ADEQ

ARKANSAS
Department of Environmental Quality

April 9, 2010

Sal Pappalardo, Pretreatment Coordinator
Jacksonville Wastewater Utility
248 Cloverdale Road
Jacksonville, Arkansas 72076

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

Dear Mr. Pappalardo:

Please find enclosed the finished report for the audit/assessment conducted March 16 through March 18, 2010. The report should be made available for review to appropriate industrial officials. Jacksonville Wastewater Utility (JWU) staff should discuss and evaluate the findings in this report. Please respond to required actions and recommendations in writing within thirty (30) working days from the date on this correspondence.

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

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

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: Audit/Assessment Checklist

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

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

JACKSONVILLE, ARKANSAS

NPDES PERMIT #AROO41335

APRIL 9, 2010

Prepared by: Rufus Torrence

Water Division Engineer

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 Northshore Drive

North Little Rock, Arkansas 72118

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LIST OF ATTACHMENTS

A) INTRODUCTION

Under Arkansas Department of Environmental Quality (ADEQ or the Department) 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 16 through March 18, 2010, of the Pretreatment Program implemented by the City of Jacksonville, Arkansas. Participants included:

Rufus Torrence	ADEQ / Water Division Engineer & Auditor
Sal Pappalardo	City of Jacksonville / Pretreatment Coordinator
James Patrick Ellis	City of Jacksonville / Lab Technician
Sam Zehtaban	City of Jacksonville / Administrative Operations 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 the Department. The Department 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 (Maximum Allowable Headworks Loadings) in the Development of Technically Based Local Limits for JWU by Crist Engineers in May 1995, incorporation of an ERG (Enforcement Response Guide) and necessary Pretreatment Ordinance revisions.

On October 14, 2005, EPA promulgated revisions to **40 CFR 403**. These revisions are commonly referred to as the "Streamlining Updates". In reference to the City's NPDES permit number AR0041335 Part III.8.a, "The Sewer Use Ordinance and the Pretreatment Program have not been modified to come into compliance with the current **40 CFR 403**. The Permittee shall submit all necessary proposed modifications to ADEQ within twelve (12) months of the effective date of this permit." The City has submitted a proposed modification to the Department to comply with the Streamlining Updates. The Department is coordinating the review of this modification with the pretreatment audit. The findings below show some of the deficiencies in the City's submittal.

The Jacksonville Wastewater Treatment Plant processes include oxidation ditches, return activated sludge, aeration, clarification, and 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 POTW effluent has shown no pattern of toxicity to this receiving stream. The preferred sludge disposal method is to haul the biosolids to the Two Pines Landfill. The back-up option is an onsite monofill.

The plant design flow is 12 MGD but the average flow was about 8 MGD for the previous year. A federal facility (Little Rock Air Force Base) contributes about 15% of the average daily flow as the other SIUs contribute less than 0.05% of the average daily flow.

The City has permitted 13 Significant Industrial Users (SIUs) including the air base and one categorical industrial user (**40 CFR 414**). Four of these SIUs are septic haulers. Under **40 CFR 403.3(v)(3)**, the City "may at any time, on its own initiative…determine that" the septic haulers are not SIUs. Furthermore, in accordance with Ordinance #**1360** Section **13.24.03 (49)(v)**, the Manager (Thea Hughes) "or her authorized…representative [**13.24.03(27)**]", the Administrative Operations Manager (Sam Zehtaban), may consider all septic haulers as "Non-Significant Industrial Users".

The audit/assessment consisted of an 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 R.

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

1) Under ***40 CFR 403.9(b)(4) Contents of POTW program submission***. "The program description must contain…A statement from the City…attorney…that the POTW has authority adequate to carry out the programs described in §403.8."

a. The letter must identify each section in ordinance #1360 that corresponds to the requirements in §403.8(f)(2). The letter dated January 6, 2010 (see Attachment A-1/1) from Robert E Bamburg does not cite the correct sections in ordinance #1360. Furthermore, §403.8(f)(1)(vii) was omitted.

b. The letter does not *adequately* address "the manner in which the POTW will implement the program.

c. Finally, the letter does not *adequately* "Identify how the POTW intends to ensure compliance with the Pretreatment Standards and Requirements".

2) Under ***40 CFR 403.8(f)(5)*** "The POTW shall develop and implement an enforcement response plan."

a. Exhibit "J" in the JWWU Industrial Pretreatment Program (2010 Modification) does not contain a narrative which "Describes how the POTW will investigate…noncompliance."

b. The exhibit does not "Describe the types of escalating enforcement responses…"

c. The exhibit does contain an Enforcement Response Guide (ERG) which identifies by title the officials responsible for each type of response.

d. The exhibit does not "Adequately reflect the POTW's primary responsibility to enforce all applicable pretreatment requirements and standards…"

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

1) The auditor recommends that JWU include a Statement of Basis within the permit to show the source of limitations in each permit. For example, the fact sheet in UNIVAR file (#86-04-01) does not show the derivation of the mass limits in Part I: Limitations. Furthermore, the Statement of Basis should be an integral part of the permit and included in the document (permit) presented to the permittee.

2) The 40CFR403.12(p) hazard waste notification to each industrial user is required only once. However, past experiences suggest that POTW personnel sometime forget to make the notification. A helpful suggestion is to include the notification in the permit application. By placing the notification in the permit application someplace, the POTW would have a routine which would not only refresh existing SIU notifications but also help avoid overlooking the notification to new SIUs. The City may include the following paragraphs in each permit application to ensure proper RCRA notification to SIUs:

> "Under the General Pretreatment Regulations, which are contained in the Code of Federal Regulations [40 CFR 403.8(f)(2)(iii)], the Publicly Owned Treatment Works (re: Jacksonville Wastewater Utility—JWU) is required to notify its industrial users [40 CFR 403.8(f)(2)(i)] of Subtitles C & D of the Resources Conservation and Recovery Act (RCRA). This law regulates Hazardous Waste Generators, Transporters, and Disposal Agents and Sites. The EPA requires that JWU notify referenced industrial users of the RCRA provisions to ensure that these users are aware of Hazardous Waste (RCRA) Regulations.
>
> The industrial user is responsible to determine whether the RCRA regulations are applicable to the user's facility. If any user has questions concerning RCRA or the user's facility obligation, the user may contact JWU at (501) 982-0581 or the Arkansas Department of Environmental Quality Hazardous Waste Division at (501) 682-0833 or the Public Outreach and Assistance Division at (501) 682-0923."

3) The City should also show the Ordinance Number (#1360) along with the City Code number on the Cover Page of each permit.

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 City may supply smaller industrial users with the PPS-CAS form shown in attachment R-1/1. This form identifies the Chemical Abstracts System number associated with the pollutants listed in 40 CFR 122 Appendix D Table II.

6) Please update Graphic Packaging Fact Sheet to show the current name.

7) The City may change Note 1 and each permit to read:

> "Exceedances of the BOD5, TSS and Oil & Grease limits are not considered a violation of the City of Jacksonville, Municipal Code (Section 13.24) unless the exceedances cause Pass Through, Interference or the influence loading to exceed the Maximum Allowable Headworks Loading shown in the current Technical Basis Local Limit (TBLL) Document. Exceedances of BOD5, TSS and Oil & Grease limits are subject to surcharges."

Please note that the City currently **does not have local limits for BOD5, TSS or Oil & Grease.** If the City wishes to restrict the loadings of these conventional pollutants at the headworks, the City must include them in the next TBLL submittal.

8) In reference to JWU Industrial Inspection Form, Section II.A.3 Description of Process (refer to Attachment O-4/7), the City should list the description of processes that generate wastewater and not a description of the manufacturing operations. Referring to Section II.C, the City should change the heading to "Spill/Slug Control Plan Review".

9) The City may designate all septic haulers as "Non-Significant Industrial Users". Non-Significant Industrial Users are not subject to oversight by the Approval Authority (ADEQ). Nonetheless, the City may continue to permit, sample and inspect these Users on its own initiative.

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

In reference to JWU letter dated February 1, 2010, the City has submitted a program modification to comply with the October 14, 2005 "Streamlining Revisions" to 40 CFR Part 403. The Department has reviewed the submittal and the required and recommended changes are shown in Attachment S.

* * * * * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. **GENERAL INFORMATION**

Control Authority Name: *City of Jacksonville* NPDES #: *AR0041335*
Mailing address: *248 Cloverdale Road* *Jacksonville, AR*
Permit Signatory: *Thea Hughes* Title: *General Manager*
Telephone: *(501) 982-0581* FAX NUMBER: *(501) 982-5791*

Pretreatment Contact: *Sal Pappalardo* Title: *Pretreatment Coordinator*
Address: *Same*
Telephone: *Same* E-Mail address: sal@jwwu.com

Pretreatment program approval date: *2-3-84*

Dates of approval of any substantial modifications: *05-30-91 & 11-02-00*

Month Annual Pretreatment Report Due: *February*

Pretreatment Year Dates: *Jan 1 - Dec 31* Date(s) of Audit: *03/16-18/2010* (ASSESSMENT)

Inspector(s):

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

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
**Sal Pappalardo*	*Pretreatment Coordinator*	*(501) 982-0581*
James Patrick Ellis	*Laboratory Technician*	"
Sam Zehtaban	*Administrative Ops. Manager*	"
Thea Hughes	*General Manager*	"

* Program Primary Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	*May 7, 2008*	*No Problems Apparent*
PCI	*August 17, 2009*	*No Problems Apparent*

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 a asterisk or footnote that tells that there is more explanatory information and where it can be found.

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	J Albert Johnson Regional	11/01/07	10/31/12

* 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- 12.31 MGD; Actual (Average)- 7.56 MGD

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

Industrial Contribution to this Treatment Plant

# of SIUs : 13 # of CIUs : 1
Industrial Flow (mgd): 1.2 Industrial Flow (%) : 16 %

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:
____	Land Application	____ dry tons/yr.
____	Incineration	____ dry tons/yr.
✓	Monofill	561 dry tons/yr.
____	Mun. Solid Waste Landfill	____ dry tons/yr.
____	Public Distribution	____ dry tons/yr.
____	Lagoon Storage	____ dry tons/yr.
✓	Other (specify)	561 dry tons/yr.

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

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for _____ Treatment Plant.)

YES NO

✓ ___ Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ***ADEQ NPDES Permit AR0041335 Part III para 3***
Issuance Date: ***June 30, 2007***
Expiration Date: ***Oct 31, 2012***

List pollutants that are specified in current sludge permit:
City must comply with requirements in 40CFR503

YES NO N/A

✓ ___ ___ Has the Control Authority submitted results of whole effluent biological toxicity testing.

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?)

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

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

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II
***Sb, Be, Se, Tl and CN

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.
Stayed the same over the last 5 years

YES NO N/A

✓ ___ ___ Has the POTW begun tracking the trends in the above samples?

___ ✓ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

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

Parameters Violated	Cause(s)

YES NO

___ ✓ Has the treatment plant sludge violated the TCLP Test?

SECTION I: GENERAL INFORMATION

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. ***The CA has submitted a proposed draft ordinance (& program narrative) to update the city's legal authority per "Streamlining Revisions" to 40CFR403***

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
09/10/2008	***Streamlining Updates***

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*** [ICIS-RIDE]
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]*
✓		Require compliance with standards *[§§13.24.10 & 13.24.11]*
✓		Control discharges through permit or similar means *[§13.24.18]*
✓		Require compliance schedules and IU reports *[§13.24.18.5.f & g]*
✓		Carry out inspection and monitoring activities *[§§13.24.20 & 13.24.21]*
✓		Obtain remedies for noncompliance *[§§13.24.28 & 13.24.29]*
✓		Comply with confidentiality requirements *[§13.24.22]*
✓		Establish Pollution Prevention ***[Preamble paragraph g]***
✓		Has the city developed and adopted a Pollution Prevention policy? ***[Program Objectives para 6]***

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 (P^2) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	***Little Rock Air Force Base***	***0***	***0****	***Contract & Permit***
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 P^2 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
None			

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

YES NO

✓ ___ Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]

✓ ___ If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?

✓ ___ Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
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 P^2 activity and the distribution of P^2 reference materials to the IUs which qualify? **Exhibit G page 3; section B.5**

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 Inspection***[1]

How often is the survey to be updated? Ongoing

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

[1]***The CA Pret Coor must sign off on all new business as a prerequisite for doing business in Jacksonville. See Attachment Q for JWWU Privelege License Inspection Report.***

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?
All Type Plumbing	***Non-Cat SIU (Conv Pollutants)***	***Yes***
Time to Shine Detailing	***Non-Cat SIU (Conv Pollutants)***	***Yes***

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

a. 13 SIUs (As defined by the Control Authority) [ICIS-RIDE]
b. 1 Categorical Industrial Users (CIUs) [ICIS-RIDE]
c. 12 Noncategorical SIUs
d. ___ Other regulated nonsignificant IUs (Describe) ___
13 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(v)(1-3)]

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?
[See Attachment A-5/22 paragraph 5]

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

What is the maximum term of the control mechanism? ***5 years***

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [ICIS-RIDE] 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?
✓ ___ Does the Control Authority accept other trucked wastes?
✓ ___ Does the Control Authority have a control mechanism for regulating trucked wastes? *[See Permit Attachment G Avery Septic Tank Cleaning]*

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*
BOD5	***250 mg/l***
TSS	***250 mg/l***
O&G	***100 mg/l***

****Exceedance of these limits are not considered a violation of Ord #1360 unless they cause Pass Through or Interference or cause the headworks to exceed these limits. Exceedance of these limits are subject to surcharges.***

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?

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 K-1/1 Date Notified ***Letter*** Method of Notification

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

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

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? [ICIS-RIDE] [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)	✓			?	✓		
Cadmium (Cd)	✓			?	✓		0.16
Chromium-Total	✓			?	✓		2.00
Copper (Cu)	✓			?	✓		1.22
Cyanide (CN)	✓			?	✓		0.19
Lead (Pb)	✓			?	✓		0.22
Mercury (Hg)	✓			?	✓		
Molybdenum (Mo) *	✓			?		✓	
Nickel (Ni)	✓			?	✓		2.01
Selenium (Se) *	✓			?		✓	
Silver (Ag)	✓			?	✓		0.41
Zinc (Zn)	✓			?	✓		1.51

** - If necessary for the sludge disposal option chosen.*
*** - ADEQ performed MAHL analysis for City for annual reports*
****- Sect 13.24.12 of Ord No. 1360 incorporates Local Limits by reference. Limits shown above (25% off Table 13 limits in Crist 1994 TBLL) 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? Yes	No	Local Limits Needed? Yes	No	Local Limits Adopted? Yes	No	Numerical Limit Adopted (mg/l)
N/A							

YES NO

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

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

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

Except the LRAFB which has special mass limits; see attachment L-2/3.

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

N/A

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

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	" "

**Page numbers refer to program approved on 11-2-2000.*

#	%	
		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 ? [ICIS-RIDE/PPSR*]-[403.8(f)(2)(v)]

* PPSR (Pretreatment Performance Summary Report)- *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	American Interplex
Cyanide	Spectrophotometric	" " "
Organics	GC/MS	" " "
Other	Biomonitoring	" " "

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe:
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; see Attachment M-1/2.

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)(viii)] *[13.24.28(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	✓	Administrative Order
✓	Setting of compliance schedule	✓	Revocation of permit
✓	Injunctive relief	✓	Fines (maximum amount):

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

✓	Imprisonment
✓	Termination of Service
	Other:

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

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: Proposed program modification is to address resampling requirement; see page 17 in proposed program narrative.
N/A		If no, does the Control Authority conduct all of the monitoring?

YES	NO	N/A	
			Does the pattern of enforcement conform to the ERP?

Complete the following table for SIUs identified as SNC.

SIU Name	Date First Identified in SNC	Enforcement Action Type	Enforcement Action Date	Return to Compliance? Yes (Date)	Return to Compliance? No
None					

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

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

YES	NO	
	✓	Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples.

SECTION II: PROGRAM ANALYSIS AND PROFILE

Has the Control Authority experienced any of the following:

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

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:

	Number	Amount
Civil	*0*	$_____
Administrative	*0*	$_____
Total	*0*	$_____
		[ICIS-RIDE]

SECTION III: INDUSTRIAL USER FILE REVIEW

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

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

YES	NO	
✓		computerized
✓		hard copy
		OTHER: _____

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
✓ &	✓	Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking
✓		Other: Chain of Custody Forms

Can IU monitoring data can be retrieved by:

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

✓		Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]
	✓	Have IUs requested that data be held confidential? How is confidential information handled by the Control Authority? _____
	✓	Are there significant public or community issues impacting the POTW's pretreatment program? If yes, please explain: _____
✓		Are all records maintained for at least 3 years?

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

1.5 < FTE <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:

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

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

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

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

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	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.):
The City has assisted the local industries with waste minimization efforts. As a results, three SIUs do not routinely discharge wastewater into the POTW.

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? ***Yes***. If yes, please attach. ***See Attachment N-2/4 for Ashland (oxides all process wastewater), Swage (recycles wastewater) and Univar (P2 program) stories.***

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 National Swage File/ID No. 86-03-01
Industry Address 1920 Redmond Rd
Industry Description Manufacturer of Swages and Cable Locks
Industrial Category Not Applicable 40 CFR N/A SIC Code:
Ave. Total Flow (gpd) 960 Ave. Process Flow (gpd) 0

Industry visited during audit: YES

Comments: IU recycles wastewater but wastewater will eventually be discharged to the POTW approximately once every three years.

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) 3387 Ave. Process Flow (gpd) 0

Industry visited during audit: YES

Comments: IU oxides all process wastewater except lab wastewater. The lab wastewater is collected and hauled off-site.

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) 9808 Ave. Process Flow (gpd) ≈7000

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 UNIVAR USA Inc File/ID No. 86-04-01
Industry Address 1101 Redmond Road
Industry Description Distributor of Chemicals
Industrial Category N/A 40 CFR SIC Code:
Ave. Total Flow (gpd) 4109 Ave. Process Flow (gpd) See Comment

Industry visited during audit: YES

Comments: IU has a 1000 gallon storage tank on site and will batch discharge to the POTW. The last batch discharge was in 2002; IU is reserving the option to continue to discharge process wastewater to the POTW.

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) 1,350,000 Ave. Process Flow (gpd) ≈1,000,000

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

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

	Swage	Ashland	G Pack	UNIVAR	LRAFB
1. Is the IU considered "significant" by the Control Authority?	Y	Y	Y	Y	Y
2. Is the user subject to categorical pretreatment standards?	N	Y	N	N	N
a. New source or existing source (NS or ES)?	N/A	ES[1]	N/A	N/A	N/A
b. Is this IU one identified as having P[2] potential?	Y	Y	N	Y	N

B. Control Mechanism

	Swage	Ashland	G Pack	UNIVAR	LRAFB
1. Does the file contain an application for a control mechanism?	Y[2]	Y[3]	Y[3]	Y[3]	Y[3]
If yes, what is the application date?	7-18-07	6-27-07	7-14-08	7-21-08	9-14-08
Does it ask for Pollution Prevention information?	N	N	N	N	N
2. Does the file contain a permit?	Y	Y	Y	Y	Y
Permit Expiration Date[4]?	12-31-10	12-31-10	12-31-11	12-31-11	12-31-11
Is a fact sheet included?	Y[5]	Y[5]	Y[5]	Y[5]	Y[5]

Comments:

1. *Ashland installed the regulated process in 1973 and is an Existing Source (ES).*
2. *Swage submitted a Baseline Monitoring Report which served as the permit application.*
3. *These IUs submitted an Industrial Waste Survey (IWS) as an appendix to the permit application.*
4. *The CA has adjusted the permit expiration dates all permits to expire at the end of the year.*
5. *The file has a Fact Sheet that show facility information only; refer to Attachment F-1/1 to see Graphic Altivity's Fact Sheet. The Fact Sheet for UNIVAR is similar and should show permit mass limits derivation.*

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Swage	Ashland	G Pack	UNIVAR	LRAFB
3. Has the SIU been issued a control mechanism[6] containing: [403.8(f)(1)(iii)(A)-(E)]					
a. Legal Authority Cite?	p1	p1	p1	p1	p1
b. Expiration date?	p1	p1	p1	p1	p1
c. Statement of nontransferability?	p7	p7	p7	p7	p7
d. Appropriate discharge limitations?	p2[7]	p2[7]	p2[7]	p2[7]	p2[7]
e. Appropriate self-monitoring requirements?	p3[8]	p3[8]	p3	p3[8]	p3
f. Sampling frequency?	p3[8]	p3[8]	p3	p3[8]	p3
g. Sampling locations?	p3[8]	p3[8]	p3	p3[8]	p3
h. Requirement for flow monitoring?	p3[8]	p3[8]	p3	p3[8]	p3
i. Types of samples (grab or composite) for self-monitoring?	p2	p2	p2	p2	p2
j. Applicable IU reporting requirements?	p4	p4	p4	p4	p4
k. Standard conditions for:					
Right of Entry?	p7	p7	p7	p7	p7
Records retention?	p7	p7	p7	p7	p7
Civil and Criminal Penalty provisions?	p8	p8	p8	p8	p8
Revocation of permit?	p7	p7	p7	p7	p7
l. Compliance schedules/ progress reports	N/A	N/A	N/A	N/A	N/A
m. General/Specific Prohibitions?	p7	p7	p7	p7	p7
n. Where technologically and economically achievable, are P2 aspect included?	Y[9]	Y[9]	N	Y[9]	N

Comments:

6. Refer to Attachment C (Graphic Packaging Permit) to view the referenced pages (p1, p2, etc.) 7. The City has employed local limits in the permits. These local limits are still under review by the Approval Authority.
8. These IUs have either no process wastewater discharge or virtually no process wastewater discharge.
9. See Attachment N (JWWU 2009 Annual Report) for P2 aspects.
10. Even though the "existing" local limits are under review by the Approval Authority, the City has properly applied the existing local limits and categorical standards. See Attachment P-2/4 for more details on Ashland permit limitations.

SECTION III: INDUSTRIAL USER FILE REVIEW

C. Application of Standards

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

	Swage	Ashland	G Pack	UNIVAR	LRAFB
1. Has the IU been properly categorized?	Y	Y	Y	Y	Y
2. Were both Categorical Standards and Local Limits properly applied?	N/A	Y[10]	N/A	N/A	N/A
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	N/A	N/A	N/A	N/A	N/A
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	N/A	N/A	N/A	N/A	N/A
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	N/A	N/A	N/A	N/A	N/A
6. For IUs receiving a "net/gross" variance, are the alternate standards properly applied?	N/A	N/A	N/A	N/A	N/A
7. Is the Control Authority applying a bypass provision to this IU?	N	N	N	N	N

D. Compliance Monitoring

Sampling

	Swage	Ashland	G Pack	UNIVAR	LRAFB
1. Does the file contain Control Authority sampling results for the industry?	Y	Y	Y	Y	Y
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Swage	Ashland	G Pack	UNIVAR	LRAFB
3. Does the sampling report(s)[11] include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	Y	Y	Y	Y	H-10/10
b. Sample date and time?	Y	Y	Y	Y	H-10/10
c. Sample type?	Y	Y	Y	Y	H-10/10
d. Wastewater flow at the time of sampling?	Y[12]	Y[12]	Y	Y[12]	H-2/10
e. Sample preservation procedures?	Y	Y	Y	Y	H-10/10
f. Chain-of-custody records?	Y	Y	Y	Y	H-10/10
g. Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	Y	Y[13]	Y	Y	H-2/10
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	N/A	N/A	N/A	N/A	N/A
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	Y	Y	Y	Y	Y
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	Y	Y	Y	Y	Y
Inspections					
7. Does the IU file contain inspection reports[14]?	Y	Y	Y	Y	Y
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	Y	Y	Y	Y	Y
b. Date of last Inspection	2-23-09[15]	9-22-09	5-26-09	4-8-09	7-9-09

Comments:

11. See Attachment H-1/10 for a copy of LRAFB Self-Monitoring Report.
12. Swage, Ashland and Univar do not have routine process wastewater discharge.
13. Ashland file has analytical results as "proof" even though the IU does not discharge process wastewater.
14. See Attachment O-1/7 for a copy of Graphic Packing Inspection Report and Attachment E-1/4 for LRAFB.
15. The next inspection for Swage is scheduled in March 2010. The City may inspect at any time during a "calendar" year to avoid establishing a "pattern".
16. Inspection Form has "Description of Process" in Section II.A.3 which should show sources of flows; see Attachment O-2/7 for more details on sources of flows. Flow sources for LRAFB is shown in report (E-1/4).

SECTION III: INDUSTRIAL USER FILE REVIEW

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

9. Does the inspection report[14](s) include: [403.8(f)(2)(vi)]	Swage	Ashland	G Pack[14]	UNIVAR	LRAFB[14]
a. Inspector Name(s)	Y	Y	O-3/7	Y	Y
b. Inspection date and time?	Y	Y	O-3/7	Y	Y
c. Name and title of IU official contacted?	Y	Y	O-3/7	Y	Y
d. Verification of production rates?	Y	Y	O-3/7	Y	Y
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	Y	Y	O-4/7[16]	Y	E-1/4[16]
f. Evaluation of pretreatment facilities?	Y	Y	O-6/7	Y	Y
g. Evaluation of self-monitoring equipment and techniques?	Y	Y	O-6/7	Y	Y
h. (Re)-Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	Y	Y	O-5/7	Y	Y
i. Manufacturing facilities?	Y	Y	O-1/7	Y	Y
j. Chemical handling and storage procedures?	Y	Y	O-4/7	Y	Y
k. Chemical spill prevention areas?	Y	Y	O-5/7	Y	Y
l. Hazardous waste storage areas and handling procedures?	Y	Y	O-4/7	Y	Y
m. Sampling procedures?	Y	Y	O-6/7	Y	Y
n. Laboratory procedures?	Y	Y	O-6/7	Y	Y
o. Monitoring records?	Y	Y	O-3/7	Y	Y
p. Evaluation of Pollution Prevention opportunities?	N	N	N	N	N
q. Control Authority inspector signature?	Y	Y	O-3/7	Y	Y

SECTION III: INDUSTRIAL USER FILE REVIEW

IU Self-Monitoring and Reporting[17]

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

	Swage	Ashland	G Pack	UNIVAR	LRAFB[17]
10. Does the file contain self-monitoring reports?	Y	Y	Y	Y	Y
11. Does the file include:					
a. BMR?	Y[18]	Y	N/A	N/A	N/A
b. 90-Day Report?	N/A	Y	N/A	N/A	N/A
c. All periodic reports?	Y	Y	Y	Y	Y
d. Compliance schedule reports?	N/A	N/A	N/A	N/A	N/A
12. Did the IU report on all required parameters?	Y	Y	Y	Y	H-2/10
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	H-2/10
15. Did the IU comply with the required reporting frequency(s)?	Y	Y	Y	Y	Y
16. For all SIUs, are self-monitoring reports signed and certified?	Y	Y	Y	Y	H-1/10
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?	N/D	N/D	N/D	N/D	Y[19]
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	N	N	N	N	N
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	N/A	N/A	N/A	N/A	N/A
b. Did POTW respond to the spill?	N/A	N/A	N/A	N/A	N/A

Comments:

17. See LRAFB Self-Monitoring Report in Attachment H-1/10.
18. Swage submitted a BMR as a permit application.
19. See Attachment I-1/1 for LRAFB Slug Plan Evaluation

SECTION III: INDUSTRIAL USER FILE REVIEW

E. Enforcement

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

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

SECTION III: INDUSTRIAL USER FILE REVIEW

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

	Swage	Ashland	G Pack	UNIVAR	LRAFB
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	N/A	N/A	N/A	N/A	N/A
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	N/A	N/A	N/A	N/A	N/A
b. TRC	N/A	N/A	N/A	N/A	N/A
c. Pass through/Interference	N/A	N/A	N/A	N/A	N/A
d. Spill/slug loads	N/A	N/A	N/A	N/A	N/A
e. Reporting	N/A	N/A	N/A	N/A	N/A
f. Compliance schedule	N/A	N/A	N/A	N/A	N/A
g. others (specify)	N/A	N/A	N/A	N/A	N/A
13. Was the SIU published for SNC?	N/A	N/A	N/A	N/A	N/A
Date of publication.	N/A	N/A	N/A	N/A	N/A

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 16-18, 2010*** Date entered into ICIS: 4-6-2010 (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.

ICIS NPDES: Add Inspection - Windows Internet Explorer

https://icis.epa.gov/icis/inspection/AddInspection.do?actionMethod=initiate&epaOrState=S&CMType=INS&fromICIS=

File Edit View Favorites Tools Help

Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media

Google Go Bookmarks Popups okay Check Send to Settings

ICIS NPDES: Add Inspection

Page Tools

Compliance Monitoring Information

Compliance Activity Type: Inspection/Evaluation

* State: AR

Compliance Monitoring Activity Name: City of Jacksonville

If Biomonitoring is selected as the Compliance Monitoring Type, please enter Biomonitoring Compliance Monitoring Method:

* Compliance Monitoring Type: AFO Defined, AFO Designation, Aerial Photography, **Audit**, Audit (IU)

* Linked Facility

FACILITIES

Program System Acronym	Identifier	Facility Site Name	Address	FRS ID
NPDES	AR0041335			

VALIDATE

Compliance Monitoring Dates

Planned Start Date: 03/16/2010

Planned End Date: 03/18/2010

Actual Start Date: 03/16/2010

Actual End Date: 03/18/2010

Statutes and Sections Information

Federal Statutes : CWA - Clean Water Act

* Programs: NPDES - Post Administrative Penalty Case (Settlement), **NPDES - Pretreatment**, NPDES - Sanitary Sewer Overflow (SSO), NPDES - Section 308 Information Requests, NPDES - Sludge/Biosolids

State Statute:

* Compliance Monitoring Action Reason: Agency Priority, Citizen Complaint/Tip, **Core Program**, For Cause, Random Inspection

* Compliance Monitoring Agency Type: State Contractor, State - Using Federal Credential, **State**, Regional, Other Federal

Compliance Monitoring Agency Name:

If State, Local or Tribal lead, did EPA Assist?: No

Was this a State, Federal or Joint (State/Federal) Compliance Monitoring Activity?: State

If Joint, what was the purpose of the participation of the other party?:

Which party had the lead?:

Government Contacts

CONTACTS

Affiliation Type	First Name	Last Name	Phone	Office	Organization

Codes

SIC Codes: 4952 Sewerage Systems

ADD / REMOVE

NAICS Codes:

ADD / REMOVE

Priorities

OECA National Priority: 2009 - (CA Only) - Air Toxics - Flares, 2009 - (CA Only) - Air Toxics - LDAR, 2009 - (CA Only) - Air Toxics - Surface Coating, 2009 - (CA Only) - Financial Assurance, 2009 - (CA Only) - MP - Mining

Regional Priority: 2009 - Region 06 - Air Toxics Major Sources (D & G), 2009 - Region 06 - Brine Spills from Oil & Gas Operations, 2009 - Region 06 - CD Implementation, 2009 - Region 06 - Minor Wastewater Collection & Treatment System, 2009 - Region 06 - Petroleum Refining

Media Monitored

Media Monitored:

Compliance Monitoring Media Indicator

Multimedia indicator:

Compliance Monitoring Information

Number of Days Physically Conducting Activity:

Number of Hours Physically Conducting Activity:

Compliance Monitoring Action Outcome:

Compliance Monitoring Rating Code:

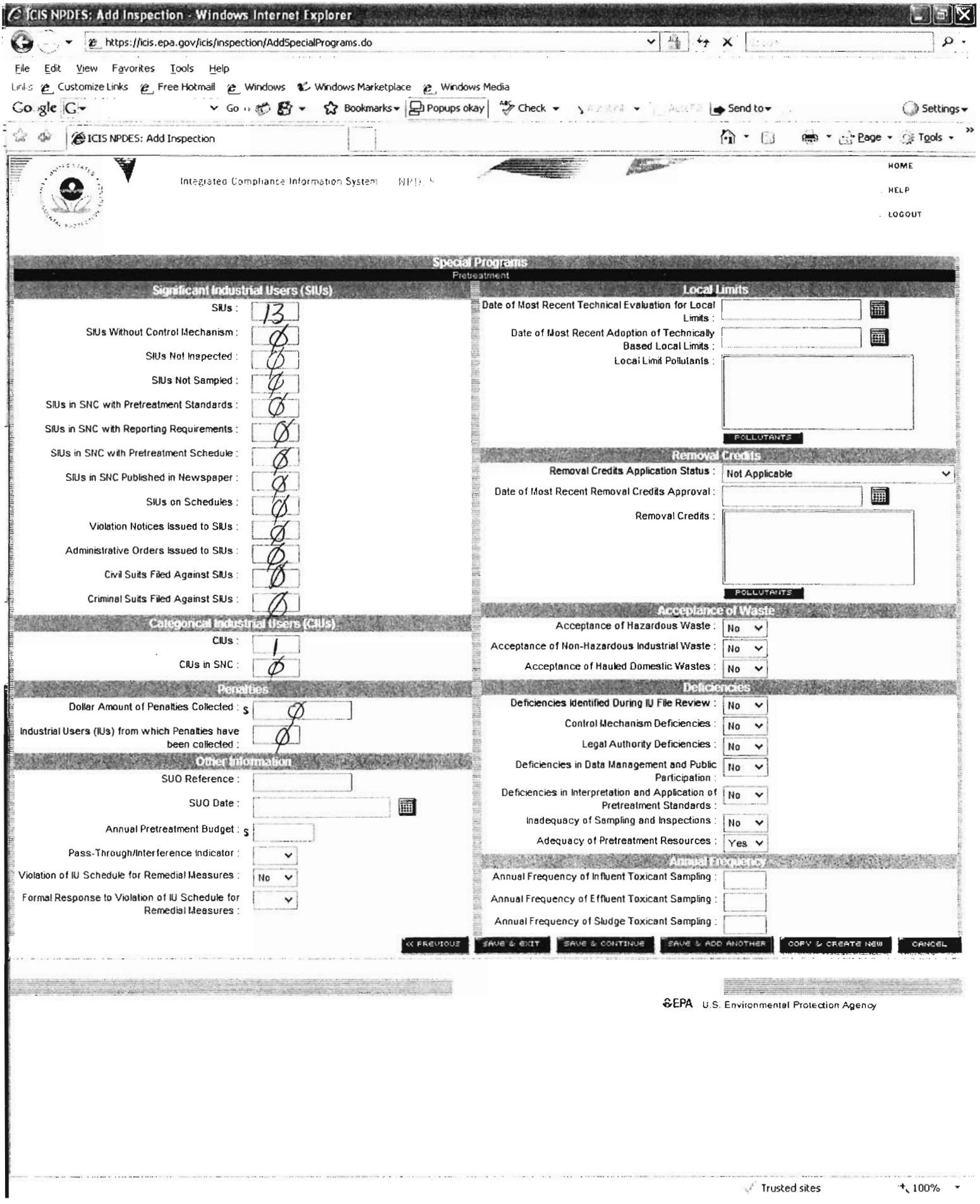
Compliance Monitoring Comments

Compliance Monitoring Comments: 005: Significant Industries Site Visits Conducted

User Defined Fields

1:

Trusted sites 100%


ICIS NPDES: Add Inspection - Windows Internet Explorer
https://icis.epa.gov/icis/inspection/AddSpecialPrograms.do
File Edit View Favorites Tools Help
Links Customize Links Free Hotmail Windows Windows Marketplace Windows Media
Google Go Bookmarks Popups okay Check Send to Settings
ICIS NPDES: Add Inspection
Page Tools
Integrated Compliance Information System
HOME
HELP
LOGOUT
Special Programs
Pretreatment
Significant Industrial Users (SIUs)
SIUs : 13
SIUs Without Control Mechanism : 0
SIUs Not Inspected : 0
SIUs Not Sampled : 0
SIUs in SNC with Pretreatment Standards : 0
SIUs in SNC with Reporting Requirements : 0
SIUs in SNC with Pretreatment Schedule : 0
SIUs in SNC Published in Newspaper : 0
SIUs on Schedules : 0
Violation Notices Issued to SIUs : 0
Administrative Orders Issued to SIUs : 0
Civil Suits Filed Against SIUs : 0
Criminal Suits Filed Against SIUs : 0
Categorical Industrial Users (CIUs)
CIUs : 1
CIUs in SNC : 0
Penalties
Dollar Amount of Penalties Collected : $ 0
Industrial Users (IUs) from which Penalties have been collected : 0
Other Information
SUO Reference :
SUO Date :
Annual Pretreatment Budget : $
Pass-Through/Interference Indicator :
Violation of IU Schedule for Remedial Measures : No
Formal Response to Violation of IU Schedule for Remedial Measures :
Local Limits
Date of Most Recent Technical Evaluation for Local Limits :
Date of Most Recent Adoption of Technically Based Local Limits :
Local Limit Pollutants :
POLLUTANTS
Removal Credits
Removal Credits Application Status : Not Applicable
Date of Most Recent Removal Credits Approval :
Removal Credits :
POLLUTANTS
Acceptance of Waste
Acceptance of Hazardous Waste : No
Acceptance of Non-Hazardous Industrial Waste : No
Acceptance of Hauled Domestic Wastes : No
Deficiencies
Deficiencies Identified During IU File Review : No
Control Mechanism Deficiencies : No
Legal Authority Deficiencies : No
Deficiencies in Data Management and Public Participation : No
Deficiencies in Interpretation and Application of Pretreatment Standards : No
Inadequacy of Sampling and Inspections : No
Adequacy of Pretreatment Resources : Yes
Annual Frequency
Annual Frequency of Influent Toxicant Sampling :
Annual Frequency of Effluent Toxicant Sampling :
Annual Frequency of Sludge Toxicant Sampling :
« PREVIOUS
SAVE & EXIT
SAVE & CONTINUE
SAVE & ADD ANOTHER
COPY & CREATE NEW
CANCEL
EPA U.S. Environmental Protection Agency
Trusted sites
100%

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
NW of the City of Jacksonville City Limits (501)987-1110
Type of industry: *Military Base*
Date/Time of visit: *March 17 @ 8:45 am*
Industry contacts: *Malcolm Windsor*

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

Additional comments:

1. Previously, the base had central Oil & Water Separators through out the facility but military personnel misunderstood the intent and used the separators as "oil disposal units". The base removed and the "central" separators and has "local" separators at each building with wet operations.

2. Stored by not generated

3. Spent Alodine tubes are placed in barrels for disposal

4. Manhole access with flow meter on 24" line @ 34 51 43.44 N 92 08 04.15 W

Visit conducted by: *Torrence/Pappalardo* Date: *March 17, 2010*

(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:

Community of 10,000 people with 1500 homes, 2 dining halls, club, lounges, restaurants, gas stations, etc.

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 with oil/water separator.*

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 & Pappalardo* Date: *March 17, 2010*

(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:
The Crosby Group, Inc./National Swage
2511 West Main Street 72076 (501)982-3112
Type of industry: *Swage Manufacturer*
Date/Time of visit: *March 17, 2010 @ 10:48 am*
Industry contacts: *Barry R. Temple, Safety Director*

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

Additional comments:

1. Classified as a "Zero Discharge" facility but this facility occasionally discharges to the POTW and can meet limits without treatment.
2. Stored but no generated

Visit conducted by: *Torrence/Pappalardo* Date: *March 17, 2010*

(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: *National Swage*

Additional comments:

This facility manufactures swaging (a suspended cable harness) equipment, cable locks, and related items for heavy machinery, oil refinery-production and construction. The only source of process wastewater in the facility is an alkaline cleaner/rinse tank. The facility recycles all the process and cooling for long periods of time (several years). The facility will eventually discharge the recycled water to the POTW.

Visit conducted by: *Torrence & Pappalardo* Date: *March 17, 2010*

(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:
Graphic (Altivity) Packaging, Inc
1301 N Redmond Road 72076 (501)985-5306
Type of industry: *Mfr of Paper Bags*
Date/Time of visit: *March 17 @ 12:53 pm*

Industry contacts: *Gary Burgess, Safety, Env & Traffic Mgr.*

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

Additional comments:

1. ALAR™ (Diatomaceous Earth Filters) to remove color and some metals.

2. Sampling point in manhole inside plant where process and sanitary wastestreams are combined.

Visit conducted by: *Torrence/Pappalardo* Date: *March 17, 2010*

(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 inside 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 making large sheets of plastic material from liquid resin. The resin is covered with a photographic negative with the finished printed symbols and exposed to UV light to solidify the resin.

Wastewater Treatment: The pretreatment system is an ALAR System. The ALAR System is designed to remove copper and 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 & Pappalardo* Date: *March 17, 2010*

(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 72076 (501)533-6117
Type of industry: *Mfr of Resins* *40 CFR Part 414*
(Include regulatory citation if CIU)
Date/Time of visit: *March 17, 2010 @ 2:40 pm*
Industry contacts: *Wayne Mullins,Plt Eng & Joseph Jenko, Ops Mgr*

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

Additional comments:

1. Ashland has a collection tank on-site for non-contact cooling water, boiler blow-down, compressor condensate, etc. The pH is monitored and controlled.
2. At the bottom of the collection tank, a nipple and valve (for sampling) is located on the line where the wastewater is released to the POTW.
3. Ashland process design oxidizes all regulated wastewater.

Visit conducted by: *Torrence/Pappalardo* Date: *March 17, 2010*

(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:

Ashland is a bulk storage and reactor plant; the main process is manufacturing polyester/styrene resins. No process wastewater is discharged to the POTW as no process wastewater is generated except small quantities from the quality control laboratory (this lab water is collected and hauled off-site). The majority of wastewater discharged to the POTW is from domestic sources within the plant and office areas. All wastewater is collected in a holding tank with inline pH and flow meters.

Visit conducted by: *Torrence & Pappalardo* Date: *March 17, 2010*

(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:
UNIVAR USA
1925 Redmond Road 72076 (501) 982-4402
Type of industry: *Chemical Distributor*
Date/Time of visit: *March 17, 2010 @ 3:40 pm*
Industry contacts: *Mike Price*

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

Additional comments:

1. *Wastewater is collected in a 2000 gallon tank. The IU checks the wastewater for compliance and notifies the City before releasing the wastewater to the POTW.*
2. *Stored but not generated.*

Visit conducted by: *Torrence/Pappalardo* Date: *March 17, 2010*

(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: *UNIVAR USA*

Additional comments:

UNIVAR is primarily a chemical distribution operation. The IU has a small barrel (chemical totes) washing operation to reclaim and reuse barrels the contained acid and caustics. The washing operation results eventually in the discharge of a 2000-gallon batch discharge.

Pollution Prevention (P2) activities include reusable dedicated chemical totes, non-acceptance of an tote containing a heel of 1" or more in volume and non-acceptance of totes other than those labeled UNIVAR. P2 activities have reduced the amount of washing activities and the last batch discharged occurred over eight years ago.

Visit conducted by: *Torrence & Pappalardo* Date: *March 17, 2010*

(Signature of auditor conducting visit)

APPLICATION FOR INDUSTRIAL DISCHARGE PERMIT

Company: Graphic Packaging International

Physical Address: 1031 North Redmond Dr.

Mailing Address: 1031 North Redmond Dr.

E-Mail Address: gary.burgess@graphicpkg.com

Telephone No.: 501-985-5306 Fax No.: 501-985-0384

Contact Person & Title: Gary Burgess Safety/Environmental/Traffic Manager

Principal Products or Services: Multiwall paper bags

SIC/NACIS CODE(s): 2673; 2674; 2679; 2759

The undersigned requests an Industrial Discharge Permit be granted by the Jacksonville Sewer Commission, and offers the following as appendices to this application:

1. A plan to the property showing accurately all sewers and drains now existing.
2. Plans and specifications covering and work purposed that would have bearing upon the industrial discharge.
3. A complete schedule of all processed water and industrial wastes produced or expected to be produced at said property, including a description of the character of each waste, the daily volume and maximum rates of discharge, representative analysis of each process discharge and any measures taken as of this date to reach compliance of any known pretreatment standard or requirement.

In consideration in the granting of this permit the undersigned further agrees:

1. To furnish information referring to the installation of use of the industrial sewer for which this permit is sought, as may be requested by the Jacksonville Sewer Commission or their representatives.
2. To accept and abide by all provisions of Ordinance No. 1133 of the City of Jacksonville and all other pertinent orders or regulations that may be adopted in the future.
3. To operate and maintain the waste pretreatment facilities as may be required in an efficient manor at all times and at no expense to the Jacksonville Wastewater Utility, the Jacksonville Sewer Commission, or the City of Jacksonville.
4. To cooperate at all times with the manager of the Jacksonville Wastewater Utility and/or his representatives and their inspecting, sampling, and study of the industrial waste, and any facilities provided for pretreatment.
5. To notify the Jacksonville Wastewater Utility immediately in the event of any accident, or other occurrence that occasionally contributes to the wastewater treatment system of any wastewater or substances prohibited or not covered by this permit.

DATE: 7/14/08 SIGNED: _____

Application approved and permit granted.

DATE: 8/11/08 SIGNED: _____

CITY OF JACKSONVILLE, ARKANSAS
INDUSTRIAL USER'S SURVEY

ENTERED 8-4-08 JB

Note to signing official: In accordance with Title 40 of the Code of Federal Regulations Part 403 Section 403.14, information and data provided in this questionnaire which identifies the nature and frequency of discharge shall be made available to the public without restriction. Requests for confidential treatment of other information shall be governed by procedures specified in 40 CFR Part 2. Should a discharge permit be required for your facility, the information in this questionnaire will be used to issue the permit.

RECEIVED
JUL 15 2008

SECTION A: GENERAL INFORMATION

1. Company Name: Graphic Packaging International
2. Mailing Address: 1031 N. Redmond Road
   Jacksonville AR Zip Code: 72076
3. Premise Address: 1031 N. Redmond Road
   Jacksonville AR Zip Code: 72076
4. Name and Title of Person (s) authorized to represent your company in an official capacity in transactions with Jacksonville Wastewater Utility (a primary and a secondary contact)
   Primary Contact: Gary Burgess
   Title: Safety / Environmental / Traffic Manager
   E-Mail: gary.burgess@graphicpkg.com
   Telephone Number: 501-985-5306 Fax Number: 501-985-0385
   Secondary Contact: Bob Dorton
   Title: Plant Engineer
   E-Mail: robert.dorton@graphicpkg.com
   Telephone Number: 501-985-5335 Fax Number: 501-985-0385
5. Check One: ✓ Existing Discharge _____ Proposed Discharge
   If proposed, anticipated date of commencement: _____
6. If the facility has a corporate office, please list below the corporate officer in charge of environmental / regulatory compliance.
   Corporate Contact: Lynda Leonhard
   Title: Environmental Compliance Corporate Manager
   Address: 2201 Bell Avenue Des Moines IA 50321
   Telephone: 515-286-4500 Fax: 515-286-4508
   E-Mail: lynda.leonhard@graphicpkg.com

A-3/22

7. List all SIC/NACIS codes for this company (along with the applicable description of the code):

2673 Plastics, Foil, and coated paper bags
2674 Uncoated Paper and Multiwall Bags
2679 Converting Paper and Paperboard Products Not Elsewhere Classified
2759 Commercial Printing Not Elsewhere Classified
4225 Warehousing

8. List below all, if any, Environmental Permits currently held by the company. Name the issuing agency and list the permit number for the company:

A. Arkansas Department of Environmental Quality RCRA Permit:

____ Yes __X__ No

If Yes, Permit #: ____

B. Arkansas Department of Environmental Quality Stormwater Permit:

__X__ Yes ____ No

If Yes, Permit #: ARR00A000

C. Arkansas Department of Environmental Quality Air Permit:

__X__ Yes ____ No

If Yes, Permit #: 1039-AR-3

D. Arkansas Department of Environmental Quality Incinerator Permit:

____ Yes __X__ No

If Yes, Permit #: ____

E. Arkansas Department of Environmental Quality Underground Storage Tank Permit:

____ Yes __X__ No

If Yes, Permit #: ____

F. Other Environmental Permits:

____ Yes __X__ No

If Yes, Permit #: ____

A-4/22

SECTION B: PRODUCT OR SERVICE INFORMATION

1. Give a brief, narrative description of the primary manufacturing or service activity and premise address and the applicable Standard Classification Code (A).

(S.I.C. No.): 2679 - we convert paper into industrial bags at our location of 1031 N. Redmond Road Jacksonville, AR 72076

SIC No.(s): 2679 Converting Paper ...

2. Principal Raw Materials Used: Multiwall Paper Starch; Latex; Hot Melt Adhesives; Ink

3. Principal Products Produced: Multiwall Paper Bags

4. Check all additional activities and indicate SIC No. (s), if known, at your premise:

	SIC No.		SIC No.
___Electroplating		___Food Preparation Service	
___Printing	2759	___Photographic Processing	
___Warehousing	4225	___Plastic Processing	
___Laboratory		___Painting, Finishing	
___Machine Shop		___Paint or Ink Formulation	
___Research		___Laundry, Cleaning	
___Medical Care		___Rubber Processing	
___Repair Shop, Garage		___Steam/Power Generation	
___Flammables, Explosives		___Other (Specify)	

5. Does your facility practice Pollution Prevention (P2)? X Yes ___ No

If so, what are type of activities are practiced? Oil containment (SPCC)

Has your facility seen benefits from these activities? X Yes ___ No

If so, what type of benefits? We have minimized oil leaks on equipment

A - 5/22

SECTION C: PLANT OPERATIONAL CHARACTERISTICS

1. Are major processes batch or continuous? Batch

   Average number of batches per 24-hour day: 25 - 30 orders per day

2. Are your processes subject to seasonal variation? Yes

   If yes, explain and indicate the month(s) of peak operation and products:

   September through February are our peak month due to farmers having to suplement their cattle with bags of feed.

3. Shift Information:

   a. Number of shifts per day: 3 b. Number of workdays per week: 5 to 6

   c. Average number of employees per shift: 1st 100 2nd 65 3rd 50

   Total: 242 Administrative: 27 Production: 215

   d. Shift start times: 1st 7AM 2nd 3PM 3rd 11PM

4. Describe any water recycling or material-reclaiming processes utilized:

   N/A

5. Is a Spill Prevention Control and Countermeasure Plan prepared for the facility?

   If more room is needed, please attach necessary description(s):

   X Yes ___No If yes, describe: We have a Spill Prevention Control and Countermeasure Plan that was professionally prepared by a Professional Engineer. The plan is maintained in the Environmental Manager's office at Graphic Packaging International 1031 N. Redmond Road Jacksonville - Our plan is open for review upon request.

A-6/22

SECTION D: WATER CONSUMPTION AND LOSS

1. Raw water source(s): X Municipal Water Division ___Private Contract
___County Water Company ___Private Well
___Surface Water ___Other _____

2. Water bill addressee: Stone Container Site #150376

3. Water services account numbers: Stone C 0002 A1031870000

4. List the past twelve months water usage from water bills:
   a. 1st six-month period 2008, 398,250 gallons
   b. 2nd six-month period 2007, 246,833 gallons
   c. Volume from other source(s): N/A gallons per day.

5. List water consumption within the facility:

Type	Estimated Average Volume (GPD)
a. Cooling Water	1500
b. Boiler Feed	7000
c. Process	1,400
d. Sanitary	1,000
e. Plant and Equipment Wash-down	500
f. Irrigation and Lawn Watering	None
g. Other (specify): Glue Cooking & Antiskid	2100
h. Total of a. through g.	13,500

6. List the average volume of discharge lost to:

Outlet	Estimated Average Discharge (GPD)
a. Municipal Sewer	1200
b. Watercourse, Storm Drain, Ground	442
c. Waste Haulers	200
d. Evaporation	550
e. Contained in Product	400
f. Total of a. through e.	2742

7. List the average water usage and average wastewater discharge for SIC process itemized in SECTION B (attach additional sheets if necessary):

Brief Process Description	SIC No.	Average Water Consumption
a. Converting Paper	2679	11,300 GPD
b. Printing Process	2759	1,200 GPD

A-7/22

c. _____ _____ _____ GPD

d. _____ _____ _____ GPD

8. Describe any water treatment or conditioning processes utilized:
We utilize an Alar to remove solids from waste ink (press wash up)

9. Does your facility have any plans to minimize water usage or any of the following wastewater reduction programs?

Yes — Storm Water Pollution Prevention plan in place (SWP 3)?

Yes — SPCC plan in place?

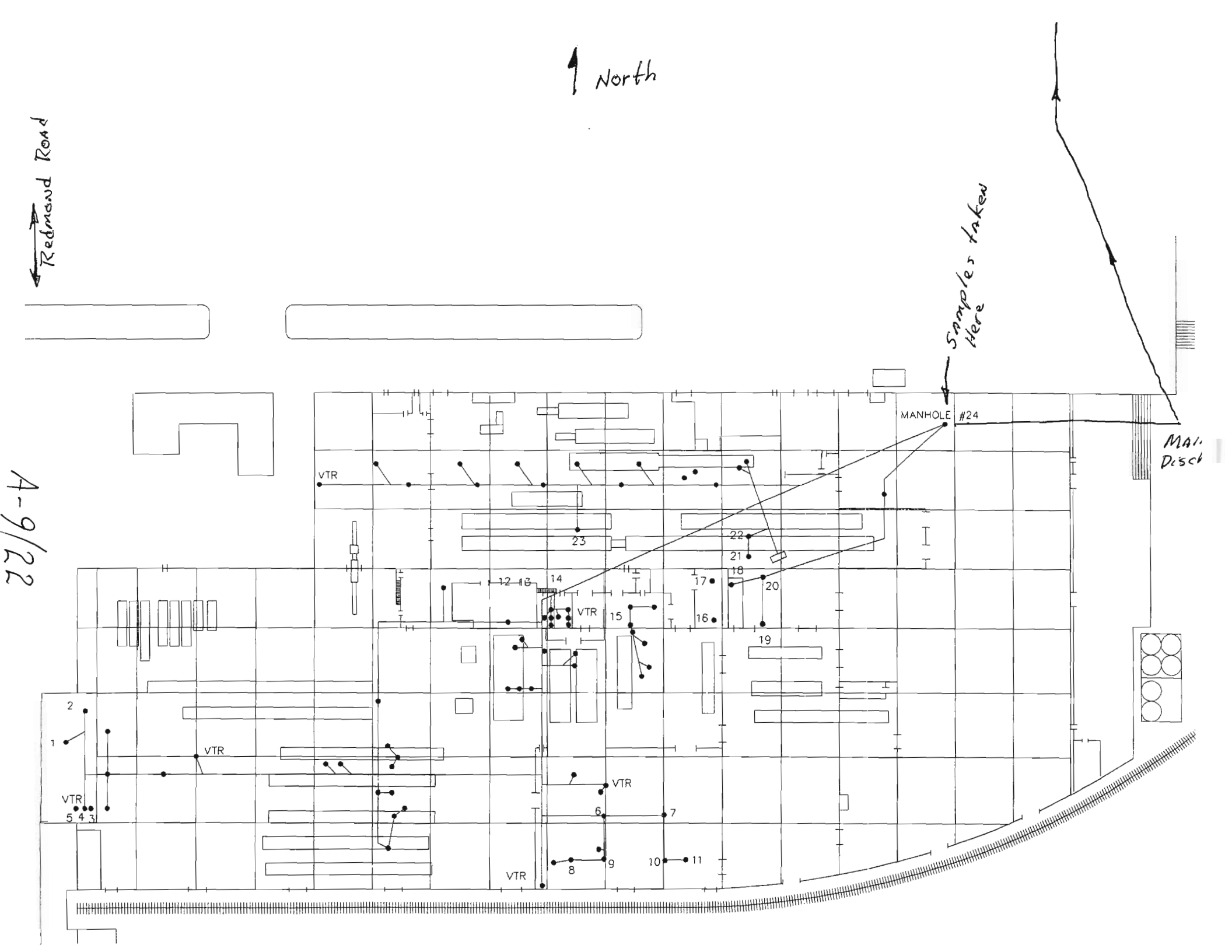
SECTION E: SEWER INFORMATION

1. Attach a scaled drawing of your facility site showing the location of all sewers. In addition, show the location of possible sampling points for these sewers and sampling points for regulated SIC processes. For reference and field orientation, buildings, streets, alleys, and other pertinent structures should be included.
See Attached

2. List facility sewers shown in Item 1, size and flow; assign reference numbers to each sewer starting with No. 1:

	Reference Number	Sewer Size (in.)	Descriptive location of Sewer Connection of Discharge Point	Average Flow (GPD)
1.	1A	N/A	NE Corner of Building	4,600
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10				
11.				
12.				

A - 8/22


North
Redmond Road
Samples taken Here
MANHOLE #24
MAI
Disch
VTR
VTR
VTR
VTR
VTR
VTR
1
2
3
4
5
6
7
8
9
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11
12
13
14
15
16
17
18
19
20
21
22
23
4-9/22

SECTION F: WASTEWATER INFORMATION

1. Does this facility discharge any wastewater other than from restrooms, cafeterias, or non-contaminated cooling water?

X Yes If yes, complete the remainder of Section F

___No If no, skip to Section G

2. Please indicate the quantities from the activities indicated below in units of gallons per day. (Refer to Section D, items 5, 6, 7, and 8) The quantities are to be given for each sewer receiving the discharge. Place an asterisk on any outfall discharging to a storm drain or surface course and give the NPDES Outfall Number and NPDES Permit Number.

Type	Discharge Quantity by Sewer Referenced in E-2						Total
Process (from D-7)	1	2	3				(Refer to D 5-7)
a. Printing	0						0
b. Glue Cooking	1600						1600
c.							
Sanitary	1000						1000
Boiler	0						0
Cooling	1500						1500
Plant & Equip. Wash	500						500
Retention Waste (From D-8)							
Other (Specify):							
Total (Refer to E-2)							
* NPDES Outfall No.							
**NPDES Permit No.							4,600

3. Is any form of wastewater pretreatment utilized at this facility?

X Yes ____ No

If yes, check type of device:

_____ Silver Recovery System _____ Ultra Membrane Filtration

_____ Grease Trap (In Ground) _____ Detention/Flow Equalization Basin

_____ Oil/Water Separator _____ pH Adjustment

_____ Grease Interceptor X Other Alar

A-10/22

Description and location of device(s) mentioned above: Our Alar unit uses A diatomaceous earth filter to seperate solids from our water base ink waste - water from this process is discharged into the sanitary sewer - Our Alar is located in our Glue Cooking Room, just North of our Printing Department

If the facility has any of the above-mentioned pretreatment devices, how often is it serviced and by whom (please include individual name, company name, address, phone number and last date of service)?

Our maintenance department services and maintain our Alar equipment.

Does this facility have a parts washer? X Yes _____ No

If yes, is the waste produced considered a Hazardous Waste? _____ Yes X No

If yes, how are the wastes disposed (please include individual name, company name, address, phone number and last date of service)? _____

4. If any wastewater analyses have been performed on the wastewater discharges from your facilities, attach a copy of the most recent data to this questionnaire. Be sure to include the date of the analysis, name of the laboratory performing the analysis, and location(s) from which the sample(s) were taken (Attach sketches, plans, etc., as necessary).

See Attached

A-11/22

CHEMISTS
ECOLOGISTS
CONSULTANTS
PLANNERS

SORRELLS RESEARCH
LABORATORY AND FIELD SERVICES

8100 National Drive
Little Rock, Arkansas 72209

Phone 501-562-8139
Fax 501-562-7025
Toll Free 1-800-331-8139

LABORATORY ANALYSIS

Date of Report: June 3, 2008
Date Received : May 6, 2008

For: GRAPHIC PACKAGING INTERNATIONAL, INC.
1031 NORTH REDMOND ROAD
JACKSONVILLE, AR 72076-
Job: IND. PRETREATMENT MONITORING. P.O.# 76-088486
Sample From: MANHOLE 24 HOUR COMPOSITE / EFFLUENT / OUTFALL 001

ANALYTE	RESULT	UNITS	METHOD
Biochemical oxygen demand	121.000	mg/Liter	5210 B
Total suspended solids	122.000	mg/Liter	2540D
pH (-H+)	7.740	units	4500 B
Temperature	22.500	.C	2550 B
Oil and grease - Gravimetric	6.800	mg/Liter	1664
Copper, Cu	42.100	ug/Liter	200.8
Metals, Digestion for	1.000	ea sample	3030 D

STANDARD METHODS, 20TH ED.; EPA METHODS, 3RD ED.
Collected by:
MAHDI HADDADI on 05/06/08 at 12:00
Analysis by :
SEE ATTACHED QUALITY ASSURANCE PAGE.
Sample preservation and Laboratory Analysis conducted according to EPA 40 CFR Part 136. Test/Analyst/Time/Coeff./Var./ QA plan filed with ADPC&E. Includes 10 % replication and 10 % recovery studies by random selection. Instruments maintained and calibrated and records kept.
See Attached.

Copies to:
MR. GARY BURGESS
GRAPHIC PACKAGING INTR'L

1031 NORTH REDMOND ROAD
JACKSONVILLE, AR 72076-

Laboratory Number: 9525.0101 TKH Reviewed By: K. E. Sorrells, M.S.

A-12/22

SORRELLS RESEARCH
LABORATORY AND FIELD SERVICES

CHEMISTS
ECOLOGISTS
CONSULTANTS
PLANNERS

8100 National Drive
Little Rock, Arkansas 72209

Phone 501-562-8139
Fax 501-562-7025
Toll Free 1-800-331-8139

QUALITY ASSURANCE

May 6, 2008
The following QA represents SRA's Quality Assurance values for this report.

ANALYTE	ANALYST	BEG. DATE	BEG. TIME	FIN. DATE	FIN. TIME	S.D. %	SPK. REC.	#IN BAT
Biochemical oxygen demand	KP/CS	05/06/08	1615	05/11/08	1405	3.41	83.0	2
ICP-MS METALS	CS/KS	05/29/08	1630	05/29/08	1915	1.43	103.4	12
Oil and grease - Gravimet	MH	05/19/08	920	05/20/08	900	1.68	96.6	14
pH (-H+)	JB	09/28/06	805	09/28/06	830	0.00	0.0	1
Total suspended solids	KESII	05/12/08	1630	05/13/08	1630	0.79	109.0	55
Temperature	MH	05/06/08	1200	05/06/08	1200	0.00	0.0	1

Field PH/TEMP/D.O. Sampler or Courier/ at time of sampling or pick up Sample preservation and laboratory analysis conducted according to EPA 40 CFR Part 136 TEST/ANALYST/TIME/COEF. VAR.* QA PLAN filed with ADPC&E. Include replication.

KES = K. E. Sorrells
JBS = James B. Sorrells
CAS = Cecil A. Sorrells
MKM = Mark Kyle McKenzie
KESII = K. E. Sorrells, II
TJS = Todd J. Sanders
JHD = J. Henry Dodson

Laboratory Number: 9525.0101 TKH

A-13/22

SORRELLS RESEARCH ASSOCIATES, INC.
8002 STANTON ROAD, LITTLE ROCK, AR 72209
(501) 562-8139 (800) 331-8139
FAX # (501) 562-7025

CHAIN OF CUSTODY RECORD

PAGE _____ OF _____

TURNAROUND TIME
RUSH 24 HR. 48 HR.
5 DAY REG.
OTHER _____

FOR LAB/OFFICE USE ONLY

LAB # 9525-0101
CLIENT # 37022
P.O. #

STANDARD METHODS PRESERVATION PER EPA 40 CFR
C 4 = COOL TO 4.C
S<2 = SULFURIC ACID TO PH<2
N<2 = NITRIC ACID TO PH < 2
T = THIOSULFATE
W = AZIDE MODIFICATION (4500-O C)
P = MEMBRANE ELECTRODE (4500-O G)
NaOH = pH > 12

NAME OF COMPANY, CITY, OR PROJECT: Graphic Packaging

PROJECT NO:

SAMPLER(S) SIGNATURE

SAMPLE NO.	SAMPLE COLLECTION LOCATION	START DATE/TIME	END DATE/TIME	COMP/ GRAB	FIELD ANALYSIS PH	TEMP	FLOW	CL2	D.O. (W) D.O. (P)	CONTAINER TYPE PRESERVATIVE	ANALYSIS REQUIRED
	EFF OUTFALL001	5/5/08 1130	5/6/08 1130	C						½ Gal Plastic	BOD, TSS
		"	"	C						500mL Plastic NaOH	NH3
			5/6/08 1200	G						1 Lit Glass H2SO4	Oil + G
			"	G	7.74	22.56	—	—	—	ONSITE	PH, Temp

A-14/22

METHOD OF SHIPMENT (CIRCLE)
FED-EX WALK-IN SRA UPS OTHER

TYPE OF SAMPLE(S): (CIRCLE)
WATER SOIL W/W SLUDGE OTHER

FIELD CALIBRATION RECORD

PH 7	7.00
PH 4	4
PH 10	10.06
D.O.	

NOTES/COMMENTS/OBSERVATIONS

FIELD ANALYSIS CONDUCTED BY: SRA CLIENT

RELINQUISHED BY:	DATE/TIME	RECEIVED BY:	DATE/TIME 1200 5/6/08
RELINQUISHED BY:	DATE/TIME	RECEIVED BY: (LAB)	DATE/TIME 1532 5/6/08

CHEMISTS
ECOLOGISTS
CONSULTANTS
PLANNERS

SORRELLS RESEARCH
LABORATORY AND FIELD SERVICES

8100 National Drive
Little Rock, Arkansas 72209

Phone 501-562-8139
Fax 501-562-7025
Toll Free 1-800-331-8139

LABORATORY ANALYSIS

Date of Report: June 3, 2008
Date Received : May 7, 2008

For: GRAPHIC PACKAGING INTERNATIONAL, INC.
1031 NORTH REDMOND ROAD
JACKSONVILLE, AR 72076-
Job: IND. PRETREATMENT MONITORING. P.O.# 76-088486
Sample From: MANHOLE 24 HOUR COMPOSITE / EFFLUENT / OUTFALL 001

ANALYTE	RESULT	UNITS	METHOI
Biochemical oxygen demand	236.000	mg/Liter	5210 E
Total suspended solids	47.000	mg/Liter	2540D
pH (-H+)	5.880	units	4500 E
Temperature	25.000	.C	2550 E
Oil and grease - Gravimetric	7.300	mg/Liter	1664
Copper, Cu	50.400	ug/Liter	200.8
Metals, Digestion for	1.000	ea sample	3030 I

STANDARD METHODS, 20TH ED.; EPA METHODS 3RD ED.
Collected by:
MAHDI HADDADI on 05/07/08 at 15:50
Analysis by :
SEE ATTACHED QUALITY ASSURANCE PAGE.
Sample preservation and Laboratory Analysis conducted according to EP
40 CFR Part 136. Test/Analyst/Time/Coeff./Var./ QA plan filed with ADPC&E.
Includes 10 % replication and 10 % recovery studies by random selection.
Instruments maintained and calibrated and records kept.
See Attached.

Copies to:
MR. GARY BURGESS
GRAPHIC PACKAGING INTR'L

1031 NORTH REDMOND ROAD
JACKSONVILLE, AR 72076-

Laboratory Number: 9525.0201 TKH Reviewed By: K. E. Sorrells, M.S.

A-15/22

SORRELLS RESEARCH
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ECOLOGISTS
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Little Rock, Arkansas 72209

Phone 501-562-8139
Fax 501-562-7025
Toll Free 1-800-331-8139

QUALITY ASSURANCE

May 7, 2008
The following QA represents SRA's Quality Assurance values for this report.

ANALYTE	ANALYST	BEG. DATE	BEG. TIME	FIN. DATE	FIN. TIME	S.D. %	SPK. REC.	#IN BAT
Biochemical oxygen demand	KP	05/07/08	1645	05/12/08	1000	0.75	95.0	2
ICP-MS METALS	CS/KS	05/29/08	1630	05/29/08	1915	1.43	103.4	12
Oil and grease - Gravimet	MH	05/19/08	920	05/20/08	900	1.68	96.6	14
pH (-H+)	MH	05/07/08	1550	05/07/08	1550	0.00	0.0	1
Total suspended solids	KESII	05/12/08	1630	05/13/08	1630	0.79	109.0	55
Temperature	MH	05/07/08	1550	05/07/08	1550	0.00	0.0	1

Field PH/TEMP/D.O. Sampler or Courier/ at time of sampling or pick up
Sample preservation and laboratory analysis conducted according to EPA
40 CFR Part 136 TEST/ANALYST/TIME/COEF. VAR.* QA PLAN filed with
ADPC&E. Include replication.

KES = K. E. Sorrells
JBS = James B. Sorrells
CAS = Cecil A. Sorrells
MKM = Mark Kyle McKenzie

KESII = K. E. Sorrells, II
TJS = Todd J. Sanders
JHD = J. Henry Dodson

Laboratory Number: 9525.0201 TKH

A-16/22

SORRELLS RESEARCH ASSOCIATES, INC.
8002 STANTON ROAD, LITTLE ROCK, AR 72209
(501) 562-8139 (800) 331-8139
FAX # (501) 562-7025

CHAIN OF CUSTODY RECORD

PAGE _____ OF _____

TURNAROUND TIME
RUSH 24 HR. 48 HR.
5 DAY REG.
OTHER _____

FOR LAB/OFFICE USE ONLY

LAB # 9525.02.01

CLIENT # _____

P.O. # _____

STANDARD METHODS PRESERVATION PER EPA 40 CFR
C 4 = COOL TO 4.C
S<2 = SULFURIC ACID TO PH<2
N<2 = NITRIC ACID TO PH < 2
T = THIOSULFATE
W = AZIDE MODIFICATION (4500-O C)
P = MEMBRANE ELECTRODE (4500-O G)
NaOH = pH > 12

NAME OF COMPANY, CITY, OR PROJECT: Graphic Packaging

PROJECT NO:

SAMPLER(S) SIGNATURE

SAMPLE NO.	SAMPLE COLLECTION LOCATION	START DATE/TIME	END DATE/TIME	COMP/ GRAB	FIELD ANALYSIS PH	TEMP	FLOW	CL2	D.O. (W) D.O. (P)	CONTAINER TYPE PRESERVATIVE	ANALYSIS REQUIRED
	EFF OUTFALL001	1145 5/6/08	1145 5/7/08	C						½ G Plm	BOD, TSS
		4	4	C						500mL HNO3	MTLs
			5/7/08 1550	G						1 Lit Glass HCl	Oil + G
			4	G	5.88	25.0	—	—	—	ONSITE	PH. TEMP

METHOD OF SHIPMENT (CIRCLE)
FED-EX WALK-IN (SRA) UPS OTHER

TYPE OF SAMPLE(S): (CIRCLE)
WATER SOIL (W/W) SLUDGE OTHER

FIELD CALIBRATION RECORD

PH 7	7.00
PH 4	
PH 10	10.00
D.O.	

NOTES/COMMENTS/OBSERVATIONS

FIELD ANALYSIS CONDUCTED BY: (SRA) CLIENT

RELINQUISHED BY: _____ DATE/TIME _____ RECEIVED BY: _____ DATE/TIME 5/7/08 1550

RELINQUISHED BY: _____ DATE/TIME _____ RECEIVED BY: (LAB) _____ DATE/TIME 5/7/08 1615

A-17/22

5. Priority Pollutant Information: Please indicate by placing an "X" in the appropriate box by each listed chemical whether it is "Suspected to be Absent," "Known to be Absent," "Suspected to be Present," or "Known to be Present" in your manufacturing or service activity or generated as a by-product. (Some compounds are known by other names. An asterisk notes those compounds (*).)

Item No.	Chemical or Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
1.	Asbestos (fibrous)	X			
2.	Cyanide (total)	X			
3.	Antimony (total)	X			
4.	Arsenic (total)	X			
5.	Beryllium (total)	X			
6.	Cadmium (total)	X			
7.	Chromium (total)	X			
8.	Copper (total)				X
9.	Lead (total)	X			
10.	Mercury (total)	X			
11.	Nickel (total)	X			
12.	Selenium (total)	X			
13.	Silver (total)	X			
14.	Thallium (total)	X			
15.	Zinc (total)			X	
16.	Acenaphthene	X			
17.	Acenaphthylene	X			
18.	Acrolein	X			
19.	Acrylonitrile	X			
20.	Aldrin	X			
21.	Anthracene	X			
22.	Benzene	X			
23.	Benzidine	X			
24.	Benzo (a) anthracene*	X			
25.	Benzo (a) pyrene*	X			
26.	Benzo (b) fluoranthene	X			

A-13/22

Item No.	Chemical Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
27.	Benzo (g, h, I) perylene*	X			
28.	Benzo (k) fluoranthene*	X			
29.	a-BHC (alpha)	X			
30.	b-BHC (beta)	X			
31.	d-BHC (delta)	X			
32.	g-BHC* (gamma)	X			
33.	Bis (2-chloroethyl) ether*	X			
34.	Bis (2-chloroethoxy) methane*	X			
35.	Bis (2-chloroisopropropyl) ether*	X			
36.	Bis (chloromethyl) ether*	X			
37.	Bis (2-ethylhexyl) phthalate*	X			
38.	Bromodichloromethane*	X			
39.	Bromoform*	X			
40.	Bromomethane*	X			
41.	4-Bromophenylphenyl ether	X			
42.	Butylbenzyl phthalate	X			
43.	Carbon tetrachloride*	X			
44.	Chlordane	X			
45.	4-Chloro-3-methylphenol*	X			
46.	Chlorobenzene	X			
47.	Chloroethane*	X			
48.	2-Chloroethylvinyl ether	X			
49.	Chloroform	X			
50.	Chloromethane*	X			
51.	2-Chloronaphthalene	X			
52.	2-Chlorophenol*	X			
53.	4-Chlorophenylphenyl ether	X			
54.	Chrysene*	X			
55.	4,4'-DDD*	X			
56.	4,4'-DDE*	X			
57.	4,4'-DDT*	X			
58.	Dibenzo (a, h) anthracene*	X			
59.	Dibromochloromethane*	X			
60.	1,2-Dichlorobenzene*	X			

A-19/22

Item No.	Chemical or Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
61.	1,3-Dichlorobenzene*	X			
62.	1,4-Dichlorobenzene*	X			
63.	3,3'-Dichlorobenzidine	X			
64.	Dichlorodifluoromethane*	X			
65.	1,1-Dichloroethene*	X			
66.	1,2-Dichloroethene*	X			
67.	1,1-Dichloroethene	X			
68.	Trans-1,2-dichloroethene*	X			
69.	2,4-Dichlorophenol	X			
70.	1,2-Dichloropropane*	X			
71.	(cis & trans) 1,3-Dichloropropene*	X			
72.	Dieldrin	X			
73.	Diethyl phthalate*	X			
74.	2,4-Dimethylphenol*	X			
75.	Dimethyl phthalate	X			
76.	Di-n-butyl phthalate	X			
77.	Di-n-octyl phthalate*	X			
78.	4,6-Dinitro-2-methylphenol*	X			
79.	2,4-Dinitrophenol	X			
80.	2,4-Dinitrotoluene	X			
81.	2,6-Dinitrotoluene	X			
82.	1,2-Diphenylhydrazine*	X			
83.	Endosulfan I*	X			
84.	Endosulfan II*	X			
85.	Endosulfan sulfate	X			
86.	Endrin	X			
87.	Endrin aldehyde	X			
88.	Ethylbenzene	X			
89.	Fluoranthene	X			
90.	Fluorene*	X			
91.	Heptachlor	X			
92.	Heptachlor epoxide	X			
93.	Hexachlorobenzene*	X			
94.	Hexachlorobutadiene	X			

A-20/22

Item No.	Chemical or Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
95.	Hexachlorocyclopentadiene*	X			
96.	Hexachloroethane*	X			
97.	Indeno(1,2,3,-cd)pyrene*	X			
98.	Isophorone*	X			
99.	Methylene chloride*	X			
100.	Naphthalene	X			
101.	Nitrobenzene	X			
102.	2-Nitrophenol*	X			
103.	4-Nitrophenol*	X			
104.	N-nitrosodimethylamine*	X			
105.	N-nitrosodi-n-propylamine*	X			
106.	N-nitrosodiphenylamine*	X			
107.	PCB-1016*	X			
108.	PCB-1221*	X			
109.	PCB-1232*	X			
110.	PCB-1242*	X			
111.	PCB-1248*	X			
112.	PCB-1254*	X			
113.	PCB-1260*	X			
114.	Pentachlorophenol	X			
115.	Phenanthrene	X			
116.	Phenol	X			
117.	Pyrene	X			
118.	2,3,7,8-Tetrachlorodibenzo-p-dioxin*	X			
119.	1,1,2,2-Tetrachloroethane*	X			
120.	Tetrachloroethene*	X			
121.	Toluene*	X			
122.	Toxaphene	X			
123.	1,2,4-Trichlorobenzene	X			
124.	1,1,1-Trichloroethane*	X			
125.	1,1,2-Trichloroethane*	X			
126.	Trichloroethene*	X			
127.	Trichlorofluoromethane*	X			
128.	2,4,6-Trichlorophenol	X			

A-21/22

Item No.	Chemical or Compound	Suspected Absent	Known Absent	Suspected Present	Known Present
129.	Vinyl chloride*	X			

6. For chemical compounds in F-5 which are indicated to be "Known Present", please list and provide the following data for each: (attach additional sheets if needed).

Item No.	Chemical or Compound	Annual Usage (Lbs.)	Estimated Loss To Sewer (Lbs./Year)
8	Copper		Trace < 1 pound / year

SECTION G: SIGNATURE

The information contained in this questionnaire is familiar to me and to the best of my knowledge and belief; such information is true, complete, and accurate.

Signature of Official 07/14/88 Date

A-22/22

Swage

Baseline Monitoring Report (BMR)
Contents as required by 40 CFR 403

1. Identifying Information – This section must include the users name and address of the facility including the facility owners and operators.

2. Permits - The BMR must contain a list of all environmental permits held by the facility.

3. Description(s) of Operations – This section must contain a brief description of the nature, average rate of production, and the Standard Industrial Classification (SIC) and the National (NACIS) of the user. This section should also include a schematic process (es) diagram, which indicates points of discharge to the sanitary sewer from the process (es) regulated by the category.

4. Flow Measurement – This section must contain information on the average daily and maximum daily flow in gallons per day from all regulated process wastestreams and any other nonregulated wastestreams.

5. Measurement of Pollutants – This section requires that you collect a sample in proportion to the flow for all pollutants regulated by the category. For those pollutants, which are not suitable for composite sampling (cyanide, volatile organic compounds, oils and greases, pH, and Phenolics), a minimum of four grab samples must be collected. These samples must be collected during normal operations and representative of normal operations. This section requires that the following information must be submitted with the BMR sample results: the sample date(s), time when sample(s) collected, description of location where sample was collected, the method used to analyze the sample (must be an EPA approved method for water analysis), and a statement certifying that all sampling and analysis were performed according to EPA standards and is representative of normal work cycles and expected pollutant discharges.

6. Certification – This section requires that the BMR be certified by the authorized representative of the facility and by a qualified professional. This certification must state whether or not the pretreatment standards (if applicable) are being met on a consistent basis. Jacksonville Wastewater Utility reserves the right of approval for the qualified professional based upon the individuals qualifications.

7. Compliance Schedule – If the BMR indicates that pretreatment standards (if applicable) are not being met, and then the BMR must contain a compliance schedule designed to achieve consistent compliance with pretreatment standards.

Industrial User Baseline Monitoring Report

Instructions: Please complete this form in as much detail as possible. Include additional information on attached sheets as necessary. Refer to the supplemental instructions and return this report to the address shown in the instructions.

1. Company Information

A. Legal Name: Crosby National Swage Co.

Mailing Address: P.O. Box 906
Jacksonville, AR. 72076

B. Facility Name: National Swage Co.

Legal Address: 2511 W. Main St.
Jacksonville, AR. 72076

C. Name of Owner(s): The Crosby Group, Inc.

D. Name of Operator(s): Mike Chandler - General Manager

E. Facility Contact (Please provide the name, title, phone number, and e-mail address of a designated person as a contact person for permit issues or if additional information is necessary.): Barry Temple Safety Director

501-982-3112 barrytemple@thecrosbygroup.com

F. Total Number of Employees: 62 - 65 Admin. 15 Prod. 47

G. Number of Shifts: 2 Hrs. of Shifts: 7:00-3:30 3:30-12:00

H. Total Months in Operation Last Year: 12

I. Total Years in Operation at Present Site: 30

J. Provide the name of the publicly owned treatment works that received the wastewater discharges from this facility. If this facility is not connected to a sewerage system, describe where wastewater is discharged.
Jacksonville wastewater Utility

B-2/7

2. Nature of Operation

A. List Raw Materials Used: Steel Forgings, Steel Tubing

B. List Chemicals Used: Castrol Syntillo 9930 coolant
MPGO Rust Preventative
Quench 70 oil
Renoclean PS 45

C. Describe Manufacturing or Service Activities Conducted and Final Product(s):
Milling forgings
Drilling forgings to make Connecting Links & hooks
Sawing Tubing
Machining Tubing
Pressing Tubing to make Sleeves

D. Summarize Each Regulated Process (include Process Description, Production Rate, Pretreatment Standards Category(s), 40 CFR Subpart, SIC/NACIS Code(s):
No Regulated Processes

B-3/7

3. **Wastewater Flow**

A. Total Plant Flow in Gallons Per Day (gpd):

Average: 0

Maximum: 0

B. Individual Process Flows in Gallons Per Day (gpd): (Continuous, Batch or None)

Regulated Process	Avg. Flow Rate (gpd)	Max. Flow Rate (gpd)	Type of Discharge
None			

Unregulated Process	Avg. Flow Rate (gpd)	Max. Flow Rate (gpd)	Type of Discharge
NONE			

Cooling Water: None - Closed Loop

Sanitary Wastewater: approx. 1200 gpd

C. Provide on a separate sheet:

N/A 1.) A schematic drawing or flow chart of each regulated process that generates wastewater.

N/A 2.) A schematic drawing showing **all** wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations.

4. Nature and Concentration of Pollutants

A. Analysis of Regulated Process Flows

The industrial user must perform sampling and analysis of the effluent from all generated processes (after treatment, if possible). Provide the analytical data for the regulated processes flows in the spaces provided below. Attach additional sheets if necessary. Only those pollutants specifically regulated by the applicable category need be reported.

Regulated Process(s): N/A

mg/L	pH	BOD_5	TSS	O&G	Phenols	CN-	Cd(t)	Cr(t)	Cu(t)	Pb(t)	Ni(t)	Ag(t)	Zn(t)
1Avg.													
1Max.													
2Avg.													
2Max.													
3Avg.													
3Max.													

Sample(s) Location: _____

Sample Type(s): (composite samples are required except where not feasible)_____

Number of Samples and Frequency Collected: _____

Analytical Methods Used: _____

B. Analysis of Total Plant Flow (if applicable)

An Industrial User may sample and analyze the total plant flow and calculate an equivalent concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

mg/L	pH	BOD_5	TSS	O&G	Phenols	CN-	Cd(t)	Cr(t)	Cu(t)	Pb(t)	Ni(t)	Ag(t)	Zn(t)
MEC*													
AEC*													
AMMC*													
AMA*													

Sample Location: _____

Sample Type(s): (composite samples are required except where not feasible)_____

Number of Samples and Frequency Collected: _____

Analytical Methods Used: _____

* MEC – Maximum Equivalent Concentration (derived through the combined wastestream formula)
* AEC – Average Equivalent Concentration (derived through the combined wastestream formula)
* AMMC – Actual Measured Maximum Concentration
* AMA – Actual Measured Average

5. Wastewater Treatment

Briefly describe any and all wastewater treatment utilized (show treatment system location) in relation to process flows on schematic drawing, as required by question 3.C.

No wastewater treatment utilized

6. Environmental Control Permits

Describe all environmental control permits held by or for the Facility.

Type & Title of Permit	Permit Number	Issuing Agency	Expiration Date
Storm Water	ARR00c366	ADEQ	12/29/08
Industrial Water	86-03-01	City Jacksonville	12/30/03

7. Compliance Certification

A. Is the facility meeting the applicable categorical pretreatment standards on a consistent basis? Yes_____ No _____ N/A X_____

B. If no, do you require:
   1.) Additional operation and maintenance (O&M) to achieve compliance? Yes _____ No _____
   2.) New or additional pretreatment facilities to achieve compliance? Yes _____ No _____

C. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, attach a schedule on a separate sheet projecting increments of progress indicating dates for the commencement and completion of major events leading to compliance with the standard. **Note:** the final compliance date in this schedule shall not be later than the compliance date for the applicable pretreatment standard. Written progress reports are required within 14 days of each of the compliance dates specified in the compliance schedule.

8. Signatory Requirement

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

Mike Chandler

Name of Authorized Representative (Please Print)

Mike Chandler

Signature

General Manager

Official Title (Please Print)

4-29-03

Date of Signing

JACKSONVILLE WASTEWATER UTILITY

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.

87-05-06

In accordance with all terms and conditions of Jacksonville Municipal Code: Section 13. 24 and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to **Graphic Packaging International.**

Classified by SIC #: **2673, 2674, 2679, & 2759** NACIS # **322223, 322224, 322299, & 323112.**

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility sewer lines at **1031 North Redmond Road .**

This Permit is granted in accordance with the application filed on **July 15, 2008** 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 on: **First day of January, 2009**

Expires on: **Thirty-First day of December, 2011**

General Manager,
Jacksonville Wastewater Utility

C-1/8

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 at 1031 North Redmond Road. . The source of water for this facility is Jacksonville Municipal Waterworks, account number A1031870000. The water meter for this facility is located along the west (front) side of the building, in the Southwest corner.

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Parameters	Daily Max. (ug/L)	Max. Monthly Average (ug/L)	Monitoring Requirements (E, SC, S)
Biochemical Oxygen Demand (5-Day)	-----	250000.0*1	SC, S *3
Total Suspended Solids	-----	250000.0*1	SC, S *3
Oil & Grease	-----	100000.0*1	SC, S *2
Cadmium	160.0	160.0	E, S *3
Chromium	2000.0	2000.0	E, S *3
Copper	1220.0	1220.0	E, S *3
Cyanide	190.0	190.0	E, S *2
Lead	220.0	220.0	E, S *3
Nickel	2010.0	2.010.0	E, S *3
Silver	410.0	410.0	E, S *3
Zinc	1510.0	1510.0	E, S *3
TTO		-----	E, S *2
Flow	Report Monthly with IUSM Report		
pH Maximum (instantaneous)	11.00 S.U.		
pH Minimum (instantaneous)	5.00 S.U.		

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

*1. Exceedances of these parameters are not considered a violation be the City of Jacksonville, Municipal Code: Section 13. 24, 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).

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. The flow shall be monitored by use of the Jacksonville Municipal Waterworks water meter. This meter reading for billing purposes shall also be used for total consumption flow.

2. The Permittee will monitor the discharge from a manhole located in the roll storage area inside the facility. To arrive at this area, you must enter the plant on the north side, at a door adjacent (east) of the loading dock. Proceed approximately 25 feet south until you come to an aisle, turn to your left at the aisle and proceed approximately 35 feet east. You are now at an area that is fenced-off by steel bars. There is a manhole located within the center of this area. This is the sampling manhole. The Permittee shall sample at the frequency specified. Samples designated as 1 sample every 6 months shall collect a sample during January – June and the second 6 month period shall be July – December All samples shall be grab samples unless otherwise indicated.

BOD_5		-2 samples every month*
TSS		-2 samples every month*
Copper	(total)	-2 samples every month*
Zinc	(total)	-2 Samples every month*
O&G		-2 samples every month
pH		-2 samples every month
Chromium	(total)	-1 sample every 6 months*
Cadmium	(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*
40 CFR 122: Tables II & III		**- on or before March 31, 2011, this sample shall be collected and analyzed for permit renewal purposes.**

*-Denotes composite sample
¤-Denotes sample for permit renewal purposes

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 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.

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, Municipal Code: Section 13.24)

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, Municipal Code: Section 13.24)

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, Municipal Code: Section 13.24)

2. REPORTING REQUIREMENTS

A. The Permittee will submit monthly self-monitoring reports for the pollutants monitored during the previous month. These reports are due by the last day of the month for all samples collected 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 **February 28, 2009** for samples collected in **January of 2009**. (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, of the discharge limits listed in this permit, 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, Municipal Code: Section 13.24)

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 (copy must be on file with JWU) 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 Permitee 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 Permitee 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 Standards specified in Part 1 of this Permit, then the Permitee will resample for that pollutant within 30 days, unless the Permittee has samples for that parameter since the violation. (40 CFR403.12.g)

4. BY PASS OF TREATMENT OPERATIONS

A. For the purpose of this provision, a bypass shall be considered the intentional diversion of a wastestream that normally receives treatment from any portion of wastewater pretreatment operation.

B. Bypassing the wastewater treatment operation is prohibited except under the following conditions:

(1) The bypass is necessary to prevent substantial physical damage to property or the pretreatment facilities, of the loss of life, or personal injury.

(2) There are no feasible alternatives to the bypass such as an alternative treatment system or storage.

C. A bypass that will not cause a violation of the pretreatment standards is allowed if the bypass is essential for maintenance of the treatment system.

D. The Permittee will notify the Utility by telephone of any bypass that could result in a violation of pretreatment standards, within twenty-four (24) hours of becoming aware of the bypass. The Utility shall require a written report on the bypass after receiving oral notification within five (5) working days after the bypass has occurred.

PART IV: STANDARD CONDITIONS

1. The Permittee shall comply with all general prohibitive discharge standards in the City of Jacksonville, Municipal Code: Section 13.24.

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, Municipal Code: Section 13.24)

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, Municipal Code: Section 13.24)

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, Municipal Code: Section 13.24)

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, Municipal Code: Section 13, 24 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, Municipal Code: Section 13. 24, 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 Municipal Code: Section 13.24, State of Arkansas regulation, or EPA regulation may result in the Utility seeking applicable fines and penalties as outlined in City of Jacksonville Municipal Code: Section 13.24.

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 Municipal Code: Section 13.24.

13. Permit Expiration – **This permit comes due for renewal on December 31, 2010. The Permittee must contact the Utility to apply for re-issuance of the permit at least 180 days prior to the expiration date (12/31/2011)**. The Utility will notify the Permittee of this responsibility 90 days before the reapplication date. (City of Jacksonville, Municipal Code: Section 13.24).

C- 8/8

JACKSONVILLE WASTEWATER UTILITY

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.

86-04-01

In accordance with all terms and conditions of Jacksonville Municipal Code: Section 13.24 and also with any applicable provisions of Federal or State law or Regulation. Permission is hereby granted to **UNIVAR USA Inc.**

Classified by **SIC No. 5169 NACIS No. 42269**

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility sewer lines at **1925 North Redmond Road, Jacksonville, Arkansas.**

This Permit is granted in accordance with the application filed on **August 18, 2008** 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 on this Date: **First day of January, 2009**

To expire on this Date: **Thirty-First of December, 2011**

General Manager,
Jacksonville Wastewater Utility

D-1/3

PART I: LIMITATIONS

The Permittee shall not exceed the effluent limitations stated below for all waters discharged to the City of Jacksonville Sanitary Sewer System at 1925 North Redmond Road. The source of water for this facility is Jacksonville Municipal Waterworks, account number A103 233 0000. The water meter for this facility is located along the west (front) side of the building. The meter is adjacent to the back-flow preventer housing.

Parameters	Total Monthly Mass Discharge (lbs/month)	Max. Monthly Average (mg/L)	Monitoring Requirements (E, SC, S)
Biochemical Oxygen Demand (5-Day)	-----	250.0	SC, S *1*2
Total Suspended Solids	-----	250.0	SC, S *1*2
Oil & Grease	-----	100.0	SC, S *1*2
Cadmium	0.0394		E, S *2*3
Chromium	0.5004		E, S *2*3
Copper	0.3040		E, S *2*3
Lead	0.0550		E, S *2*3
Nickel	0.5029		E, S *2*3
Silver	0.1030		E, S *2*3
Zinc	0.3778		E, S *2*3
Mercury	0.0000834		E, S *2*3
Flow (gallons/batch discharge)		REPORT ONLY	
pH Maximum (instantaneous)	11.00 S.U.		*2
pH Minimum (instantaneous)	5.00 S.U.		*2

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

*1. Exceedances of these parameters are not considered a violation be the City of Jacksonville, Jacksonville Municipal Code: Section 13.24, 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. Limits for the discharge shall be determined by the formula:

D X C = C+

Where D = Number of days since last discharge
C = Daily maximum concentration
C+ = Concentration allowed for discharge

Attached to this permit are the equivalent concentration limits for these pollutants discharged at 1000, 1500, and 2000 gallons per month.

D-2/3

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 from Univar USA Inc. into the City of Jacksonville Sanitary Sewer system at 1925 North Redmond Road. The samples shall be collected from the pH adjustment tank, located at the rear of the facility, at the frequency specified. The volume of the discharge (flow) shall be determined by observing the gradient measurement device, located on of the pH adjustment tank, prior to discharge to the sanitary sewer. All samples shall be grab samples collected after the wastewater in the tank is mixed prior to discharge into the sanitary sewer.

BOD_5		-1 sample every batch discharged
TSS		-1 sample every batch discharged
O&G		-1 sample every batch discharged
pH		-1 sample every batch discharged
Cyanide	**(total)**	**-1 sample every batch discharged**
Total Recoverable Phenolics	**(total)**	**-1 sample every batch discharged**
Antimony	**(total)**	**-1 sample every batch discharged**
Arsenic	**(total)**	**-1 sample every batch discharged**
Beryllium	**(total)**	**-1 sample every batch discharged**
Cadmium	(total)	-1 sample every batch discharged
Chromium	(total)	-1 sample every batch discharged
Copper	(total)	-1 sample every batch discharged
Lead	(total)	-1 sample every batch discharged
Nickel	(total)	-1 sample every batch discharged
Thallium	**(total)**	**-1 sample every batch discharged**
Selenium	**(total)**	**-1 sample every batch discharged**
Silver	(total)	-1 sample every batch discharged
Zinc	(total)	-1 sample every batch discharged
Mercury	**(total)**	**-1 sample every batch discharged**
40 CFR 122: Table III	**- Collected and analyzed on or before March 31, 2010, should batch be discharged. This sample shall be collected and analyzed for permit renewal purposes.**	

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 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. All sample results shall be reported using the MQL limits attached to this document. All sampling results shall be reported in micrograms per liter when possible.

D-3/3

To: Little Rock Air Force Base (LRAFB) Correspondence File -- 2009

From: Jon Boyles, Pretreatment Coordinator
Sal Pappalardo, Pretreatment Inspector

Subject: 2009 Annual Inspection Report

Date: July 28 , 2009

An annual pretreatment inspection was performed at LRAFB by Jon Boyles, JWU Pretreatment Coordinator and Sal Pappalardo, JWU Pretreatment Inspector, on Thursday and Friday, July 9 & 10, 2009. The escort for this inspection was Mr. Malcolm Windsor, Environmental Engineer. The purpose of this inspection was to provide an overview into the operations of the base. Areas of major emphasis observed during the inspection included the following areas: Motor Pool, Aircraft Ground Equipment, Aircraft Wash Rack Hanger, Corrosion Control, Fuel Cell, Hospital (now Clinics), National Guard (Air) Facility (Aircraft Wash Rack), Nondestructive Inspection, Engine Test Cell, and the Grease Traps located throughout the base. A summary of the inspection will be entered at the bottom of this report. From the information obtained during the inspection and the information contained within Jacksonville Wastewater Utility (JWU) files, LRAFB appears to be in compliance with their Industrial Wastewater Discharge Permit.

The following is a summary of the inspection of the major areas that create process wastewater that is disposed of in the sanitary sewer. These areas are inspected on annual basis.

USAF Motor Pool (Buildings: #B-549, #B-550, #B-552, and #B-554): Vehicles are brought in for servicing or repair. There are no floor drains that service these buildings. The mechanic shop has parts washers that utilize a recyclable solvent. These areas use a Tenant/Zamboni type floor scrubber to clean the floor after sweeping and picking up of large solids. Fluids (motor oils, transmission fluids, anti-freeze, and others) are recycled and if unable to recycle, they are sent off site for disposal. There are no oil/water separators for these buildings. All solvent-based parts washers located in this area are not connected to the sanitary sewer and waste solvent is hauled off site for disposal.

USAF Aircraft Ground Equipment "AGE" (Building #B-256): This building performs routine maintenance and repairs for the support equipment used by the aircraft crews during servicing and repair of aircraft. All solvent-based parts washers located in this area are not connected to the sanitary sewer and waste solvent is hauled off site for disposal. Examples of these types of equipment are generators, trailers for loading and transportation, fuel tank bowsers, gray water bowsers, and other related equipment. This building uses a Tenant/Zamboni type floor scrubber to clean the floor after sweeping and picking up of large solids.

USAF Aircraft Wash Rack Hangar (Building #B-228): This area is a large hangar that is big enough to hold the whole aircraft. Aircraft are brought into this building to be washed and waxed. The Hangar is currently using the following compounds to wash and wax the aircraft: Areo-Wash IV (alkaline detergent) & PC-1020 (Soil Barrier-Wax). This building uses a

Tenant/Zamboni type floor scrubber to clean the floor after sweeping and picking up of large solids. The oil/water separator for this building has been removed.

USAF Corrosion Control (Buildings #B-282 & B-208): This area is a large paint and prep hangar. A dry painting system has been installed and filters are used to trap airborne particles. Very little wastewater is generated at this location, with the primary source being from the bathroom facilities. This building uses a Tenant/Zamboni type floor scrubber to clean the floor after sweeping and picking up of large solids.

A canister that has a small quantity of alodine (approximately one ounce) within a crushable vessel that has a paint brush/swap attached has replaced the alodine coating dip, for surface preparation. When the vessel of alodine is crushed, the alodine is released to the brush/swab and the brush/swab applies the alodine to the area that has been prepared. After this operation, the area can now be painted. The wastes from this process have been approved for disposal in the dumpster.

USAF Fuel Cell (Building #295): This building is similar to a Gas Station that provides Fuel for Aircraft. Trucks can carry Fuel to the plane on Portable tanks. These tanks are called Bowers. If an aircraft is experiencing fuel tank problems, the fuel tanks are off-loaded into fuel tank bowsers and the aircraft's fuel tanks are brought to this building. The tanks are pressure tested and the site of the leak is determined and marked for repair. The fuel tank bowsers are taken to the tank bottoms water treatment system for fuel reclamation. No drains are located in this building or can any Fuel reach the sanitary sewer from this building.

USAF Hospital (Building #B-1090): All X-Ray and Dental work has gone to digital processes.

Air National Guard Facility (Buildings #B-126, & B-207): Located in Building 126, are a garage, administrative offices, and vehicle wash rack. The only floor drain in this building has been removed. The vehicle wash rack operates similar to a self-service car wash. There is a high-pressure washer, and detergent and rinse water used are similar to the ones used in civilian car washes. A Tenant/Zamboni floor scrubber is used to remove the used wash water in the wash rack before filtering and disposal down the sanitary sewer. The fire station is also located within this building and shares equipment with Building 126.

In Building 207, aircraft are washed, tires are washed and inspected, and small engine repairs are performed. The washing of the aircraft is performed similar to the USAF operation and the same chemicals are used to wash and wax the aircraft. The tires and wheels are washed using Areo Wash IV and a tire washer that recycles the wash solution. The spent solution is filtered before disposal to the sanitary sewer. The engine repair facility has an aqueous parts washer similar to the unit mentioned above. The waste solids collected in the screening of the wash water are allowed to dry before disposal as hazardous wastes. There is also a small (approx 20 gallon) solvent part washer located in the engine repair facility that is not connected to the sanitary sewer. The solvent is hauled off site for disposal.

Nondestructive Inspection (Building #B-368): This facility inspects parts from aircraft and other machinery for wear and fatigue. A process is used in which a part is immersed in a

florescent liquid (penetrant) and allowed to drain. After draining, the part is rinsed and inspected under ultraviolet lighting. Any imperfection is dramatically illuminated by the ultraviolet light and marked for repair. Another process utilizes applying a small electrical current to the part and measuring any increase or decrease in the magnetic field of the part. The instrument used to inspect the part will also aid in identifying the area of the imperfection. This section also uses an X-Ray inspection process for fine examination of the parts. The spent fixer and developer are disposed at the existing silver recovery system located in the building.

Engine Repair and Testing Facilities (Building #B-390 &B-391): This facility performs the major engine repairs and testing for the entire base. This facility is a jointly run operation between Air National Guard (Building 390), USAF (Building 391), and private contractors. The private contractors are the firms that have built the aircraft or are doing modifications to the aircraft. This facility has the majority of its operations performed outside. A concrete pad covers this entire area. The run-off from this pad goes through socks or booms to skim and/or collect any excess petroleum products before going to a separate catch basin. There is a valve located within this catch basin that allows the water to be routed to solvent socks that filters out the oily wastes before entry to the sanitary sewer.

Tank Bottoms Water Treatment System (Buildings #B-1340 & B-1342): This system is responsible for the removal of water, which has combined with petroleum solutions from fuel tanks. The solutions are pumped to a holding tank until a determined amount (approximately 250 gallons) is collected. The solution is then pumped to activated charcoal filters, which attract the petroleum solution and allows the water to pass through minus the petroleum solution. The initial test results collected from this system are located in the correspondence file. These results show the concentrations before and after the system was used to remove the petroleum solutions.

Metals Technology (Building #B-246): Basically a machine shop that performs these operations: Tooling &Tap & Die, Welding, Polishing, Cutting and Grinding. Tooling has self-contained cooling water that has mineral spirits added. There are no existing drains or any way to receive influent to wastewater plant.

Grease Traps: The grease traps were inspected at the following locations:

- **Hanger 1080** ***1,000*** Gallon Trap – Needs Pumping
- **DFAC:** ***5,000*** Gallon Trap --Good Condition
- **Anthony's Pizza:** ***750*** Gallon Trap – Good Condition
- **Chief Williams Express:** ***1,000*** Gallon Trap – Facility Closed
- **Commissary:** ***1,000*** Gallon Trap -- Good Condition
- **Golf Center:** *Interceptor outside bldg.* – Facility Closed
- **Bowling Center:** ***100*** Gallon Interceptor – Needs Pumping
- **Shoppette / Popeyes:** ***1,000*** Gallon Trap – Needs Pumping
- **Burger King:** ***500*** Gallon Trap – Good Condition
- **Conference Center:** ***1000*** Gallon Trap – Needs Pumping,
- Open Drain needs to be sealed, also vent or c/o open.
- **Flight Kitchen:** ***100*** Gallon Interceptor Outside – Good Condition
- **Razorback Café:** ***5000*** Gallon Trap – Good Condition

Summary: The purpose of this inspection was to provide an overview into the operations of the base and the second was to inspect the grease traps. I was very impressed by the energy and dedication of personnel operating the base and achieving compliance under their Industrial Wastewater Discharge Permit.

JWU will address any requirements, recommendations and suggestions that have resulted from this inspection in the *Post Inspection Findings—2009* report, which will be presented concurrently with this report.

JACKSONVILLE WASTEWATER UTILITY
INDUSTRIAL WASTEWATER DISCHARGE PERMIT FACT SHEET

Industry Name:	**Altivity Packing Inc.**
Mailing Address:	**1031 North Redmond Road** **Jacksonville, Arkansas 72076**
Facility Location:	**Same**
Main Phone #:	**(501) 982-1573**
Contact Person:	**Mr. Gary Burgess**
Title:	**Safety & Environmental Manager**
Telephone Number:	**(501) 985-5306**
Cell:	**(501) 766-2281**
Fax Number:	**(501) 985-0385**
E-Mail:	www.gary.burgess@altivity.com
Secondary Contact Person:	**Mr. Robert Dorton**
Title:	**Maintenance Engineer**
Telephone Number:	**(501) 985-5353**
E-Mail:	www.robert.dorton@altivity.com
Signatory Authority:	**Mr. Narzell Davenport**
Title:	**Plant Manager**

Environmental Permits Issued to the Facility:

1.	ADEQ Stormwater Permit:	ARR00B455
2.	ADEQ Air Emissions:	1039-AR-3
3.	JWU Industrial Wastewater Discharge Permit:	87-05-06

Altivity Packaging Inc. (API) produces multi-wall paper bags and multi-wall paper bags with plastic liners. The majority of the bags are printed at this location with a company's logo(s) and for the content and weight of the bag. These bags are used to contain 25 to 80 pounds of animal feed, concrete mix, mortar mix, seeds, and many other bulk uses. The first step in the process of making paper bags is the selection of the paper. The majority of these bags are made from Kraft paper (Brown Grocery Bag Paper), which is mounted on the printing press. The surface of the press is loaded with a die (similar to a rubber stamp, but approximately 3' x 5' in size) and the correct inks are selected and loaded. After being fed through the press and printed, the paper is re-rolled at the end of the press.

After printing, the printed / or non-printed roll of paper is loaded on a creaser or folding machine. The paper is cut, folded, and glued during its time on this machine. API uses cornstarch as its main glue to hold together the various layers of the bag. If the bag has a plastic liner, special glue is used to bond the plastic liner to the rest of the layers. After this process, the bags are stacked on pallets and shipped to the customers. The process water produced is from the wash down of dies and cornstarch glue residues. The waste stream is treated by an Alar system that coagulates the wastes and filters out the solids with diatomaceous sand. The solid and sand mixture is disposed at Two-Pine Landfill.

JACKSONVILLE WASTEWATER UTILITY

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.

03-06-09

In accordance with all terms and conditions of Jacksonville City Ordinance No. 1360, amendments, and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to **Avery Septic Tank Cleaning**

Classified by SIC No. **7699** NACIS No. **562991**

For the contribution of Portable Toilet Wastes into the Jacksonville Wastewater Utility sewer lines at **J. Albert Johnson Regional Treatment Facility** .

This Permit is granted in accordance with the application filed on **January 27, 2009** in the office of 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 On: **March 6, 2009**

Expires On: **December 31, 2011**

General Manager,
Jacksonville Wastewater Utility

G-1/7

PART I: LIMITATIONS

1. JWU requires a telephone call, one hour prior to arrival time at the POTW. This telephone call is used for the purpose of checking on whether conditions are favorable for the disposal of wastewater collected during septic tank cleaning operations. These waters are to be discharged at the Influent Gate Structure located at the J. Albert Johnson Regional Treatment Facility.

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 *2
Total Suspended Solids	-----	250.0 *1	SC, S *2
Oil & Grease	-----	100.0 *1	SC, S *2
Cadmium	0.160	0.160	E, S *2
Chromium	2.000	2.000	E, S *2
Copper	1.220	1.220	E, S *2
Cyanide	0.190	0.190	E, S *2
Lead	0.220	0.220	E, S *2
Nickel	2.010	2.010	E, S *2
Silver	0.410	0.410	E, S *2
Zinc	1.510	1.510	E, S *2
Table II 40 CFR 122			E, S *2
Flow	Volume is determined by truck tank capacity		
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 be the City of Jacksonville, Ordinance 1360, 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.

PART II: MONITORING REQUIREMENTS

1. All monitoring shall be performed by the Utility. All costs associated with monitoring shall be the responsibility of the Permittee. Enforcement monitoring shall be conducted at the discretion of the Utility. Normal monitoring shall be conducted at the frequency listed below along with the parameters to be sampled and tested.

2. The Utility will monitor the discharge from the tank on the pump truck as it discharges at Influent Gate Control Structure. All samples shall be grab samples unless otherwise indicated.

BOD_5		-1 sample every 12 months
TSS		-1 sample every 12 months
O&G		-1 sample every 12 months
Cyanide	(total)	-1 sample every 12 months
NH_3N	(total)	-1 sample every 12 months
Chloride	(total)	-1 sample every 12 months
pH		-1 sample every 12 months
Arsenic	(total)	-1 sample every 12 months
Cadmium	(total)	-1 sample every 12 months
Chromium	(total)	-1 sample every 12 months
Copper	(total)	-1 sample every 12 months
Lead	(total)	-1 sample every 12 months
Mercury	(total)	-1 sample every 12 months
Nickel	(total)	-1 sample every 12 months
Silver	(total)	-1 sample every 12 months
Zinc	(total)	-1 sample every 12 months

Pollutants Listed in Table II 40 CFR 122
-1 sample 6 months prior to permit renewal

3. All sample collection, 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. REPORTING REQUIREMENTS

A. In case of an accidental discharge, Jacksonville Wastewater Utility requires the discharge to be ceased immediately and corrective actions to be taken by the Permittee to prevent any further accidental discharge.
(City of Jacksonville, Ordinance No. 1360 – Section 13.24.15)

B. Should the Permittee collect samples, the Permittee will submit a report to the Utility indicating when samples were collected, results of the analysis, and when the wastes were discharged to the sanitary sewer. The report must contain a signed statement that all sampling and analysis was performed according to EPA regulations.
(40 CFR 403.12)

C. The Permittee shall notify the Utility's Pretreatment Coordinator / Laboratory Department, by telephone, within one (1) business day of becoming aware of the violations of the conditions of this permit.
(40 CFR 403.12.G.2)

D. The Permittee shall notify the Utility prior to the introduction of new wastewater, pollutants (MSDS), or any substantial change in the volume or characteristic of the wastewater being discharged to the sanitary sewer. This notification shall be written and the Permittee must receive the Utility's approval before the changes can occur.
(City of Jacksonville, Ordinance No. 1360 – Section 13.24.20)

E. All reports required by this permit must be signed by either: the owner, general partner, a principal executive officer that is at least at 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))

2. SPECIAL CONDITIONS

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

B. The Permittee shall abide by the JWU "Policy on the acceptance of Septic Tank, Holding Tank, and Portable Toilet Waters to the Sanitary Sewer System" rules and regulations and JWU's "Guidelines for Disposal of Liquid Wastes." All Permittees shall obtain and maintain in force during the term in which they discharge to the sanitary sewer system, a standard insurance coverage with respect to liability and property damage, with coverage being in the amount of at least $1,000,000 per occurrence and the Permittees shall provide the Utility with such certificates evidencing such insurance coverage prior to discharge.
(Jacksonville Wastewater Utility Policies – Policy of acceptance of Septic Tank, Holding, and Portable Toilet Waters to the Sanitary Sewer System)

PART IV: STANDARD CONDITIONS

1. The Permittee shall comply with all general prohibitive discharge standards listed in the City of Jacksonville Ordinance No. 1360
(City of Jacksonville, Ordinance No.1360 – 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. 1360 – Section 13.24.25.3)

3. Records Retention – The Permittee shall retain all records relative to monitoring, analysis, and operations of any process 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. 1360– Section 13.24.13)

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. 1360 – Section 13.24.18)

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. 1360, 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.
(City of Jacksonville, Ordinance no. 1360 – Section 13.24.18.7)

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. 1360, 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.
(City of Jacksonville, Ordinance no. 1360 – Section 13.24.29.2)

G-6/7

8. Penalties – Failure to resolve any violation of this permit, City of Jacksonville Ordinance No. 1360, 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. 1360 – Section 13.24.29
(City of Jacksonville, Ordinance no. 1360 – Section 13.24.29)

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.
(City of Jacksonville, Ordinance no. 1360 – Section 13.24.29.5)

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.
(City of Jacksonville, Ordinance no. 1360 – Section 13.24.25.3)

11. Proper Disposal of Pretreatment Sludge and Spent Chemicals – The Permittee shall dispose of 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, except for that information that is deemed confidential in accordance with the provisions of the City of Jacksonville Ordinance No. 1360.
(City of Jacksonville, Ordinance no. 1360 – Section 13.24.22.1)

13. Permit Expiration – This permit comes due for review on **June 30, 2011.** 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. 1360– Section 13.24.18.6)

Entered 1-29-10 (BP)

JACKSONVILLE WASTEWATER UTILITY
MONTHLY INDUSTRIAL SELF-MONITORING REPORT

Industrial Discharge Permittee Name: LITTLE ROCK AFB

Mailing Address: 19 CES/CEAN 528 THOMAS AVENUE

This report covers the current month for the reports attached.

Sampling Information (please attach sample report)

Month/Year Sample Collected: December 09 Time Collected: see attached

Sample Type (Composite or Grab): Flow Proportional

Sample Preservation: STANDARD

Sample Collected By: AMERICAN INTERPLEX

Flow Reporting

Regulated Process: See Attached (Average) See Attached (Maximum)

Other Flows_____gpd(avg)_____gpd(max)_____Source

Other Flows_____gpd(avg)_____gpd(max)_____Source

Other Flows_____gpd(avg)_____gpd(max)_____Source

Sample Results (Please Attach)

Are the limits in the permit being met? Yes ☺ No _____
If no, please explain:

Certification Statement

All samples were collected and analyzed according to the requirements of 40 CFR 136 and the provisions of my Industrial Discharge Permit. These samples were collected during normal operating periods. 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.

Authorized Signature

21 Dec 09
Date

RECD 1-14-10

H-1/10

Monthly Sewage Report

Date by Month December 2009

FLOW For 02 December ***was*** 2.12 ***MGD***

Flow revised for 0 *time*

		mg/L	*Load lb/D*	*Limit Lb/D*	*Excursions*
Cadmium		0.0066	0.12	*0.235*	☐
Chromium	*LDL*	0.007	0.12	*2.799*	☐
Copper		0.028	0.495	*2.094*	☐
Lead		0.015	0.265	*0.854*	☐
Nickel		0.004	0.076	*3.095*	☐
Silver	*LDL*	0.007	0.124	*0.592*	☐
Zinc		0.066	1.167	*4.014*	☐
Arsenic	*LDL*	0.001	0.02	*1.148*	☐
Cyanide		0.012	0.21	*0.308*	☐
Mercury	*LDL*	0.0002	0.00354	*0.00914*	☐

Other Parameter Limits

BOD:	91	*250 mg/L*
TSS:	96	*250 mg/L*
OG	12	*100 mg/L*
pH:	7	*5.0-11.0*
*Phenols**	0.005	*Report Only*

LDL: Lower Detection Limits

Summary for 'Date' = 12/2/2009 (1 detail record)

	Avg	**Min**	**Max**	**Limit Lb/Day**
Cadmium	0.117	0.117	0.117	**0.265**
Chromium	0.124	0.124	0.124	**2.799**
Copper	0.495	0.495	0.495	**2.094**
Lead	0.265	0.265	0.265	**0.854**
Nickel	0.076	0.076	0.076	**3.095**
Silver	0.124	0.124	0.124	**0.592**
Zinc	1.167	1.167	1.167	**4.014**
Arsenic	0.018	0.018	0.018	**1.148**
Cyanide	0.212	0.212	0.212	*0.308*
Mercury	0.0035	0.0035	0.0035	***0.00914***

1-2/16

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Little Rock Air Force Base
ATTN: Mr. Malcolm Windsor
314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

Dear Mr. Malcolm Windsor:

Project Description: Two (2) water sample(s) received on December 3, 2009
P.O. No. Contract No. FA4460-10-P-0018 Call No. 0865

This report is the analytical results and supporting information for the samples submitted to American Interplex Corporation (AIC) on December 3, 2009. The following results are applicable only to the samples identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the laboratory director or a qualified designee.

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

AMERICAN INTERPLEX CORPORATION

By _____
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

PDF cc: Little Rock Air Force Base
ATTN: Mr. Malcolm Windsor
malcolm.windsor@littlerock.af.mil

H-3/16

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Little Rock Air Force Base
314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 2°C

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

COMMENTS

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

References:

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

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

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

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

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

12-4/10

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Little Rock Air Force Base
314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

ANALYTICAL RESULTS

AIC No. 134333-1
Sample Identification: Outfall Flume 12-3-09 1515

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Recoverable Phenolics	EPA 420.1	< 0.005	0.005	mg/l	W30993	
Total Cyanide	SM4500-CN C,E	0.012	0.01	mg/l	W30992	
pH on-site	EPA 150.1	7.0	-	units	S2714	
Oil and Grease	EPA 1664A	12	5	mg/l	B6059	

AIC No. 134333-2
Sample Identification: Outfall Flume 12/2-3/09 0001-0001

Analyte	Method	Result	RL	Units	Batch	Qualifier
BOD 5-day	SM 5210 B	91	2	mg/l	W30994	
Total Suspended Solids	USGS 3765	96	4	mg/l	W31021	
Arsenic	EPA 200.8	< 0.001	0.001	mg/l	S26847	
Cadmium	EPA 200.8	0.0066	0.004	mg/l	S26847	
Chromium	EPA 200.8	< 0.007	0.007	mg/l	S26847	
Copper	EPA 200.8	0.028	0.001	mg/l	S26847	
Lead	EPA 200.8	0.0015	0.001	mg/l	S26847	
Nickel	EPA 200.8	0.0043	0.001	mg/l	S26847	
Silver	EPA 200.8	< 0.007	0.007	mg/l	S26847	
Zinc	EPA 200.8	0.066	0.002	mg/l	S26847	
Mercury	EPA 245.2	< 0.0002	0.0002	mg/l	S26850	

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AMERICAN INTERPLEX CORPORATION
LABORATORIES

Little Rock Air Force Base
314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

SAMPLE PREPARATION REPORT

AIC No. 134333-1

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Total Recoverable Phenolics	04DEC09 0844 291	07DEC09 1150 291		W30993	
Total Cyanide	04DEC09 0815 291	07DEC09 0910 291		W30992	
pH on-site	-	03DEC09 1522 292		S2714	
Oil and Grease	04DEC09 1046 100	07DEC09 0937 100		B6059	

AIC No. 134333-2

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
BOD 5-day	04DEC09 0911 285	09DEC09 1036 285		W30994	
Total Suspended Solids	08DEC09 1331 285	09DEC09 0856 285		W31021	
Metals	04DEC09 1645 286	10DEC09 0032 270		S26847	
Metals	04DEC09 1645 286	11DEC09 1717 270		S26847	
Mercury	07DEC09 1151 286	08DEC09 1214 286		S26850	

H-6/16

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Little Rock Air Force Base
314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Total Recoverable Phenolics	0.2 mg/l	108/101	85-115	6.64	10	W30993	
BOD 5-day	200 mg/l	105/106	84.5-115	0.712	20	W30994	
Cyanide	0.1 mg/l	101/91.3	85-115	10.5	20	W30992	
Total Suspended Solids	200 mg/l	108/112	80-120	3.19	20	W31021	
pH on-site	-	99.9	98-102	-		S2714	
Arsenic	0.05 mg/l	88.7/89.5	85-115	0.930	20	S26847	
Cadmium	0.05 mg/l	98.5/98.4	85-115	0.0919	20	S26847	
Chromium	0.05 mg/l	92.8/92.9	85-115	0.156	20	S26847	
Copper	0.05 mg/l	93.7/95.0	85-115	1.37	20	S26847	
Lead	0.05 mg/l	96.8/96.9	85-115	0.112	20	S26847	
Nickel	0.05 mg/l	91.4/91.9	85-115	0.559	20	S26847	
Silver	0.02 mg/l	98.6/99.0	85-115	0.423	20	S26847	
Zinc	0.05 mg/l	95.8/96.9	85-115	1.13	20	S26847	
Mercury	0.0025 mg/l	106/97.2	85-115	9.04	20	S26850	
Oil and Grease	40 mg/l	96.5/96.2	78-114	0.259	20	B6059	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Total Recoverable Phenolics	0.2 mg/l	98.2	80-120	-	10	W30993	
Cyanide	0.1 mg/l	102/100	75-125	1.78	20	W30992	
Arsenic	0.05 mg/l	84.5/82.8	75-125	2.05	20	S26847	
Cadmium	0.05 mg/l	97.0/96.4	75-125	0.683	20	S26847	
Chromium	0.05 mg/l	88.7/88.4	75-125	0.370	20	S26847	
Copper	0.05 mg/l	96.5/97.4	75-125	0.940	20	S26847	
Lead	0.05 mg/l	96.5/96.7	75-125	0.257	20	S26847	
Nickel	0.05 mg/l	92.1/92.2	75-125	0.0991	20	S26847	
Silver	0.02 mg/l	100/101	75-125	0.751	20	S26847	
Zinc	0.05 mg/l	92.4/91.4	75-125	0.958	20	S26847	
Mercury	0.0025 mg/l	106/112	70-130	4.89	20	S26850	

H-7/10

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Little Rock Air Force Base
314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	PQL	QC Sample	Qual
Total Recoverable Phenolics	EPA 420.1	< 0.005	mg/l	0.005	0.01	W30993-1	
BOD 5-day	SM 5210 B	< 2	mg/l	2	2	W30994-1	
Cyanide	SM4500-CN C,E	< 0.01	mg/l	0.01	0.01	W30992-1	
Total Suspended Solids	USGS 3765	< 4	mg/l	4	4	W31021-1	
Arsenic	EPA 200.8	< 0.001	mg/l	0.001	0.001	S26847-1	
Cadmium	EPA 200.8	< 0.004	mg/l	0.004	0.004	S26847-1	
Chromium	EPA 200.8	< 0.007	mg/l	0.007	0.007	S26847-1	
Copper	EPA 200.8	< 0.0005	mg/l	0.0005	0.0005	S26847-1	
Lead	EPA 200.8	< 0.0005	mg/l	0.0005	0.0005	S26847-1	
Nickel	EPA 200.8	< 0.001	mg/l	0.001	0.001	S26847-1	
Silver	EPA 200.8	< 0.007	mg/l	0.007	0.007	S26847-1	
Zinc	EPA 200.8	< 0.002	mg/l	0.002	0.002	S26847-1	
Mercury	EPA 245.2	< 0.0002	mg/l	0.0002	0.0002	S26850-1	
Oil and Grease	EPA 1664A	< 5	mg/l	5	5	B6059-1	

H - 9/16

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Little Rock Air Force Base
314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

QUALITY CONTROL PREPARATION REPORT

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Total Recoverable Phenolics	04DEC09 0845 291	07DEC09 1150 291		W30993-2	
Total Recoverable Phenolics	04DEC09 0845 291	07DEC09 1150 291		W30993-3	
BOD 5-day	04DEC09 0911 285	09DEC09 0926 285		W30994-2	
BOD 5-day	04DEC09 0911 285	09DEC09 0927 285		W30994-3	
Cyanide	04DEC09 0816 291	07DEC09 0900 291		W30992-2	
Cyanide	04DEC09 0816 291	07DEC09 0902 291		W30992-3	
Total Suspended Solids	08DEC09 1332 285	09DEC09 0856 285		W31021-2	
Total Suspended Solids	08DEC09 1332 285	09DEC09 0856 285		W31021-3	
pH on-site	-	03DEC09 0938 292		S2714-2	
Metals	04DEC09 1650 286	09DEC09 2227 270		S26847-2	
Metals	04DEC09 1650 286	09DEC09 2236 270		S26847-3	
Mercury	07DEC09 1151 286	08DEC09 0909 286		S26850-2	
Mercury	07DEC09 1151 286	08DEC09 0912 286		S26850-3	
Oil and Grease	04DEC09 1047 100	07DEC09 0937 100		B6059-2	
Oil and Grease	04DEC09 1047 100	07DEC09 0937 100		B6059-3	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Total Recoverable Phenolics	04DEC09 0845 291	07DEC09 1150 291		W30993-5	
Cyanide	04DEC09 0816 291	07DEC09 0908 291		W30992-5	
Cyanide	04DEC09 0816 291	07DEC09 0906 291		W30992-6	
Metals	04DEC09 1650 286	09DEC09 2245 270		S26847-4	
Metals	04DEC09 1650 286	09DEC09 2254 270		S26847-5	
Mercury	07DEC09 1151 286	08DEC09 0915 286		S26850-4	
Mercury	07DEC09 1151 286	08DEC09 0919 286		S26850-5	

LABORATORY BLANKS

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Total Recoverable Phenolics	04DEC09 0845 291	07DEC09 1150 291		W30993-1	
BOD 5-day	04DEC09 0911 285	09DEC09 0924 285		W30994-1	
Cyanide	04DEC09 0816 291	07DEC09 0859 291		W30992-1	
Total Suspended Solids	08DEC09 1332 285	09DEC09 0856 285		W31021-1	
Metals	04DEC09 1650 286	09DEC09 2218 270		S26847-1	
Mercury	07DEC09 1151 286	08DEC09 0905 286		S26850-1	
Oil and Grease	04DEC09 1047 100	07DEC09 0937 100		B6059-1	

H-9/10

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: Little Rock Air Force Base
Project Reference:
Project Manager:
Sampled By: DJS + FEH 177
Call No. 0865

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	SAMPLE MATRIX: WATER	SOIL	NO OF BOTTLES	ANALYSES REQUESTED: pH. Site	CN.T	O&G	Phenolics	BOD, TSS	As, Al, Li, Co, Cr, Cu, Fe, Hg, Ni, Ll, Pb, Zn
1	Outfall Flume	12-3-09 (1515)	X		X		3	6.95	X	X	X		
2	Outfall Flume	12/2-3/09 (0001 - 2359)		X	X		2					X	X
		Container Type							P	G	G	P	P
		Preservative							B	S	S	NO	N

AIC CONTROL NO: 134333
AIC PROPOSAL NO:
Carrier: AIC
Receive Temperature C: 2
Remarks:
Field pH calibration on 12-3-09 @0938
Buffer: 4/10/7.42/10.03

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

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: _____
Phone: 501-987-6800 Fax: 501-987-8327
Report Attention to: Mr. Malcolm Windsor
Report Address to: 314 CES/CEV
528 Thomas Avenue
Little Rock Air Force Base, AR 72099-4987

Relinquished By:	Date/Time	Received By:	Date/Time
Doug Smith	12.3.09 (1600)		
Relinquished By:	Date/Time	Received in Lab By:	Date/Time
		Eugene Hopton	12-3-09 1600

Comments: sampled per EPA-600/4-82-029
Tech Time = 1.5 hrs

6/04

FORM 0060

9/191-11

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

Facility: Little Rock Air Force Base

SIC Code: 0711 NACIS #: 92811

Industrial Wastewater Discharge Permit (IWDP) #: 87-08-12

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) Changes are already being made in charge of Project is Sandra Wilks

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:
5. Did the most recent inspection indicate a need for a SDCP? Yes ____ No ✓ Always needed
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: Sept 6, 2006 Signature: [signature]

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

SIC CODE:_____ **NACIS #:**_____

Facility Name: _____

Date Received: _____

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: _____

Signature: _____

J-1/1

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 9-30-02 JAB

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

Jon Boyles
Pretreatment Coordinator

Enclosure

Cc. Ms. Thea Hughes, General Manager

K-1/1

JACKSONVILLE WASTEWATER UTILITY

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.

87-08-12

In accordance with all terms and conditions of the City of Jacksonville Municipal Code – Section 13. 24, and 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 **September 16, 2008** 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 2009**

Expires: **Thirty -First day of December 2011**

General Manager,
Jacksonville Wastewater Utility

L- 1/3

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)	Monitoring Requirements (E, SC,S)
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
Recoverable 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 be 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).

L - 2/3

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 and 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*
Arsenic	(total)	-1 sample every month*
Mercury	(total)	-1 sample every month*
Recoverable Phenols	(total)	-1 sample every month#
Cyanide	(total)	-1 sample every month#
Beryllium	(total)	-1 sample every 6 months*
Thallium	(total)	-1 sample every 6 months*
Antimony	(total)	-1 sample every 6 months*
Selenium	(total)	-1 sample every 6 months*
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, 2011

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.

L - 3/3

SAMPLE PROTOCOL
for
UNIVAR # 14

SECTION I - General Industrial Information

1. Facility Name: **UNIVAR U.S.A. Inc.**
2. Street Address: 1925 Redmond Road, Jacksonville AR 72076
3. Phone Number: (501) 982-4402
4. Contact Person: Mr. Mike Price, Re-Pack Supervisor[1] & Mr. Steve Jaworski, Reg. Regulatory Mgr.[2]
5. Type of Industry: Chemical Repackaging and Delivery
6. WWTP Receiving Waste: Johnson Plant
7. Map Location (page #): Page # 7

SECTION II - Routine Sampling Information

1. Applicable Sampling Days: Monday through Friday
2. Hours of Operation: 7:30 A.M. to 5:00 P.M.
3. Seasonal Variation Information: N/A
4. Sample Classification: B
5. Inhibitory Factors for the Lab to Consider:
6. Description of Proper Sample Site: Located in the rear of the facility, is a drum washing area. All wash and rinse waters are collected in a large tank and held for discharge. The tank is pH adjusted prior to discharge. The IU calls JWU prior to discharge so a sample can be collected. Approximately 1,500 gallons are collected and composited before discharge occurs.
7. Strainer Placement: N/A
8. Sampler Base Set-Up: N/A
9. Sample Frequency: Grab Sample
10. Special Sampling Information: Sample collected from tank. There is an opening at the top for acid or base to add for pH adjustment. Located on the south side of the tank is a spigot. Sample can be collected from either location.
11. Parameter(s) Needed:

PARAMETER	TYPE SAMPLE	MONTHLY LIMIT	EQUIVALENT MAX LIMIT*	TEST FREQUENCY
pH	Grab	N/A	5.0 to 11.0 s.u.	2/Year
BOD_5	Grab	N/A	>250 mg/L Sur.	2/Year

M - 1/2

PARAMETER	TYPE SAMPLE	MONTHLY LIMIT	EQUIVALENT MAX LIMIT*	TEST FREQUENCY
TSS	Grab	N/A	>250 mg/L Sur.	2/Year
O & G	Grab	N/A	>100 mg/L Sur.	2/Year
CN^-	Grab	N/A	N/A	2/Year
Cd (t)	Grab	0.0400 lbs	4.800 mg/L	2/Year
Cr (t)	Grab	0.5004 lbs	60.00 mg/L	2/Year
Cu (t)	Grab	0.3050 lbs	36.57 mg/L	2/Year
Pb (t)	Grab	0.0550 lbs	6.595 mg/L	2/Year
Ni (t)	Grab	0.5029 lbs	60.30 mg/L	2/Year
Ag (t)	Grab	0.0400 lbs	4.796 mg/L	2/Year
Zn (t)	Grab	0.3778 lbs	45.30 mg/L	2/Year

* **Equivalent Max Limit:** Based on 1,000 gallon discharge per month

SECTION III -Site Entry/Exit Procedures (Guard, Gates Codes): Report to the main office prior to proceeding to the tank. Have IU representative to escort you to the tank. The tank should have pH adjustment prior to sampling event.

SECTION IV - Special Safety Considerations:

Utility Safety Policy
Contact Hazards: Proceed with caution; contact hazards unknown.
Protective Equipment: Disposable Gloves, Safety Glasses, Hard Hat, & Safety Toe Footwear
Traffic Controls: Be aware of forklift and vehicle traffic in the area around the drum washing area.
Other: No confined space entry. No smoking or open fires due to chemical storage in adjoining areas.

IU Facility Safety Policy
Ear protection must be worn during any entry into building warehouse (rear of main building).

SECTION V - Other Instructions:

Original Protocol Date:

Protocol Written/Revised By:

_____
Jon Boyles, Pretreatment Coordinator Date

Protocol Approved By:

_____
Sam Zehtaban, Administrative Operations Manager Date

cc: Laboratory File
IU File

M - 2/2

Jacksonville Wastewater Utility

Jacksonville Soaring Higher

248 Cloverdale Road, Jacksonville, AR 72076
Phone: (501) 982-0581 Fax: (501) 982-5791
www.jwwu.com

February 16, 2010

Mr. Rufus Torrence
Pretreatment Coordinator, NPDES Branch
ADEQ
5301 North Shore Drive
North Little Rock, AR 72118

Subject: 2009 Pretreatment Report - AR0041335

Dear Mr. Torrence:

Enclosed please find the Jacksonville Wastewater Utility's Annual Pretreatment Program Status Report as required by NPDES Permit No. AR0041335. All industries have complied with their Industrial Wastewater Discharge Permits in 2009.

If you have any questions concerning the information contained in the attached report or should you require any additional information, please contact me at (501) 982-0581.

Sincerely,

JACKSONVILLE WASTEWATER UTILITY

Sal Pappalardo

Sal Pappalardo
Pretreatment Coordinator

Cc: Ms. Shirley Vaughan, ADEQ
NPDES Enforcement Water Division

ENCLOSURES

N-1/4

JACKSONVILLE WASTEWATER UTILITY
2008 Pretreatment Program Status Report

1. INTRODUCTION

The Jacksonville Wastewater Utility submits the following report pursuant to our AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) AND THE ARKANSAS WATER AND AIR POLLUTION CONTROL ACT, Permit Number: AR0041335, Part III Other Conditions, paragraph 1, d. The determination of Significant Noncompliance of an Industrial User was made by application of the criteria published in the July 24, 1990 Federal Register, amending 40 CFR 403.

2. INDUSTRIAL PRETREATMENT PROGRAM OVERVIEW

The Jacksonville Wastewater Utility currently has thirteen (13) permitted significant industrial users. One of these, significant industrial users, is a categorical industry. This industry, Ashland Specialty Chemical Corporation is a zero discharger, regulated under 40 CFR 414. Below is a brief synopsis of all industrial users and their status.

A. **Ashland Specialty Chemical Corporation** - This facility is a manufacturer of polyester resins and does not discharge any process water to the sanitary sewer but is permitted for spill control. The Industrial Wastewater Discharge Permit (IWDP) for this facility was renewed on January 1, 2008 and expires on December 31, 2010. The permit prohibits the discharge of any process wastewater that would be regulated by the OCSFR category (40 CFR 414). This facility was determined to be a categorical industry in May 2004 by Mr. Allen Gilliam, ADEQ State Pretreatment Coordinator. This facility is aware of the requirements necessary to receive permission to discharge any regulated process wastewater. This facility experienced no violations of their IWDP in 2009 and currently has a valid IWDP for spill & slug protection and control.

B. **National Swage** - This plant manufactures swaging (a suspended cable harness) equipment, cable locks, and related items for heavy machinery, oil refinery-production, and construction. National Swage's alkaline cleaner tank (rinse water) is the only source of process wastewater, which produces very little wastewater. The IWDP for this facility was renewed on January 1, 2008 and will expire on December 31, 2010. In January 2003, National Swage completed a project that allows their facility to recycle all their process and cooling waters, which allows for zero process water discharge. The facility experienced no violation of their IWDP for the year 2009 and National Swage currently holds a valid IWDP for spill & slug protection and control.

C. **Graphic Packaging Inc.** – This facility was formerly named Altivity Packaging Inc. and Smurfit-Stone Container Corporation. The facility manufactures and prints paper bags. Processes at this facility consist of gluing paper and printing. This facility operates an ALAR Filtration Pretreatment system for copper removal. The IWDP for this facility was renewed, effective January 1, 2009 and will expire on December 31, 2011. The facility experienced no violations of their IWDP in 2009 and has a currently has a valid IWDP.

D. **Little Rock Air Force Base** - Little Rock Air Force Base (LRAFB) is a Department of Defense facility with the majority of their flow generated from domestic activities. LRAFB is a community of 10,000 people, with 1500 homes, and additional discharge from 2 dinning halls, a club, 2 lounges, 2 fast food restaurants, 2 gas stations, 2 aircraft maintenance shops, an engine repair facility, 2 aircraft washing facilities, an automotive/vehicle repair facility, and a dry airplane painting facility. LRAFB's IWDP was renewed on January 1, 2009 and expires on December 31, 2011. The facility has experienced no violation of their Industrial Wastewater Discharge Permit in 2009 and LRAFB currently holds a valid IWDP.

N - 2/4

E. **North Metro Medical Center** – (formerly Rebsamen Medical Center) is a complete service hospital. Sources of process wastewater other than patient care are the radiology department that uses silver recovery system to recover silver from the waste stream, the pathology laboratory which uses formalin to preserve tissue samples for examination and testing and the cafeteria, which has an in-ground grease trap. The IWDP for this facility was renewed on January 1, 2010 and expires on December 31, 2012. North Metro Medical Center experienced no discharge violations of their IWDP in 2009 and currently has a valid IWDP.

F. **UNIVAR USA Inc.** – UNIVAR USA Inc. is primarily a chemical distribution operation but it does have a small barrel (chemical totes) washing operation to reclaim and reuse barrels that have contained acid and caustics. This operation results in the discharge of a 2000-gallon batch discharge. Pollution Prevention (P2) activities such as reusable dedicated chemical totes, non-acceptance of any tote containing a heel of 1" or more in volume and the non-acceptance of totes other than those labeled UNIVAR (Vopak or Van Waters and Rogers), have enabled UNIVAR to reduce the amount of washing activities needed. UNIVAR has not discharged wash water during the year 2009. The IWDP for this facility was renewed on January 1, 2009 and expires on December 31, 2011. UNIVAR experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

G. **Two Pine Landfill** (a Waste Management Company) – Two Pine Landfill (TPL), a Class A Landfill, accepts municipal and commercial (non-industrial) wastes from the central Arkansas area. The Industrial Wastewater Discharge Permit for this facility was due to expire on October 9, 2009, for the discharge of Landfill Leachate to Jacksonville Wastewater Utility. Two Pines was given a 60 day permit extension on October 10, 2009 and again on December 10, 2009. The IWDP Permit was finalized and renewed on February 11, 2010. The leachate arrives at the J. Albert Johnson Regional Treatment Facility in a six-thousand (6,000) gallon tanker truck. The leachate is mixed with the influent wastewater stream for treatment. TPL experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

H. **Arkansas Portable Toilets** (dba Little John's Portable Toilets and Arkansas Portable Toilets) -- Arkansas Portable Toilets (APT) services portable toilets in the central Arkansas area. Chemicals used are prepackaged and intended for approximately one time use per portable toilet. The Industrial Wastewater Discharge Permit for this facility was renewed on September 1, 2008 and expires on August 31, 2010, for the discharge of Portable Toilet Waste to Jacksonville Wastewater Utility. APT experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

I. **Dirty Work Inc.** – Dirty Work Inc. (DWI) plans to wash vehicles on site, collect the wash water, and discharge the wash water after sediment filtration to Jacksonville Wastewater Utility. The sediment collected will be disposed into the garbage for disposal at a landfill. DWI intends to use a mild detergent (Dawn) for cleaning purposes. DWI has not discharged to JWU, but upon discharge, samples will be collected for the BMR. The Industrial Wastewater Discharge Permit for this facility was issued in 2007 and expires on January 1, 2010. DWI experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

J. **Metro Portable Toilets** – Metro Portable Toilets (MPT) services portable toilets in the central Arkansas area. Chemicals used are prepackaged and intended for approximately one time use per portable toilet. The IWDP for this facility was issued for the facility on August 1, 2007 and the IWDP was renewed on January 1, 2010. MPT experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

K. **All Type Plumbing Co.** (dba U.S. Rooter) -- All Type Plumbing Inc. (ATPI) services septic tanks in the central Arkansas area. The IWDP for this facility was issued on October 25, 2007 and was renewed on January 1, 2010. The IDWP was issued for the disposal of domestic septage to JWU. ATPI experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

NB/4

L. **Avery Septic Tank Cleaning** (ASTC) - Avery Septic Tank Cleaning services septic tanks in the central Arkansas area. The IWDP for this facility was issued on March 6, 2009 and expires on December 31, 2011. The IDWP was issued for the disposal of domestic septage to JWU. ASTC experienced no violations of their IWDP in 2009 and currently has a valid IWDP.

M. **Time to Shine Detailing** (TTSD)- Time to Shine Detailing details vehicles in the central Arkansas area. The IWDP for this facility was issued on March 9, 2009 and expires on December 31, 2011. TTSD has not discharged to Jacksonville Wastewater Utility in 2009.

3. PRIORITY POLLUTANT SCAN AND QUARTERLY ANALYSIS

The Utility is required by AR0041335, part III, (c), to perform an analysis of the Influent and Effluent flows for those pollutants listed in 40 CFR 122, Appendix D, Table III, at least once/quarter except Antimony, Beryllium, Selenium, Thallium, and Cyanide which are required to be analyzed at least once/year and is required to perform an analysis of the Influent and Effluent flows for those pollutants listed in 40 CFR 122, Appendix D, Table II, once/year.

4. SLUDGE MONOFILL MONITORING

As required by Jacksonville Wastewater Utility's Solid Waste Permit #219-S, the Utility has performed an analysis on the four monitoring wells and sludge for the pollutant parameters listed in the permit twice a year. In addition, sludge is monitored according to USEPA 40 CFR 503 regulations.

5. PRETREATMENT PERFORMANCE SUMMARY

Attached to this report is a copy of the completed EPA forms "Pretreatment Performance Summary", "Updated Significant Industrial User List", Significant Violators - Enforcement Actions Taken", and monitoring results.

6. PRETREATMENT INVESTIGATIVE TECHNIQUES AND OUTREACH PROGRAM

- The Utility has a program in effect that periodically checks and inspects the oil/water interceptors, sand traps, and grease interceptors to determine and observe the cleanliness and functioning of these pretreatment devices.
- The Utility has a program that will inspect the health care providers within the service area for proper disposal techniques for silver and mercury.
- The Pretreatment Coordinator is a certified Plumbing Inspector and is able to conduct Plumbing inspections of Commercial and or Industrial firms to determine if pretreatment devices are necessary before the facility opens for business.
- The City of Jacksonville requires a Privilege License Inspection from all commercial businesses prior to the business opening to the public. A representative from the Laboratory or Pretreatment Departments will inspect new businesses so that any business that creates a process wastewater stream will be evaluated by the Pretreatment Department for treatability.

7. PUBLICATION OF INDUSTRIAL USERS IN SIGNIFICANT NONCOMPLIANCE

All Jacksonville Wastewater Utility's Significant IUs were in compliance with their IWDP for the year 2009.

N-4/4

To: Graphic Packaging Inc. IU Correspondence File

From: Jon Boyles, Pretreatment Coordinator
Sal Pappalardo, Pretreatment Inspector

Subject: Annual Industrial Inspection -- 2009

Date: May 26, 2009

On Tuesday, May 12, 2009, an annual pretreatment inspection was performed by Mr. Sal Pappalardo, Pretreatment Inspector and Mr. Jon Boyles, Pretreatment Coordinator, at Graphic Packaging Inc., located at 1031 North Redmond Road. Mr. Gary Burgess, Safety, Transportation, and Environmental Manager, was the escort for the inspection. Altivity changed their name on March 12, 2008 and the change affected the Jacksonville plant on June 2, 2008. A new Industrial Wastewater Discharge Permit front page reflecting this change was sent out. According to the information obtained during the walk through inspection and a review of the information contained in Jacksonville Wastewater Utility files, Graphic (Altivity) Packaging Inc. appears to be in compliance with the Industrial Discharge Permit issued on January 1, 2009.

Industrial Process - The facility produces paper bags. Paper bags are made various ways. The bag outer surfaces are printed at another site or can be printed on site. The rear of the production area is used as storage for the pre-printed and unprinted rolls of Kraft paper. Storage for additional non-printed rolls of Kraft is located outside of the facility on the north and east sides. The paper bag production is supported by these secondary operations: trimming, glue production, sewing, and packaging.

Trimming is the cutting away of excess paper, so the bag can be folded correctly and into a uniform size. The Kraft paper is placed on the press to remove excess wrinkles and the excess is trimmed away. This excess is bailed and sent for future recycling. The remaining bag has precut areas that aid in loading the bag by the customer. Examples of these bags are concrete bags, animal feed bags and others that are loaded by the customer at their plants. Most of these bags are poly lined to prevent moisture from seeping into the contents.

Glue Production (corn starch based) is located in the center area of the plant and is enclosed within a berm to prevent any spills from spreading throughout the plant. The glue is made from cornstarch and hot water. It is mixed and blended within this area and pumped to a holding tank located on a second, higher tier in this area. From here it is pumped throughout the plant to be used for the adherence of the different kraft paper sides of the bag together. The use of this cornstarch-based glue is the source of the high BOD_5 concentration in the waste stream.

Some of the bags have poly liners. A second type of glue (synthetic glue) is used on the top and bottom of some of the bags and is used to glue the poly liner to the inside of the bag. When this glue is used, there is very minimal waste. This waste is non-liquid in the original form and has to be heated and liquefied before use. The bottom of the bag is sealed at the plant while the top has glue placed on the surface for use by the purchaser when the bag is filled. In the poly liner operation, the glue is applied to the inside of the kraft paper and the poly liner is pressed to this Kraft paper. Any waste produced by this glue and poly liners is disposed of as solid waste.

Sewing consists of attaching plastic handles to the bags for ease of carrying. Some of the loads that the bags contain when filled weigh upward to 80 lbs. The handle helps in the carrying of these heavy bags.

Packaging loads the finished bags on to pallets for shipping. This operation is dry and produces no wastewater.

Die Making - The die making process for the presses is located within the center of the plant. In this process, large sheets of a specially treated plastic material is heated and exposed to a photographic negative of the material to be printed. After this process, the sheet is further processed by removal of the unexposed areas by a biodegradable liquid and the remaining sheet is reduced to a thin sheet with the raised areas used to print on the surface of the bag. The wastewater generated by this procedure has been reviewed and approved by the pretreatment department for disposal of the waste stream after the pretreatment system.

Wastewater Treatment – In February 2004, Charter [Altivity (then Smurfit-Stone)] Packaging Inc changed their pretreatment system to an ALAR System. The ALAR system is designed to remove the color from the waste inks. The system operator is very familiar with the system, maintenance, and the chemicals involved for treatment. The process water produced in the bag printing areas is collected in a treatment tank and pumped to the ALAR System. These holding tanks are necessary because pH adjustment is conducted at this point of the pretreatment system. The pH is lowered and then raised. Flocculation occurs during these processes. The waste stream is pumped through a drum filter that is coated with diatomaceous earth. The drum filter is scraped after the waste stream is pumped through and the solids are collected in a 55-gallon drum for disposal at the landfill. If the waste stream is not reasonably clean (the color of iced tea or so), it is returned to the beginning of the pretreatment process for another round of treatment. This system is due for replacement and Mr. Burgess says that the company is in the process of evaluating replacement treatment processes that will remove the color and lower the BOD_5.

Post Inspection Interview – I requested Mr. Burgess to submit a document, showing the name and signature of the new signatory authority (Mr. Tyrone Jeffcoat, New Plant Manager). This request was made due to the departure of Mr. Davenport (Old Plant Manager).

Date and Time: ~~5-19-09~~ 5-12-09 @ 1:30 p.m.

Print Name and Signature: Jon Boyles / Jon Boyles

JACKSONVILLE WASTEWATER UTILITY
INDUSTRIAL INSPECTION FORM

SECTION I. FACILITY INFORMATION

A. General Information (All Items Must Be Completed)

1. Facility name: Charter Packaging International Inc.
2. Service address: 1031 Redmond Road, Jacksonville, AR 72076
3. Mailing address (if different): N/A
4. Contact(s) & Title(s): Mr. Gary Burgess, Safety & Environmental Manager
   Ms. Robert Dorton, Maintenance Engineer
5. Phone number(s): (501) 982-1573 Fax# (501) 985-0385
6. Water Works account #: Stone 0002-01597-97048
7. Environmental Permit(s): SEE Below
   a. RCRA:
   b. Air: 1039-AR-2
   c. Water: 87-05-06 Storm water:
8. Signatory Authority (Name & Title): MR. Tyrone Jeffcoat
   , Plant Manager (New)

B. Sample Protocol Information

1. SIC(s): 2673, 2674, 2679, & 2759 NACIS: 326111,322224,322299,322231,323112
2. Days of Operation: Mon-Sat Days of Production: Mon-Sat
3. Hours of Operation: 24Hrs Hours of Production: 24 Hrs
4. Number of Shifts: 3 Hrs-Shift 1: 7a-3p Hrs-Shift 2: 3p-11p Hrs-Shift 3: 11p-7a
5. Number of Employees: 225-230 Production: 200-205 Administrative: 25
6. Seasonal Variations: Yes Peak Months: Aug-Apr Slow Months: Summer
7. Scheduled Plant Shutdowns: Christmas and Other Holidays

C. Records Review (Yes/No & Comment)

1. Pretreatment System Operations Logs: Yes, kept in pretreatment area.
   Neat + Orderly Files
2. Sample Results & Reports (IU Must Maintain for 3 Years):
   Yes, three years on file
3. Emergency Response & Spill Plan (Review for Changes): No Changes needed
4. Chemical Inventory (MSDS on new chemicals): No new chemicals
   (Reviewed MSDS on Die wash solutions - Approved)
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

SECTION II. FACILITY INSPECTION (Walkthrough Information)

A. Process review

1. Process Name: Multi-wall Bags W or WO Poly Liner
2. Location: Production Area
3. Description of Process: Kraft Paper rolls, fed thru presses to imprint design, cut, trim, fold, and apply adhesive before final pressing to make seams or seals. Before final processing, poly liner is inserted and on some bags a plastic handle is attached.
4. Raw Materials & Chemicals Used: Adhesive, Corn Starch (adhesive), Kraft Paper, and Water based inks.
5. Product & Possible Pollutants: Commercial Grade Bags (feed, concrete, birdseed, & etc...) BOD, TSS, & Metals from inks
6. Destination of Wastewater from Process (sewer, treatment system, diverted): Pretreatment System
7. Are Management Practices Outlined in TOMP, Spill Control, or Other Plans Being Followed?: Yes
8. Comments: No floor drains within process area. Any spill is collected and processed through the pretreatment system.
9. Sketch of Process, In File: Yes If No: Attach Diagram or Plan if Available: N/A
10. Is There a Potential for Spills into Sewer ?: Possible Starch in small quantity
11. Spill Prevention (Berms, Secondary Containment, and etc...): Berms around pretreatment system.
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): Various locations throughout the plant. ~5 gallon containers of ink beside presses in designated totes. Ink formulation area in center of plant. Starch storage area in rear of plant and Pumped throughout Plant as needed
2. Chemical List & Volumes: Located in JWU files
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, yearly training provided
5. Spill Containment Area Assessment (attach sketch and comments): In JWU files

C. Slug Control Plan Review

1. Is a Slug Control Plan required for this IU? ? Yes
2. If no, proceed to next page.
3. If yes, name the chemicals/compound(s) included in the initial plan.

   Inks, Corn Starch, and adhesives
4. Day and Date of initial plan review. 9/15/06
5. Are the compounds listed on the plan the same as listed on the initial plan?

   Yes
6. Is a sign posted with the JWU contacts displayed in a central location? (Explain)

   Yes
7. If sign not posted, then where is a listing of JWU contacts located?

   N/A Spills Go to Pretreatment System.
8. Please list all chemicals/compounds that would have the potential to spill into a floor drain and cause a slug load to the POTW (provided during this year's inspection).

   Inks, Cornstarch, and Adhesives - Addressed w Secondary Containment - Pallet Contain
9. Have MSDS's been provided for the chemicals/compounds listed above (in question # 8). Yes
10. Where is the on site slug control plan ? Pretreatment area and Mr. Burgess' office

    JWU Copy ? In permit file.

C. Pretreatment System

1. System Operator(s): ~~Mr. Michael Perry~~, Operator in charge

2. System Description: ALAR system is used to remove color and heavy metal (copper) from waste stream. Ink waste stream flow and fill the ~~1,000 to 1,500~~ 4000 gallon treatment tank, pH adjustment downward occurs, pH adjustment upward occurs and finally coagulation occurs. While these processes occur, the operator wets the filter with diatomaceous earth and the coagulated solution is pumped thru the filter and the solids are settled upon the diatomaceous earth and are scraped off the filter and placed in55-gallon drums for disposal at a landfill. Clear effluent is produced. Should the waste stream have a high concentration of solids, the waste stream is cycled through the filter until little or no color remains.

3. Is the Schematic Drawing Accurate?: Yes If No,Then List the Descrepancies:
4. Discharge from System (continuous). If any Discharges are batch, List:
   Volume of Each Batch: 1,000 to 1,500
   Number of Batches Discharged per Time: 1
   Approximate Duration of Batch Discharge: ~2 Hrs

5. Meters on System (flow, pH, etc.)

Meter Type	Model & Serial #	Calibration Procedure/Frequency	Comments (Totalizer Reading)
pH Meter			
Cole-Parner	59003-20	2 point calibration	N/A

6. Is the System Operator Knowledgeable of System's Operation? Comments: Yes
7. Sampling Methodology (list sample type, container type, preservatives used, holding times, and frequency): Private Laboratory provides sampling service. Grab samples for O&G & pH. 24-Hour composite samples for BOD, TSS, & Metals.
8. Sample Location and Evaluation. (All regulated & non-regulated Wastestreams):
   Sample Location: Enter dock area and precede ~ 30' then turn left for ~ 45 ' and the manhole is surrounded by yellow safety pipes.

9. Sludge Handling: Stored in pretreatment area until disposal as Non-Hazardous Wastes. in Two Piece Lab

10. Is There Potential for Spills into the Sewer? No If Yes or Maybe, See 11&12.
    11. Chemical List & Volumes: Diatomaceous earth used to bind solids from filtration system, so can be disposed of in commercial landfill.

12. Is the Employee Notification Sign of Whom to Call in the Event of A Spill Posted?: Yes

13. Process/Waste stream Flow Measurement Waste products collected in 55-gallon drums and transported to pretreatment area from production areas Thereof to

14. Exit Interview (IU comments): Requested Mr. Burgess continue practice of keeping pretreatment log book and requested Mr. Burgess obtain letter stating formal change of name. & Received and in file.

O-6/7

(IU Representative Signature)

SECTION III. INSPECTION SUMMARY

A. Action Items:

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

No Corrective Actions at this time.

Follow-up Visit Required: Yes _____ No X

B. Comments None

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

Clean manufacturing operation, I.U. has no processes that need any attention at present.

Jon L. Boyles

5-12-09

Date of Inspection

0-7/7

JACKSONVILLE WASTEWATER UTILITY

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO.

86-02-01

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 **Ashland Specialty Chemical Company**

Classified by SIC No. **2821** or NIACS No. **325211**

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility sewer lines at **1901 North Redmond Road, Jacksonville, Arkansas.**

This Permit is granted in accordance with the application filed on **June 27, 2007** at the office of 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 **1st day of January 2008**

To expire **31st day of December 2010**

General Manager,
Jacksonville Wastewater Utility

PART I: LIMITATIONS

1. The Permittee shall not discharge any waters regulated by the Organic Chemical, Plastics and Fibers Category (40 CFR 414) without prior approval from the Utility. Any request to discharge waters regulated by the Organic Chemical, Plastics, and Fibers Category will result in a permit modification before any of these waters can be discharged.

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 2*
Total Suspended Solids	-----	250.0 *1	SC, S 2*
Oil & Grease	-----	100.0 *1	SC, S 2*
Cadmium	0.160	0.160	E, S 2*
Chromium	2.000	2.000	E, S 2*
Copper	1.220	1.220	E, S 2*
Cyanide	0.190	0.190	E, S 2*
Lead	0.220	0.220	E, S 2*
Nickel	2.010	2.010	E, S 2*
Silver	0.410	0.410	E, S 2*
Zinc	1.510	1.050	E, S 2*
Cyanide	0.190	0.190	E, S 2*
Acenaphthene	0.047	0.019	E, S 2*
Anthracene	0.047	0.019	E*S 2*
Benzene	0.134	0.057	E*S 2*
Bis(2-ethylhexyl)phtalate	0.258	0.095	E*S 2*
Carbon Tetrachloride	0.380	0.142	E*S 2*
Chlorobenzene	0.380	0.142	E*S 2*
Chloroethane	0.295	0.110	E*S 2*
Chloroform	0.325	0.111	E*S 2*
Di-n-butyl phthalate	0.043	0.020	E*S 2*
1,2-Dichlorobenzene	0.794	0.196	E*S 2*
1,3-Dichlorobenzene	0.380	0.142	E*S 2*
1,4-Dichloeobenzene	0.380	0.142	E*S 2*
1,1-Dichloroethane	0.059	0.022	E*S 2*
1,2-Dichloroethane	0.574	0.180	E*S 2*
1,1-Dichloroethylene	0.060	0.022	E*S 2*
1,2-trans-Dichloroethylene	0.066	0.025	E*S 2*
1,2-Dichloropropane	0.794	0.196	E*S 2*
1,3-Dichloropropylene	0.794	0.196	E*S 2*
Diethyl phthalate	0.113	0.046	E*S 2*

Dimethyl phthalate	0.047	0.019	E*S	2*
4,6-Dinitro-o-cresol	0.277	0.078	E*S	2*
Ethylbenzene	0.380	0.142	E*S	2*
Flouranthene	0.054	0.022	E*S	2*
Flourene	0.047	0.019	E*S	2*
Hexachlorobenzene	0.794	0.196	E*S	2*
Hexachlorobutadiene	0.380	0.142	E*S	2*
Hexachloroethane	0.794	0.196	E*S	2*
Methyl Chloride	0.295	0.110	E*S	2*
Methylene Chloride	0.170	0.036	E*S	2*
Naphthalene	0.047	0.019	E*S	2*
Nitrobenzene	6.402	2.237	E*S	2*
2-Nitrophenol	0.231	0.065	E*S	2*
4-Nitrophenol	0.576	0.162	E*S	2*
Phenanthrene	0.047	0.019	E*S	2*
Pyrene	0.048	0.020	E*S	2*
Tetrachloroethylene	0.164	0.052	E*S	2*
Toluene	0.074	0.028	E*S	2*
1,2,4-Trichlorobenzene	0.794	0.196	E*S	2*
1,1,1-Trichloroethane	0.059	0.022	E*S	2*
1,1,2-Trichloroethane	0.127	0.032	E*S	2*
Trichloroethylene	0.069	0.026	E*S	2*
Vinyl Chloride	0.172	0.097	E*S	2*
Flow		REPORT ONLY		3*
pH Maximum (instantaneous)	11.0	S.U.	E, S	
pH Minimum (instantaneous)	5.0	S.U.	E, S	

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

*1. Exceedances of these parameters are not considered a violation be 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 The volume (flow) discharged from the collection tank shall be determined by use of an in-line metering device, that has recording and totalizing capabilities.

PART II: MONITORING REQUIREMENTS

1. The Utility may conduct any monitoring that the utility deems necessary to verify that Ashland Chemical is not discharging any waters regulated by the Organic Chemical, Plastics, and Fibers Category (40 CFR 414).

2. The Permittee and the Utility will monitor the discharge from the collection tank located at the North Central area of the facility. The Utility monitoring point shall be a side valve mounted on the collection tank, after proper mixing has occurred prior to discharge of the monitoring tanks into the sanitary sewer and the secondary site is a private manhole (which receives the flow from the discharge of the collection tank) located approximately 10 feet to the east of this tank. This private manhole discharges into the sanitary sewer at manhole number 1596. The Permittee shall monitor from the side valve installed in the tank after proper mixing has occurred prior to discharge of the monitoring tanks into the sanitary sewer. The monitoring will be performed at the frequency specified. One sample event must be conducted during the first six months (Jan – Jun.) of the year and the second sample event must be conducted during the second six months (Jul. – Dec.) of the year. All samples shall be grab samples unless otherwise indicated. The Permittee will not discharge any water from any process operation to the sanitary sewer.

BOD	-2 samples per year
TSS	-2 samples per year
O&G	-2 samples per year
Cd (t)	-1 sample per permit duration
Cr (t)	-1 sample per permit duration
Cu (t)	-1 sample per permit duration
Pb (t)	-1 sample per permit duration
Ni (t)	-1 sample per permit duration
Ag (t)	-1 sample per permit duration
Zn (t)	-1 sample per permit duration
Cyanide	-1 sample per permit duration
pH	-1 sample every discharge
Styrene	-2 samples per year
Ethylene Glycol	-2 samples per year
Maleic Anhydride	-2 samples per year
Phthalic Anhydride	-2 samples per year
Dicyclopentadiene	-2 samples per year
Volatiles	-1 sample per permit duration
Base Neutrals/Acid Compounds	-1 sample per permit duration

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 time, analysis, and quality control procedures shall be in accordance with approved and current EPA procedures and requirements.

Jacksonville Wastewater Utility
Privilege License
Inspection Form

I. General Information:

Date: 3-10-10

Phone #: No Bus phone yet

Establishment : JAS-E Leathers

Location: 2021 No 1st St. Suite C

Contact Person: Julia A. Steele-Essary 765-2107

Does the facility need a pretreatment device? Yes / No

Notes: Retail Clothing + Alterations
1-1/2 Bath and one Mop Sink only.

III. Sketch/Diagrams of Facility Location *Show North Arrow or Land Marks*

Direction:

Signature of Inspector

Q-1/2

CITY OF JACKSONVILLE

#1 Municipal Drive, P.O. Box 126, Jacksonville, AR 72076
Phone: (501) 982-6071 Fax: (501) 985-0168

PRIVILEGE TAX INFORMATION
PLEASE PRINT **BUSINESS INFORMATION**

BUSINESS LICENSE FEE
$_____

BUSINESS NAME: JAS-E LEATHERS

BUSINESS ASSOCIATION: ____ CORPORATION ____ LLC (LIMITED LIABILITY CO)
(Please Check One)
____ LIMITED PARTNERSHIP ____ GENERAL PARTNERSHIP
__✓__ SOLE PROPRIETORSHIP

PHYSICAL LOCATION: 2021 North First Street
(STREET ADDRESS)

MAILING ADDRESS (IF OTHER THAN ABOVE) _____

CITY: Jacksonville STATE: AR ZIP CODE: 72076

BUSINESS PHONE: _____ OTHER PHONE: (501) 765-2107

BASIS STATEMENT: (Major products sold or services offered)
Leather Alteration + Consignment Shop.

OWNER: (1) Julia A. Steele-Essary
(NAME)
SIGNATURE: Julia A. Steele-Essary

OWNER: (2) _____
(NAME)
SIGNATURE: _____

==========

X **(1) WATER DEPARTMENT** 1900 MARSHALL ROAD -982-6561 **Ronnie or Brett**
RPZ Valve Present
_____ yes _____ no
Adequate service Line & Meter
_____ yes _____ no

_____ _____
Date Approved Water Department Representative

==========

X **(2) WASTEWATER DEPARTMENT** 248 CLOVERDALE ROAD 982-0581 **Sal Pappalardo**
Pre-treatment Device
_____ yes __X__ no
Pre-treatment Necessary
_____ yes __X__ no

3-10-10 _____
Date Approved Wastewater Dept. Representative

==========

X (3) FIRE **DEPARTMENT - FIRE MARSHALL** 985-0374 **Mike Williams**
900 N.REDMOND ROAD-FIRE MARSHALL-

_____ _____
Date Fire & Life Safety Code Compliance approved. Fire Marshall

==========

(4) **INSPECTION DEPARTMENT**- 982-6071 **Manny or Marty**

OCCUPANCY CLASSIFICATION: _____ ZONING CLASSIFICATION: _____

CERTIFICATE OF OCCUPANCY REQUIRED: _____ SIGN PERMIT ISSUED: _____

DATE APPROVED: _____ INSPECTOR: _____

==========

HEALTH DEPARTMENT - 982-7477

DATE APPROVED: _____ INSPECTOR: _____

==========

FINANCE DEPARTMENT

ACCOUNT #: _____ DEPT.:# _____ BUS.START DATE: _____

==========

Inspection, Fire Department, Water, and Wastewater Dept. MUST sign off prior to issuance of the Privilege License by the Finance Department. DO NOT FAX OR COPY THIS FORM. THE CITY REQUIRES THE ORIGINAL COPY WITH SIGNATURES.

Rev. 2/3/09 mlb

2-2/2

TABLE II

40CFR122 APP D / CHEMICAL ABSTRACT SYSTEM PPS-CAS.wpc

50-29-3 4,4'-DDT
50-32-8 Benzo(a)Pyrene
51-28-5 2,4-Dinitrophenol
53-70-3 Dibenzo(a,h)Anthracene
56-23-5 Carbon Tetrachloride
56-55-3 Benzo(a)Anthracene
57-74-9 Chlordane
58-89-9 Gamma-BHC
59-50-7 4-Chloro-3-Methylphenol
60-57-1 Dieldrin
62-75-9 N-Nitrosodimethylamine
67-66-3 Chloroform
67-72-1 Hexachloroethane
71-43-2 Benzene
71-55-6 1,1,1-Trichloroethane
72-20-8 Endrin
72-54-8 4,4'-DDD
72-55-9 4,4'-DDE
74-83-9 methyl bromide
74-87-3 methyl chloride
75-00-3 Chloroethane
75-01-4 Vinyl Chloride
75-09-2 Methylene Chloride
75-25-2 Bromoform
75-27-4 Bromodichloromethane
75-34-3 l,l-Dichloroethane
75-35-4 1,1-dichloroethylene
76-44-8 Heptachlor
77-47-4 Hexachlorocyclopentadiene
78-59-1 Isophorone
78-87-5 1,2-Dichloropropane
79-00-5 1,1,2-Trichloroethane
79-01-6 Trichloroethene
79-34-5 1,1,2,2-Tetrachloroethane
83-32-9 Acenaphthene
84-66-2 diethyl phthalate
84-74-2 Di-n-Butylphathalate
85-01-8 Phenanthrene
85-68-7 Butylbenzylphthalate
86-30-6 N-Nirosodiphenylamine (1)
86-73-7 Fluorene
87-68-3 Hexachlorobutadiene
87-86-5 Pentachlorophenol
88-06-2 2,4,6-Trichlorophenol
88-75-5 2-Nitrophenol
91-20-3 Naphthalene
91-58-7 2-Chloronaphthalene
91-94-1 3,3'-Dichlorobenzidine
92-87-5 Benzidine
95-50-1 1,2-Dichlorobenzene
95-57-8 2-Chlorophenol
98-95-3 Nitrobenzene
100-02-7 4-Nitrophenol
100-41-4 Ethylbenzene
101-55-3 4-Bromophynyl-Phenylether
105-67-9 2,4-Dimethylphenol
106-46-7 1,4-Dichlorobenzene
107-02-8 Acrolein
107-06-2 1,2-Dichloroethane
107-13-1 Acrylonitrile
108-60-1 Bis(2-Chloroisopropyl)Ether
108-88-3 Toluene
108-90-7 Chlorobenzene
108-95-2 Phenol
110-75-8 2-Chloroethylvinylether
111-44-4 bis (2-Chloroethyl) Ether
111-91-1 bis (2-Choloethoxy) Methane
115-29-7 Alpha-Endosulfan
115-29-7 Beta-Endosulfan
117-81-7 bis(2-Ethylhexyl)Phthalate
117-84-0 Di-n-Octyl Phthalate
118-74-1 Hexachlorobenzene
120-12-7 Anthracene
120-82-1 1,2,4-Trichlorobenzene
120-83-2 2,4-Dichlorophenol
121-14-2 2,4-Dinitrotoluene
122-66-7 1,2-diphenylhydrazine
124-48-1 Dibromochloromethane
127-18-4 Tetrachloroethene
129-00-0 Pyrene
131-11-3 Dimethyl Phthalate
156-60-5 Trans-l,2-Dichloroethene
191-24-2 Benzo(g,h,i)Perylene
193-39-5 Indeno(1,2,3-cd)Pyrene
205-99-2 3,4-benzofluoranthene
206-44-0 Fluoranthene
207-08-9 Benzo(k)Fluoranthene
208-96-8 Acenaphthylene
218-01-9 Chrysene
309-00-2 Aldrin
319-84-6 Alpha-BHC
319-85-7 Beta-BHC
319-86-8 Delta-BHC
534-52-1 4,6-Dinitro-2-Methylphenol
541-73-1 1,3 Dichlorobenzene
542-75-6 1,3-dichloropropylene
606-20-2 2,6-Dinitrotoluene
621-64-7 N-Nitroso-Di-n-Propylamine
1024-57-3 Heptachlor Epoxide
1031-07-8 Endosulfan Sulfate
7005-72-3 4-Chlorophenol-phenylether
7421-93-4 Endrin Aldehyde
8001-35-2 Toxaphene
1031-07-8 Endosulfan Sulfate
11096-82-5 Aroclor-1260
11097-69-1 Aroclor-1254
11104-28-2 Aroclor-1221
11141-16-5 Aroclor-1232
12672-29-6 Aroclor-1248
12674-11-2 Aroclor-1016
39638-32-9 bis(2- c'i'propyl)ether
53469-21-9 Aroclor-1242

Color Code: Red => Required Changes [redacted] => Recommended Changes Yellow => Attention

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BEST MANAGEMENT PRACTICES

BMPs (Best Management Practices) are management and operational procedures that intended to prevent pollutants from entering a facility's wastestream or from reaching a discharge point. BMPs are defined in JMC 13.24.03(6) and at Title 40 of the *Code of Federal Regulation* (CFR) 403.3(e) as schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the general and specific prohibitions listed in sections 403.5(a)(1) and (b). BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.

Means used to track the use of the BMP are logbooks, waste manifests, and other record keeping methods as well as instrument readings and the use of test strips to check the effluent from the treatment device. The final rule requires in JMC 13.24.18(5)(g) and at 40 CFR 403.12(b), (e), and (h) that IUs subject to BMP requirements as part of their Pretreatment Standards submit documentation of compliance with such requirements.

[redacted] [redacted] **is included in Exhibit "K" of this report.**

Comment: Please do not include a copy of the "Machine Shop BMP" in Exhibit "K". BMPs are industry specific and the Machine Shop BMP does not apply to every industry in Jacksonville.

S-2/11

INDUSTRY AND UTILITY COMPLIANCE MONITORING

Compliance Monitoring - Jacksonville Wastewater Utility (JWU) will determine compliance with all applicable regulations by Industrial Users (IUs) through self-monitoring, JWU monitoring, and from a minimum of an annual industrial inspection(s) of the IUs. All of the above mentioned resources would be used to determine whether the IU is Significantly Non-Compliant (SNC) or not as determined with the Enforcement Response Plan (ERP). **All Significant Industrial Users, Categorical and Non-Categorical, will be required by their permit to resample for any pollutant that exceeds the limits in their permit within 30 days of becoming aware of the violation if the Control Authority (JWU) has not sampled in this period. Should JWU sampling results show that the User (SIU or NSIU) has violated the permit limit and JWU has elected not to require the User to resample; JWU shall resample (within 30 days of becoming aware of the violation) the User's discharge (the User may resample also) for the purposes of determination of compliance with the IWDP or General Permit. All sampling shall be representative of the process water discharged from the facility.** Listed below are the minimum requirements of this monitoring program:

Comment: "Streamlining Update": When JWU performs the initial sampling JWU must resample or require the User to resample.

Inspections - All Significant and Non-Significant Permitted IUs will be inspected a minimum of once per year. The (JWU) Utility will reserve the right to conduct inspections more often in response to violations or other problems. These inspections will be on demand inspections and will be conducted with no prior notice to the IU. Permitted Non-Significant industrial users will be inspected a minimum of once a year. A copy of the latest inspection form used by JWU is located in Exhibit "H". Before any inspection is conducted, a review of the information located within the files of JWU is conducted by the Pretreatment Coordinator or other designated utility representative. Other type of inspections conducted by JWU will be to assess the potential for slug loadings from IU's, response to emergency situations (fire, explosions, and etc…), response to requests from the general public, collection system upsets, violations of instantaneous limits, and concerns of treatment plant employees, and other situations that could be determined to be of imminent danger to health and safety.

Industry Self-Monitoring – Industry Self-Monitoring shall consist of samples collected by the IUs. The types of samples collected shall be grab and composite. Grab samples are individual samples collected over a period of time not exceeding 15 minutes, and may be collected by manual or automatic methods. A composite sample is a mixture of grab samples collected at the same sampling point over a known period of time or proportional to flow. Composite sampling may be done manually or with an automatic sampler. All sample collection handling and analysis shall be performed by an ADEQ-certified laboratory unless they are performed by the permitee. Designated laboratories shall be subject to the Manager of JWU **for** approval. **IU's are required to submit one of the following reports (Monthly (IUSM), Quarterly (IUSMQ), or Semi-Annual (PRCC)) for t he purpose of determining compliance with their IWDP. Sampling requirements are listed on the permit as well as the number of grab and composite samples required to determine compliance status. All sampling results shall be reported to JWU by the end of the month following sample collection.**

[redacted]

Comment: The Reviewer is not sure about the City's acronyms and the City should verify.

S-3/81

PRETREATMENT PROGRAM OBJECTIVES

The objectives of the Jacksonville Wastewater Utility (JWU) pretreatment program are as follows:

1. Prevent the introduction of pollutants into the municipal wastewater collection system, which will interfere with the operation of the wastewater collection system, wastewater treatment facility, or will render the wastewater Biosolids unfit for economical disposal.

2. Prevent the introduction of pollutants into the municipal wastewater collection system, which will pass through the wastewater treatment system, inadequately treated, into the receiving waters or the atmosphere or otherwise be incompatible with the wastewater collection system.

3. Prevent the introduction of pollutants into the storm drainage system **either** through a direct discharge or an indirect discharge such as a sanitary sewer overflow **(SSO)**.

4. Prevent the discharge of pollutants, which may be harmful to the employees of JWU or the public.

5. Implement procedures for the random inspection and sampling of industrial users to ensure compliance with all applicable local, state, or federal regulations including the collection of data suitable for presentation as evidence in court.

6. Develop a line of communication with the City's industrial users to discuss the goals and intent of the pretreatment regulations; waste minimization practices, pollution prevention [redacted], reuse and recycling methods [redacted], operation and maintenance procedures; and the inspection of the facilities.

Under the pretreatment program, Industrial Users (IU's) which discharge wastewater into the sanitary sewer system, that do not meet the standards set forth in **40 CFR 403 and others,** JMC 13.24.et. Seq, Arkansas Department of Environmental Quality **(ADEQ)** standard or regulation, or applicable federal categorical standard. These IU's shall be required to install and operate, at their own expense, wastewater treatment facilities. **These Users** will reduce the concentration or mass loadings of specific regulated pollutants to limits established by the applicable law or regulation before discharging to the sanitary sewer.

S-4/11

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 at .....

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		
pH Maximum (instantaneous)	11.0 S.U.		
pH Minimum (instantaneous)	5.0 S.U.		

Comment: Do not show local limits in this permit exhibit. Local Limits are subject to change from time to time.

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

*1. Exceedances of these parameters are not considered a violation be the City of Jacksonville, Ordinance 1360, 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).

S-5/11

JACKSONVILLE WASTEWATER UTILITY

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO. _____

In accordance with all terms and conditions of Jacksonville City Ordinance No. 1132 1360, and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to _____

Classified by SIC No._____NACIS No._____

For the contribution of Industrial Wastewater into the Jacksonville Wastewater Utility sewer lines at _____.

This Permit is granted in accordance with the application filed on _____ 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 date: _____

To expire date: _____

_____
General Manager,
Jacksonville Wastewater Utility

5-6/11

PART I: LIMITATIONS

1. The Permittee shall not discharge any waters regulated by the _____ without prior approval from the Utility. Any request to discharge waters regulated by the _____ will result in a permit modification before any of these waters can be discharged.

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 *2
Total Suspended Solids	-----	250.0 *1	SC, S *2
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
Flow	REPORT ONLY		
pH Maximum (instantaneous)	11.0	S.U.	
pH Minimum (instantaneous)	5.0	S.U.	

Comment: Do not show local limits in permits. Local Limits may change from time to time.

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

*1. Exceedances of these parameters are not considered a violation be the City of Jacksonville, Ordinance 1360, 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).

S-7/11

PART III: REPORTING REQUIREMENTS/SPECIAL CONDITIONS

1. SPILL [redacted] CONTROL-(Each Industrial User will be evaluated individually to determine the extent of their spill control program)

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. 1360 – Section 13.24.15.E.2,3)

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. 1360 – Section 13.24.15.E.4)

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. 1360 – Section 13.24.15.E.3)

2. REPORTING REQUIREMENTS

A. The Permittee will submit monthly self-monitoring reports for the pollutants monitored during the previous month. These reports are due by the last day of the month for all discharges in the previous month. The report must contain the results of all samples collected during the month and a signed statement that all sampling and analysis was performed according to EPA regulations. (40 CFR 403.12) 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 as outlined above.

B. The Permittee shall notify the Utility's Pretreatment Coordinator/Laboratory Department, by telephone, within one (1) business day of becoming aware of the violations of the conditions of this permit.
(40 CFR 403.12.G.2)

C. 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. 1360 – Section 13.24.20.4)

5-8/11

Jacksonville Wastewater Utility
LABORATORY SERVICES DEPARTMENT

CHAIN-OF-CUSTODY RECORD

Identification & Sample Number:	Sampler Number:	Set-up Collection Date & Time: @ AM/PM
Sample Technician(s) (Signature): ~~Jon Boyles /~~ Patrick Ellis / Sal Pappalardo /		Take-off Collection Date & Time: @ AM/PM

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
0			

Sample Type: Composite	Sample Type: Grab Sample Collection Date & Time	Preservative	Sample Bottle Type & Number		Parameters Requested	Designated Laboratory	Relinquished By: (Signature) Date & Time	Received In Laboratory By (Signature)
		N/A			pH--S/U	ON SITE		
		Cool to 4 deg C H2SO4 to pH of < 2.0	G	A30-01	O & G	AI		
24 HC		Cool to 4 deg C	P	A30-02	BOD, TSS	AI		
24 HC		Cool to 4 deg C HNO3 to pH of	P	A30-03	Ag (t)	AI		
		N/A			pH--T/O	ON SITE		

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:		17-002			Grab pH Date&Time:	1
Reported Value (pH s.u.) :		1		2		2
Duplicate Values:		1		2	Date & Time Performed:	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

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City of

JACKSONVILLE,

ARKANSAS

Robert E. Bamburg
CITY ATTORNEY

January 6, 2010

Arkansas Department of Environmental Quality
5301 Northshore
North Little Rock, AR 72118

RE: Pretreatment Program/Legal Authority
Jacksonville Wastewater Utility

Dear Sir or Madam:

Please be advised that I represent the Jacksonville Wastewater Utility.

The Jacksonville Wastewater Utility has prepared an Industrial Monitoring and Pretreatment Program pursuant to Section 307(b) and (c) and 402(b)(8) of the Federal Water Pollution Control Act and 40 CFR Part 403.

The City of Jacksonville is authorized, pursuant to ACA §14-235-201, et. seq., to own, operate, and maintain sewage collection, treatment, and related systems. The City of Jacksonville has duly enacted and adopted an Industrial Discharge Ordinance, with amendments, now codified under Jacksonville Municipal Code Section 13.24, et. seq.

The Jacksonville Sewer Commission, through its Chair, members, and Utility Manager or authorized agent, are authorized to operate the utility and enforce the appropriate provisions of the Municipal and State Industrial Discharge regulations by and through state law.

The following references to Jacksonville Municipal Code relate to the listed enforcement requirements of 40 CFR 403.8(f)(1):

S-10/11

303 North James ◆ P.O. Box 5913 ◆ Jacksonville, Arkansas 72078
(501) 982-6303 ◆ (501) 982-2280 (Facsimile) ◆ rebamburg@aol.com

CFR Enforcement Provision	JMC Enforcement Provision
403.8(f)(1)(i)	13.24.09 & .12
403.8(f)(1)(ii)	13.24.10 & .11
403.8(f)(1)(iii)	13.24.18
403.8(f)(1)(iv)	13.24.18.5 (f) & (g)
403.8(f)(1)(v)	13.24.20 & .21
403.8(f)(1)(vi)	13.24.28 & .29
403.8(f)(1)(vii)	13.24.22

The Jacksonville Wastewater Utility intends to implement and the Sewer Commission plans to enforce the pretreatment requirements of the Federal Water Pollution Control Act and 40 CFR Part 403 through our Municipal Code and as described above.

If there are any questions or require any additional information, please do not hesitate to contact me.

Sincerely,

CITY OF JACKSONVILLE, ARKANSAS

BY: _____
ROBERT E. BAMBURG
City Attorney

REB/hz
cc: Ms. Joan Zumwalt, Chair
Jacksonville Sewer Commission
Ms. Thea Hughes, Manager
Jacksonville Wastewater Utility

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