE	0
DATE	7/7/2011
TECH.	KDB

*SEN = SENSITIVITY *B.S. = BELOW SENSITIVITY *N.D. = NON-DTECTED

Industrial Monitoring Schedule 2011

January		February	
10-11	TFHS	1-2	SJMHC
18-19	MADI	7-8	NPMC
25-26		14-15	
		21-22	
March		**April**	
1-2	ARC	5-6	TFHS
7-8	CCI	12-13	MADI
14-15	HSP	19-20	
21-22		26-27	
28-29			
May		**June**	
2-3	SJMHC	6-7	ARC
9-10	NPMC	13-14	CCI
16-17		20-21	HSP
23-24		27-28	
July		**August**	
5-6	TFHS	1-2	SJMHC
11-12	MADI	8-9	NPMC
18-19		15-16	HSP
25-26		22-23	
		29-30	
September		**October**	
6-7	ARC	3-4	TFHS
12-13	CCI	10-11	MADI
19-20		17-18	HSP
26-27		24-25	
November		**December**	
1-2	SJMHC	5-6	ARC
7-8	NPMC	12-13	CCI
14-15		14-15	
28-29		27-28	

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

CITY OF HOT SPRINGS
GARLAND COUNTY

LIS. NO. 08- 099
AFIN 26-00145

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order (hereinafter "Order") is issued pursuant to the authority of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended; Ark. Code Ann. §8-4-101 et seq.) and the regulations issued thereunder (hereinafter collectively referred to as "the Act").

Pursuant to the authority of Ark. Code Ann. §8-4-207(1)(B), the Director for the Arkansas Department of Environmental Quality (hereinafter ADEQ) is authorized to set schedules of compliance for facilities permitted under the Act necessary to assure compliance with both applicable state and federal effluent limitations, including, but not limited to, those mandated by the National Pollutant Discharge Elimination System Program (hereinafter "NPDES") under section 402 of the Federal Water Pollution Control Act, 33 U.S.C. §1342 as well as under sections 301, 318, and 405 of the Federal Water Pollution Control Act, 33 U.S.C. §1311, 33 U.S.C. §1328 and 33 U.S.C. §1345; and Arkansas Pollution Control and Ecology Commission Regulations 2, 6, 7 & 8.

The issues herein having been settled by the agreement of the City of Hot Springs (hereinafter the "Permittee") and ADEQ, it is hereby agreed and stipulated that the following **FINDINGS OF FACT** and **ORDER AND AGREEMENT** be entered herein.

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FINDINGS OF FACT

1. The City of Hot Springs operates a municipal wastewater utility in Garland County, Arkansas.

2. The City of Hot Springs operates and maintains a sanitary sewer system that includes two wastewater treatment plants, a collection system, 4150 pump stations, and related appurtenances pursuant to Arkansas NPDES Permit Numbers AR0033880 and AR0050148, issued by ADEQ.

3. The City of Hot Springs has been actively improving its collection system management and operation and maintenance practices. The City of Hot Springs has constructed collection system rehabilitation projects totaling over $13,442,587.

4. Despite these efforts, the City of Hot Springs continues to experience wet weather sanitary sewer overflows (SSOs) during heavy rains. There were 359 SSOs beginning in January 2004 through May 2008. The City of Hot Springs is in the initial phases of developing a Sewer Evaluation and Capacity Assurance Plan.

5. Violations of the effluent characteristic limits in Part I, Section A of permit AR0033880 for outfall number 001, as found in Discharge Monitoring Reports ("DMRs") submitted by the Permittee to ADEQ since January 2007, are as follows:

Outfall	Date	Parameter	Reported	Permitted
001	Jan 2007	TSS (Mo.Avg.)	2681 lbs/dy	1500 lbs/dy
001	Jan 2007	TSS (Mo.Avg.)	17.58 mg/l	15 mg/l
001	Jan 2007	TSS (7-Dy.Avg.)	31.20 mg/l	23 mg/l
001	May 2007	pH (Min.)	5.90 s.u.	6 s.u.
001	Feb 2008	DO (Mo.Avg.Min.)	Overdue	2.0 mg/l
001	Feb 2008	Phosphorus (Mo.Avg.)	Overdue	150.0 lbs/dy

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Outfall	Date	Parameter	Reported	Permitted
001	Feb 2008	Phosphorus (Mo.Avg.)	Overdue	Report mg/l
001	Feb 2008	Phosphorus (Mo.Avg.)	Overdue	Report mg/l
001	Mar 2008	DO (Mo.Avg.Min.)	Overdue	2.0 mg/l
001	Mar 2008	Phosphorus (Mo.Avg.)	Overdue	150.0 lbs/dy
001	Mar 2008	Phosphorus (Mo.Avg.)	Overdue	Report mg/l
001	Mar 2008	Phosphorus (Mo.Avg.)	Overdue	Report mg/l
001	Apr 2008	TSS (Mo.Avg.)	2019 lbs/dy	1500.0 lbs/dy
001	Apr 2008	CBOD5 (Mo.Avg.)	1090 lbs/dy	1000.0 lbs/dy

ORDER AND AGREEMENT

In order to further document the actions the City of Hot Springs is taking to comply with its NPDES Permits, and to ensure that the City of Hot Springs actions are fully consistent with the "proper operation and maintenance" clause of the NPDES permits, ADEQ and the City of Hot Springs agree to the following:

I. General Requirements

1. The City of Hot Springs shall develop a collection system management program capable of allowing the City of Hot Springs to comply with and maintain the following general standards:

a. Properly manage, operate and maintain, at all times, all parts of the collection system that the City of Hot Springs owns or retains operational control of;

b. Provide adequate capacity to convey base flows and peak flows in accordance with the System Evaluation and Capacity Assurance Plan

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(SECAP), to be submitted and approved by the Department, for all parts of the collection system over which the City of Hot Springs retains operational control or owns, and take all feasible steps to stop and mitigate the impact of non-wet weather related sanitary sewer overflows in portions of the collection system over which the City of Hot Springs retains operational control or owns;

c. Provide notification to parties with a reasonable potential for exposure to pollutants associated with an overflow event.

The overall goal of these requirements is the elimination of capacity and noncapacity related sanitary sewer overflows and to ensure the City of Hot Springs shall at all times properly operate and maintain all facilities and systems of treatment and control, which are installed or used by the City of Hot Springs to achieve compliance with Part II, Section B, Paragraph 1 of the NPDES Permit.

2. Develop and submit a written summary of the collection system management program in accordance with the Schedule of Compliance Activities (Attachment A). This summary will be made available to any member of the public upon request.

3. Within ninety (90) days of the date of a request by ADEQ, the City of Hot Springs shall provide documentation to ADEQ personnel confirming compliance with specific program requirements, and if not in compliance, a written explanation of why compliance cannot be achieved.

II. Management/Administrative Requirements

1. Identify with specificity the major goals of the collection system management program, consistent with the general standards identified above.

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HAND DELIVERED

August 2010

City of Hot Springs

Sewer Evaluation and Capacity Assurance Plan

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TABLE OF CONTENTS

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

January 24, 2010

Arkansas Department of Environmental Quality
Attn: Rufus Torrence
5301 Northshore Drive
Little Rock, AR 72118-5317

Re: Pretreatment Performance Summary (PPS)

Dear Mr. Torrence,

Please find enclosed the City of Hot Springs Municipal Utilities' 2010 performance summary.

Please note that the first, second, third and fourth quarter low level Hg results and collection dates are highlighted in red on the report. These samples were collected at different times from our regular table III results.

If you have any questions, comments and/or need additional information, please let me know.

Sincerely,

Dennis R. Brunson
Pretreatment Coordinator

Enclosure

C: Ron Wacaster, Facilities Operations Manager
Larry Merriman, Utilities Director
Steve Mallett, Deputy City Manager

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Pretreatment Performance Summary (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT EPA AUTHORIZATION.

I. General Information

Control Authority Name: Hot Springs Municipal Utilities

Address: 320 Davidson Dr.

City: Hot Springs State: AR Zip: 71901

Contact Person: Dennis R. Brunson Title: Pretreatment Coordinator

Contact Telephone: 501-262-1881 Ext 15

NPDES Permit No: AR0033880

Reporting Period: January 1, 2010 December 31, 2010
(Beginning month and year) (Ending month and year)

Total Number of Categorical IUs: 3

Total Number of Noncategorical IUs: 6

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS

	Categorical	Noncategorical
1. No. of SIUs Submitting BMRS/Total No Required.....	0/3	N/A
2. No. of SIUs Submitting 90 day Compliance Reports/ No. Required...	0/3	N/A
3. No. of SIUs Submitting Semi-annual Reports/Total No. Required.....	~~3/3~~ 0/0	~~5/6~~ 0/0
4. No. of SIUs Meeting Compliance Schedule/Total No. Required to Meet Schedule.....	0/0	0/0

Torrence, Rufus

From: Steve Mallett <SMallett@cityhs.net>
Sent: Friday, July 15, 2011 8:15 AM
To: Dennis Brunson; Torrence, Rufus
Cc: Ron Wacaster; Larry Merriman; Richard Penn; Brian Albright
Subject: RE: Revised Code Ordinance

I spoke with Brian about this yesterday afternoon and we will make every effort to get it on the next Board Agenda (August 2, 2011). I will keep you posted.

Steve Mallett, Jr., P.E.
Deputy City Manager for Public Works and Utilities
City of Hot Springs
smallett@cityhs.net
(501) 321-6860
City of Hot Springs Website: www.cityhs.net

From: Dennis Brunson
Sent: Thursday, July 14, 2011 11:06 AM
To: Torrence, Rufus
Cc: Ron Wacaster; Larry Merriman; Richard Penn; Steve Mallett; Brian Albright
Subject: RE: Revised Code Ordinance

Rufus,

I do not know if my superiors still have Wood, Smith, Schnipper & Clay Law Firm on retention as the Utilities' legal representatives. They are still listed as the Utilities' legal counsel in our approved program protocol. The City of Hot Springs city attorney is Brian Albright. I don't know if Mr. Albright has reviewed it. All I know is that it was submitted promptly by this office to my superiors upon your approval.

With that being said, if there are any specific problems as to why the ordinance has not been presented and/or adopted by the Hot Springs Board of Directors, this office does not have the answer to your question.

Dennis R. Brunson
Pretreatment Coordinator
City of Hot Springs Municipal Utilities WWTP
Industrial Pretreatment Division
dbrunson@cityhs.net
(501) 262-1881#15
(501) 262-0339 Fax
www.cityhs.net

From: Torrence, Rufus [mailto:TORRENCE@adeq.state.ar.us]
Sent: Thursday, July 14, 2011 10:01 AM
To: Dennis Brunson
Cc: Ron Wacaster; Larry Merriman; Richard Penn; Steve Mallett; Brian Albright
Subject: RE: Revised Code Ordinance

Are you having any specific problems? Is the City Attorney still Ray Smith of "Wood, Smith, Schnipper & Clay"? Has the City Attorney reviewed the ordinance?

From: Dennis Brunson [mailto:DBrunson@cityhs.net]
Sent: Thursday, July 14, 2011 9:53 AM
To: Torrence, Rufus
Cc: Ron Wacaster; Larry Merriman; Richard Penn; Steve Mallett; Brian Albright
Subject: RE: Revised Code Ordinance

Not at this time. I sent it to my superiors after you approved it.

Dennis R. Brunson
Pretreatment Coordinator
City of Hot Springs Municipal Utilities WWTP
Industrial Pretreatment Division
dbrunson@cityhs.net
(501) 262-1881#15
(501) 262-0339 Fax
www.cityhs.net

From: Torrence, Rufus [mailto:TORRENCE@adeq.state.ar.us]
Sent: Wednesday, July 13, 2011 2:48 PM
To: Dennis Brunson
Subject: RE: Revised Code Ordinance

Has the ordinance been adopted?

From: Dennis Brunson [mailto:DBrunson@cityhs.net]
Sent: Tuesday, December 15, 2009 10:45 AM
To: Torrence, Rufus
Cc: Ron Wacaster; Gilliam, Allen
Subject: Re: Revised Code Ordinance

Rufus,

The following attachment is our 4577 sewer use ordinance. All revisions have been highlighted in "red". If you have any questions and/or comments, please let me know.

Thanks,

Dennis R. Brunson
Pretreatment Coordinator
City of Hot Springs Municipal Utilities WWTP
dbrunson@cityhs.net
(501) 262-1881#15
(501) 262-0339 Fax
www.cityhs.net

9-3-43.2. National categorical pretreatment standards.

The categorical pretreatment standards found at 40 CFR Chapter I, Subchapter N, Parts 405-471 are hereby incorporated.

(a) Where a categorical pretreatment standard is expressed only in terms of either the mass or the concentration of a pollutant in wastewater, the city manager or his designee may impose equivalent concentration or mass limits in accordance with 40 CFR403.6(c).

(b) When wastewater subject to a categorical pretreatment standard is mixed with wastewater not regulated by the same standard, the city manager or his designee shall impose an alternate limit using the combined wastestream formula in 40 CFR 403.6(e).

(c) A user may obtain a variance from a categorical pretreatment standard if the user can prove, pursuant to the procedural and substantive provisions in 40 CFR 403.13, that factors relating to its discharge are fundamentally different from the factors considered by EPA when developing the categorical pretreatment standard.

(d) A user may obtain a net gross adjustment to a categorical standard in accordance with 40 CFR 403.15.

9-3-43.3. State pretreatment standards.

State pretreatment standards set by state statute or regulation are hereby incorporated.

9-3-43.4. Local limits.

The following pollutant limits are established to protect against pass through and interference. No person shall discharge wastewater containing in excess of the following average allowable monthly discharge limits:

1.11 mg/l arsenic
0.59 mg/l cadmium
17.43 mg/l chromium
16.65 mg/l copper
2.45 mg/l cyanide
2.53 mg/l lead
0.037 mg/l mercury
10.07 mg/l nickel
150 mg/l oil and grease
0.47 mg/l silver
34.08 mg/l zinc

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