ADEQ

A R K A N S A S
Department of Environmental Quality

JUN 16 2015

Jim Sorrells
Operations Manager
Hot Springs Municipal Utilities
320 Davidson
Hot Springs, Arkansas 71902

Re: City of Hot Springs (NPDES #AR0033880) Pretreatment Program Audit / Municipal Pollution Prevention (P2) Assessment

Dear Mr. Sorrells:

Please find enclosed the finished report for the Audit/Assessment conducted March 24th through the 26th, 2015. The report with required actions and recommendations should be made available for review and discussion by appropriate City representatives. Please respond in writing within 30 days from the date on this correspondence with proposed corrective actions to deficiencies and recommendations found during the Audit.

Several administrative deficiencies were discovered and need your Pretreatment staff's attention. Pollution Prevention (P2) activities, although voluntary, were found to be almost non-existent. P2 activities are meant to compliment Hot Springs' Pretreatment Program and be a win-win situation for both the City and its industries.

Most of the recommendations, while not required by the Pretreatment Regulations, are meant to help the day-to-day activities of your Pretreatment personnel. Please seriously consider them.

It was a pleasure and learning experience working with the City's Pretreatment personnel during this event and becoming more familiar with Hot Springs and its Pretreatment Program and industries.

Feel free to contact this office with any questions or concerns at (501) 682-0625.

Sincerely,

Allen Gilliam

Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist/Attachments

ec: Rudy Molina/EPA 6WQ-PO
Jason Bolenbaugh, Field Services Branch Manager

E/NPDES/NPDES/Pretreatment/Reports

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF HOT SPRINGS, ARKANSAS

NPDES PERMIT #AR0033880

May 28, 2015

PREPARED BY: Allen Gilliam

State Pretreatment Coordinator

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LIST OF ATTACHMENTS

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 March 24th through the 26th, 2015, of the Pretreatment Program implemented by City of Hot Springs. Participants included:

Allen Gilliam	ADEQ State Pretreatment Coordinator
Dennis Brunson	Hot Springs / Pretreatment Coordinator
Bill Garner	Hot Springs / Pretreatment Inspector
Jim Sorrells	Hot Springs / Operations Manager

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; and

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 Program was again modified and approved 2/25/02 which included incorporation of an enforcement response plan and revisions to the pretreatment ordinance. And, lastly the City's Program was approved on 8/8/12 which incorporated the required "Streamlining" revisions to the Federal Pretreatment Regulations in 40 CFR 403.

This auditor found the Program's section on the "Evaluation of Technically Based Local Limits (TBLL)" to be lacking in a narrative explaining the few spreadsheets in that section of the Program. There is no conclusion or narrative explaining whether TBLLs are necessary or not.

The City's POTW consists of actuated grit chambers; primary clarification; diffused aeration basins; secondary clarification; tertiary sand filters; chlorination and de-chlorination before discharge to Lake Catherine.

The POTW's design flow is 16 MGD and averages about 11 MGD. Its effluent has not exhibited a pattern of toxicity, but there was lethality to the fathead minnow in September of 2013 and sublethality shown in May of 2012. Sublethality was shown on the water flea in June of 2012 and September of 2013.

The plant receives approximately 0.11 MGD from 4 significant industries, 3 of which are categorical industrial users.

Approximately 1,100 dry tons/yr of sludge is belt press de-watered, composted with yard waste and 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 three (3) of their industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Additional information obtained during the audit is included as Attachments A.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the City. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of 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 403.8(f)(2)(i)***, "[The City will] Identify and locate all possible Industrial Users [IUs] which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of IUs made under this paragraph shall be made available to [ADEQ] upon request; and ***(ii)***, [the City will] Identify the character and volume of pollutants contributed to the POTW by the IUs identified under paragraph (f)(2)(i) of this section. This information shall be made available to [ADEQ] upon request...".

During the checklist review it was not clear when the City had conducted an IU survey. No "compilation, index or inventory" could be produced.

The City must send out non-domestic surveys to cover ALL non-domestic users (machine shops, auto body repair shops, hospitals, salvage yards, boat maintenance shops, screen printers, chiropractors, veterinarians, etc.) tailoring their surveys asking questions specific to their wastewater generating operations including chemicals (not trade names) on-site, their volumes, disposal practices, etc. It is suggested to conduct these surveys by business sector to facilitate full coverage.

These surveys should be sent with a requirement to return them to the City's Pretreatment Coordinator within 10 working days along with the signed and dated certification statement, "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The City should consider creating a spreadsheet to keep track of all non-domestic users' surveys' most pertinent information. Many can be placed in a separate spreadsheet denoting "sanitary only" never to be surveyed again.

2) Under ***40 CFR 403.12(b)***, "...Industrial Users subject to such categorical Pretreatment Standards and currently discharging to or scheduled to discharge to a POTW shall be required to submit to the [City] a report which contains...***(3)*** *Description of operations.* The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes."

During the file review it was discovered not all industries' files contained a complete comprehensive process narrative or updated/accurate wastewater flow schematics.

The City must require their significant IUs to submit an understandable process narrative with a wastewater flow schematic from the point(s) of generation through wastewater treatment with directional arrows to the final sampling point. These two documents together should give interested parties a much better understanding of what the City's IUs' actually do as far as generating process wastewater, how it is treated and how this wastewater flows throughout the facility.

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

During the site visits at Triumph Airborne and Triumph Fabrications it was discovered a

bathroom (sanitary wastewater) and an "empty" barrel wash, respectively were being discharged with the regulated wastestreams.

The City must obtain accurate flow measurements of these dilution streams. If they're considered "de-minimus" and do not make an impact on the two facilities' Metal Finishing standards via the combined wastestream in 40 CFR 403.6(e), this must be documented and fully explained ideally in their fact sheets.

4) Under ***40 CFR 433.12(b)***, "In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies to the satisfaction of the permitting authority...the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater...".

During the file review Triumph Airborne's toxic organic management plan (TOMP) focused on a list of its hazardous waste (see Attch. A-4), not toxic organics that may be present in the facility's processes.

Their application signed and dated 4/7/14 (see Attch. A-2i through A-2l) indicated the list of toxic organics was "suspected absent". If this is the case, their TOMP could simply state "There are no 40 CFR 433.11(e) listed toxic organics on site at this facility" and continue to certify in lieu of testing for them.

Regardless, the City must review, independently verify (through a comprehensive inspection) and approve their TOMP in writing.

This same "approval in writing" also applies to Triumph Fabrications, the City's other Metal Finisher (who should also detail in its TOMP their solvent recovery system).

5) Under ***40 CFR 403.8(f)(1)(B)(4)***, "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions: (4) Self-monitoring, sampling, reporting, notification and recordkeeping requirements....sampling location, sampling frequency..."

During the file review it was discovered Triumph Airborne's permit incorrectly authorizes the facility to "transport industrial wastewater..." (see Attch. A-1) and must be corrected to reflect current conditions narratively describing the exact sampling point of the facility's wastewater to the City's collection system.

6) Under ***40 CFR 403.8(f)(2)(vi)***, "[The City must] Evaluate whether each...Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User...The results of such activities shall be available to [ADEQ] upon request..."

During the file review, documents could not be produced indicating the City had conducted slug

discharge potential evaluations although slug control plans for several industries were located (see Attch. A-6 for a good example). The City's own slug discharge potential evaluations must be in the industries' files ideally located with their fact sheet.

7) Under ***40 CFR 403.8(f)(2)(v)***, "[The City must] Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year..."

a. During the file review it was discovered the City's industry inspection form (see Attch. A-5 for example) was vague and did not address many of the questions asked in the attached EPA's checklist form, Section III, pages 21-22, "Inspections", #9e. through #9p. The form must be modified to include these questions with more comprehensive answers than a "No" or "Yes". Wastewater generating and treatment processes should be evaluated to determine if the operation and preventive maintenance is being followed. The appearance of all tanks, plumbing, pumps, valves etc. should be noted if there are leaks, rust, galvanic corrosion, standing pools of fluids or evidence of concrete floor crumbling from caustic spills. Chemical storage and handling practices must also be discussed. The process and treatment information should already be in the industries' files (ideally with their fact sheets). The inspection forms could simply state "process and treatment processes can be located in the City's IU file".

b. During the file review it was discovered one of the City's chains of custody was not complete (see Attach. A-3). The sampler's name was not written on the form. The results from the analysis connected to a "broken" chain of custody may not be admissible in a court of law. Connected "Industrial Monitoring Data" did include the "technician's" signature, but the City must ensure all chains of custody are complete.

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

1) Strong recommendation to develop a fact sheet (section) in each permitted industry's file. These fact sheets should include the most pertinent information on the facility: main Pretreatment contact, cognizant official, date the facility first went into operation, permit limits' statement of basis, dated comprehensive process and wastewater treatment processes' narrative description, a dated comprehensive wastewater flow schematic with directional arrows from point(s) of generation through treatment to the final sampling point, slug discharge potential evaluation, TOMPs and their approval dates, etc.

2) Recommend requesting pollution prevention and best management practices in all permit applications and non-domestic surveys (source reduction, waste minimization, water and energy conservation practices, etc.).

3) Recommend sending out the hazardous waste notification in 40 CFR 403.12(p) to all the generators (connected to the City/still in business) on the list provided during the audit. It is recognized these facilities can and do move around the nation continually. This notification puts the generator on notice the City does know who and where they are.

4) Recommend revising "24 hr composite" to "timed composite" in all industries' permits. It is realized this is what is practiced as the type of sampling, but there is no definition for it. This would avoid any industry doing self-monitoring to conduct flow proportional composites.

5) Recommend revisiting Alliance Rubber's permit parameters to determine which realistically (historically) need to be limited. A review of their sampling results showed many parameters were non-detect. If this is a historical trend and taking into account Alliance is not a Federal Categorical industry (Metal Finisher under CFR 433), it is the City's discretion which parameters need to be analyzed for. Sampling/analysis for all of the metal finishing parameters could be a waste of money that could be used better elsewhere.

6) Recommend recording process flows on days the City is doing the sampling at each industry.

7) Strong recommendation to include a place on the City's (revised) inspection form for the industry representative's signature and date also. This will further confirm an inspection was conducted on that day.

8) Recommend date stamping all correspondence and initialing. Some of this correspondence such as notifications of non-compliance, should be dated to start the "enforcement clock" to ensure the industry comes back into compliance in timely fashion, requires some type of formal enforcement action or escalated enforcement options per the City's Pretreatment Program's Enforcement Response Plan.

9) Recommend reorganizing industry files possibly using three-ring notebooks to separate permitted industry information. These notebooks could further be divided with tabs denoting: fact sheet information; current permit, current permit application; self-monitoring results; City monitoring reports; general correspondence, violation correspondence; slug discharge potential evaluation; slug control plan (as necessary); TOMP (as necessary), etc.

While most of the City's information could be found, some was in different files while some information could not be located.

10) Continue sending out fliers advising the general public the proper disposal of FOG, pharmaceuticals and non-dispersibles.

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

Revise the City's Pretreatment Program Appendix E (?), "Technically Based Local Limits (TBLL)" to include some sort of narrative describing the development of the Maximum Allowable Headworks Loading and the Maximum Allowable Industrial Loadings. The narrative should also include a conclusion stating whether local limits are needed for certain parameters or TBLLs are currently not necessary for any of the identified pollutants of concern.

The Program Appendix this office has only has a few tables which appear to include mostly EPA default data from its guidance manual for developing TBLLs. The only City specific data is from 2006 and 2007 influent and effluent data for copper and zinc.

This office has no complete "approved" Program. Please submit a copy of what the City considers its final approved Pretreatment Program within thirty (30) days from the date on the cover letter.

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

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: David Watkins Title: City Manager

Telephone: 501.321.6860 FAX NUMBER: 501.262.0339

Pretreatment Contact: Dennis Brunson Title: Pretreatment Coordinator

Address: 320 Davidson 71902

Telephone 501.262.1881 x-15 e-mail address: dbrunson@cityhs.net

Pretreatment program approval date: September 30, 1988

Dates of approval of any substantial modifications: Streamline Approved on 8/8/12

Month Annual Pretreatment Report Due: January

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: March 24-26, 2015 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	Pretreatment Coord./ADEQ	501.682.0625

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Dennis Brunson	Pretreatment Coordinator	same
Bill Garner	Pretreatment Inspector	501.262.1881 x-17
Jim Sorrells	Operations Mngr.	501.262.1881

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED

SECTION I: GENERAL INFORMATION

YES	NO	
___	✓	Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?
		If yes, describe the required corrective action:
		_____
		_____
		_____
___	✓	Is the Control Authority currently in SNC or RNC?

.....

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

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0033880	Hot Springs Regional Wastewater	2/1/13	1/31/18

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Same

Location Address: 320 Davidson Drive
Expiration Date of NPDES Permit: Same

Treatment Plant Wastewater Flow: Design- 16 MGD; Actual (Avg.)- 11.2 MGD

Sewer System: 100% Separate; # of SSOs due to grease blockages: 0
Industrial Contribution to this Treatment Plant

# of SIUs: 4 # of CIUs : 3

Industrial Flow (mgd): 0.112 Industrial Flow (%): 1 %

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: Ouachita River, Segment 2f of the Ouachita River Basin
Receiving Stream Use: Primary/secondary contact recreation, raw water source for domestic, industrial and AG supplies, propagation of desirable species of fish and other aquatic life.

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

Method of Sludge Disposal:		Quantity of Sludge:
____	Land Application	____ dry tons/yr.
____	Incineration	____ dry tons/yr.
____	Monofill	____ dry tons/yr.
____	Mun. Solid Waste Landfill	____ dry tons/yr.
✓	Public Distribution (compost)	1,072 dry tons/yr.
____	Lagoon Storage	____ dry tons/yr.
____	Other (specify)	____ dry tons/yr.

List of toxic pollutant limits in NPDES permit: Conventionals and TRC

SECTION I: GENERAL INFORMATION

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:

City currently allows the public to haul composted sludge

Issuing Authority: n/a
Issuance Date: n/a
Expiration Date: n/a

List pollutants that are specified in current sludge permit:
n/a

YES	NO	N/A	
✓	___	___	Has the Control Authority submitted results of whole effluent biological toxicity testing.
___	✓	___	Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?)

No pattern, but the effluent showed lethality to the fathead minnow in 9/13 & sub-lethality in 5/12. Sublethality shown on the water flea in 6/12 & 9/13.

a. (continuation of individual treatment plant information for Hot Springs Regional Wastewater Treatment Plant.)

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

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

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

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

Not currently evaluating

YES	NO	N/A	
___	✓	___	Has the POTW begun tracking the trends in the above samples?
✓	___	___	Has the POTW violated its NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)
TSS & T. Phos 3/31/14	

n/a Has the treatment plant sludge violated the TCLP Test?

C. Control Authority Pretreatment Program Modification [403.18]

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	
✓		Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
✓		Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ #5837 Nature of Modification	Date Incorporated in NPDES Permit
8/8/12	Entire Program modified to be compliant with the Streamlining Revisions to 40 CFR 403	unknown

2. Modifications in Progress:

Date Requested	Nature of Modification
n/a	

YES	NO	
	✓	Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:
✓		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: 9/6/11
Date of most recent Pretreatment Program modification approval: 8/8/12

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

YES	NO	
✓		Deny or condition pollutant discharges
✓		Require compliance with standards
✓		Control discharges through permit or similar means
✓		Require compliance schedules and IU reports
✓		Carry out inspection and monitoring activities
✓		Obtain remedies for noncompliance
✓		Comply with confidentiality requirements
	✓	Establish Pollution Prevention
	✓	Has the city developed and adopted a Pollution Prevention policy?*

YES NO

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

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

___ no 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
n/a			

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)]
___	✓	If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?
✓	___	Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
___	✓	If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^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

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

YES	NO	
___	✓	Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?
n/a		

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

a.	4	SIUs (As defined by the Control Authority) [ICIS-SIUS]
b.	3	Categorical Industrial Users (CIUs) [ICIS-CIUS]
c.	1	Noncategorical SIUs
d.	4	Other regulated nonsignificant IUs (Describe) meat packing, hospital, Craighead cleaners & a water bottler.
	8	TOTAL of a. + d.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	
✓		Has the POTW identified any IUs with Pollution Prevention opportunities?
✓		Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

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

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

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

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

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

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [ICIS-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?

Mountain Valley Water w.w. discharged at a designated point.

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
n/a	

SECTION II: PROGRAM ANALYSIS AND PROFILE

G. Application of Pretreatment Standards and Requirements

YES NO

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

Jan 2009 Date Notified Mail Method of Notification

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

✓	Federal Register	___	Journals, Newsletters
✓	Meetings, Training	✓	Internet
✓	Government Agencies	✓	Other internet

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

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)	✓			?		✓	None listed
Cadmium (Cd)	✓			?		✓	in latest
Chromium-Total	✓			?		✓	8/8/12
Copper (Cu)	✓			?		✓	"approved
Cyanide (CN)	✓			?		✓	Pretreatment
Lead (Pb)	✓			?		✓	Program"
Mercury (Hg)	✓			?		✓	
Molybdenum (Mo) *				?		✓	
Nickel (Ni)	✓			?		✓	
Selenium (Se) *	✓			?		✓	
Silver (Ag)	✓			?		✓	
Zinc (Zn)	✓			?		✓	

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	
	✓	Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

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

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	
Other SIUs	1/year	1/year	
Sampling:			
CIUs	2/year	1/year	
Other SIUs	2/year	1/year	
Reporting:			
CIUs	12/year	2/year	?
Other SIUs	12/year	2/year	?
Self-Monitoring:			
CIUs	12/year	2/year	?
Other SIUs	12/year	2/year	?

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

1. 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)

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	WET	

Were all wastewater samples analyzed by 40 CFR 136 methods? *YES*

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

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:

5 days Conventionals
" Metals
" Organics

✓*		Is there an established protocol clearly detailing sampling location and procedures? **GIS in place now for FOG program.*
	✓	Has the Control Authority had any problems performing compliance monitoring? If yes, explain:

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES	NO	
✓	___	Scheduled compliance monitoring
✓	___	Unscheduled compliance monitoring
✓	___	Demand monitoring for IU compliance
✓	___	IU self-monitoring
___	___	Other: _____ _____

YES	NO	
___	✓	Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year ? If yes, describe below.

I. ENFORCEMENT

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

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

YES	NO	
✓	___	Describe how the Control Authority will investigate instances of noncompliance
✓	___	Describe the Control Authority's types of escalating enforcement responses and the periods for each response
✓	___	Identify by Title the Official(s) responsible for implementing each type of enforcement response
✓	___	Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards.

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

✓	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)*

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:
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?

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)	Return to Compliance? No
n/a					

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

#	%	
0	0	Pretreatment Standards [ICIS-PSNC] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [ICIS-MSNC]
0	0	Reporting requirements [ICIS-PSNC]
0	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	
	✓	Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples.

Has the Control Authority experienced any of the following:

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	
✓		Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

0 How many SIUs are currently on compliance schedules?

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	$ 0
Administrative	0	$ 0
Total	0	$ 0

[ICIS-IUPN]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

YES	NO	
✓		computerized
✓		hard copy
		OTHER: _____

Are the following files computerized:

✓		Control Mechanism Issuance
✓		Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking
		Other: _____

Can IU monitoring data can be retrieved by:

✓		Industry name
✓		Pollutant type
	✓	Industrial category or type
✓		SIC/NAICS Codes
✓		IU discharge volume
	✓	Geographic location
	*	Receiving treatment plant (i.e. if > one plant in the system)
		Other (specify) *SW POTW doesn't include Pret. language and must be corrected

✓		Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
	✓	Have IUs requested that data be held confidential?

How is confidential information handled by the Control Authority?

_____

_____

_____

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES	NO	
___	✓	Are there significant public or community issues impacting the POTW's pretreatment program?
		If yes, please explain: _____
✓	___	Are all records maintained for at least 3 years?

K. RESOURCES

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

2 FTEs including FOG Program

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	Pick-Up
✓	___	Analytical equipment	Standard conv pollutant equip

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
   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 EVALUATION

FILE #: 1 Industry Name Triumph Airborne Structures File/ID No. C-0001
Industry Address 115 Centennial Drive
Industry Description Mfg and repair of aircraft parts
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3728
Avg. Total Flow (gpd) ? Avg. Process Flow (gpd) ~20,000

Industry visited during audit: YES

Comments: _____

FILE #: 2 Industry Name Triumph Fabrications File/ID No. C-0003
Industry Address 1923 Central
Industry Description Mfg military and commercial aircraft parts
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3728
Avg. Total Flow (gpd) ? Avg. Process Flow (gpd) ~50,200

Industry visited during audit: YES

Comments: _____

FILE #: 3 Industry Name Alliance Rubber Co File/ID No. C-0004
Industry Address 210 Carpenter Dam Road
Industry Description Mfg Rubber Bands & other products from Natural/Synthetic Rubber
Industrial Category Rubber Mfgr 40 CFR n/a SIC Code: 3069
Avg. Total Flow (gpd) ? Avg. Process Flow (gpd) ~40,500

Industry visited during audit: YES

Comments: _____

FILE #: 4 Industry Name ORG Chem Group (used to be Mid-American Distillation)
File/ID No. C-0006 Industry Address 847 Blacksnake Rd.
Industry Description Distillation & reclamation of used oil based products for re-use
Industrial Category Centralized Waste Treatment 40 CFR 437 SIC Code: 2992 & 2869
Avg. Total Flow (gpd) ? Avg. Process Flow (gpd) ~1,300

Industry visited during audit: NO

Comments: Subparts A and B

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

Industry visited during audit: n/a

Comments: _____

SECTION III: INDUSTRIAL USER FILE EVALUATION

A. Industrial User Characterization

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

B. Control Mechanism (see Attch. A-1 for example)

1. Does the file contain an (see Attach A-2 for example) application for a control mechanism?	✓	✓	✓	✓	
If yes, what is the application date?	4/13	7/14	5/14	3/14	
Does it ask for Pollution-Prevention information?	no	no	no	no	
2. Does the file contain a permit?	✓	✓	✓	✓	
Permit Expiration Date?	8/17	7/17	3/17	3/17	
Is a fact sheet included?	no	no	no	no	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	✓	✓	✓	✓	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	

SECTION III: INDUSTRIAL USER FILE EVALUATION

	File 1	File 2	File 3	File 4	File 5
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	
h. Requirement for flow monitoring?	✓	✓	✓	✓	
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	
Records retention?	✓	✓	✓	✓	
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	
Revocation of permit?	✓	✓	✓	✓	
l. Compliance schedules/ progress reports	n/a	n/a	n/a	n/a	
m. General/Specific Prohibitions?	✓	✓	✓	✓	
n. Where technologically and economically achievable, are P^2 aspect included?	no	no	no	no	

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	✓	✓	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	
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	

SECTION III: INDUSTRIAL USER FILE EVALUATION

	File 1	File 2	File 3	File 4	File 5
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	1	1	n/a	n/a	
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	
7. Is the Control Authority applying a bypass provision to this IU?	no	no	no	no	

D. Compliance Monitoring

Sampling

1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	2	2	2	2	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	no	no	no	no	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	

Comments: 1)"De-minimus" flows from bathroom at Triumph Airborne and barrel washing at Triumph Fab. was not considered. No documentation could be located in files explaining reason why and 2) Possibly not all chains of custody had the samplers name/signature affixed although a 2nd corresponding field report did include the "technician's" signature (see Attch A-3)

SECTION III: INDUSTRIAL USER FILE EVALUATION

	File 1	File 2	File 3	File 4	File 5
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	1	✓	n/a	n/a	
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	timed	"	"	"	
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	
Inspections *(see Attch. A-5 for example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	
b. Date of last Inspection	11/14	11/14	11/14	11/14	
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	2	2	2	2	
f. Evaluation of pretreatment facilities?	3	3	3	3	
g. Evaluation of self-monitoring equipment and techniques?	✓	✓	✓	✓	

Comments: 1) Triumph Airborne's TOMP did not appear complete as it mainly focused on haz waste (see Attch. A-4); 2) No mention of processes generating wastewater and 3) Could include a more thorough evaluation of the O&M appearance of "pretreatment" (rusting tanks, plumbing, pumps; leaks, standing pools of fluids for example).

SECTION III: INDUSTRIAL USER FILE EVALUATION

	File 1	File 2	File 3	File 4	File 5
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	no	no	no	no	
i. Manufacturing facilities?	1	1	1	1	
j. Chemical handling and storage procedures?	no	no	no	no	
k. Chemical spill prevention areas?	no	no	no	no	
l. Hazardous waste storage areas and handling procedures?	no	no	no	no	
m. Sampling procedures?	2	2	2	2	
n. Laboratory procedures?	3	3	3	3	
o. Monitoring records?	4	4	4	4	
p. Evaluation of Pollution Prevention opportunities?	no	no	no	no	
q. Control Authority inspector signature?	✓	✓	✓	✓	
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	✓	✓	✓	✓	
11. Does the file include: a. BMR?	✓	✓	n/a	arch.	
b. 90-Day Report?	arch.	arch.	n/a	arch.	
c. All periodic reports?	✓	✓	✓	✓	
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	
12. Did the IU report on all required parameters?	✓	✓	✓	✓	
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	✓	✓	
14. Did the IU report flow?	✓	✓	✓	✓	
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	

Comments: 1) Process/manufacturing ops are not described nor "evaluated" much like #2 on previous page's note; 2) Vague; 3) "Contract lab" and 4) Only a question whether records are kept for 3 yrs.

SECTION III: INDUSTRIAL USER FILE EVALUATION

	File 1	File 2	File 3	File 4	File 5
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	✓	
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	n/a	
18. Has the IU developed a Slug Control and Prevention Plan?	✓	1	NNec.	NNec.	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	no	no	no	no	
b. Did POTW respond to the spill?	n/a	n/a	n/a	n/a	
1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	✓	n/a	n/a	n/a	
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	1	0	0	0	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	NNec.	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	

Comments: 1) See Attch. A-6 for a fairly good example.

SECTION III: INDUSTRIAL USER FILE EVALUATION

	File 1	File 2	File 3	File 4	File 5
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	
6. Was the IU notified of all violations?	✓	n/a	n/a	n/a	
7. Was follow-up enforcement action taken by the Control Authority?	✓	n/a	n/a	n/a	
8. Did the Control Authority follow its approved ERP?	✓	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	
10. Is there a compliance schedule?	n/a	n/a	n/a	n/a	
If yes:					
11. Were there any compliance schedule violations?	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/a	n/a	n/a	
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	n/a	n/a	n/a	
b. TRC	✓	n/a	n/a	n/a	
c. Pass through/Interference	n/a	n/a	n/a	n/a	
d. Spill/slug loads	n/a	n/a	n/a	n/a	
e. Reporting	n/a	n/a	n/a	n/a	
f. Compliance schedule	n/a	n/a	n/a	n/a	
g. others (specify)	--	--	--	--	
13. Was the SIU published for SNC?	no	no	no	no	
Date of publication.	n/a	n/a	n/a	n/a	

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: March 24 - 26, 2015 Date entered into QNCR: 5/29/15
(ASSESSMENT)

		Level
NO	Failure to enforce against pass through and/or interference	I
NO	Failure to submit required reports within 30 days	I
NO	Failure to meet compliance schedule milestone date within 90 days	I
NO	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
NO	Failure to inspect or sample 80% of SIUs within the last reporting year	II
NO	Failure to enforce pretreatment standards and reporting requirements	II
YES	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

NO Is the Control Authority in SNC for violation of any Level I criterion.

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

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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, 501.767.7132

Type of industry: "Airplane body shop" - Metal Finisher CFR 433
(Include regulatory citation if CIU)

Date/Time of visit: 3/25/15 / 9:20 a.m.
Industry contacts: Ed Allbritton, Facilities Mgr

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
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?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	?		

Additional comments: Facility brings in aircraft parts (aluminum) to be repaired/anodized. This op causes them to be covered under the Metal Finishing regs. Various machining ops do not generate wastewater. Some parts require abrasive blasting, sheet metal repair and core replacement.

There are no floor drains in the building.

Visit conducted by: Gilliam/Brunson/Sorrells Date: 3/25/15

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Hot Springs NPDES #: AR0033880

Industry name: Triumph Airborne

Additional comments: Various parts are disassembled, repaired and/or overhauled in accordance with the manufacturer's/FAA specs. There are about 9 process tanks/stations. Wastewater generating processes include a heated/air agitated (HAA) alkaline clean tank w/a wet air scrubber (WAS) which is sent to treatment, city water pre-rinse spray nozzles followed by a de-I water immersion tank. The work pieces are then de-oxidized in an 3,250 gal. heated immersion tank with water/sulfuric acid and sodium dichromate w/a WAS which is sent to treatment, then City water rinsed followed by a 3,250 gal. de-oxidizing immersion tank with water and phosphoric acid (anodizing) w/a WAS which is sent to treatment, then a city water rinse and then immersed in a de-I water final rinse. All process tanks are over a below grade sump to catch any catastrophic leak.

Treatment consists of a 1,100 gal chrome reduction (to Cr^{+3}) tank with sulfuric acid and sodium metabisulfite, a 1,100 gal pH neutralization tank with sodium hydroxide, flocculation section, a 1,500 gal clarifier with polymers added to precipitate solid/metals, a 1,500 gal sludge thickening tank where the solids feed into a filter press with the supernatant sent back to the pH neutralizing tank. The pressed sludge is sent off as a haz waste. The water that overflows from the clarifier is discharged to the city's collection system at a rate of ~20,000 gpd. Their treatment operators have a comprehensive SOP manual for operating the system as well as troubleshooting.

If any tank overflows there are redundant float switches in the containment pit under the tanks that shut down city water supply to the process tanks. There are also visual/audible alarms to prevent spills. Also, when the pH levels in the Cr reduction or pH neutralization tanks are out of spec the same safety controls as above are in place. Only 3 wastewater treatment personnel have the keys to reset the water valve. Chemicals are stored in the treatment room in barrels and 250 gal. totes with the floor sloped to a center containment pit. Chemical handling is mainly conducted using enclosed 5 gal. containers to their appropriate tanks/stations.

One bathroom is connected to the treatment system, but the daily flow is so low, it would not alter the CFR 433 limits via the CWF formula.

Visit conducted by: Gilliam/Brunson/Sorrells Date: 3/25/15

Allen Gilliam

(signature of auditor conducting visit)

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., 501.622.4267
Type of industry: Aircraft parts Mfg. - CFR 433 Metal Finisher
(Include regulatory citation if CIU)

Date/Time of visit: 3/25/15 / 11:45 a.m.

Industry contacts: Michael Corballis, Env Mgr & Jason Haley, Env Supv.

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
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?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments: Facility works with sheet aluminum of varying thicknesses to produce commercial and military aircraft parts of varying types adhering to FAA/Military specs.
Facility's processes are too complex to provide specifics (chems/rinses/etch baths/etc) so this site visit's description will be general in nature. Schematics and process descriptions are located in City's files.
There are three different processes in use to produce the various aircraft parts.
These processes and treatment are located in two separate buildings, but are connected to the City by one discharge line with one sampling point.
Main processes include metal forming, heat treating, cleaning, masking, chemical milling Al & Ti, anodizing and painting.

Visit conducted by: Gilliam/Brunson/Sorrells Date: 3/25/15

(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: Building 2 houses various metal forming and finishing ops. including anodize/alodine tanks used to clean and apply corrosion resistant coating to aircraft parts. WW is generated from the rinsing of parts after chem treatment in one of the various chem tanks. Heat treating/annealing processes are also conducted in this bldg. One process utilized a molten salt bath. WW is generated from the rinsing/quenching. The other heat treat process utilizes an elect furnace, then quenched in a glycol solution. WW is generated from the rinse after the glycol quench.
Bldg. 13 houses a maskant application and aluminum chemical milling op. Aircraft parts are cleaned in a series of large chemical baths to remove dirt and lubricant. WW is generated from the rinsing of the parts between immersion in the chem baths and upon completion of the cleaning process. After the cleaning process, a protective maskant is applied to the parts either via a dip process or spray application w/no WW generated. Bldg. 13 also houses the Al chem milling operation where parts are selectively etched according to customer specs. Parts are milled by immersion in tanks containing etchant solution/rinsed/deoxidized in an acid solution and rinsed again. WW generation is from rinsing the parts between the steps and upon completion of the milling operation.
Bldg. 1 houses the Ti chem milling ops. where parts are selectively etched according to customer specs. Parts are milled by immersion in tanks containing etchant solution/rinsed/deoxidized in an acid solution and rinsed again. WW is generated from the rinsing of the parts between steps and upon completion of the milling ops.
Building 13 also houses the facility's WW treatment system. Wastewater from Building 2 is pumped to an equalization tank in the basement of Building 13. It is then pumped to a chrome reduction tank, where sodium metabisulfite is added to reduce any chrome from the hexavalent to the trivalent state. The water then flows to a pH neutralization tank. WW from Buildings 1 and 13 are pumped to an equalization tank in the basement of Building 13. This water is then pumped to the pH neutralization tank, where the pH of the two WW streams is raised. The water then flows to a flocking chamber (ferrous sulfate) where anionic polymer is added.

Visit conducted by: Gilliam/Brunson/Sorrells Date: 3/25/15

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

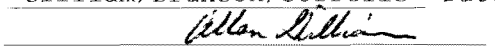
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Hot Springs NPDES #: AR0033880

Industry name: Triumph Fabrications

Additional comments: The water then flows to one of two clarifiers. Sludge is pumped from the bottom of the clarifiers to a sludge thickening tank. It is then pumped through a filter press. The resulting filter cake is containerized in a 20 yard roll off and shipped to Chemical Waste Management for disposal as haz waste. Treated water overflows from the top of the clarifier and is discharged to the City's sewage collection system.
Facility practices P2 by carbon adsorption of the maskants' vapors (perchloroethylene) or (toluene) by an M&W Regensorb catalytic oxidizer system. The facility also utilizes a caustic recovery process for re-use saving ~$200K/yr.
All tanks are "contained" over a "basement" so it's not possible any could rupture and enter WW treatment.
The facility' TOMP is on-file with the City, appears comprehensive and approvable.
An "empty" acid barrel wash (post-consumer safety precaution) was observed with its washwater going to treatment. The quantities generated here were estimated to be minute compared to the total avg flow from the entire facility's regulated flow. Use of the CWF would not substantially change the CFR 433 limits. This "dilution" water should be discussed in the facility's fact sheet as to why it was not considered in the facility's permit limits.
Overall, the IU's processes and WW treatment system appeared to be in good, clean operating order with both reps familiar with their permit limitations and requirements

Visit conducted by: Gilliam/Brunson/Sorrells Date: 3/25/15



(signature of auditor conducting visit)

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, 501.262.2700

Type of industry: Mfg of rubber bands from raw rubber
(Include regulatory citation if CIU)
Date/Time of visit: 3/26/15 / 9:25 a.m.
Industry contacts: Trevor Hamilton, Safety/Training Coordinator

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
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?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments: Facility manufactures rubber bands and other rubber band products from natural and synthetic rubber. This process include mixing of rubber bales and chemical (sulfur, Zn oxide, stearic acid, tranzinc and some other) compounds to form rubber tubing by extrusion (one of six extruders).
Different amounts of chemicals are added to make the "formula" to meet customer specs. in SS tanks. Four different grades of rubber bands are made from the "Cadillac" version to the low grade bands.

Visit conducted by: Gilliam/Brunson/Sorrells Date: 3/26/15

Allen Gilliam

(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: Different colored dies are added to the rubber and mixed thoroughly to make a homogeneous colored raw tub of rubber "dough". Each "batch" is milled, then cut by hand and weaved. An anti-tack compound is added to restrict sticking of rubber after which the "rubber dough" is cut into strips and conveyed thru a fan cooled area. The rubber is extruded (like a garden hose) under heat into tubing and vulcanized (cured) in a heated (~450° to 480°F) salt solution (never discharged) and then City water rinsed (spray nozzles). Rubber "tubing" is then put into barrels of City water and Dawn dish soap (for lubrication). The lubricated "tubes" are then moved to the high speed cutting machines to form rubber bands, "pony tail" bands, grocery store lobster band and other vegetable rubber band products.
Other operations include manual and automated packaging of bands, warehousing and shipping.
WW treatment includes a DAF unit which consists of 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. Chemicals are used to increase the efficiency.
This industry discharges about 40,500 gpd. Facility rep familiar with their permit limits.
Adequate sampling point.
The facility appeared orderly and clean with good air circulation.

Visit conducted by: Gilliam/Brunson/Sorrells Date: 3/26/15

(signature of auditor conducting visit)

Attachment A-1

CITY OF HOT SPRINGS
Industrial Discharge Permit

Industry: Triumph Airborne Structures, Inc.

Mailing Address: 115 Centennial Drive
Hot Springs, AR 71913

Representative: Larry Potts

Title: President

Permit Number: C-0001

The above Industry is authorized to transport industrial wastewater to the City of Hot Springs Municipal Wastewater Collection System at 115 Centennial Drive. in accordance with any applicable provisions of the City of Hot Springs Ordinance 4577, Environmental Protection Agency (EPA) Regulation 40 CFR 403, any applicable provisions of Arkansas Department of Environmental Quality (ADEQ) and other conditions set forth in this permit.

This permit shall become effective 2 August 2014 and shall expire 1 August 2017.

Dennis T. Brunson
Pretreatment Coordinator

Control Authority: City of Hot Springs
P. O. Box 700
Hot Springs, AR 71902

Publicly Owned Treatment Works: City of Hot Springs
Regional Wastewater Treatment Facility
320 Davidson Drive
Hot Springs, AR 71901

SECTION 1

WASTEWATER DISCHARGE PROHIBITIONS

The Industry shall not discharge the following substances into the City of Hot Springs Municipal Wastewater 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, kerosene, naphtha, benzene, toluene, xylene, eithers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides, and sulfides and any other substances which the Control Authority, States or EPA has deemed a fire hazard to the system.

b. Solids or viscous substances which may cause obstruction or interference with the operation of the wastewater treatment facility such as, but not limited to greases, garbage with a particle greater than one half (1/2") in any dimensions, animal guts, or tissues, paunch manure, bones, hair, hides, or fleshing, 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 Publicly Owned Treatment Works (POTW).

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, sludge 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 wastewater collection system 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 its 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 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 the 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.

A-1c

SECTION 2

WASTER DISCHARGE PERMIT 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 Cadmium	0.69	0.26	24hr Composite
T Chromium	2.77	1.71	24hr Composite
T Copper	3.38	2.07	24hr Composite
T Lead	0.69	0.43	24hr Composite
T Chromium	2.77	1.71	24hr Composite
T Nickel	3.98	0.26	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 Submit Monthly TTO Certification Statement

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 next to utility trailers on the northside of facility.

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.

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

E. The industry will measure its regulated wastestream and any unregulated wastestream with control authority approved flow measuring device (s). Restroom wastestreams are exempted from this requirement.

A-1d

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 (501)262-1881. Within five (5) days of notification, the Industry shall submit a detailed report describing the cause of the discharge and action to be taken. Preventive measures shall be included to prevent future occurrence.

b. The industry shall notify the control authority within twenty-four (24) hours after the discovering and 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 noncompliance, including quantities and concentration, dates, times of the noncompliance and if noncompliance is continuing, when compliance is reasonably expected to occur and all steps taken or to be taken to prevent reoccurrence.

c. The Industry shall notify the Control Authority prior to the introduction of new wastewater or pollutants, any substantial change in the volume or characteristic of the wastewater being discharged to the collection system, or any new construction or process modifications involving plumbing changes. This notification shall be written and sent to the Control Authority for approval before any changes can occur.

d. The industry will submit a monthly self monitoring discharge report. This report will contain a certification statement, laboratory analyses of parameter listed in section 2-A and monthly average and daily maximum flow of effluent. All monitoring and laboratory analyses must be performed in accordance to 40 CGR 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 monitoring more frequently than required by section 2-B of this permit, the results of this monitoring will be included in the monthly report.

A-1e

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 shall be submitted to the following address:

City of Hot Springs
Regional Wastewater Treatment Plant
320 Davidson Drive, Hot Springs, AR 71901

A-1f

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 in accordance with 40 CFR 403.12[o].

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 any time 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 City of Hot Springs Regional 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:
   i. The Industry has submitted a complete permit application at least sixty (60) days prior to the expiration date of the Industry's existing permit.
   ii. The failure to reissue the permit prior to the 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.

A-14

SECTION 6

PENALTY

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

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 and 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.

END OF PERMIT

Attachment A-2

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**~~ LARRY POTTS EZ9

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

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):

A-26

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-2c

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	

A-2d

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

c. Peak hourly flow rate (GPD) 1272
d. Maximum daily flow rate (GPD): 14,496
e. Annual daily average (GPD): A-2e

. 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-2 f

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-2g

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)

N/A

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)

A-2h

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

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

A-ZK

	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

[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 Lead

Phone: 501-767-7314

Full time: 7:00 - 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

A-2m

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:	150	150	150	150	150		
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?

A-2N

[ ] 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.

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

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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.

Larry Potts Title: **President**

Signature	Date	Phone
	4-7-14	501-767-7136

A-2r

AMERICAN INTERPLEX CORPORATION LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: City of Hot Springs
Project Reference: Industrial Monitoring
Project Manager: Dennis Brunson
Sampled By:

PO No. 14-1230

AIC Control No: 174696
AIC Proposal No:
Carrier: Hot Springs Delivery
Received Temperature °C: 0.4°C

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	Sample Matrix: WATER	Sample Matrix: SOIL		No of BOTTLES	Ag, As, Cd, Cu, Cr, Hg, Pb, Ni, Zn	Oil and Grease	CN.T	TMO	2,3 Dichloroanaline O-Cresol	2,4-6 Trichlorophenol P-Cresol				Remarks
1-2014	Triumph Fabrications Hot Springs	1-15-2014 @ 1045 hrs	X		X			1	X		X							
2-2014	Triumph Fabrications Hot Springs	1-16-2014 @ 1140 hrs		X				1	X									
3-2014	Mid-America Distillation Inc	1-17-2014 @ 1330 hrs		X				1	X			X						
4-2014	Mid-America Distillation Inc	1-17-2014 @ 1420 hrs	X					1		X								
5-2014	Mid-America Distillation Inc	1-17-2014 @ 1330 hrs		X				1					X	X				
6-2014	Mid-America Distillation Inc	1-17-2014 @ 1330 hrs		X				1					X	X				
																		Field pH calibration
		Container Type							P	G	P	P	G	G				on _____ @ _____
		Preservative							N	S	B	N	NO	NO				Buffer:

Analyses Requested: Semi-Volatiles

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 A = $(NH_4)_2SO_4$

Turnaround Time Requested: (Please circle)
(NORMAL) or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: Dennis Brunson
Phone: 501-262-1888 Ext 15 Fax: 501-262-2939
Report Attention to: Mr. Dennis Brunson
Report Address to: 320 Davidson Road
Hot Springs, AR 71901

Relinquished By:	Date/Time	Received By:	Date/Time
A. Thomason	1-22-14 @ 0950	M. Mann	1-22-14 @ 0950
M. Mann	1-22-14 @ 1050		1-22-14 1050

Received in Lab By:

Comments:

Attachment A-3

INDUSTRIAL MONITORING DATA

REPRESENTATIVE: **Triumph Fabrications**
SAMPLING LOCATION: Michael Corballis
Between new & old clarifiers, inside bldg 13

____ End of Pipe	X	End of Prcess	____	Other:			
Type of Sampling	X	Grab	____	Composite	____	Discete	
		Flow Proportional Composite			____	Other	
Number of Samples per 24 Hour Composite:	96 DG						
Number of Grab Samples:	1						
Type of Monitoring	____	Scheduled	X	Unscheduled	____	Demand	
	____	Special Sample	____				
Wastewater Characteristics:		Color:	____	Cloudy	____	red/fleshling	
			____	Diluted Brown	X	Clear	
			____	Clear/Sudsy			
Flow Conditions:	X	Continuous	____	Batch	____	No Dischage	
	____	Semi-Continuous	____	Batch Tank			

Sampler Cleaning Date/Time: 1-14-2014 @ 0920 Hrs
Sample Container Cleaning Date/Time: 1-14-2014 @ 0945 Hrs
Sampler Number: 1
Composite Container Number: 1

Auto Sampler Calib: 10 ml per 15 min(s)
pH calibration Buffer Data
4.01 pH 4.00 S.U. 10.01 pH 7.00S.U. 2.00 pH 10.00S.U.
Buffer Temp: N/A % Slope N/A
Calibration Date/Time: N/A
pH Meter QA/QC Lab Check Date/Time: N/A

Grab Sample: pH S.U. N/A Temp Deg C N/A
Grab Sample Collection Date/Time: 1-15-2014 @ 1045 Hrs
Composite Sample Collection Date/Time: N/A

Parameter: N/A Metals N/A Conventional

Technician Signature: Bill Gruner

Comments: Collected Grab for Cyanide @ 1045 Hrs. Problem with Sampler, will do Another Tour on 1-16-2014 For In-House + Metals.

INDUSTRIAL MONITORING DATA

REPRESENTATIVE: **Triumph Fabrications**
SAMPLING LOCATION: Michael Corballis
Between new & old clarifiers, inside bldg 13

____ End of Pipe	X	End of Prcess	____	Other:			
Type of Sampling	____	Grab	X	Composite	____	Discete	
		Flow Proportional Composite			____	Other	
Number of Samples per 24 Hour Composite:	96						
Number of Grab Samples:	1						
Type of Monitoring	____	Scheduled	X	Unscheduled	____	Demand	
	____	Special Sample	____				
Wastewater Characteristics:		Color:	____	Cloudy	____	red/fleshling	
			____	Diluted Brown	X	Clear	
			____	Clear/Sudsy			
Flow Conditions:	X	Continuous	____	Batch	____	No Dischage	
	____	Semi-Continuous	____	Batch Tank			

Sampler Cleaning Date/Time: 1-14-2014 @ 0900 HRS
ample Container Cleaning Date/Time: 1-14-2014 @ 0745 HRS
Sampler Number: 1
Composite Container Number: 4

Auto Sampler Calib: 10 ml per 15 min(s)
pH calibration Buffer Data
pH 4.00 S.U. N/A pH 7.00S.U. N/A pH 10.00S.U.
Buffer Temp: N/A % Slope N/A
Calibration Date/Time: N/A
pH Meter QA/QC Lab Check Date/Time: N/A

Grab Sample: pH S.U. 8.6 Temp Deg C 28.4
Grab Sample Collection Date/Time: 1-16-2014 @ 1145 HRS
Composite Sample Collection Date/Time: 1-16-2014 @ 1140 HRS

Parameter: X Metals X Conventional

Technician Signature: Bill Garner

Comments: 1-16-2014, Second Tour due To Sampler problem.
In-House + Metals
Collected grab For pH @ 1145 HRS on 1-16-2014. Triumph Fabrications pH meter was utilized For pH reading.

A-3c

Attachment A-4

Triumph Airborne Structures
115 Centennial Drive
Hot Springs, AR 71913

Toxic Organic Management Plan

Revision Date: 11/18/2014

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: 501-262-1555

(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 (RQ-LB)	Amount on Hand (LB)	Maximum 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	NA9189	Tradebe Treatment Tennessee 5485 Victory Lane Millington, TN 38053 TND000772186
Solid N.O.S.		5485 Tay-For Drive Millington, TN 38053
Hazardous Waste	NA3077	Excel TSD of TN LLC 552 Rivergate Road Memphis, TN 38109 TND980847024
		Tradebe Treatment Tennessee 5485 Victory Lane Millington, TN 38053 TND000772186
Solid N.O.S. (Paint Booth Filters)		
Waste, Paint	UN1263	Tradebe Treatment Tennessee 5485 Victory Lane Millington, TN 38053 TND000772186
Related Material		
Waste Sulfuric Dichromate	UN1755	US Ecology Texas 3277 County Road 69 Robstown, TX 78380 TXD069452340
		TM Deer Park Services LP 2525 Independence PKWY S. Deer Park, TX 77536 TXD000719518

III. Location, Storage & Containment of Hazardous Substances

A 4c

(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 FM approved storage building on the south end of the property.

(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) 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' 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 A

VI. Policy and Procedure
Triumph Airborne Structures 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.

November 18, 2014

Larry Potts
President
Triumph Airborne Structures

Date

Attachment A-5

Hot Springs Municipal Utilities
Inspection Report

Facility Name: Triumph Airborne Structures, Inc.
Date/Time: 19 Nov 14 1330hrs

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 Excel TSD, Trade to Treatment & Recycling of TN.

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 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):

No recommended action (s) suggested. Industry is implementing a pollution prevention program. Industry has changed to degreasing tanks into a biotene type which will not required to be disposed of as hazardous waste.

Findings/Required Action (s):

No required action (s) needed at this time.

Report completed by: [signature] Date/Time: 19 Nov 14 / 1330 Hrs

A-5h

Attachment A-6

Triumph Fabrications - Hot Springs
A Triumph Group Company

Slug Control Plan

Industrial User: Triumph Fabrications Hot Springs

Address: 1923 Central Ave Hot Springs

Hot Springs Arkansas 71901

Emergency Contact: Michel Corballis Title: Environmental Manager

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

Secondary Contact: Rob Rosan Title: Facilities Manager

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

DEFINITION:

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

1. Identify potential slug discharge sources

MATERIAL 115 NEVADA ST BLDGS 1& 13

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

Triumph Fabrications - Hot Springs
A Triumph Group Company

MATERIAL 115 NEVADA ST BLDGS 1&13 CONT.

TYPE OF MATERIAL	VOLUME	DISCHARGE	POTENTIAL POLLUTANTS OF CONCERN
BLDG 1 Filter Press	7 CuFt	BLDG 13 pH Neutralization Tank, 20 Yd Roll Off for site disposal	Copper, Chromium , Zinc
BLD 1 Caustic Bulk Storage Tank	10000 gal	1-T-1 Aluminum Chem-Mill, BLDG 1 Batch Holding Cone Tank 1	pH
BLDG 1 Triethananol-amine 99 LFG 85 Bulk Storage Tank	3000 gal	1-T-1 Aluminum Chem-Mill	pH
BLDB 1 Nitric Acid Bulk Storage Tank	4000 gal	1-T-3 Aluminum Deoxidizer, 1-T-7 Titanium Deoxidizer, 1-T-14 Titanium Deoxidize	pH
13-T-1 Etchant 33	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH, Copper, Zinc
13-T-2 Aluminum Chem Mill	15000 gal	Caustic Recovery System	pH, Copper, Zinc
13-T-3 Spray Rinse	30-50 gpm	BLDG 13 pH Neutralization Tank	pH, Copper, Zinc
13-T-4 Turco 4215 NCLT	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH
13-T-5 Spray Rinse	30-50 gpm	BLDG 13 Chrome Reduction Tank	pH, Copper, Zinc, Chromium
13-T-6 Deoxidizer 6/16	15000 gal	BLDG 13 Batch Holding Tank 1, 2	pH, Copper, Zinc, Chromium
13-T-7 Immersion Rinse	15000 gal	BLDG 13 Chrome Reduction Tank	pH, Copper, Zinc, Chromium
BLDG 13 Bulk Caustic Storage	6000 gal	13-T-2 Aluminum Chem Mill	pH
BLDG 13 Triethananol-amine 99 LFG 85 Bulk Storage Tank	3000 gal	13-T-2 Aluminum Chem Mill	pH
BLDG 13 Sludge Thickening Tank	2200 Gal	Filter Press BLDG 13	pH, Copper, Zinc, Chromium
BLDG 13 Batch Treat Tank	2200 gal	Filter Press BLDG 13, BLDG 1 Batch Holding Cone Tank 1	pH, Copper, Zinc, Chromium
BLDG 13 Batch Holding Tank 1	8500 gal	Truck Shipped Off Site, Filter Press Process Tanks BLDG 13, 1-T-1 Aluminum Chem-Mill	pH, Copper, Zinc, Chromium
BLDG 13 Batch Holding Tank 2	8500 gal	Truck Shipped Off Site, Filter Press Process Tanks BLDG 13, 1-T-1 Aluminum Chem-Mill	pH, Copper, Zinc, Chromium
BLDG 13 Chrome Reduction Tank	3000 gal	BLDG 13 pH Neutralization Tank	pH, Copper, Zinc, Chromium
BLDG 13 pH Neutralization Tank	3000 gal	BLDG 13 Clarifier	pH, Copper, Zinc, Chromium
BLDG 13 Clarifier	120 gpm	City Sewer, BLDG 13 Sludge Thickening Tank	pH, Copper, Zinc, Chromium
Filter Press BLDG 13	5 Cu ft	BLDG 13 pH Neutralization Tank, 20 Yd Roll Off for site disposal	pH, Copper, Zinc, Chromium
BLDG 13 Batch Maskant Mixing Tank	300 gal	Isolated from City Sewer. Spills drummed and shipped off site	Flammable Organic Chemicals
BLDG 13 Toluene Storage Tank	4000 gal	Containment Pit isolated from city sewer. Spills drummed and shipped off site	Flammable Organic Chemicals

Triumph Fabrications - Hot Springs
A Triumph Group Company

MATERIAL 115 Nevada St BLDGs 1&13 Cont.

TYPE OF MATERIAL	VOLUME	DISCHARGE	POTENTIAL POLLUTANTS OF CONCERN
BLDG 13 Acetone Storage Tank	3000 gal	Containment Pit isolated from city sewer. Spills drummed and shipped off site	Flammable Organic Chemicals
Caustic Recovery system 5 tanks 8500 gal Each 2 each 10 CUFT filter presses	42,500 gal	Recycled Caustic returned to the chem. Mill tanks 1-T-1 and 13-T-2. Aluminum Trihydrate is sold as a raw product	pH, Copper, Zinc

MATERIAL 1923 CENTRAL AVE BLDG 2

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

2. Monitoring

A. Baseline Analyses

Analysis of baths and rinses are conducted at least weekly and when chemical additions are made. Results are electronically logged in F:\ Share \Lab \Lab Wizard. A 24 hr composite sample of the discharge from to the POTW is analyzed at least twice weekly the results are located in F:\Environmental\Tech Record.

B. Schedule of discharges or releases

The immersion rinses and spray rinses discharge to the Wastewater Treatment System BLDG 13 continuously during production hrs. The spent process baths are pumped to batch holding tanks shipped to Alpha omega for recycling.

MOCO rinse (Glycol) pumped to the waste treatment system Building 13

MOCO Glycol tank (20% Glycol) normally never dumped . If dump is needed the solution will be hauled for off site treatment and disposal.

3. Control of Identified slug discharge sources

A. Housekeeping

Licensed Wastewater Treatment operators maintain the cleanliness and operation of the wastewater treatment system to achieve compliance to discharge requirements when production is operating.

B. Spill containment

The process lines consist of several tanks installed in a spill containment pit with the capacity to contain at least 1-½ times the volume of any tank should the tank rupture. The bulk chemical tanks at BLDG 1/13 are located in a spill containment pit that has the capacity to hold at least 1 ½ times the volume of the bulk tank. The Toluene and Acetone tank are located in the same containment pit with a capacity equal to 1 ½ times the capacity of either tank.

C. Control plan

In order to comply with EPA regulations concerning slug discharges, Triumph Fabrications Hot Springs has adopted the following elements of a Slug Discharge Control Plan (SDCP):

1. Perform inspection and maintenance of storage areas.
2. Monitor discharge practices and record keeping including non-routine batch discharges.
3. Perform proper handling and transfer of materials.
4. Conduct worker training
5. Continuously evaluate containment structures
6. Containment of toxic organic pollutants TTO Plan Attached
7. Maintaining spill trailer to contain emergency spills
8. Arrange transportation and disposal of hazardous waste with an EPA approved Hazardous Waste Company.
9. Evaluate opportunities for significant reuse of spent process baths
10. The MOCO 20% Glycol tank is not to be discharged to the POTW. The sump Pump in MOCO collection pit will be locked out during production hrs.
11. The MOCO rinse tank will be discharged to Hot Springs Municipal Sewer System per standard operation procedures.
12. Batch dumps are shipped to Alpha Omega for recycle
13. The waste water treatment system is equipped with SATA system. The SATA system phones the lead waste treatment operator and Environmental Manager of problems with the waste water system.

14. The waste water treatment system is equipped with an automatic system to shutdown the discharge to the POTW if pH or ORP sensors detect an out of control readings.

4. Reporting of Slug discharges

If a slug discharge occurs it shall be the responsibility of either the Environmental Manager or the Director of Facilities to notify the Hot Springs Municipal Sewer System as soon as possible.
Remedial actions will be taken to properly contain and dispose of the slug load. A report of the slug load shall be prepared and shall contain the following information

A. Date of Slug of the Slug Load
B. Who made the notification.
C. Remedial Actions
D. Containment
E. Disposal

Triumph Fabrications - Hot Springs
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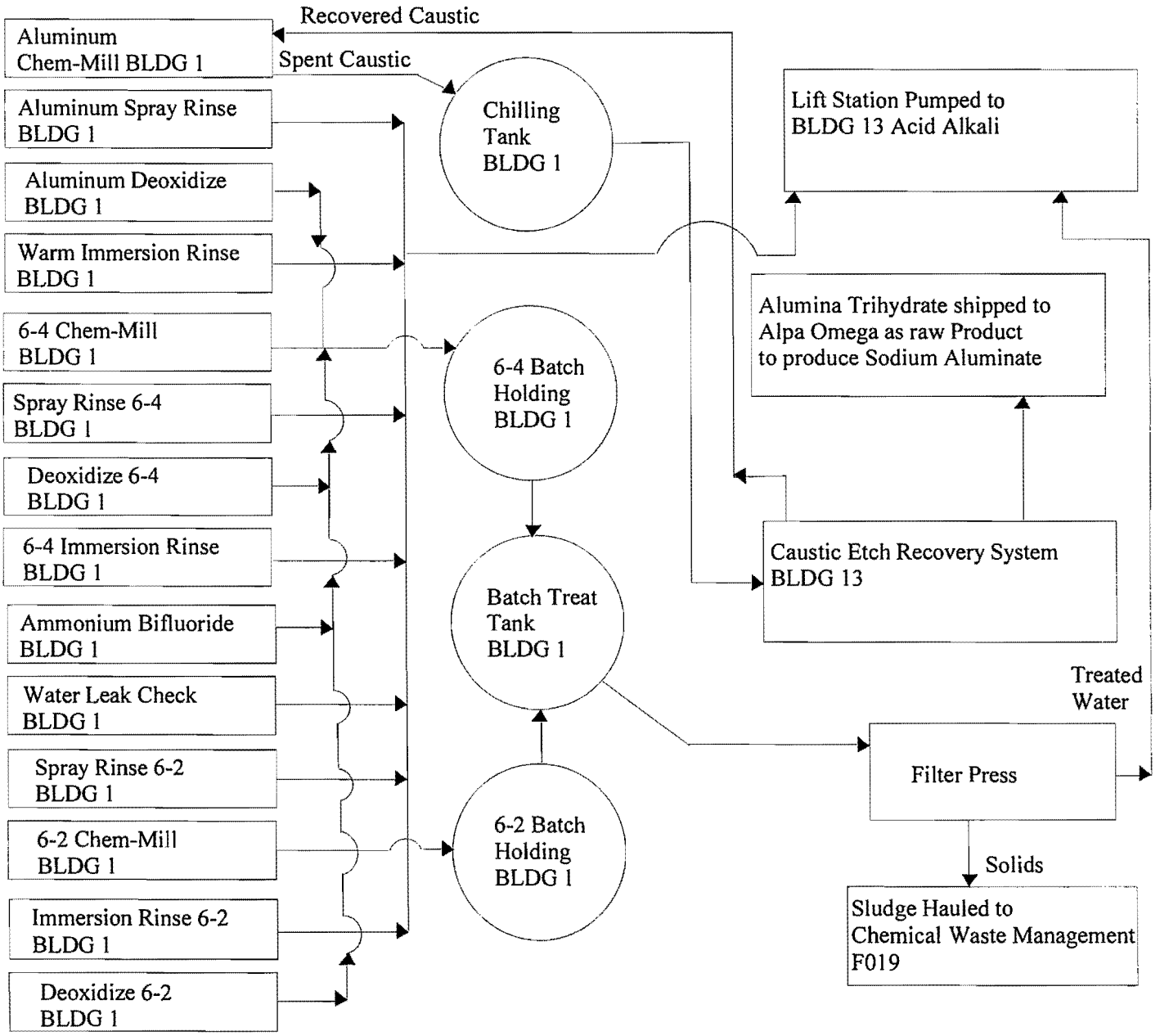
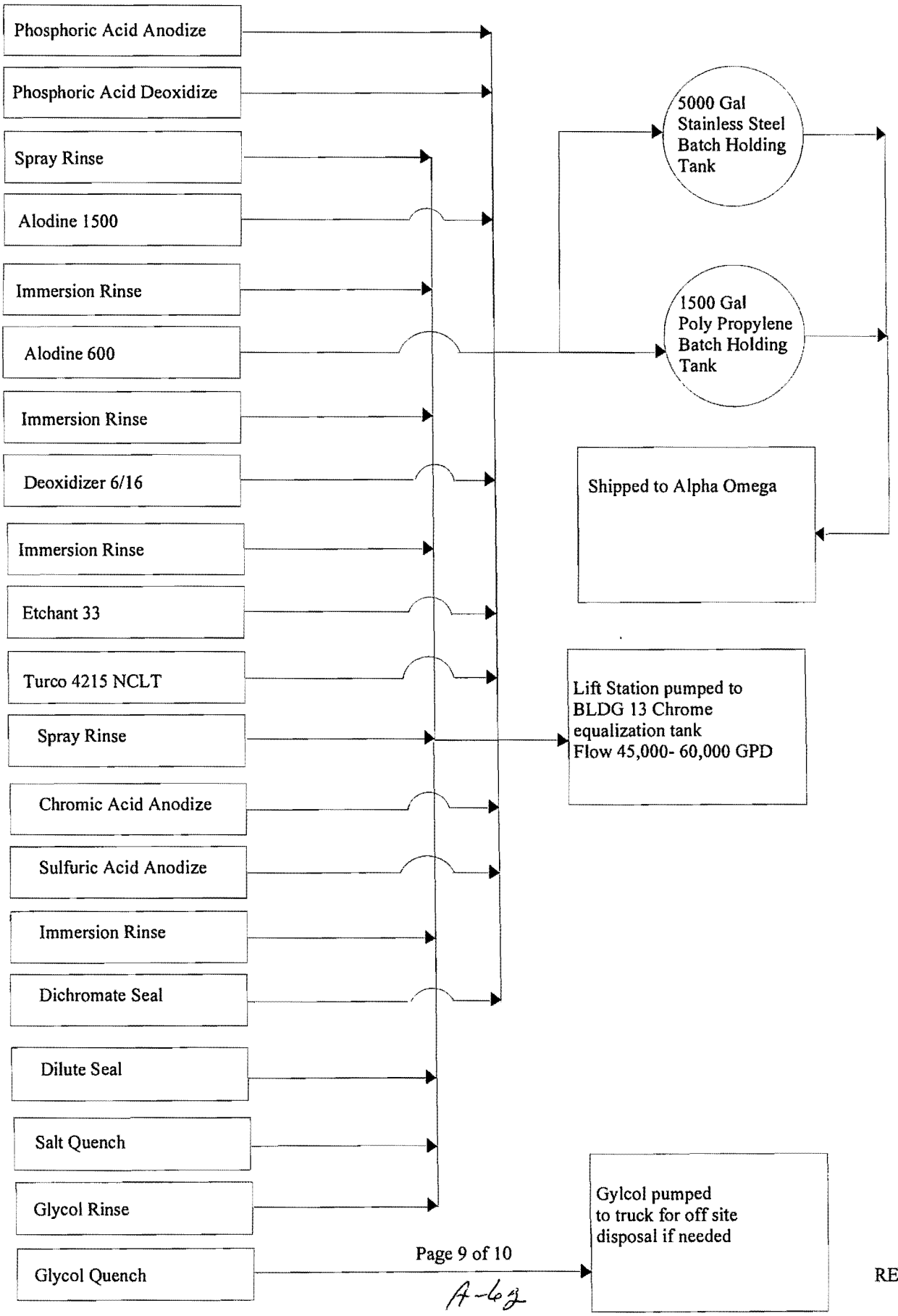
BLDG 1 Waste Flow
115 Nevada



Triumph Fabrications - Hot Springs
A Triumph Group Company

Building 2
1923 Central Ave



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Triumph Fabrications - Hot Springs
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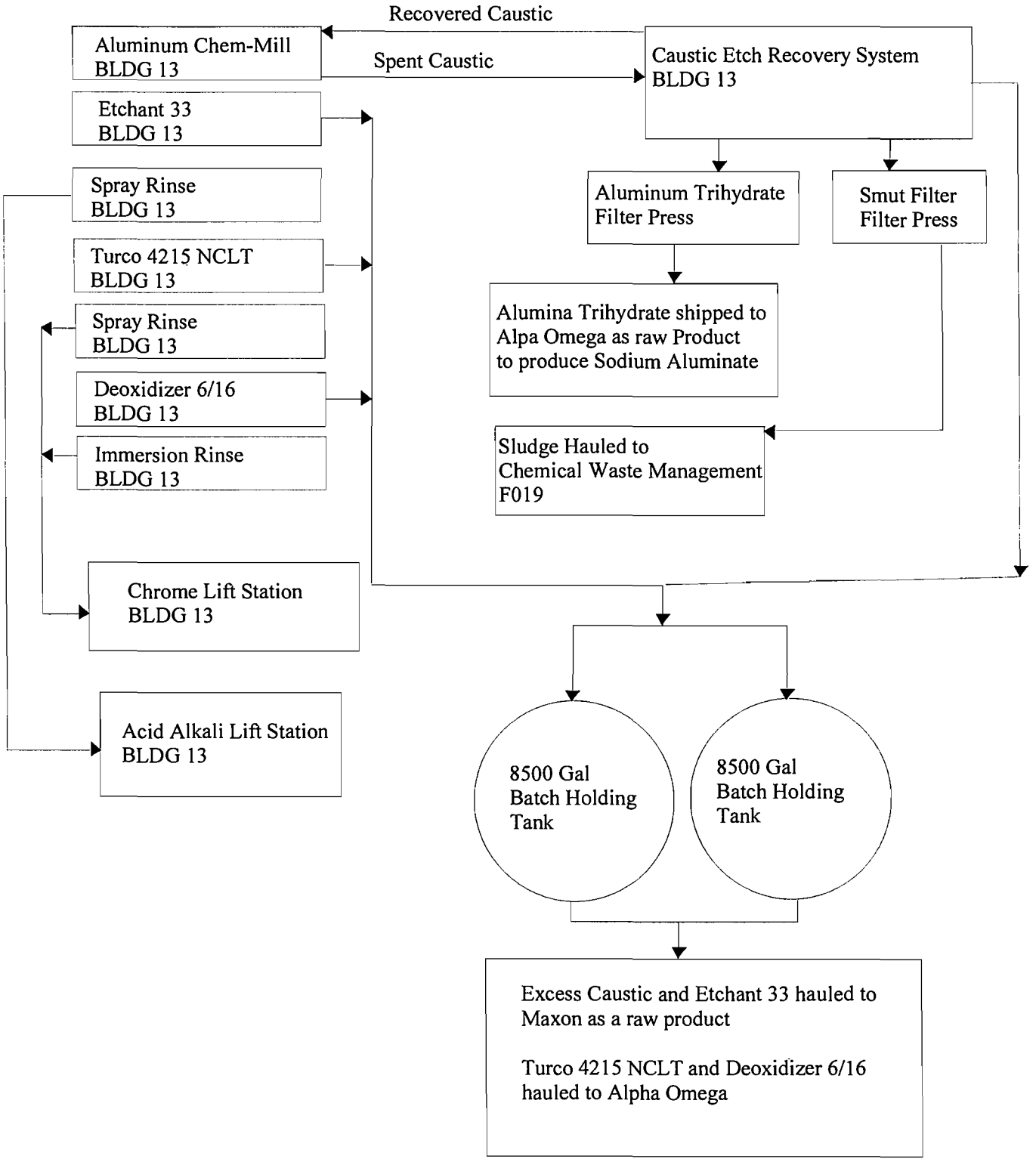
BLDG 13 Waste Flow
115 Nevada St



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