

ADEQ

ARKANSAS
Department of Environmental Quality

April 5, 2007

Jon Boyles, Pretreatment Coordinator
Jacksonville Wastewater Utility
248 Cloverdale Road
Jacksonville, AR 72078

Re: City of Jacksonville (Permit Number: AR0041335 AFIN: 60-00543) Pretreatment Program
Audit/Municipal Pollution Prevention (P2) Assessment

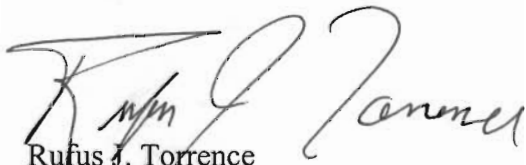
Dear Mr. Boyle:

Please find enclosed the finished report for the audit/assessment conducted March 19 through 22, 2007. The report should be made available for review to appropriate City officials. Discussions and an evaluation should be made concerning the recommendations and required actions. Please respond in writing within thirty (30) days to the audit findings with proposed actions.

The department would like to thank you for your cooperation during the audit. The recommendations in the attached audit/assessment are intended to aide the City of Jacksonville pretreatment program with achieving the objectives of the Clean Water Act.

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

Sincerely,



Rufus J. Torrence
ADEQ Pretreatment Engineer

Encl: Audit/Assessment Checklist

Cc: Lee Bohme / EPA 6WQ-PM (via e-mail w/o attmt)
Frank Esry / ADEQ Inspector Supervisor (w/o attmt)
Dennis Benson / ADEQ NPDES Enforcement (w/o attmt)

**PRETREATMENT PROGRAM AUDIT/
POLLUTION PREVENTION ASSESSMENT**

JACKSONVILLE, ARKANSAS

NPDES PERMIT #AROO41335

APRIL 3, 2007

PREPARED BY: RUFUS TORRENCE

NPDES PRETREATMENT ENGINEER

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LIST OF ATTACHMENTS

Pretreatment Program Audit/Assessment Checklist:

- Section I: General Information

- Section II: Program Analysis and Profile

- Section III: Industrial User File Review

- Reportable Noncompliance (RNC) Worksheet

- SIU Site Visit Summaries

Attachments A, B & C: Supporting Documentation

A) INTRODUCTION

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

With Pollution Prevention (P2) being integrated into Pretreatment Programs assessments of cities' P2 projects and programs will be made in conjunction with the audits.

An audit/assessment was performed March 19 through March 22, 2007, of the Pretreatment Program implemented by the City of Jacksonville, Arkansas. Participants included:

Rufus Torrence	ADEQ/Pretreatment Engineer & Auditor
Jon Boyles	City of Jacksonville/Pretreatment Coordinator
James Patrick Ellis	City of Jacksonville/Lab Technician
Sam Zehtaban	City of Jacksonville/Administrative Ops. Manager
Thea Hughes	City of Jacksonville/General Manager

The goals of the audit/assessment were:

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

The City of Jacksonville Pretreatment Program was originally approved on February 3, 1984. The City submitted two program modifications to ADEQ; ADEQ approved the two modifications and incorporated the modifications into the City's NPDES permit on May 30, 1991 and November 2, 2000. The last modification included program narrative revisions, reallocation of the MAHL (Development of Technically Based Local Limits for JWU by Crist Engineers in May 1995) incorporation of an ERP and necessary Pretreatment Ordinance revisions.

The Jacksonville Wastewater Treatment Plant processes include: oxidation ditches, return activated sludge, aeration, clarification, gravity sludge thickening with a belt filter press. Final polishing consists of gravity dual-media filtration followed by chlorination and de-chlorination. The effluent is discharged into the Bayou Meto creek. The preferred sludge disposal method is to haul the biosolids to the Two Pines Landfill; the back-up option is an onsite monofill.

The Admin. Ops. Mgr. conducted a plant tour on Monday afternoon (March 19th) for the auditor and the ADEQ permit engineer (Jennifer Harmon). The plant design flow is 12 MGD but the average flow is only 4 MGD. A federal facility (Little Rock Air Force Base) contributes about 25% of the average daily flow as the other SIUs contribute less than 0.05% of the average daily flow. The City has permitted 10 SIUs including the air base and two categorical industrial users (Metal Finisher & OCPSF); nonetheless, the POTW effluent has shown no pattern of toxicity to the receiving stream.

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

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 of Jacksonville. 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 Jacksonville Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program will be paraphrased citations of the same. A narrative explanation of the finding will follow.

- 1) Under **40 CFR 403.8(f)(4) Local Limits**. "The POTW shall develop local limits as required in §403.5(c)(1)...". Under **40 CFR 403.5(c)(1) When specific limits must be developed by POTW**. "Each POTW with an approved pretreatment program shall continue to develop these limits as necessary...". Under **40 CFR 122.44(j)(2)(ii)** "Provide a written technical evaluation of the need to revise local limits under 40 CFR 403.5(c)(1), following permit issuance or reissuance."

The City of Jacksonville developed local limits in May 1995. The City's consultants (Crist Engineers, attachment C3) calculated the water quality standards for the receiving stream (Bayou Meto) based on Regulation No. 2 (Act 472 of the Acts of Arkansas for 1949) as promulgated at that time. Regulation No. 2 has been revised and the most recent promulgation date is April 28, 2006. The City of Jacksonville shall, within sixty (60) days of the effective date of their next NPDES permit, (1) submit a WRITTEN CERTIFICATION that a technical evaluation has demonstrated that the existing technically based local limits (TBLL) are based on current state water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, worker health and safety problems, and sludge contamination, OR (2) submit a WRITTEN NOTIFICATION that a technical evaluation revising the current TBLL and draft sewer use ordinance which incorporates such revisions will be submitted

within 12 months of the effective date of the City’s next NPDES permit.

- 2) Under **40 CFR 403.8(f)(1)(iii)(B)(3)** Permits must contain “Effluent limits...based on applicable general Pretreatment Standards...categorical Pretreatment Standards, local limits...” Under **40 CFR 403.4 State or local law**. The POTW must enforce “local law as long as the...local requirements are not less stringent than any set forth in National Pretreatment Standards...”.

The following categorical standards for 40 CFR 433.17 metal finishers (see Cold Extrusion Co of America {CECA} permit in Attachment A1-2of7) are more stringent than JWU local limits:

	<u>Milligrams per liter (mg/l)</u>		
	Cat. Max.	Cat. Ave	Local Limit
Cadmium	0.11	0.07	0.16
Chromium		1.71	2.00
Silver		0.24	0.41
Zinc		1.48	1.51

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

- 1) The auditor recommends that JWU include the exact regulation cite in all permits where the permittee is regulated by categorical standards. The current permits for CECA and Ashland do not state if the sources are new or existing. For example, CECA permit should state someplace in Part I: Limitations that the permittee is subject to 40 CFR 433.17 Pretreatment standards for new sources (PSNS); refer to attachment A1-2of7.
- 2) The auditor recommends that JWU revise para. B.24.30 in ordinance #1133 to include the following language to give a specific city official authority to impose administrative fines (see attmt C2):

“A. When [General Manager] finds that a User has violated, or continues to violate, any provision of this ordinance, an individual wastewater discharge permit, [or a general permit {optional}] or order issued hereunder, or any other Pretreatment Standard or Requirement, [the General Manager] may fine such User in an amount not to exceed [\$1000]. Such fines shall be assessed on a per-violation, per-day basis. In the case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation.

- 3) The auditor recommends that JWU show the name and address of the SIU on each chain-of-custody form which is used during a sampling event (see attmt C1).
- 4) The auditor recommends that for permits issued to non-categorical SIUs that JWU require self-monitoring for only those toxic pollutants with potential to exceed the local limits. If the Little Rock Air Force Base (see attmt A2-3of3) and other non-categorical

SIUs have demonstrated no potential threat to the POTW for pollutants with local limits, then JWU should cease the requirement for self-monitoring for these pollutants.

- 5) The auditor recommends that an additional FTE (Full Time Equivalent) be added; the Pretreatment Program is not adequately staffed. The new member may be a full time inspector to assist the Pretreatment Coordinator.
- 6) The auditor recommends that the City review the new EPA Model Pretreatment Ordinance and consider adopting the ordinance to update the legal authority. Adopting the model ordinance should satisfy the requirements in section D below.
- 7) The auditor recommends that the City include a Fact Sheet in each permit.

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

- 1) Make revisions to the City's Program in response to this audit's requirements.
- 2) Comply with most the most recent changes to 40 CFR 403 (commonly referred to as the "Streamling Rule Changes" promulgated on October 14, 2005). The City must review the existing approved program and make all necessary modifications to comply.

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

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

* * * * *

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

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
*AR0041335	Albert Johnson	11/01/02	10/31/07

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

2. Individual Treatment Plant Information

a. Name of Treatment Plant: Johnson
 Location Address: 248 Cloverdale Road

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 12 MGD; Actual (Average)- 4 MGD

Sewer System: 100 % Separate; 0 % Combined, # of CSOs

Industrial Contribution to this Treatment Plant

of SIUs : 10 # of CIUs : 2
 Industrial Flow (mgd) : 1.2 Industrial Flow (%) : 25 %

Level of Treatment

Type of Process(es) :

Primary Oxidation ditches, return activated sludge
 Secondary Aeration, clarification, DAF or gravity sludge thickening
 Tertiary Gravity dual-media filtration

Method of Disinfection: Chlorination

Dechlorination YES NO

Effluent Discharge

Receiving Stream Name: Bayou Meto

Receiving Stream Classification: Seq. #3B in Ark. River Basin

Receiving Stream Use: Fishable/Swimmable; primary/secondary contact

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

Method of Sludge Disposal:

Quantity of Sludge:

<input type="checkbox"/> Land Application	_____ dry tons/yr.
<input type="checkbox"/> Incineration	_____ dry tons/yr.
<input checked="" type="checkbox"/> Monofill	<u>1500</u> dry tons/yr.
<input type="checkbox"/> Mun. Solid Waste Landfill	_____ dry tons/yr.
<input type="checkbox"/> Public Distribution	_____ dry tons/yr.
<input type="checkbox"/> Lagoon Storage	_____ dry tons/yr.
<input checked="" type="checkbox"/> Other (specify)	<u>5200</u> dry tons/yr.

List of toxic pollutant limits in NPDES permit: (Permit currently pending)

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES NO

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

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

1. Modifications:

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

2. Modifications in Progress:

Date Requested	Nature of Modification
None	_____
_____	_____
_____	_____

YES NO

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

 N/A Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

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

Date of original Pretreatment Program approval: 2/3/1984 [WENDB-PTIM]
 Date of most recent Ordinance approved by the Control authority: 11/2/2000
 Date of most recent Pretreatment Program modification approval: See Above

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

YES NO

- Deny or condition pollutant discharges [§§13.24.09; 13.24.12 & 13.24.12]
- Require compliance with standards [§§13.24.10 & 13.24.11]
- Control discharges through permit or similar means [§13.24.19]
- Require compliance schedules and IU reports [§13.24.19.5.g]
- Carry out inspection and monitoring activities [§13.24.20 & 13.24.21]
- Obtain remedies for noncompliance [§13.24.30]
- Comply with confidentiality requirements [§13.24.23]
- Establish Pollution Prevention
- Has the city developed and adopted a Pollution Prevention policy?

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no: *POTW serves the Little Rock Air Force Base*

Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions? *Contract signed 6/82*

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

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

Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1. <u>Little Rock Air Force Base</u>	<u>0</u>	<u>0*</u>	<u>Contract & Permit</u>
2. _____	_____	_____	_____

*The LRAFB is considered a single SIU

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

Problems

- Updating industrial waste survey _____
- Notification of IUs _____
- Permit issuance _____
- Receipt and review of IU reports _____
- Inspection and sampling of IUs _____
- Assessment of IUs for P² activity _____
- Analysis of samples _____
- Enforcement _____
- Other: _____

Briefly describe other problems: None

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

IU Name	Problem	NPDES Permit Violation	
		Yes	No
<u>None</u>	_____	_____	_____

SECTION II: PROGRAM ANALYSIS AND PROFILE

E. Industrial User Characterization [403.8(f)(2)(i)]

YES NO Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

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

Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
See Page 6 in Program Description (Updating The Industrial User Survey)

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

What methods are used to update the IWS:

- Review of newspaper/phone book
- Review of plumbing/building permits
- Review of water billing records
- Permit reapplication requirements
- Onsite inspections
- Citizen involvement
- Other (specify) City Privilege Tax Inspection¹

How often is the survey to be updated? Ongoing

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

¹The CA Pret Cor must sign off on all new business as a prerequisite for doing business in Jacksonville.

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?
<u>Ark Portable Toilets</u>	<u>Non-Cat SIU (Conv Pollutants)</u>	<u>Yes</u>

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

- a. 10 SIUs (As defined by the Control Authority) [WENDB-SIUS]
- b. 2 Categorical Industrial Users (CIUs) [WENDB-CIUS]
- c. 8 Noncategorical SIUs
- d. 10 Other regulated nonsignificant IUs (Describe) _____
- 10 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:

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.): _____

What is the maximum term of the control mechanism? _____

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

IU NAME	PERMIT EXPIRATION DATE
_____	_____
_____	_____
_____	_____

YES NO

- Does the Control Authority accept trucked septage wastes? (Ark Port Toilet)
- Does the Control Authority accept other trucked wastes?
- Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

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

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

Pollutant	Limit
Gen & Specific Prohibitions	_____
_____	_____
_____	_____

Describe the discharge point(s) (including security procedures):
Vault prior to the headworks or in the storage basin

- Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes?

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SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

 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	

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?

See Attmt C4 Date Notified Letter Method of Notification

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

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

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

	Headworks Analysis Completed? **		Local Limits Needed?		Local Limits Adopted?		Numerical Limit Adopted *** (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u> </u>
Cadmium (Cd)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>0.16</u>
Chromium-Total	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>2.00</u>
Copper (Cu)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>1.22</u>
Cyanide (CN)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>0.19</u>
Lead (Pb)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>0.22</u>
Mercury (Hg)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u> </u>
Molybdenum (Mo) *	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u> </u>	<u>✓</u>	<u> </u>
Nickel (Ni)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>2.01</u>
Selenium (Se) *	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u> </u>	<u>✓</u>	<u> </u>
Silver (Ag)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>0.41</u>
Zinc (Zn)	<u>✓</u>	<u> </u>	<u> </u>	<u>?</u>	<u>✓</u>	<u> </u>	<u>1.51</u>

* - If necessary for the sludge disposal option chosen.

** - ADEQ performed MAHL analysis for City for annual reports

*** - Sect 13.24.12 of Ord No. 1133 incorporates Local Limits by reference Limits shown above applies to all SIUs except LRAFB

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

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

YES NO

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

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

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

*Except the LRAFB which has special mass limits.

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 (Local Limits were developed for CLOSED West Plant)

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	None (page 16)
Other SIUs	1	1/year	" "
Sampling:			
CIUs	2	1/year	" (page 18)
Other SIUs	2	1/year	" "
Reporting:			
CIUs	2	2/year	" (page 18)
Other SIUs	2	2/year	" "
Self-Monitoring:			
CIUs	2	2/year	" (page 18)
Other SIUs	2	2/year	" "

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

* 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.

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	ICAP/Furnace	Env Service Company
Cyanide	Spectrophotometric	" " "
Organics	GC/MS	" " "
Other	Biomonitoring	Arkansas Analytical

Were all wastewater samples analyzed by 40 CFR 136 methods?

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

Does the POTW use QA/QC for sampling and analysis? If yes, describe:
CA uses labs certified by ADEQ

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

2 wks Conventionals
2 wks Metals
2 wks Organics

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

Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

1. CA has written sample protocol for each SIU

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

YES NO

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

YES NO

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

I. ENFORCEMENT

YES NO

Is the Control Authority definition of SNC consistent with EPA's?
[403.8(f)(2)(vii)] [13.24.29(5)]

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

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

- Imprisonment
- Termination of Service
- Other: _____

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

YES NO

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

_____ Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].
 Comment: Section 1 Para 13 & 14 has 24 hours notification but makes no specific reference to "additional monitoring within 30 days".

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	Enforcement Action		Return to Compliance?	
	in SNC	Type	Date	Yes (Date)	No
CECA	12-14-2005	NOV	1-15-2006	3-10-2006	

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

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

YES NO

SECTION II: PROGRAM ANALYSIS AND PROFILE

 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:

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

YES NO

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

 0 How many SIUs are currently on compliance schedules?

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

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

	<u>Number</u>	<u>Amount</u>
Civil	<u> 0</u>	<u> \$</u>
Administrative	<u> 0</u>	<u> \$</u>
Total	<u> 0</u>	<u> \$</u>

[WENDB-IUPN]

SECTION III: INDUSTRIAL USER FILE REVIEW

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] * - FTE = Full Time Equivalent Employee
<2.0

YES NO

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

	<u>Percent of Total Funding</u>
<u>✓</u> POTW general operating fund	<u>99</u>
<u>✓</u> IU permit fees	<u>.25</u>
<u>✓</u> monitoring charges	<u>.5</u>
<u>✓</u> industry surcharges	<u>.25</u>
<u> </u> other (describe) _____	
	Total <u>100%</u>

✓ 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 Need extra help with inspections
- ✓ Sample collection Also need extra help with 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 City has isco automatic samplers and flowmeters
- ✓ Safety equipment Gas detectors, blowers, ropes, glove, suits safety glasses, respirators, et.al.
- ✓ Vehicles Van and car
- ✓ Analytical equipment retains contract lab

SECTION III: INDUSTRIAL USER FILE REVIEW

L. POLLUTION PREVENTION

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

N/A

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:

N/A

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

5. Are SIUs required to get a pollution prevention audit or assessment as a part of their permit application or as a requirement of their permit?

No

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

If yes, which of the "Guides to Pollution Prevention" were used?

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Cold Extrusion Co. File/ID No. 90-03-00
Industry Address 1920 Redmond Rd
Industry Description Extrusion & forging of steel/forming/wire rope fittings
Industrial Category Metal Finishing 40 CFR 433 SIC Code: 3462
Ave. Total Flow (gpd) 7953 Ave. Process Flow (gpd) 7148

Industry visited during audit: YES

Comments: City to confirm installation date of regulated processes.
The SIU claims that the reg process was installed after 1982
which makes CECA a "New Source"

FILE #: 2 Industry Name Ashland Specialty File/ID No. 86-02-01
Industry Address 1901 Redmond Rd
Industry Description Mfr of Polyester Resins
Industrial Category OCPSF 40 CFR 414 SIC Code: 2821
Ave. Total Flow (gpd) 2619 Ave. Process Flow (gpd) 0

Industry visited during audit: YES

Comments: During the site visit, the auditor noted that the pH of the sanitary/CCW wastewater was over 9.6; the CA is to verify the source of alkaline wastewater or confirm improper calibration of pH meter.

FILE #: 3 Industry Name Altivity Packing File/ID No. 87-5-06
Industry Address 1301 N. Redmond Rd
Industry Description Mfr of Multiwall Paper & Plastic Bags
Industrial Category N/A 40 CFR SIC Code: 2674
Ave. Total Flow (gpd) 14,000 Ave. Process Flow (gpd) 10,182

Industry visited during audit: YES

Comments: Has ALAR (Diatomaceous earth) treatment system to remove color and certain metals from the wastewater.

FILE #: 4 Industry Name Triangle Eng File/ID No. 91-09-03
Industry Address 1101 Redmond Road
Industry Description Mfr of industrial fans and ventilators
Industrial Category N/A 40 CFR SIC Code: 3564
Ave. Total Flow (gpd) 1153 Ave. Process Flow (gpd) 471

Industry visited during audit: YES

Comments: Uses only alkaline cleaning

FILE #: 5 Industry Name Little Rock Air Force Base File/ID No. 87-08-12
Industry Address North by NW and Adjacent to Jacksonville city limit
Industry Description Federal Military Base
Industrial Category N/A 40 CFR SIC Code: 9711
Ave. Total Flow (gpd) 800,000 Ave. Process Flow (gpd) 75,000

Industry visited during audit: YES

Comments: Base has a number of major areas that produce process wastewater (Hobby Shop, Motor Pool, Aircraft Wash, Corrosion Control Bldg., Hospital, etc.)

SECTION III: INDUSTRIAL USER FILE REVIEW

A. Industrial User Characterization

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Is the IU considered "significant" by the Control Authority?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
2. Is the user subject to categorical pretreatment standards?	<u>Y</u>	<u>Y</u>	<u>N</u>	<u>N</u>	<u>N</u>
a. New source or existing source (NS or ES)?	<u>1</u>	<u>1</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. Is this IU one identified as having P ² potential?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>

Comments: 1. The auditor gave the CA the new source dates; the CA is to verify sources.

B. Control Mechanism

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Does the file contain an application for a control mechanism?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
If yes, what is the application date?	<u>8-23-05</u>	<u>4-18-03</u>	<u>11-30-05</u>	<u>5-24-05</u>	<u>10-31-05</u>
Does it ask for Pollution Prevention information?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>
2. Does the file contain a permit?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Permit Expiration Date?	<u>8-23-08</u>	<u>12-31-07</u>	<u>1-1-09</u>	<u>7-1-08</u>	<u>1-1-08</u>
Is a fact sheet included?	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>	<u>2</u>
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
b. Expiration date?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
c. Statement of nontransferability?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
d. Appropriate discharge limitations?	<u>3</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>	<u>4</u>
e. Appropriate self-monitoring requirements?	<u>Y</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
f. Sampling frequency?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Sampling locations?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
h. Requirement for flow monitoring?	<u>Y</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
i. Types of samples (grab or composite) for self-monitoring?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
j. Applicable IU reporting requirements?	<u>5</u>	<u>N/A</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
k. Standard conditions for:					
Right of Entry?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Records retention?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Civil and Criminal Penalty provisions?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
Revocation of permit?	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>	<u>Y</u>
l. Compliance schedules/ progress reports	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
m. General/Specific Prohibitions?	<u>6</u>	<u>6</u>	<u>6</u>	<u>6</u>	<u>6</u>
n. Where technologically and economically achievable, are P ² aspect included?	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>

- Comments: 2. CA has Sample Protocol only for each SIU
3. Contains only Local Limits/Did not include some more stringent categorical limits.
4. LRAFB has special mass limits.
5. Did not include some 40CFR433 limits which were more stringent.
6. Permit references only General Prohibitions

C. Application of Standards

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Has the IU been properly categorized?	<u>7</u>	<u>7</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
2. Were both Categorical Standards and Local Limits properly applied?	<u>3</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	<u> 8 </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>
7. Is the Control Authority applying a bypass provision to this IU?	<u> N </u>	<u> N </u>	<u> N </u>	<u> N </u>	<u> N </u>

Comments: 7. No specific CFR cites shown in CIU permits

8. No process schematic in files but CA claims to be sampling only reg ww; during the site visit CECA claimed that only the rinse ww from the phosphate process flows thru the sampling point.

D. Compliance Monitoring

Sampling

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
1. Does the file contain Control Authority sampling results for the industry?	<u> 9 </u>	<u> 9 </u>	<u> 9 </u>	<u> 9 </u>	<u> 9 </u>
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?					
b. Sample date and time?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
c. Sample type?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
d. Wastewater flow at the time of sampling?	<u> 10 </u>	<u> 10 </u>	<u> 10 </u>	<u> 10 </u>	<u> 10 </u>
e. Sample preservation procedures?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
f. Chain-of-custody records?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/management requirements?	<u> 11 </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)]	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>

Comments: 9. Sampling results are computerized.
 10. C-of-C form has space for recording flow but none shown.
 11. CECA TOMP shows that no TTO's are on-site.
 12. Copy of CECA inspection shown in attmt B1.

Inspections

7. Does the IU file contain inspection reports?	<u> 12 </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
b. Date of last Inspection	<u> 8-18-06 </u>	<u> 9-13-06 </u>	<u> 9-22-06 </u>	<u> 5-10-06 </u>	<u> 6-21-06 </u>
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
b. Inspection date and time?	<u> 13 </u>	<u> 13 </u>	<u> Y </u>	<u> 13 </u>	<u> 13 </u>
c. Name and title of IU official contacted?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
d. Verification of production rates?	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
f. Evaluation of pretreatment facilities?	<u> N/A </u>	<u> N/A </u>	<u> 14 </u>	<u> N/A </u>	<u> N/A </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
g. Evaluation of self-monitoring equipment and techniques?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
i. Manufacturing facilities?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
j. Chemical handling and storage procedures?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
k. Chemical spill prevention areas?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
l. Hazardous waste storage areas and handling procedures?	<u> 15 </u>	<u> 15 </u>	<u> 15 </u>	<u> 15 </u>	<u> 15 </u>
m. Sampling procedures?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
n. Laboratory procedures?	<u> 16 </u>	<u> 16 </u>	<u> 16 </u>	<u> 16 </u>	<u> 16 </u>
o. Monitoring records?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
p. Evaluation of Pollution Prevention opportunities?	<u> N </u>	<u> N </u>	<u> N </u>	<u> N </u>	<u> N </u>
q. Control Authority inspector signature?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>

Comments: 13. No time of entry shown on inspection form or report.

14. ALAR (Diatomaceous Earth) to remove color and some metals.

15. Form has no reference space for Hazardous Materials

16. CA uses contract lab

IU Self-Monitoring and Reporting

	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
10. Does the file contain self-monitoring reports?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
11. Does the file include:					
a. BMR?	<u> Y </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>
b. 90-Day Report?	<u> N </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>
c. All periodic reports?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>
d. Compliance schedule reports?	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>	<u> N/A </u>
12. Did the IU report on all required parameters?	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>	<u> Y </u>

SECTION III: INDUSTRIAL USER FILE REVIEW

13. Did the IU comply with the required sampling frequency(s)? Y Y Y Y Y
14. Did the IU report flow? Y Y Y Y Y
15. Did the IU comply with the required reporting frequency(s)? Y Y Y Y Y

FILE 1 FILE 2 FILE 3 FILE 4 FILE 5

16. For all SIUs, are self-monitoring reports signed and certified? Y Y Y Y Y
17. Did the IU report all changes in its discharge? [403.12(j)] N/A N/A N/A N/A N/A
18. Has the IU developed a Slug Control and Prevention Plan? 17 N N 17 17
19. Has the industry been responsible for spills or slug loads discharged to the POTW? N 18 18 N N

If yes, does the file contain documentation regarding:

- a. Did the spill cause Pass Through or Interference? - - - - -
- b. Did POTW respond to the spill? - - - - -

Comments: 17. Slug Discharge Control Plan in file
 18. No data/report on file
 19. Classification of NS not determined yet.

E. Enforcement

FILE 1 FILE 2 FILE 3 FILE 4 FILE 5

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]
- a. Control Authority monitoring results? Y Y Y Y Y
- b. IU self-monitoring results? Y Y Y Y Y

SECTION III: INDUSTRIAL USER FILE REVIEW

c. If NS CIU was it compliant within 90 days from commencement of discharge?	<u>19</u>	<u>19</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
2. How many reports submitted during the past reporting year indicated discharge violations?	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
<u>Enforcement (continued)</u>					
	<u>FILE 1</u>	<u>FILE 2</u>	<u>FILE 3</u>	<u>FILE 4</u>	<u>FILE 5</u>
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
5. Were all nondischarge violations identified in the file?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
6. Was the IU notified of all violations?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
7. Was follow-up enforcement action taken by the Control Authority?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
8. Did the Control Authority follow its approved ERP?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
10. Is there a compliance schedule? If yes:	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
11. Were there any compliance schedule violations?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

SECTION III: INDUSTRIAL USER FILE REVIEW

During evaluation for SNC,
did the CA consider each of
the following criteria?

a. Chronic violations	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
b. TRC	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
c. Pass through/Interference	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
d. Spill/slug loads	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
e. Reporting	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
f. Compliance schedule	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
g. others (specify)	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
 13. Was the SIU published for SNC?	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>
 Date of publication.	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>	<u>N/A</u>

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

**REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist**

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Jacksonville NPDES #: AR0041335

Date of Audit: March 19 - 22, 07 Date entered into QNCR: _____
(ASSESSMENT)

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

SIGNIFICANT NONCOMPLIANCE (SNC)

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

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:
Triangle Engineering Co
1101 Redmond Road

Type of industry: Mfr of Ind Fans Date/Time of visit: 3/21 @ 8:30
(Include regulatory citation if CIU)

Industry contacts: Preston Robinson

Table with 4 columns: Question, Yes, No, N/A. Contains 12 rows of audit questions and their corresponding responses (e.g., '1. Significant industrial user? Y', '3. Pretreatment equipment or procedures? X').

Additional comments: The facility manufactures cooling fans. These fans are for household, commercial, agriculture and industrial purposes. The bare (non-painted) parts are cleaned with an alkali cleaner and rinsed twice. All drag-out water is collected in a sump, located beneath the wash and rinse areas.

Visit conducted by: Torrence/Boyles Date: March 21, 2007

Handwritten signature of Torrence/Boyles with the text '(signature of auditor conducting visit)' below it.

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jacksonville NPDES #: AR0041335

Industry name: Triangle Eng. Co

Additional comments:

The sump is enclosed by a berm. All drag-out water is returned to the first alkali wash as make-up water. All rinse tanks have automatic shut-off valves to prevent over filling. On a normal painting day, approximately 2000 gallons of rinse water is generated. The facility staff currently uses parts that were pre-painted off-site and is only painting on a very limited basis. This practice began around January 2002. The staff is painting parts approximately once per week.

Visit conducted by: Torrence & Boyles Date: March 21, 2007


(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:

Cold Extrusion Co of America

1920 Redmond Road

Type of industry: Metal Finisher Date/Time of visit: 3-31-07@9:20

(Include regulatory citation if CTU)

40 CFR Part 433

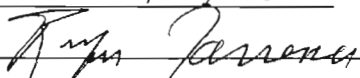
Industry contacts: Tom Nowak & Jeff Peterson

	Yes	No	N/A
1. Significant industrial user?	<u>_Y_</u>	<u>___</u>	<u>___</u>
2. Classified correctly?	<u>_1_</u>	<u>___</u>	<u>___</u>
3. Pretreatment equipment or procedures?	<u>___</u>	<u>___</u>	<u>_X_</u>
4. Pretreatment equipment maintained and operational?	<u>___</u>	<u>___</u>	<u>_X_</u>
5. Hazardous waste generated or stored?	<u>___</u>	<u>_N_</u>	<u>___</u>
6. Proper solid waste disposal?	<u>_Y_</u>	<u>___</u>	<u>___</u>
7. Solvent management/TTO control?	<u>_Y_</u>	<u>___</u>	<u>___</u>
8. Suitable sampling location?	<u>_Y_</u>	<u>___</u>	<u>___</u>
9. Appropriate self-monitoring procedures/equipment?	<u>_Y_</u>	<u>___</u>	<u>___</u>
10. Adequate spill prevention and control?	<u>_Y_</u>	<u>___</u>	<u>___</u>
11. Industrial familiar with limits and requirements?	<u>_Y_</u>	<u>___</u>	<u>___</u>
12. Pollution Prevention activity	<u>___</u>	<u>_N_</u>	<u>___</u>

Additional comments:

1. Date of installation of regulated process to be confirmed. CECA operates an iron phosphate coating line which causes the facility to fall under 40CFR433. CECA buys metal blanks (cylinders about 2" in dia and 4" high) and cold presses the blanks to form fitting for wire ropes.

Visit conducted by: Torrence/Boyles Date: March 21, 2007


(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jacksonville NPDES #: AR0041335

Industry name: Cold Extrusion of America

Additional comments:

NONE

Visit conducted by: Torrence & Boyles Date: March 21, 2007



(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:

Ashland Specialty
1901 Redmond Road

Type of industry: Mfr of Resins Date/Time of visit: March 21@ 10:00
(Include regulatory citation if CIU)

40 CFR Part 414

Industry contacts: John Buzzard and William Hammesfahr

Table with 4 columns: Question, Yes, No, N/A. Contains 12 rows of questions regarding industrial user status, classification, pretreatment equipment, hazardous waste, and pollution prevention activities.

Additional comments: Ashland is a bulk storage and reactor plant; the main process is manufacturing styrene resins. No process wastewater is discharged to the POTW as no process wastewater is generated except small quantities from the quality control laboratory. The majority of wastewater discharged to the POTW is

Visit conducted by: Torrence/Boyles Date: March 21, 2007

Handwritten signature of Torrence/Boyles
(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jacksonville NPDES #: AR0041335

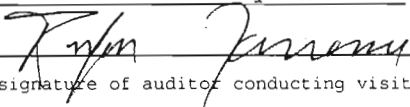
Industry name: Ashland Specialty

Additional comments:

from domestic sources within the plant and office areas. All wastewater is collected in a holding tank with inline pH and flow meters.

During the visit the auditor noted that the pH meter was reading 9.59. Using litmus paper, Mr. Boyles confirmed that the water circulating in the cooling tower had a pH near 7. The CA should look into the source of the high pH or confirm that the pH meter was not calibrated correctly.

Visit conducted by: Torrence & Boyles Date: March 21, 2007


(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:

Altivity Packaging, Inc

1301 N Redmond Road

Type of industry: Mfr of Bags Date/Time of visit: March 21@11:15

(Include regulatory citation if CIU)

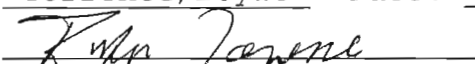
Industry contacts: Dennis Davis

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

Additional comments:

1. ALAR (Diatomaceous Earth) to remove color and some metals.
2. Sampling point in manhole where process and sanitary wastestreams are combined.

Visit conducted by: Torrence/Boyle Date: March 21, 2007


(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jacksonville NPDES #: AR0041335

Industry name: Altivity Packaging

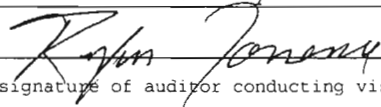
Additional comments:

Industrial Process: The facility produces paper bags with multiple layers from paper rolls purchased off-site. Paper bags are made in various ways some bags have poly (plastic) liners. The bags outer surface are printed off-site or can be printed on-site. The rear of the production area is used as storage for the pre-printed rolls of kraft paper. Kraft paper storage for the non-printed rolls is located outside the facility. The paper bag production is supported by these secondary operations: glue production, sewing and packaging.

Die Making: The die making process consist of large sheets of plastic material which are heated and exposed to a photographic negative of the finished printed symbols.

Wastewater Treatment: The pretreatment system is an ALAR System. The ALAR System is designed to remove color from the waste inks. The system has holding tanks to adjust the pH; then flocculation occurs; then the wastewater is pumped through a drum that is coated with diatomaceous earth.

Visit conducted by: Torrence & Boyles Date: March 21, 2007


(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: City of Jacksonville NPDES #: AR0041335

Name, address and phone number of industry:

Little Rock Air Force Base

North by NW of the City of Jacksonville City Limits

Type of industry: Military Base Date/Time of visit: March 21@1:45
(Include regulatory citation if CIU)

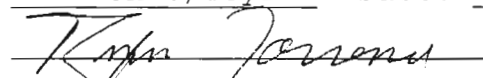
Industry contacts: Malcolm Windsor

	Yes	No	N/A
1. Significant industrial user?	<u>_Y_</u>	<u>___</u>	<u>___</u>
2. Classified correctly?	<u>_Y_</u>	<u>___</u>	<u>___</u>
3. Pretreatment equipment or procedures?	<u>_1_</u>	<u>___</u>	<u>___</u>
4. Pretreatment equipment maintained and operational?	<u>_Y_</u>	<u>___</u>	<u>___</u>
5. Hazardous waste generated or stored?	<u>___</u>	<u>___</u>	<u>_X_</u>
6. Proper solid waste disposal?	<u>_Y_</u>	<u>___</u>	<u>___</u>
7. Solvent management/TTO control?	<u>_Y_</u>	<u>___</u>	<u>___</u>
8. Suitable sampling location?	<u>_Y_</u>	<u>___</u>	<u>___</u>
9. Appropriate self-monitoring procedures/equipment?	<u>_Y_</u>	<u>___</u>	<u>___</u>
10. Adequate spill prevention and control?	<u>_Y_</u>	<u>___</u>	<u>___</u>
11. Industrial familiar with limits and requirements?	<u>_Y_</u>	<u>___</u>	<u>___</u>
12. Pollution Prevention activity	<u>___</u>	<u>___</u>	<u>_X_</u>

Additional comments:

1. Has Oil & Water Separators through out base

Visit conducted by: Torrence/Boyle Date: March 21, 2007


(signature of auditor conducting visit)

SECTION III: INDUSTRIAL USER FILE REVIEW

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Jacksonville NPDES #: AR0041335

Industry name: LR Air Force Base

Additional comments:

The following is a summary of major areas in the base that produce wastewater.

USAF Hobby Shop: This area is used by LRAFB personnel to repair personal automobiles and watercrafts.

USAF Motor Pool: This area has military vehicles. The area is equipped with an oil/water separator.

USAF Aircraft Ground Equipment: This building performs routine maintenance and repairs for the support equipment used by the aircraft crews during servicing and repair of aircraft.

USAF Aircraft Wash Hangar: Plane wash area.

USAF Corrosion Control Building: Paint and prep hangar.

USAF Fuel Cell Building: Fuel tank storage and repair & maintenance.

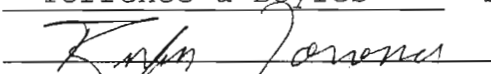
USAF Hospital: Base Hospital

Air National Guard Facility: The Air National Guard dental and medical clinics are housed here.

Nondestructive Inspection: Inspect parts from aircraft using immersion in florescent penetrant liquids.

Engine Repair and Testing Facilities

Visit conducted by: Torrence & Boyles Date: March 21, 2007


(signature of auditor conducting visit)

JACKSONVILLE WASTEWATER UTILITY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.

90-03-30

In accordance with all terms and conditions of Jacksonville City Ordinance No. 1133, and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to CECA, LLC.

Classified by SIC No. 3462 & 3599 NACIS No. 332111 & 333999

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility sewer lines at 1900 & 1920 Redmond Road, between manholes 1373 and 1374.

This Permit is granted in accordance with the application filed on August 22, 2005 in the office of the Jacksonville Wastewater Utility and in conformity with plans, specifications and other data submitted to the Jacksonville Wastewater Utility in support of the above application. All of which are filed with and considered as part of this permit, together with the following named conditions and requirements.

Effective this Twenty-third day of August, 2005

To expire Twenty-third day of August, 2008

Idea Hughes
General Manager,
Jacksonville Wastewater Utility

PART I: LIMITATIONS

1. The Permittee shall not exceed the effluent limitations stated below for all waters discharged to the City of Jacksonville Sanitary Sewer System from the Zinc phosphate coating rinse water operation at 1900 North Redmond Road.

Parameters	Daily Max. (mg/L)	Max. Monthly Average (mg/L)	Monitoring Requirements (E, SC, S)
Biochemical Oxygen Demand (5-Day)	-----	250.0 *1	SC, S *3
Total Suspended Solids	-----	250.0 *1	SC, S *3
Oil & Grease	-----	100.0 *1	SC, S *2
Cadmium	0.160	0.160	E, S *3
Chromium	2.000	2.000	E, S *3
Copper	1.220	1.220	E, S *3
Cyanide	0.190	0.190	E, S *2
Lead	0.220	0.220	E, S *3
Nickel	2.010	2.010	E, S *3
Silver	0.410	0.410	E, S *3
Zinc	1.510	1.510	E, S *3
TTO		-----	E, S *2
Flow		REPORT ONLY	*4
pH Maximum (instantaneous)	11.0	S.U.	
pH Minimum (instantaneous)	5.0	S.U.	

E – Enforcement Monitoring
 SC – Surcharge Monitoring *1
 S – Self-Monitoring

*1. Exceedances of these parameters are not considered a violation by the City of Jacksonville, Ordinance 1133, unless they cause the Treatment Plant Head Works to exceed these levels. Exceedances of these parameters are subject to surcharge.

*2 Samples for this parameter shall be collected using the grab method.

*3 Samples for this parameter shall be collected as composite samples (minimum of 4 parts over a 24-Hour period).

*4 Flow measurement shall be determined by the periodic readings obtained from the dial water meter located at the Zinc phosphate coating line to determine the process flow from the I.U.

PART II: MONITORING REQUIREMENTS

1. The Utility will conduct enforcement monitoring at a frequency subject to the discretion of the Utility.

2. The Permittee will monitor the discharge from Zinc phosphate coating rinse water operation discharge at the frequency specified. All samples shall be grab samples unless otherwise indicated. Composite samples shall consist, at the minimum, of one aliquot per hour of discharge unless otherwise indicated.

Cyanide	(total)	-1 sample every 6 months
pH		-1 sample every month
Cadmium	(total)	-1 sample every 6 months*
Chromium	(total)	-1 sample every 6 months*
Copper	(total)	-1 sample every 6 months*
Lead	(total)	-1 sample every 6 months*
Nickel	(total)	-1 sample every 6 months*
Silver	(total)	-1 sample every 6 months*
Zinc	(total)	-1 sample every month*
Flow	Report Zinc phosphate coating rinse water operation discharge on monthly report.	

*-Denotes composite sample

3. All sample collection, handling, preservation and analysis shall be performed by an ADEQ-certified laboratory unless they are performed by the permittee. Designated laboratories shall be subject to Jacksonville Wastewater Utility approval.

4. All sample handling, preservation, equipment, sample container, holding times, analysis and quality control procedures shall be in accordance with approved and current EPA procedures and requirements.

PART III: REPORTING REQUIREMENTS/SPECIAL CONDITIONS

1. SPILL CONTROL

A. In case of an accidental discharge, the Jacksonville Wastewater Utility Pretreatment Coordinator/Laboratory Department must be notified immediately, by telephone, at 982-0581. If after regular business hours, leave a message with the answering service, which will notify the proper Utility personnel. Notification shall include location of discharge, type of waste, concentration and volume, Permittee personnel with knowledge of the spill, and corrective actions to be taken by the Permittee to prevent any further accidental discharge.

(City of Jacksonville, Ordinance No. 1133 – Section 13.24.16)

B. A notice shall be permanently posted on the Permittee’s bulletin board or other prominent place advising employees of the notification procedure in the event of a dangerous discharge. Permittee shall ensure that all employees who may cause or witness such a dangerous discharge are advised of the emergency notification procedure.

(City of Jacksonville, Ordinance No. 1133 – Section 13.24.16)

C. Within five days of an accidental discharge, the Permittee shall submit to the Manager of Jacksonville Wastewater Utility, a detailed written report describing the cause of the discharge and the measures to be taken by the Permittee to prevent future incidents.

(City of Jacksonville, Ordinance No. 1133 – Section 13.24.16)

2. REPORTING REQUIREMENTS

A. The Permittee will submit monthly self-monitoring reports for the pollutants and flow monitored during the previous month. These reports are due by the last day of the month for all samples collected and flow measured in the previous month. The report must contain the results of all samples collected during the month, the daily maximum and average discharge flow rate, and a signed statement that all sampling and analysis was performed according to EPA regulations. **The first monthly self-monitoring report will be due at JWU by the close of the workday on September 30, 2005 for samples collected in August of 2005.** (40 CFR 403.12)

B. If the Permittee monitors any pollutant more frequently than required by Part II (2) of this Permit, the results of this monitoring shall be included in the reports required by Part III, Section 2A of this Permit. (40 CFR 403.12.G.5)

C. The Permittee shall notify the Utility of any violations of the Pretreatment Standards specified in Part I of this Permit. If sampling performed by the Permittee indicates a violation, the Permittee shall notify the Utility’s Pretreatment Coordinator/Laboratory Department, by telephone, within one (1) business day of becoming aware of the violation.

(40 CFR 403.12.G.2)

D. The Permittee shall notify the Utility prior to the introduction of new wastewater or pollutants, any substantial change in the volume or characteristic of the wastewater being discharged to the sanitary sewer, or any new construction or process modifications involving plumbing changes. This notification shall be written and the Permittee must receive the Utility's approval before the changes can occur.

(City of Jacksonville, Ordinance No. 1133 – Section 13.24.16)

E. The Permittee will submit a semi-annual report on the discharge phosphate coating rinse water operation, which will be due on the last day of the months of June and December. These reports should contain the results of all monitoring performed during the preceding 6 months as well as the average daily and maximum daily discharge flow rate during the reporting period. The June report will cover the period of December through May and the December report will cover the period of June through November. These reports must be signed by the Permittee indicating that all samples were collected and analyzed according to EPA regulations and must also state whether or not the Permittee has been in compliance for the reporting period. If the report indicates that the Permittee is not in compliance the report must also contain a compliance schedule.

(40 CFR 403.12 (e))

F. All reports required by this permit must be signed by either the owner, general partner, a principal executive officer of at least the level of vice president, or a responsible individual who has received written delegation of this authority from either the owner, general partner, or a principal executive officer of at least the level of vice president. (40 CFR 403.12 (k))

G. The Permittee shall notify the utility of the release of a slug load. A slug load is any release of pollutants at a flow rate or concentration, which would cause the Permittee to violate any limitations contained in this permit or the General Discharge Prohibitions contained in the City of Jacksonville Ordinance No. 1133. This notification shall be made immediately by telephone 982-0581. The notification shall include the corrective actions to be taken. The verbal notification must be followed by a detailed written report within five days of the discharge. (40 CFR 403.12.(g))

3. SPECIAL CONDITIONS

A. If the Permittee experiences a violation of any of the Pretreatment Limitations specified in Part I of this Permit, then, the Permittee will resample for that pollutant within 30 days, unless the Permittee has samples for that parameter since the violation. (40 CFR403.12.g)

B. In lieu of monitoring for TTO, the Permittee may submit a Toxic Organic Management Plan (TOMP) for Utility approval. Once the plan has been approved by the Utility and fully implemented by the Permittee, all monitoring requirements for TTO will be dropped. This TOMP shall be reviewed and resubmitted during the permit application process.

PART IV: STANDARD CONDITIONS

1. The Permittee shall comply with all general prohibitive discharge standards in the City of Jacksonville Ordinance No. 1133 – Section 13.24.09.
2. Rights of Entry – The Permittee shall allow duly authorized representatives of the Utility, bearing proper credentials and identification, to enter the premises at reasonable hours for the purpose of inspecting, sampling or record inspection. Reasonable hours are considered anytime the Permittee is operating any process, which results in the discharge of wastewater to the sanitary sewer.
(City of Jacksonville, Ordinance No. 1133 – Section 13.24.21)
3. Records Retention – The Permittee 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 sanitary sewer for a minimum of three (3) years.
(40 CFR 403.12 (1))
4. Dilution – The Permittee 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 Part I of this permit. (City of Jacksonville Ordinance No. 1133 – Section 13.24.14)
5. Non-transferability – This permit is issued to a specific Permittee for a specific operation and is not assignable to another discharger or transferable to any other location without the prior written approval of the Utility.
(City of Jacksonville, Ordinance no. 1133 – Section 13.24.8)
6. Permit Modification – (a) The terms and conditions of this permit are subject to modification by the Utility at any time in response to changes in the City of Jacksonville Ordinance No. 1133, modification or promulgation of any federal regulation including promulgation of new Categorical Pretreatment Standards, State of Arkansas Regulation, and/or issuance of special or administrative orders, (b) Any permit modifications which result in new conditions or limitations will include a reasonable time schedule for compliance, if necessary.
7. Permit Revocation – This permit may be revoked by the Utility if it is determined that the Permittee has violated any provision of this permit, City of Jacksonville Ordinance No. 1133, State of Arkansas regulations, or EPA regulations. Additionally, falsification or intentional misrepresentation of data or statements pertaining to the permit application or any report required by this permit shall be cause for permit revocation.

8. Penalties – Failure to resolve any violation of this permit, City of Jacksonville Ordinance No. 1133, State of Arkansas regulation, or EPA regulation may result in the Utility seeking applicable fines and penalties as outlined in City of Jacksonville Ordinance No. 1133 – Section 13.24.19.8.

9. Severability – 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.

10. Property Rights – 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.

11. Proper Disposal of Pretreatment Sludge and Spent Chemicals – The Permittee 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 403.8 (f) (iii))

12. Confidentiality – All reports and data related to the requirements of the permit shall be available for public inspection at the Jacksonville Wastewater Utility, 248 Cloverdale Road, Jacksonville, Arkansas, except for that information that is deemed confidential in accordance with the provisions of the City of Jacksonville Ordinance No. 1133 – Section 13.24.23

13. Permit Expiration – **This permit comes due for review on August 23, 2008.** The Permittee must reapply for re-issuance of the permit at least 180 days prior to the expiration date. The Utility will notify the Permittee of this responsibility 90 days before the reapplication date. (City of Jacksonville, Ordinance No. 1133 – Section 13.24.19.6)

**JACKSONVILLE WASTEWATER UTILITY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.**

87-08-12

In accordance with all terms and conditions of Jacksonville City Ordinance No. 1133 and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to Little Rock Air Force Base

Classified by SIC No. 9711 NACIS No. 92811

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility sewer lines at Little Rock Air Force Base Monitoring Flume on South Redmond Road.

This Permit is granted in accordance with the application filed on November 4, 2005 in the office of the Jacksonville Wastewater Utility and in conformity with plans, specifications and other data submitted to the Jacksonville Wastewater Utility in support of the above application. All of which are filed with and considered as part of this permit, together with the following named conditions and requirements.

Effective: First day of January 2006

Expires: First day of January 2008

Shea Hughes
General Manager,
Jacksonville Wastewater Utility

PART I: LIMITATIONS

1. The Permittee shall not exceed the effluent limitations stated below for all waters discharged through the Little Rock Air Force Base Monitoring Flume. The limitations below for the enforcement parameters (E) are based upon the proportion of the Permittee's flow to Jacksonville Wastewater Utility. Attached to this permit is a worksheet indicating how these enforcement parameters were derived.

Parameters	Max. 24-HR Flow Proportional Composite (lbs/day) *1	Max. Monthly Average (mg/L) *2	Monitoring Requirements (E, SC,S) *3
Biochemical Oxygen Demand (5-Day)	-----	250.0 *2	SC, S *4
Total Suspended Solids	-----	250.0 *2	SC, S *4
Oil & Grease	-----	100.0 *2	SC, S *3
Cadmium	0.265		E, S *4
Chromium	2.799		E, S *4
Copper	2.094		E, S *4
Arsenic	1.148		E, S *4
Cyanide	0.308		E, S *3
Lead	0.854		E, S *4
Mercury	0.00914		E, S *4
Nickel	3.095		E, S *4
Silver	0.592		E, S *4
Zinc	4.014		E, S *4
Flow (gal/day)		REPORT ONLY	S
Phenols (total)		REPORT ONLY	S *3
pH Maximum (instantaneous)	11.0	S.U.	E, S *3
pH Minimum (instantaneous)	5.0	S.U.	E, S *3

E – Enforcement Monitoring
 SC – Surcharge Monitoring *2
 S – Self-Monitoring

- *1. (Lbs/day) = (concentration (mg/L)) X (daily flow MGD) X (8.34)
- *2. Exceedances of these parameters are not considered a violation by the City of Jacksonville, Ordinance No. 1133, unless they cause the Treatment Plant Head Works to exceed these levels. Exceedances of these parameters are subject to surcharge.
- *3. Samples for this parameter shall be collected using the grab method.
- *4. Samples for this parameter shall be collected as composite samples (minimum of 4 parts over a 24-Hour period).

A2-2 of 3

PART II: MONITORING REQUIREMENTS

1. The Utility will conduct surcharge and enforcement monitoring at a frequency subject to the discretion of the Utility. Samples collected for surcharge monitoring will be averaged with the samples collected by the permittee for the purpose of assessing a surcharge if applicable.

2. The Permittee will monitor the discharge/flow from Little Rock Air Force Base at the flow-monitoring flume and meter, located at South Redmond Road, east of the Jacksonville Animal Services Shelter, for the following pollutants at the frequency specified. All samples shall be 24-hour flow proportional composites with aliquots taken no more than 60 minutes apart unless otherwise indicated.

BOD ₅		-1 sample every month*
TSS		-1 sample every month*
O&G		-1 sample every month#
pH		-1 sample every month#
Cadmium	(total)	-1 sample every month*
Chromium	(total)	-1 sample every month*
Copper	(total)	-1 sample every month*
Lead	(total)	-1 sample every month*
Nickel	(total)	-1 sample every month*
Silver	(total)	-1 sample every month*
Zinc	(total)	-1 sample every month*
Cyanide	(total)	-1 sample every month#
Arsenic	(total)	-1 sample every month*
Mercury	(total)	-1 sample every month*
Phenols	(total)	-1 sample every month#
40 CFR 122:		-See note (□) below
	□Volatiles	
	□Acid Compounds	
	□Base / Neutral	
	□Pesticides	

*-Denotes composite sample

#-Denotes grab sample

□-Denotes special sample collected by March 31, 2008

3. All sample collection, handling, preservation, and analysis must be performed by an ADEQ-certified laboratory. Designated laboratories shall be subject to Jacksonville Wastewater Utility approval.

4. All samples handling, preservation, equipment, sample container, holding times, analysis and quality control procedures shall be in accordance with approved and current EPA procedures and requirements.

A2-3 of 3

Date: 8-18-06

Signature: Tom Nowak

JACKSONVILLE WASTEWATER UTILITY
INDUSTRIAL INSPECTION FORM

*Environ
4-6-06
Jag*

SECTION I. FACILITY INFORMATION

A. General Information (All Items Must Be Completed)

- 1. Facility name: CECA LLC.
- 2. Service address: 1920 North Redmond Road, Jacksonville, AR 72076
- 3. Mailing address (if different): P. O. Box 279, Jacksonville, AR 72078
- 4. Contact(s) & Title(s): Mr. Tom Nowak, Engineering Manager
Mr. Jeff Peterson, Quality Control Manager
- 5. Phone number(s): (501) 982-9045 Ext 24 (Tom) Ext 15 (Jeff) Fax: (501) 982-9676
- 6. Water Works account #: 1032220001 & 1032240001
- 7. Environmental Permit(s):
 - a. RCRA: _____
 - b. Air: _____
 - c. Water: JWU # 90-03-30
- 8. Signatory Authority (Name & Title): Mr. Tom Nowak
Engineering Manager

B. Sample Protocol Information

- 1. SIC(s) Codes: 3462, 3599, 3498, & 3648 NACIS: 332111, 333999, 332996, & 335129
- 2. Days of Operation: M-F w occ. Sat Days of Production: Same
- 3. Hours of Operation: 6 am to 3am Hours of Production: Same
- 4. Number of Shifts: 2 Hrs-Shift 1: 6A-4:30P Hrs-Shift 2: 4:30P-3A Hrs-Shift 3: _____
- 5. Number of Employees: 28 Production: 22 Administrative: 6
- 6. Seasonal Variations: N/A Peak Months: _____ Low Months: _____
- 7. Scheduled Plant Shutdowns: Christmas and New Years Day

C. Records Review (Yes/No & Comment)

- 1. Pretreatment System Operations Logs: N/A
- 2. Sample Results & Reports (IU Must Maintain for 3 Years): In Tom's Office
- 3. Emergency Response & Spill Plan (Review for Changes): Reviewed Sluc control plans also (No changes)
- 4. Chemical Inventory (MSDS on new chemicals): N/A New
- 5. Production Verification Records (for IUs with production-based standards- Record type, inclusive dates, production figures, etc.): N/A
- 6. Inform IU of need to inform ADPC&E of discharge of non-polluted waters and possible need for NPDES permit: N/A

Date: 8-18-06
Signature: Jan T. Bugh

SECTION II. FACILITY INSPECTION (Walkthrough Information)

A. Process review

1. Process Name: Phosphate Cleaning & Coating of Metal Blanks
2. Location: Second Building / Southern Section
3. Description of Process: Metal Blanks are placed into a heated (180 - 200°F) solution of Freiclean 10M for 5-10 minutes. The metal blank is then removed and placed in the first stage rinse for 1-2 minutes. The water in this rinse is maintained at 150°F to 160°F. A second rinse of the blank is then performed for 1 to 2 minutes at 160°F to 170°F. One of the process waste stream components is the second rinse overflow. (cont. on pg 3) *
4. Raw Materials & Chemicals Used: Freiclean 10M, Formcoat #1, other assorted cleaners, lubricants, coolants, and cutting oils for the cutting and tapping machines.
5. Product & Possible Pollutants: _____
6. Destination of Wastewater From Process (sewer, treatment system, diverted): Second stage rinse water, from both processes, is discharged into the sanitary sewer.
7. Are Management Practices Outlined in TOMP, Spill Control, or Other Plans Being Followed?: Yes
8. Comments: None
9. Sketch of Process, In File: Yes If No: Attach Diagram or Plan if Available: _____
10. Is There A Potential for Spills into Sewer?: No
11. Spill Prevention (Berms, Secondary Containment, and etc...): Berms around the wash and rinse operations, sump located below the wash and rinse operations
12. Is the Employee Notification Sign of Whom to Call in the Event of A Spill Posted?: Yes

B. Chemical Storage Area(s)

1. Location (s): Buildg 2 South + West Wall
2. Chemical List & Volumes: Several 55 Gal Drums - Spent
3. Is the employee notification sign of whom to call in the event of a spill posted?: yes
4. Are employees in the area aware of spill containment, handling, and cleaning Procedures? Comments: yes - Training Annual
5. Spill Containment Area Assessment (attach sketch and comments):

SECTION III. INSPECTION SUMMARY

A. Action Items:

List all corrective action, additional information, communications or follow up action required as a result of the inspection and estimated completion date of each item.

None

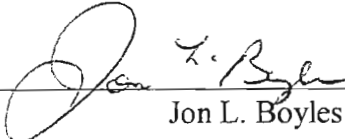
Follow-up Visit Required: Yes _____ No *X*

B. Comments

OK

Inspectors Overall Assessment of the Industrial User and any General Comments.

Large Machine Shop


Jon L. Boyles

8-18-06
Date of Inspection

To: CECA, LLC. Correspondence File -- 2006

From: Jon Boyles, Pretreatment Coordinator ^{ekj}

Subject: Annual Inspection -- 2006

Date: August 22, 2006

On Friday, August 18, 2006, an annual pretreatment inspection was performed at CECA, LLC. Mr. Tom Nowak, Engineering Manager and Mr. Jeff Peterson, Quality Control Manager were the escorts for the inspection. CECA LLC is a subsidiary of CECA FORGE INC., is a categorical industry, and is regulated under the 40 CFR 433 (Metal Finishing) category. From the information obtained from the walk through inspection and the permit file, CECA LLC., appears to be in compliance with their Industrial Wastewater Discharge Permit.

CECA LLC has been determined a categorical industry under Environmental Protection Agency (EPA) guidelines as a Categorical Industrial User (40 CFR 433 – Metal Finishing) and has specific pretreatment standards and reporting requirements concerning the discharge of process waters to the Publicly Owned Treatment Works (POTW) collection system. CECA LLC operates a phosphate coating line that has been determined to be a regulated process that is categorized under these pretreatment standards. The discharge limitations are listed within the Industrial Wastewater Discharge Permit.

The inspection began with a tour of the first building (office); the main press is located within this building along with an oil-cooled band saw. An additional 500-Ton press is due to be installed in this building soon. There has been a sump pit dug, framed, and poured in preparation for the installation of this press. The main press leaks a small amount of oil occasionally and Mr. Nowak said that they lose approximately a quart of oil a month. Oil dri is used to absorb the leaking oil from the press. This material is swept-up and placed in the dumpster for disposal. All floor drains in this building have been sealed and filled with sand to prevent discharge to the outside. A walk around this building was performed to determine whether these floor drains have discharged recently to the wooded area to the west of the building. No oily area was found.

The inspection of second building, where the phosphate rinse is performed, shows an almost complete recovery from the fire that occurred in this building approximately six years ago. The insulation has been replaced and the second floor offices have been restored and remodeled. Mr. Nowak's office has been moved from the first building to the second floor of the second building. There have been some new cutting tools installed in the first section of the building that utilize the recirculation of cooling waters. Mr. Nowak said that this water is refiltered each time it is pumped through to be reused by the machine. These pieces of metal are cut to the desired length after they are placed in the press. There are four of these types of machines in this building. The sludge generated by the cutting machines is disposed along with the sludge generated from the phosphate rinse by a solid waste hauler.

The phosphate rinse is used to prepare the metal blanks for use in the presses. The blanks are processed by using a powered compound (Freiclean 10M) placed in with water. This solution is heated to 180° - 200° F. and the blank is inserted for 5 to 10 minutes. The blank is then removed and placed in the first stage rinse for 1-2 minutes. The water in this rise is maintained at 150° to 160° F. A second rinse of the blank is then performed for 1 to 2 minutes at 160° to 170° F. One of the components of the process waste stream is the second rinse from the cleaning of the blanks.

The blank is then placed in the coating solution (Formcoat #1) for 5 to 10 minutes at 175° to 185° F. The blanks are placed in first rinse for 1- 2 minutes at 140° to 160° F. A second rinse is then used on the blanks for 1 – 2 minutes with the water temperature being 170° F. This second rinse is also a component of the process waste stream.

After the blank is “processed,” the part is coated with Formlube #1 (as a rust inhibitor); it is stored for further tooling. The south portion of the second building has been cleaned out and is being used for storage. The west wall of this building has been cleaned and is being used as a chemical storage area. The chemicals used in the phosphate coating process are stored here. Some of the chemicals are liquid and secondary containment is provided for these chemicals. The second building was very clean and neat.

This inspection also served as an opportunity to revisit the items mentioned on the ADEQ 2005 inspection. Both of the building’s exterior have been cleaned and kept in the manner as requested by ADEQ.

A review of the files kept by Mr. Nowak revealed neatly entered data and contacts for wastes disposal.

B1-6ad/c

Entered
2-7-07
LRS

JACKSONVILLE WASTEWATER UTILITY MONTHLY INDUSTRIAL SELF-MONITORING REPORT

Industrial Discharge Permittee Name: CECA, LLC

Mailing Address: 1920 North Redmond Road, Jacksonville, AR 72076

This report covers the month of: December Year of: 2006

Sampling Information (please attach sample report)

Date Sample Collected: 12/13/06 Time Collected: 0600AM to 1000PM

Sample Type (Composite or Grab): Composite I.D. 4138-347-06-01

Sample Preservation: Arkansas Analytical Supplied Container - Nitric Acid

Sample Collected By: CECA, LLC Personnel

Flow Reporting

Regulated Process 1# 6,240 gpd (Average) / 2# 7,909 gpd (Maximum)

Other Flows 3# 251 gpd (avg) / 4# 658 gpd (max) Sanitary Source

Sample Results (Please Attach Lab Report)

PH 7.47 units Metals - Zinc 0.534 mg/l avg.

Are the limits in the permit being met? Yes No

If no, please explain _____

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. I am aware that the City of Jacksonville Ordinance No. 1133 carries strict penalties for making false statements in reports as required by Jacksonville Wastewater Utility.

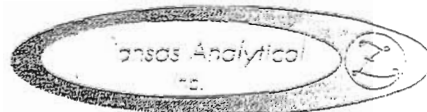
Jeffrey J. Peterson
Authorized Signature

01/03/2007
Date

JAN 4 2007

21 December 2006

Jeff Peterson
CECA
1620 N Redmond Rd.
Jacksonville, AR 72076
Project: Outfall



Date Received: 15-Dec-06 11:54

ANALYTICAL RESULTS

Lab Number: 0612154-01
Sample Name: Outfall - 4138 347 06 01
Date/Time Collected: 12/13/06 22:00
Sample Matrix: Water

Total Metals 200.7	Units	Result	Date/Time Analyzed	Batch	Method
Zinc	mg/L	0.534	12/19/06 11:25	A612143	EPA 200.7

ANALYTICAL RESULTS

Lab Number: 0612154-02
Sample Name: Outfall
Date/Time Collected: 12/15/06 10:50
Sample Matrix: Water

Wet Chemistry	Units	Result	Date/Time Analyzed	Batch	Method
pH	S.U.	7.47	12/15/06 10:50	A612183	EPA 150.1
Temperature	°C	34.8	12/15/06 10:50	A612184	SM 18th Ed. 2550B

QUALITY CONTROL RESULTS

Total Metals 200.7
Batch: A612143 (Water); Prepared: 15-Dec-06 14:35

	Blank	LCS	MS	MSD/RPD
Zinc	< 0.090 mg/L	87.6 %	86.8 %	88.0 % / 1.35

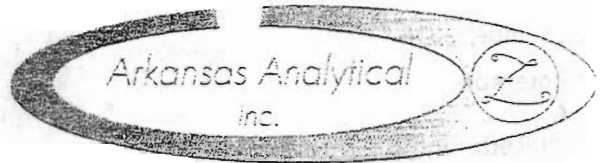
Wet Chemistry
Batch: A612183 (Water); Prepared: 15-Dec-06 10:50

	LCS	LCSD/RPD
pH	100 %	100 % / 0.285

Wet Chemistry
Batch: A612184 (Water); Prepared: 15-Dec-06 10:50

	Duplicate/RPD
Temperature	34.8 / 0.00

B2-2 of 5



11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

21 December 2006

Jeff Peterson
CECA
1620 N Redmond Rd.
Jacksonville, AR 72076
RE: Outfall

Enclosed are the results of analyses for samples received by the laboratory on 15-Dec-06 11:54.
If you have any questions concerning this report, please feel free to contact me.

Sincerely,

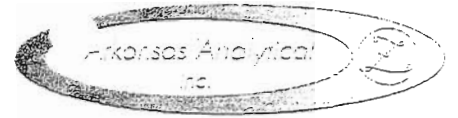
A handwritten signature in cursive script that reads "Norma James". The signature is written in dark ink and is positioned above a horizontal line.

Norma James
President

B2 - 3 of 5

21 December 2006

Jeff Peterson
CECA
1620 N Redmond Rd.
Jacksonville, AR 72076
Project: Outfall



Date Received: 15-Dec-06 11:54

All Analysis performed according to EPA approved methodology when available:
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods, 20th Edition.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

A handwritten signature in cursive script that reads "Norma James".

Reviewed by: _____

Norma James
President

B7-A 15



11701 Interstate 30, Bldg. 1, Ste. 115
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Project Description		Turnaround Time		Preservation Codes:					
CECA		Outfall		24 Hour		1. Cool, 4 Degree Centigrade					
1620 N Redmond Rd.		Reporting Information		48 Hour		2. Sulfuric Acid (H ₂ SO ₄), pH < 2					
Jacksonville, AR 72076		Telephone:		72 Hour		3. Nitric Acid (HNO ₃), pH < 2					
Attn: Jeff Peterson		FAX:		Routine (5 Day)		4. Thiosulfate for Dechlorination					
		Bill to/P.O. #:		Preservative Code:		5. Hydrochloric Acid(HCl)					
		Bottle Type:		TEST PARAMETERS		6. Sodium Hydroxide (NaOH), pH > 12					
Sampler(s) Signature: <i>Jeffery S. Peterson</i> Sampler(s) Printed: <i>Jefferson Jefferys.</i>		Field Number: <i>12-13-06</i> Date(s): <i>12/13/06</i> Time(s): <i>10:45 AM</i>		Grad: <i>X</i> Comp: <i>Y</i> Number of Bottles: <i>1</i> Sample Matrix: <i>01</i>		IDENTIFICATION/DESCRIPTION: <i>4138 397 06 01</i> <i>OUTFALL</i>		SAMPLE: <i>Zinc</i> <i>help picture</i>		Arkansas Analytical Work Order Number: <i>000054-01</i> <i>000054-02</i>	
1. Relinquished by: (Signature)		Date/Time		2. Received by: (Signature)		3. Relinquished by: (Signature)		Date/Time		4. Received by lab: (Signature)	
<i>Jefferys J</i>		<i>12-15-06</i> <i>10:45 AM</i>		<i>Jefferys J</i>		<i>Jefferys J</i>		<i>12/15/06</i> <i>11:50</i>		<i>Jefferys J</i>	
1. CUSTODY SEALS:		2. CONTAINERS CORRECT:		3. COCLABELS AGREE:		4. PRESERVATION CONFIRMED:		5. RECEIVED ON ICE:		6. TEMPERATURE ON RECEIPT:	
Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input type="checkbox"/> No <input type="checkbox"/>		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
REMARKS / SAMPLE COMMENTS		ON-SITE MEASUREMENTS		PH		Temperature		Time			
		Sample		<i>7.97</i>		<i>34.8</i>		<i>10:50</i>			
		Duplicate		<i>7.97</i>		<i>1</i>		<i>1</i>			
		% Variance									
		Average									
		QC Recovery		<i>70%</i>		<i>99%</i>		<i>10%</i>			

12-15-06

EVALUATION TO DETERMINE NEED FOR
SLUG DISCHARGE CONTROL PLAN
[Reference 40 CFR 403.8(f)(2)(v)]

Facility: CECA LLC

SIC Code: 3462 + 3599 NACIS #: 332111 + 333999

Industrial Wastewater Discharge Permit (IWDP) #: 90-03-30

Part 1. Does Industrial User have a Slug Discharge Control Plan (SDCP)?

Yes Go to Part 2

No Go to Part 3

Part 2. Is the SDCP adequately controlling slug discharges?

Yes No change needed

No Requires an Upgraded SDCP (Go to Part 3)

Part 3. Does the Permittee Require a SDCP? JWU must evaluate at least once every two years whether a Significant Industrial User requires a plan to control slug discharges. A slug discharge is defined as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge. This determination will be made based on the following factors.

1. Does the compliance history indicate whether a SDCP is necessary? N/A Yes No

2. Has a slug discharge occurred that which the requirement of a SDCP? N/A Yes No

3. Has the POTW violated any permits or / and regulations caused by the Permittee? N/A Yes No

4. Are there any other factors that indicate a SDCP is required? N/A Yes No

If yes, describe on separate sheet & attach:
Industry is Categorical (40 CFR 133)

5. Did the most recent inspection indicate a need for a SDCP? Yes No

6. Has JWU determined that the Permittee requires a SDCP? N/A Yes No

Answering yes to any Part 3 question, requires the Permittee to submit a Slug Discharge Control Plan to JWU for approval.

Date of evaluation: ~~8-23-06~~ JB Signature: Jan X. Bifer

8-23-06

SLUG DISCHARGE CONTROL PLAN ELEMENTS FORM
[Reference 40 CFR 403.8(f)(2)(v)(A)-(D)]

SIC CODE: 3462 + 3599 NACIS #: 332111 + 393999

Facility Name: CECA LLC

Date Received: 7-28-06

Does the Slug Discharge Control Plan (SDCP) contain following elements?

1. Description of discharge practices, including non-routine batch discharges;

N/A Yes No

2. Description of stored chemicals;

N/A Yes No

3. Procedures for immediately notifying the JWU of slug discharges, including any discharge that would result of in a violation of any condition of the Industrial User Discharge Permit with procedures for follow-up written notification within five days; and

N/A Yes No

4. If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.

N/A Yes No

If answer to all of the above questions is yes then the SDCP is ready for approval and incorporation into the Industrial User's affluent permit. Any responses of no require the SDCP be return to the Industrial User for modification and re-submittal to JWU for approval.

Date of Evaluation: August 23, 2006

Signature: 

13.24.30 Penalties

(1) Any User found to have violated a provision of this Code or any applicable provision or directive of any orders, rules, regulations, and permits issued hereunder shall be fined not less than Twenty-five Dollars (\$25.00) nor more than One Thousand Dollars (\$1000.00) or the maximum allowed by Arkansas statute, whichever is greater, for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense.

(2) Any person who knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other document filed or required to be maintained pursuant to this Code section or Industrial Wastewater Discharge Permit, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this Code section, shall, upon conviction, be punished by a fine of not more than One Thousand Dollars (\$1000.00) or the maximum allowed by Arkansas statute and/or by imprisonment for not more than six (6) months.

(3) Any person who violates any provision of this Code section or any orders, rules, regulations, and permits issued hereunder, shall be liable civilly to a penalty not to exceed One Thousand Dollars (\$1000.00) or the maximum allowed by Arkansas statute. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. Any such penalties imposed under the provisions of this paragraph shall not be construed as liquidated damages, and shall accrue in addition to any liability for any consequential damages or additional operating expense incurred by Utility resulting from the violation for which the penalty is imposed. Consequential damages shall include, but not be limited to, fines, penalties, and costs incurred and imposed upon the City or by other public authorities.

SECTION TWO: If any provision, paragraph, word, section, or article of this Ordinance is invalidated by any court of competent jurisdiction, the remaining provisions, paragraphs, words, sections, and articles shall not be affected and shall continue in full force and effect.

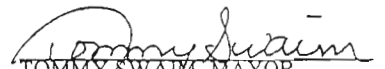
SECTION THREE: All other Ordinances or parts of Ordinances in conflict herewith are hereby repealed to the extent of said conflict.

SECTION FOUR: Immediate implementation of the terms of this Ordinance are necessary to the health and welfare of the citizens because efficient and effective operation of the Jacksonville Wastewater Utility is vital to service the needs of the citizens of Jacksonville. Therefore, an emergency is hereby declared and this Ordinance shall take effect immediately upon its passage and publication, as provided by and subject to applicable law.


APPROVED AND ADOPTED THIS 2nd DAY OF NOVEMBER, 2000.

CITY OF JACKSONVILLE, ARKANSAS

By:


TOMMY SWAIM, MAYOR

ATTEST:


SUSAN DAVITT, CITY CLERK

APPROVED AS TO FORM:

ROBERT E. BAMBURG, CITY ATTORNEY

Development
of
Technically Based Local Limits
for the

Jacksonville West Wastewater Treatment Plant
Jacksonville Wastewater Utility
Jacksonville, Arkansas
April, 1995
(Revised May, 1995)

Crist Engineers, Incorporated
Consulting Engineers
Little Rock, Arkansas



C3-1 of 1



Jacksonville Wastewater Utility

P.O. Box 69, 248 Cloverdale Road, Jacksonville, AR 72078
Phone: 501/982-0581 Fax: 501/982-5791

Mr. Tom Nowak, Engineering and Quality Control Manager
CECA LLC
1920 Redmond Road
Jacksonville, AR 72076

*Entered
9-20-02
JTB*

RE: HAZARDOUS WASTE GENERATION NOTICE

Dear Mr. Nowak:

Under the General Pretreatment Regulations, which are contained in the Code of Federal Regulations (40 CFR 403.8 (f) (2) (iii). Publicly Owned Treatment Works (nee Jacksonville Wastewater Utility -- JWU) are required to notify its industrial and commercial users of Subtitles C & D of the Resource Conservation and Recovery Act (RCRA). This law regulates Hazardous Waste Generators, Transporters, and Disposal Agents and Sites. The EPA requires that JWU notify all industrial and commercial users of the RCRA provisions ensuring those entities, which might be associated with Hazardous Wastes and could possibly become regulated under the RCRA provisions.

It is the responsibility of your facility to determine whether the RCRA regulations are applicable to your firm. If you have any questions concerning RCRA, or your facilities obligations under these regulations, please contact me at (501) 982-0581 or the Arkansas Department of Environmental Quality: Hazardous Waste Division at (501) 682- 0923.

Sincerely,
JACKSONVILLE WASTEWATER UTILITY

Jon Boyles
Pretreatment Coordinator

Enclosure

Cc. Ms. Thea Hughes, General Manager

C4-1 of 1

**DEPARTMENT OF THE AIR FORCE**HEADQUARTERS 314TH AIRLIFT WING (AETC)
LITTLE ROCK AIR FORCE BASE, ARKANSASEntered
10-24-03
JTB

OCT 24 2003

Lt Col Robert E. Moriarty
314th Combat Engineer Squadron/CC
528 Thomas Avenue
Little Rock AFB, AR 72099-4987


Ms Zumwalt
Jacksonville Wastewater Utility Chairperson
P.O. Box 69
Jacksonville, Arkansas 72078

Dear Ms Zumwalt

We wish to commend Mr Jon Boyles, Pretreatment Coordinator, Jacksonville Wastewater Utility, for his efforts in identifying the source of our recent zinc anomaly. Mr Boyles correctly detected a galvanized sampling funnel as the basis for the errant analyses Little Rock AFB experienced May 03 to Aug 03.

Mr. Boyles spent 2 weeks at Little Rock AFB with professionalism, dedicated solely to locating this parameter excursion. As a result of his discovery, the base was able to postpone the services of a professional environmental contractor whose activation would have cost an estimated \$80,000. In addition to these costs, using a parity comparison of civilian environmental contractor charges, a 2-week service call would easily be in excess of \$20,000. As a result of Mr Boyle's tenacious zeal and efforts, we estimate a total cost savings to the base, and taxpayer, of more than \$100,000 in expenditures.

As always, we look forward to working with you and your staff on environmental matters. Please feel free to call upon my assistants or myself at any time.



ROBERT E. MORIARTY, Lt Col, USAF
Commander

cc:

Mr. Tommy Swain, Mayor



Jacksonville Wastewater Utility
LABORATORY SERVICES DEPARTMENT
CHAIN-OF-CUSTODY RECORD



Identification & Sample Number: **12-002** Sampler Number: **2** Set-up Collection Date & Time: **9/6/06 @ 12:00 AM/PM**

Sample Technician(s) (Signature): *Jon Boyles / Patrick Ellis / Sam Zehtaban* Take-off Collection Date & Time: **9/6/06 @ 11:45 AM/PM**

Type Of Sample: (Specify STP)
 Plant Influent **Industrial Waste** Receiving Stream Final Effluent Other

Wastewater Characterization Of Composite Sample:
 Color Lt Beige - Lt Gray Oil None Flow In Pipe medium Turbidity Slight

Sampling Comments: **Lab # 103070**

Sample Type	Grab Sample Collection Date & Time	Preservative	Sample Bottle		Parameters Requested	Designated Laboratory	Relinquished By: (Signature) Date & Time	Received In Laboratory By: (Signature) Date & Time
			Type & Number					
	9/6/06	N/A		N/A	pH-S/U		On Site	
	9:03 A							
	9/7/06 9:00 A	N/A		N/A	pH-T/O		On Site	
	@ 3:50 P.M.							
24 HC		Cool to 4 degC	P	A36-07	BOD, TSS	AI	<i>Jon Boyles</i> 9-7-06 12:40 P SPurchase 9-7-06/12:40	
24 HC		Cool to 4 degC HNO3 to pH of 1.78	P	A36-08	Ag (t), Cd (t), Ni (t), Cr (t) Zn (t), Cu (t), Pb (t), As (t), & Hg (t)	AI	<i>Jon Boyles</i> 9-7-06 12:40 P SPurchase 9-7-06/12:40	

pH Calibration and Performance Data

Date & Time	Calib. Method	Buffer Temp. °C	pH Buffers Before & After Standardization			% Slope	Analysist	Comments	
				4.00	7.00				10.00
9-6-06 1	2pt	26.3	B	-	6.97	10.02	94.2	JB	N/A
@ 9:07 A.M.			A	-	-	-			
9-6-06 2	2pt	27.4	B	-	7.00	10.00	94.7	JZ	N/A
@ 3:54 P.M.			A	-	7.00	10.00			

pH Analysis Record

Sample Number:	12-002				Grab pH Date & Time:	9-6-06 @ 9:03 A.M.
Reported Value (pH s.u.):	7.14	1	7.22	2	Date & Time Performed:	9-6-06 @ 3:50 P.M.
Duplicate Values:	—		1	2		9-6-06 @ 9:09 A.M.
Date	Time	pH Val. (s.u.)	Deg. C	Vio. Y/N		9-6-06 @ 3:56 P.M.
9-6-06	9:09 A.M.	7.14	27.3	N	Analysist: (See names Above)	<i>Jon Boyles</i>
9-6-06	3:56 P.M.	7.22	28.1	N	Analysist: (See names Above)	<i>Jon Boyles</i>



**Jacksonville Wastewater Utility
LABORATORY SERVICES DEPARTMENT
CHAIN-OF-CUSTODY RECORD**



Identification & Sample Number: 12-002	Sampler Number: 2	Set-up Collection Date & Time: N/A @ N/A AM/PM
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Sample Technician(s) (Signature): Jon Boyles / Patrick Ellis / Sam Zehtaban <i>Jon Boyles</i> 1	Take-off Collection Date & Time: N/A @ N/A AM/PM
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Type Of Sample: (Specify STP)

Plant Influent Industrial Waste Receiving Stream Final Effluent Other

Wastewater Characterization Of Composite Sample:

Color Oil Flow In Pipe Turbidity

Sampling Comments: ^{ICM} Recoverable Phenolics and Cyanide samples are three-part composites, collected during the period the 24-Hour composite sample is collected. **Lab # 103070**

2 - 1,000 ml Bottles used for Total Recoverable Phenolics.

Sample Type		Preservative	Sample Bottle	Parameters Requested	Designated Laboratory	Relinquished	Received In
Composite	Grab Sample Collection Date & Time		Type & Number			By: (Signature) Date & Time	Laboratory By (Signature) Date & Time

9-6-06	Cool to 4 degC H2SO4 to pH of	G	A36-04	O & G	AI	<i>Jon Boyles</i>	SPurchase
09:10A	1.17					9-7-06	9-7-06/12:40
						12:40P	
9-6-06	Cool to 4 degC NaOH to pH of	P	A36-05	CN- (t)	AI	<i>Jon Boyles</i>	SPurchase
See note above	12.15					9-7-06	9-7-06
						12:40P	12:40pm
9-6-06	Cool to 4 degC H2SO4 to pH of	G	A36-06	Total Recoverable Phenolics	AI	<i>Jon Boyles</i>	SPurchase
See Note above	1.34					9-7-06	9-7-06
						12:40P	12:40pm

pH Calibration and Performance Data

Date & Time	Calib. Method	Buffer Temp.	pH Buffers Before & After Standardization			% Slope	Analysist	Comments
			4.00	7.00	10.00			
1			B					
			A					
2			B					
			A					

pH Analysis Record

Sample Number:		12-002			Grab pH Date & Time:		1
Reported Value (pH s.u.):		1	2		Date & Time Performed:		2
Duplicate Values:		1	2				1
Date	Time	pH Val. (s.u.)	Deg. C	Vio. Y/N			2
1					Analysist: (See names Above)		1
2					Analysist: (See names Above)		2