ADEQ

ARKANSAS
Department of Environmental Quality

October 18, 2016

Trey Lieblong
Environmental Coordinator
Conway Corporation
P.O. Box 99
Conway, Arkansas 72033

Re: Conway Corporation's (NPDES #AR0051951; AFIN #2301095) Pretreatment Program Audit/Municipal Pollution Prevention Assessment

Dear Mr. Lieblong:

Please find enclosed the finished report for the audit/assessment conducted September 20th through the 22nd, 2016. The report should be made available for review by appropriate Conway Corporation and Conway City officials. Discussions and an evaluation should be made concerning the findings. Please respond to the required actions and recommendations in writing within thirty (30) days from the date on this correspondence. Your response should outline the steps and provide a schedule in which the Conway Corporation can reasonably address/correct deficiencies and/or required actions.

Many of the audit/assessment recommendations are meant to aide your Program further achieve the Clean Water Act's (CWA) objectives to eliminate discharge of pollutants to the environment. The National Pretreatment Program is the CWA's compliment helping protect publicly owned treatment works with value added by implementing a Pollution Prevention program. Conway Corporation is at a point to fully integrate pollution prevention into its Pretreatment Program.

It was a pleasure working with you and your Pretreatment staff during the audit and becoming more familiar with the City of Conway, its Pretreatment Program, industries and their Pollution Prevention activities.

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

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist

ec: Richard Healey, NPDES Enforcement Branch Manager
Jason Bolenbaugh, NPDES Inspector Supervisor
Rudy Molina, EPA 6WQ-PO

PRETREATMENT AUDIT

REPORT FOR CONWAY CORPORATION

CONWAY, ARKANSAS

NPDES PERMIT #AR0051951

October 17, 2016

PREPARED BY:

ALLEN GILLIAM

ADEQ STATE PRETREATMENT COORDINATOR

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LIST OF ATTACHMENTS

A) INTRODUCTION

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

With Pollution Prevention (P2) being integrated into Pretreatment Programs assessments of Cities' P2 projects and programs will be made.

An audit/assessment was performed September 20th through September 22nd, 2016, of the Pretreatment Program implemented by Conway Corporation. "The City" or "CC" may be used interchangeably throughout this report. Participants included:

Allen Gilliam	ADEQ / State Pretreatment Coordinator
Adam Yates	ADEQ / NPDES Permit Engineer
Amy Beck	ADEQ / District Water Inspector
Trey Lieblong	Conway Corp. / Environmental Coordinator
Kenny Beaty	Conway Corp. / Lab Supervisor

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the Conway Corporation's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;

* To determine the effectiveness of the City's Pretreatment and P2 Programs in controlling industrial discharges;

* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements and;

* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

Conway's Pretreatment Program was originally approved 4/1/84. Conway Corporation implements and enforces the City's Program.

Program modifications were submitted 12/7/87. The modification requested revisions to the sewer

use ordinance including TTO and O&G limits, surcharge authority and a few other minor language changes. It was approved, sent to public notice and incorporated by reference into their NPDES permits on 6/2/88.

Streamlining modifications to the City's Pretreatment Ordinance were received by this office on 4/18/11. Their Ordinance was approved on 1/23/12 and adopted by the City on 2/28/12. Parts of the remaining Pretreatment Program narrative were submitted beginning in February 2012. The technically based local limits evaluation for based on their new Tupelo Bayou POTW is near completion and remains to be reviewed for accuracy and approval. Conway Corp. is near full completion of its "streamlined" Pretreatment Program ready for approval and incorporation into its NPDES permits.

The Tupelo Bayou POTW has been at static conditions for approximately two (2) years and consists of a bar screen, grit removal, activated sludge (primary clarification, aeration basin and final clarification) with sludge removal (gravity thickening, primary and secondary digesters) followed by UV disinfection before discharge to the Arkansas River.

There has been no evidence of lethality or sub-lethality in its effluent within the past three (3) years.

It currently receives all of CC's significant industrial users' (SIU) discharges. Seventeen (17) SIUs constitute approximately 9% of its average flow of 5.9 MGD. Seven (7) of these SIUs are metal finishing (categorical) industries and one SIU had a "sewer ban" placed on its discharge.

The Tucker Creek POTW receives no SIU wastewater. The POTW's average daily flow is 3.6 MGD. Wastewater treatment at this POTW consists of augers with two (2) lagoons consisting of four partial mix aerated cells with additional mechanical aerators followed by chlorination and de-chlorination before discharge to the Arkansas River. Sludge is allowed to accumulate in the lagoons.

There has been no evidence of lethality or sub-lethality in its effluent within the past three (3) years.

The Stone Dam Creek POTW was decommissioned in November of 2014 with its flow diverted to the Tupelo Bayou POTW.

The audit/assessment consisted of informal discussions with CC's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits at three (3) of their permitted 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 in Attachments A – 1 through A – 7.

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

authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City's Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (***40 CFR 403***) and with the City's approved program will be paraphrased citations of the same. A narrative explanation of the finding will follow.

1a) Under ***40 CFR 403.12(e)***, "*Periodic reports on continued compliance.* (1) Any Industrial User subject to a categorical Pretreatment Standard…shall submit to [CC] during the months of June and December [semi-annually]…[CC] may modify the months during which the above reports are to be submitted…";

1b) Under ***40 CFR 403.12(h)***, "*Reporting requirements for Industrial Users not subject to categorical Pretreatment Standards.* Significant Non-categorical Industrial Users must submit to the Control Authority at least once every six months (on dates specified by [CC]) a description of the nature, concentration, and flow of the pollutants required to be reported by [CC]."; and

1c) Under ***40 CFR 403.12(g)***, "…This sampling and analysis may be performed by [CC] in lieu of the Industrial User." which Conway Corp. does.

It was discovered during the file review CN sampling frequency for the metal finishers was only to be conducted "once a year" (see Attch. A-4c). CC must sample all of its SIUs' permitted parameters at least semi-annually and revise applicable permits' language accordingly.

2) Under ***40 CFR 403.5(c)***, "*When specific limits must be developed by POTW*…Each POTW with an approved pretreatment program shall continue to develop these limits as necessary and effectively enforce such limits."

CC did in fact develop and implement local limits based on site specific data for Stone Dam Creek (circa 7/00). The impacting local limits were for Cd, Cr and Ni "Max. Monthly Averages".

Since Stone Dam Creek's POTW was decommissioned in November 2014, the local limits discovered during the file review were no longer applicable or valid and must be removed (along with footnote #4) from any SIU permits (see Attch. A-b) which included them until local limits can be established (or demonstrated not necessary) based on Conway Corp's new Tupelo Bayou POTW's site specific data.

3) Under ***40 CFR 403.8(f)(2)(B)***, "…individual…control mechanisms [permits] must be enforceable and contain, at a minimum, the following conditions: ***(4)*** "…sampling location…"

It was discovered during the file review individual SIU's sampling locations were not mentioned in their permits. Conway Corp. must include a descriptive sampling point in all SIU permits preferably with footages from a fixed reference point.

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

1) Recommend including a few more pertinent notes in the SIU fact sheets. While the current ones (reviewed) appeared comprehensive (see Attch. A-5 for example), a few other items could be noted: a) the SIU's start-up date helping to determine existing/new source status; b) basis for permit limits; c) revision of the POTW it's discharging to; d) inclusion of the date on which the latest revisions were made to the fact sheet; e) chronological compliance history over a period of time (5 years?); and f) page numbers.

2) During the file review the IU inspection template (see Attch. A-6 for example) was deemed adequate. Most questions were answered by checking a "yes" or "no" box.

Several areas of Tokusen's inspection (Attch. A-6) do not have any boxes checked especially the section regarding "P2 Equipment/Practices in use" of which Tokusen has several.

It's recommended the inspection reports include more narrative regarding an actual evaluation of the facility's process/treatment tanks and appurtenances ("...housekeeping" should be replaced by O&M/Preventive Maintenance"?). Are any areas showing signs of rust, scale build-up, cracked welds, leaky plumbing/pumps, excessive vibration of motor shafts to mixers, etc.?

It's also recommended to add more narrative describing the facility's chemical and hazardous waste handling and storage procedures. As mentioned in the last Audit, once a comprehensive inspection is on file, it can be used as a template for future ones.

3) Recommend sending the hazardous waste notification in 40 CFR 403.12(p) to all applicable generators on the ADEQ list provided during the Audit. It is known many of these generators move in and/or close shop frequently throughout the county. CC should also send this notification requirement to all healthcare facilities as many do not realize they are generators and are not on ADEQ's list. It is known oncology facilities/units generate acute hazardous waste. CC's Pretreatment personnel may also find some not previously provided this notification. The notification to this sector would/should raise their awareness or at least some attention.

4) Strongly recommend including the bypass prohibition per 40 CFR 403.17 in all permits

5) Recommend filling out CC's contract lab's chains of custody which includes sample preservation and type of bottles samples are collected in. CC's Pretreatment personnel have other sheets they use internally (in conjunction with their contract lab's) which includes both preservation techniques and types of sample bottles, but it's this auditor's opinion it would be much simpler to have this

information on one sheet.

6) Recommend re-evaluation of CC's SIUs' slug potential evaluation. It was not evident that Tokusen's slug potential evaluation had been given serious attention (see Attch. A-7) as its conclusion was "Yes" to the question whether it needed a Slug/Spill Control Plan even though each area of the "evaluation" indicated a "low" potential for a slug discharge.

Tokusen's inspection (Attch. A-6h) indicates it has a "Spill/Slug" control plan, but upon a brief review of the document, this auditor found it to be related to its storm water pollution prevention plan and its spill prevention control and countermeasure plan, neither of which specifically targeted the basic elements required for a slug control plan in 40 CFR 403.8(f)(2)(vi).

Conway Corp's Pretreatment Coordinator's change (see Attch. A-7b) of the decision concluding Tokusen was required to submit a slug control plan during the Audit after some discussion is not acceptable until a new thorough slug potential evaluation is completed.

7) Recommend including P2 questions on all permit applications. The two large Metal Finishers visited during the audit (and others) could list their P2 activities, BMPs, internal/corporate continual improvement programs, ISO 140003 certification, water and/or energy conservation efforts, etc.

8) Strongly recommended to include P2 questions on future non-domestic user surveys. It was advised to conduct these on a sector-by-sector basis and tailor the survey questions to "fit" particular business sectors with questions meaningful to their possible operations. See Appendix II for some sector specific questions related to non-domestic users in EPA's "IU Inspection and Sampling Manual for POTWs" @ https://www3.epa.gov/npdes/pubs/owm0025.pdf .

9) Recommend including the general and specific prohibitions [40 CFR 403.5(a)(1) and 403.5(b)] in the septage haulers' permits. See Attach. A-3 for CC's current "permit" for their waste haulers.

10) Recommend developing a Program section for standard operating procedures (SOP) for the various day-to-day Pretreatment Program implementation activities. Sampling techniques at individual IUs, incoming data management, "date received" stamp pretreatment correspondence, filing procedures of Pretreatment reports and data (hard copies and/or entered into a database), pre-inspection procedures, etc., may be well known to the more experienced pretreatment related employees, but it would make sense to have these activities briefly summarized in writing for ease of educating new employees.

The sampling techniques should include for each permitted IU with proper equipment preparation, hose usage/change-out period and storage after use. See (above) EPA's "IU Inspection and Sampling Manual for POTWs" dated 4/94 for more details.

10) Recommend hosting/catering an annual Industry Awards/Information Day, Luncheon or something similar. This should help the industries realize their stakeholders' role in the City's

Pretreatment and Pollution Prevention programs. These events are being conducted at numerous Pretreatment cities throughout the state and are well received by their industries. Much information can be shared at meetings such as this.

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

Conway Corporation's Streamlined Pretreatment Program and its required modifications are currently being compiled. Tupelo Bayou's technically based local limits evaluation should be nearing completion ready for submittal, review and approval by ADEQ. As mentioned previously, their Pretreatment Ordinance has been approved and adopted.

Tupelo Bayou's upcoming (circa January 2017) permit renewal will require submittal of Conway Corporation's complete Pretreatment Program submittal within sixty (60) from its effective date.

* * * * * * * *

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

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: Conway Corporation NPDES #: AR0051951
Mailing address: P.O. Box 99, Conway, AR 72033
Permit Signatory: David Bradley Title: Manager, Water Systems

Telephone: 501.548.3040 FAX NUMBER: 501.450.6061

Pretreatment Contact: Trey Lieblong Title: Environmental Coordinator
Address: 1405 Lollie Road
Telephone: 501.548.3040
e-mail: trey.lieblong@conwaycorp.com

Pretreatment program approval date: 4/1/84
Dates of approval of any substantial modifications: (see notes on next page)
Month Annual Pretreatment Report Due: April
Pretreatment Year Dates: Jan 1 - Dec 31 Date(s) of Audit: 9/20 - 22/16 (ASSESSMENT)

Inspector(s):

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	State Pret. Coordinator / ADEQ	501.682.0625
Adam Yates	Permit Engineer / ADEQ	501.682.0617
Amy Beck	District Water Inspector / ADEQ	479.968.7339

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
*Trey Lieblong	Environmental Coordinator	Same
Kenny Beaty	Lab Supervisor	504.6421

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	10/12/12	"Satisfactory"

SECTION I: GENERAL INFORMATION

YES NO

___ ✓ Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?

If yes, describe the required corrective action: _____

_____

_____

_____

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

. . . . . .

Their previously submitted Program modifications (submitted piecemeal from ~93 to 2002) were never fully reviewed/approved/sent to public notice nor incorporated into their NPDES permits. The district water inspector kept "the finished product" in his office until his retirement sometime before '02.

The City's final "Streamlined" Pretreatment Ordinance was submitted (12/1/11), approved on 1/23/12 and adopted on 2/28/12.

Their Pretreatment Program narrative was submitted on 2/13/12, but was far from complete. It did not include a section regarding local limits and remains to be reviewed for recommendations and comments.

The local limits' section of their Pretreatment Program is substantially complete.AD

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

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

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
*AR0051951	Tupelo Bayou	2/1/12	1/31/17
AR0047279	Tucker Creek	2/1/12	1/31/17

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

Individual Treatment Plant Information

a. Name of Treatment Plant: Tupelo Bayou
Location Address: 1405 Lollie Road

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 16 MGD; Actual (Avg): 5.87 MGD

Sewer System: 100 % Separate; SSOs due to grease blockages 0

Industrial Contribution to this Treatment Plant

# of SIUs: 17 # of CIUs: 7
Industrial Flow (mgd): 0.52 Industrial Flow (%): 8.96 %

Level of Treatment		Type of Process(es) (from permit):
Primary	✓	Bar screen; grit removal; RAS (primary clarification;
Secondary	✓	aeration basin & final clarification); gravity
Tertiary	✓	sludge thickening; primary & secondary digester

Method of Disinfection: UV

Dechlorination ____ YES ✓ NO

Effluent Discharge

Receiving Stream Name: Arkansas River
Receiving Stream Classification: Segment 3F of the Arkansas River
Receiving Stream Use: primary/secondary contact recreation; fishable/swimmable; propagation of species of desirable fish; raw water source for public, private, industrial & agricultural water supplies

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

Method of Sludge Disposal: N/A		Quantity of Sludge:
✓	Land Application	585 dry metric tons/yr.
_____	Incineration	_____ dry tons/yr.
_____	Monofill	_____ dry tons/yr.
_____	Mun. Solid Waste Landfill	_____ dry tons/yr.
_____	Public Distribution	_____ dry tons/yr.
_____	Lagoon Storage	_____ dry tons/yr.
_____	Other (specify)	_____ dry tons/yr.

List of toxic pollutant in its in NPDES permit: conventionals

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for

Tupelo Bayou 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
Effective Date: 6/1/12
Expiration Date: 5/31/17

List pollutants that are specified in current sludge permit:
All CFR 503 parameters, TSS, Nitrate-N, Nitrite-N, NH3-N, TKN, T. Phos, and T. Potassium.

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There has been no sublethality or lethality shown to either the fathead minnow or the water flea during the past 3 yrs (8 WET tests)

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				
Other:				

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

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

YES NO N/A

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

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

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

Parameters Violated	Cause(s)
None	

YES NO

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

SECTION I: GENERAL INFORMATION

3. Individual Treatment Plant Information

a. Name of Treatment Plant: Tucker Creek

Location Address: 1001 Sherwood Drive

Treatment Plant Wastewater Flow: Design- 6.4 MGD; Actual (Average)- 3.58 MGD

Sewer System: 100 % Separate SSOs due to grease blockages: 0

Industrial Contribution to this Treatment Plant

# of SIUs: 0 # of CIUs: 0
Industrial Flow (mgd): 0 Industrial Flow(%): 0 %

Level of Treatment		Type of Process(es):
Primary	✓	augers; screening; degritting; a multi-
Secondary	✓	cell partial mix aerated lagoon
Tertiary		

Method of Disinfection: chlorination

Dechlorination ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Arkansas River

Receiving Stream Classification: Segment 3F of the Arkansas River

Receiving Stream Use: primary/secondary contact recreation, raw water source for domestic, industrial and ag. water supplies, propagation of desirable species of fish

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

Method of Sludge Disposal:		Quantity of Sludge:
	Land Application	0 dry tons/yr.
	Incineration	____ dry tons/yr.
	Monofill	____ dry tons/yr.
	Mun. Solid Waste Landfill	____ dry tons/yr.
	Public Distribution	____ dry tons/yr.
✓	Lagoon Storage	____ dry tons/yr.
	Other (specify)	____ dry tons/yr.

List of toxic pollutant in its in NPDES permit: conventionals & TRC

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for Tucker Creek 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: n/a
Issuance Date: n/a
Expiration Date: n/a

List pollutants that are specified in current sludge permit:
Reference to 503 requirements in their NPDES boilerplate language

YES NO N/A

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

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it. (eg. Is there an ongoing TRE?) There has been no sublethality or lethality shown to either the fathead minnow or the water flea during the past 3 yrs (8 WET tests)

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

	Influent	Effluent	Sludge	Ambient
Metals *	4	4		
Priority **	1	1		
Biomonitoring		2		
TCLP				
Other:				

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

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

YES NO N/A

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

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

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

Parameters Violated	Cause(s)
None	

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
✓	___	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. See footnote on second page of this audit checklist. Final approval has not been given by ADEQ nor incorporated into current NPDES permit(s).

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ # 0-12-08 Nature of Modification	Date Incorporated in NPDES Permit
1/23/12	Streamlined Ord. Mods only.	n/a

2. Modifications in Progress:

Date Requested	Nature of Modification
	Conway Corp. is currently working on its TBLLs for the Tupelo POTW. A partial "Program" was submitted on 2/13/12, but it was incomplete with no TBLL evaluation or appendices showing various templates (permits e.g.) used.

YES	NO	
___	✓	Have any changes been made to any pretreatment program components (excluding) any listed above)? If yes:
✓	___	Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

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

Date of original Pretreatment Program approval: 4/1/84
Date of most recent Ordinance approved by ADEQ: 1/23/12
Date of most recent Pretreatment Program modification approval: 6/2/88
Does the Control Authority's legal authority enable it to: [403.8(f)(1)(i-vii)]

YES	NO	
✓	___	Deny or condition pollutant discharges
✓	___	Require compliance with standards
✓	___	Control discharges through permit or similar means
✓	___	Require compliance schedules and IU reports
✓	___	Carry out inspection and monitoring activities
✓	___	Obtain remedies for noncompliance
✓	___	Comply with confidentiality requirements
✓	___	Establish Pollution Prevention

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ ✓ Has the city developed and adopted a Pollution Prevention policy?

___ ✓ 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: _____

YES NO

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

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

n/a Have provisions been made for the incorporation of Pollution Prevention (P^2) policies by contributing jurisdictions?

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

	Name of Jurisdiction	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	n/a			

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

		Problems
___	Updating industrial waste survey	n/a
___	Notification of IUs	
___	Permit issuance	
___	Receipt and review of IU reports	
___	Inspection and sampling of IUs	
___	Assessment of IUs for P^2 activity	
___	Analysis of samples	
___	Enforcement	
___	Other: _____	

Briefly describe other problems: _____

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

IU Name	Problem	NPDES Permit Violation Yes	No
N/A		___	___

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)] *"every new type of connection goes thru Pretreatment from various downtown engineering departments".*

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

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

___ ✓ If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

✓ Review of newspaper/phone book
✓ Review of plumbing/building permits
✓ Review of water billing records
✓ Permit reapplication requirements
✓ Onsite inspections
___ Citizen involvement
✓ Other (specify) new business connections are routed thru Pretreatment

How often is the survey to be updated? Ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: none apparent

YES NO

___ ✓ Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?
N/A		

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

a. 17 SIUs (As defined by the Control Authority)
b. 7 Categorical Industrial Users (CIUs)
c. 10 Noncategorical SIUs
d. 6 Other regulated nonsignificant IUs (Describe) septage haulers
23 TOTAL of a. + d.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓* ___ Has the POTW identified any IUs with Pollution Prevention opportunities?
**Not documented by Conway Corp., but some of their SIUs have P2 practices.*

___ ✓ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)]

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

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

YES NO

✓ ___ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?

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

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

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

SIU NAME	PERMIT EXPIRATION DATE

YES NO

✓ ___ Does the Control Authority accept trucked septage wastes? (See Attch A-3)

___ ✓ Does the Control Authority accept other trucked wastes?

✓ ___ Does the Control Authority have a control mechanism for regulating trucked wastes?

YES NO

✓ ___ Does Control Mechanism designate a discharge point? [403.5(b)(8)]

n/a Are all applicable categorical standards and local limits applied to trucked wastes?

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

Pollutant	Limit References Pretreatment Ord. conditions

Describe the discharge point(s) (including security procedures):
"At a septage receiving station at the Tupelo Bayou POTW witnessed by Conway Corp. personnel". This septage essentially empties into the POTW's digester.

SECTION II: PROGRAM ANALYSIS AND PROFILE

		Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted? (**in permits)		*(Currently null/void)* Proposed (7/2000) MAHLs/ 8/13/02 Ord. TBLLs
		Yes	No	Yes	No	Yes	No	(lb/day) / (mg/l)
Arsenic (As)		✓			✓	✓		4.52 / 0.5
Cadmium (Cd)		✓		✓		✓**		0.13 / 0.015
Chromium-Total		✓		✓		✓**		16.45 / 1.0
Copper (Cu)		✓			✓	✓		1.61 / 2.5
Cyanide (CN)		✓			✓	✓		0.45 / 1.0
Lead (Pb)		✓			✓	✓		0.27 / 1.0
Mercury (Hg)		✓			✓	✓		0.0036 / 0.05
Molybdenum (Mo)	*		✓		?	✓		-- / --
Nickel (Ni)		✓		✓		✓**		5.02 / 1.5
Selenium (Se)	*		✓		✓	✓		-- / 0.4
Silver (Ag)		✓			✓	✓		0.11 / 0.5
Zinc (Zn)		✓			✓	✓		8.94 / 2.61

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

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							

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

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)	✓		

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

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

___ n/a 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, that are 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?

2/09 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	✓	Other EPA & ADEQ websites
✓	Government Agencies	✓	Other internet

YES NO

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

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
Evaluation of TBLLs for their "new" Tupelo Bayou POTW is almost complete.			

YES NO

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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? _____
Since Tucker Creek only receives domestic, their Tupelo Bayou POTW's TBLLs will apply to the SIUs discharging to that plant.

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:
(Conway Corp. does all IU self-monitoring)

Program Aspect	Approved Program	Federal Requirement	Explain Difference
Inspections:			
CIUs	1	1/year	n/a
Other SIUs	1	1/year	"
Sampling:			
CIUs	12	1/year	always been
Other SIUs	1 - 4	1/year	done this way
Reporting: City does monitoring			
CIUs	n/a	2/year	
Other SIUs	n/a	2/year	
Self-Monitoring: City does monitoring			
CIUs	n/a	2/year	
Other SIUs	n/a	2/year	

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

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected. N/A

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
✓		If requested?
n/a		To verify IU self-monitoring results?

SECTION II: PROGRAM ANALYSIS AND PROFILE

Provide the following information regarding pollutant analyses done by the POTW:

	Analytical Method *	Name of Laboratory
Metals	ICP/MS	American Interplex
Cyanide	spectrophotometric (4500 series)	"
Organics	GC/MS	"
Other	BOD, TSS, COD	POTW
	Biomonitoring	Arkansas Analytical

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

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

YES NO

✓ ___ **Does the POTW use QA/QC for sampling and analysis? If yes, describe:**
POTW relies on the ADEQ's certification program for contract labs and EPA's blind performance tests.

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

5 days Conventionals
1 week Metals
7-10 days Organics

___ ✓ **Is there an established protocol clearly detailing sampling location and procedures?** *Nothing in written detail*

___ ✓ **Has the Control Authority had any problems performing compliance monitoring?**
If yes, explain: _____

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

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

YES NO

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

I. **ENFORCEMENT**

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

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

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

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

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

✓	Imprisonment
✓	Termination of Service
_____	Other: _____

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

YES	NO	
✓	___	When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]
n/a		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:
✓	___	If no, does the Control Authority conduct all of the monitoring?

YES	NO	N/A	
✓	___	___	Does the pattern of enforcement conform to the Enforcement Response Plan?

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					

SECTION II: PROGRAM ANALYSIS AND PROFILE

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

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

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

Has the Control Authority experienced any of the following:

YES	NO		EXPLAIN and ID Industrial User
	✓	Interference	_____
	✓	Pass through	_____
	✓	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?	_____

✓		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	$ 0
Administrative	0	$ 0
Total	0	$ 0

SECTION II: PROGRAM ANALYSIS AND PROFILE

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

✓ ___ Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES	NO	
✓	___	computerized
✓	___	hard copy
___	___	OTHER: _____

Are the following files computerized:

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

Can IU monitoring data can be retrieved by:

✓ ___ Industry name
___ ✓ Pollutant type
✓ ___ Industrial category or type
___ ✓ SIC Code
✓ ___ IU discharge volume
✓ ___ Geographic location
✓ ___ 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?
Ordinance says there will be a 10 day IU notification prior to releasing any paperwork considered "confidential"

___ ✓ Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: _____

✓ ___ Are all records maintained for at least 3 years?

K. RESOURCES

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

approx. 3

SECTION II: PROGRAM ANALYSIS AND PROFILE

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:

n/a

		Percent of Total Funding
✓	Conway Corp. budget line item	50
___	IU permit fees	
✓	monitoring charges	50
___	industry surcharges	
✓	other (describe) re-sampling	<1
	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	10 ISCO samplers; 2 portable pH meters; 6 portable flow meters
✓	___	Safety equipment	Standard list
✓	___	Vehicles	Pick-ups/cars
✓	___	Analytical equipment	Standard equip.

SECTION II: PROGRAM ANALYSIS AND PROFILE

L. POLLUTION PREVENTION

1. Describe any efforts that have been taken to incorporate pollution prevention into the Pretreatment Program (e.g. waste minimization at IUs, household hazardous waste programs, etc.):
   none

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:
   Conway Corp. performs various types of public education to help inform their customers of P2 ways helping out their POTWs. They also have pamphlets and handouts providing households in "trouble" areas along with information on the do's and don't's for their industrial and commercial users.

4. Does the POTW have any pollution prevention success stories for industrial users documented? no . If yes, please attach.
   CC has multiple IUs the practice P2, from recycling to large water/waste/ energy conservation. One of their IUs was a finalist in ADEQ's ENVY award program. A few of their IUs are ISO 14003 certified and/or have their own in-house continual improvement programs.

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? n/a
   Two of the IUs visited had very good P2 practices and could probably aid in updating the old P2 Guidance Manuals.

SECTION III: INDUSTRIAL USER FILE REVIEW

FILE #: 1 Industry Name Tokusen USA, Inc. File/ID No. 17
Industry Address: 1500 Amity Road
Industry Description: Mfg. brass plated steel wire for automobile tires
Industrial Category: Metal finishing 40 CFR 433
SIC/NAICS Codes: 2296/314994
Avg. Total Flow (gpd): ??? Avg. Process Flow (gpd): 300,000

Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name: Valley Plating File/ID No. 23
Industry Address: Highway 65 South
Industry Description: Ni/Cr plating office and school chairs/desks
Industrial Category: Metal finishing 40 CFR 433
SIC/NAICS Codes: 3471/332813
Avg. Total Flow (gpd): ??? Avg. Process Flow (gpd): ~40,000

Industry visited during audit: YES

Comments:

FILE #: 3 Industry Name: Central AR Dust Control File/ID No.: 5
Industry Address: 1512 Hairston 72032
Industry Description: Small Industrial Laundry
Industrial Category: n/a 40 CFR n/a SIC/NAIC Codes: 7218/812332
Avg. Total Flow (gpd): 7,000+ Avg. Process Flow (gpd): 7,000

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name: SFI (plant 2) File/ID No.: 8
Industry Address: 780 Equity Ave.
Industry Description: Fabricated Steel Products w/phosphatizing & powder coat
Industrial Category: Metal finishing 40 CFR 433
SIC/NAICS Codes: 3479/332812
Avg. Total Flow (gpd): ??? Avg. Process Flow (gpd): ~5,000

Industry visited during audit: NO

Comments:

FILE #: 5 Industry Name: Southern E-Coat File/ID No. 18
Industry Address: 985 Jennette Dr. 72032
Industry Description: Electro-coating various fabricated metal parts
Industrial Category: Metal Finishing 40 CFR 433
SIC/NAICS Codes: 3479/332812
Avg. Total Flow (gpd): ??? Avg. Process Flow (gpd) ~6,000

Industry visited during audit: NO

Comments:

SECTION III: INDUSTRIAL USER FILE REVIEW

[CC used for Conway Corp. for brevity; "nn" = not necessary; "arch." = archived)

A. Industrial User Characterization

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

B. Control Mechanism

1. Does the file contain an application for a control mechanism? *(See Attch. A-1 for example)*	✓	✓	✓	✓	✓
If yes, what is the application date?	9/12	9/12	12/13	9/12	9/12
Does it ask for Pollution Prevention information?	no	no	no	no	no
2. Does the file contain a Permit? *(See Attch. A-4 for example)*	✓	✓	✓	✓	✓
Permit Expiration Date?	7/17	7/17	7/17	7/17	7/17
Is a fact sheet included? *(See Attch. A-5 for example)*	1	1	1	1	1
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(A)-(E)] *(See Attch. A-4 for example)*					
a. Legal Authority Cite?	✓	✓	✓	✓	✓
b. Expiration date?	✓	✓	✓	✓	✓
c. Statement of nontransferability?	✓	✓	✓	✓	✓
d. Appropriate discharge limitations?	2	2	2	2	2
e. Appropriate self-monitoring requirements?	3	3	3	3	3
f. Sampling frequency?	4	4	✓	4	4
g. Sampling locations?	5	5	5	5	5

Comments: 1) Fact sheets need a little more info; 2) The metal finishers' permit (local) limits should have been deleted when the Stone Dam Creek POTW was decommissioned since the TBLLs were developed using that POTW's data; 3) City does all sampling as stated in permits (see Attch A-4c); 4) The metal finishers' CN sampling frequency says 1/yr. 2/yr minimum is required by Regs; 5) Sampling locations must be in all permits clearly described preferably using footage(s) from a fixed reference point.

SECTION III: INDUSTRIAL USER FILE REVIEW

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

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	✓
2. Were both Categorical Standards and Local Limits properly applied?	2	2	✓	2	2
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

Comments: 1) There could be more specific questions asked on IU inspection forms; and 2) See comment #2 on previous page. A new TBLL evaluation using Tupelo Bayou's site specific data is near completion which will most likely show "local limits are not necessary".

SECTION III: INDUSTRIAL USER FILE REVIEW

		FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
5.	For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	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?	1	1	1	1	1
D.	Compliance Monitoring Sampling					
1.	Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	✓
2.	Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	2	2	2	2	2
3.	Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a.	Name of sampling personnel?	✓	✓	✓	✓	✓
b.	Sample date and time?	✓	✓	✓	✓	✓
c.	Sample type?	✓	✓	✓	✓	✓
d.	Wastewater flow at the time of sampling?	✓	✓	✓	✓	✓
e.	Sample preservation procedures?	3	3	3	3	3
f.	Chain-of-custody records?	✓	✓	✓	✓	✓
g.	Results for all parameters? SIUs & CIUs [403.12(g)(1) - CIUs]	✓	✓	✓	✓	✓

Comments: 1) No bypass provisions; recommend including it in all permits; 2) See comment #4 on pg. 21; and 3) Although CC's field and bench sheets included all required preservation and container descriptions, their contract lab's standard chain of custody has "boxes" denoting these. It will be recommended to complete the contract lab's C of C to show all required data on a single sheet.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	1	1	n/a	1	1
5. Did the Control Authority adequately assess the need for flow-proportion vs. time-proportion vs. grab samples?	timed	"	"	"	"
6. Were 40 CFR 136 analytical methods used? [403.8(f)(2)(vi)	✓	✓	✓	✓	✓
Inspections *(See Attch. A-6 for example)*					
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	✓
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(c)]	✓	✓	✓	✓	✓
b. Date of last Inspection	12/15	12/15	12/15	12/15	12/15
9. Does the inspection report(s) include: [403.8(f)(2)(vi)]					
a. Inspector Name(s)	✓	✓	✓	✓	✓
b. Inspection date and time?	✓	✓	✓	✓	✓
c. Name and title of IU official contacted?	✓	✓	✓	✓	✓
d. Verification of production rates?	n/a	n/a	n/a	n/a	n/a
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	2	2	2	2	2
f. Evaluation of pretreatment facilities?	3	3	3	3	3

Comments: 1) Metal Finishers have not submitted TOMPs so CC is sampling/analyzing for the TTOs in CFR 433 twice/yr; 2) Inspection form says "See file for description"; and 3) Could include more narrative.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
g. Evaluation of self-monitoring equipment and techniques?	n/a	n/a	n/a	n/a	n/a
h. Evaluation of slug *(see Attch. A-7 for example)* discharge control plan & need to develop? [403.8(f)(2)(v)]	1	✓	✓	✓	✓
i. Manufacturing facilities?	2	2	2	2	2
j. Chemical handling and storage procedures?	2	2	2	2	2
k. Chemical spill prevention areas?	2	2	2	2	2
l. Hazardous waste storage areas and handling procedures?	2	2	2	2	2
m. Sampling procedures?	n/a	n/a	n/a	n/a	n/a
n. Laboratory procedures?	n/a	n/a	n/a	n/a	n/a
o. Monitoring records?	n/a	n/a	n/a	n/a	n/a
p. Evaluation of Pollution Prevention opportunities?	3	3	3	3	3
q. Control Authority inspector signature?	✓	✓	✓	✓	✓
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	n/a	n/a	n/a	n/a	n/a
11. Does the file include:					
a. BMR?	arch.	arch.	n/a	arch.	arch.
b. 90-Day Report?	"	"	n/a	arch.	arch.
c. All periodic reports?	n/a	n/a	n/a	n/a	n/a
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	n/a

Comments: 1) Slug potential evaluations' conclusions were confusing. Tokusen's Slug Control Plan did not have even one of the 4 basic/required elements of a SCP, but was a SWPPP & SPCC; 2) Questions regarding these need to include more descriptive narrative and a few questions were not even "checked" in the "yes" or "no" boxes; and 3) There is a section which asks questions regarding P2.

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
12. Did the IU report on all required parameters?	n/a	n/a	n/a	n/a	n/a
13. Did the IU comply with the required sampling frequency(s)?	n/a	n/a	n/a	n/a	n/a
14. Did the IU report flow?	n/a	n/a	n/a	n/a	n/a
15. Did the IU comply with the required reporting frequency(s)?	n/a	n/a	n/a	n/a	n/a
16. For all SIUs, are self-monitoring reports signed and certified?	n/a	n/a	n/a	n/a	n/a
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?	no	no	no	✓	no
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	no
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

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	None found during previous year				
b. IU self-monitoring results?	n/a	n/a	n/a	n/a	n/a

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
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?	nn	nn	nn	nn	nn
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:	no	no	no	no	no
11. Were there any compliance schedule violations?	n/a	n/a	n/a	n/a	n/a

SECTION III: INDUSTRIAL USER FILE REVIEW

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
12. Was SNC calculated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	✓
During evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	✓
b. TRC	✓	✓	✓	✓	✓
c. Pass through/Interference	✓	✓	✓	✓	✓
d. Spill/slug loads	✓	✓	✓	✓	✓
e. Reporting	✓	✓	✓	✓	✓
f. Compliance schedule	✓	✓	✓	✓	✓
g. others (specify)					
13. Was the SIU published for SNC?	n/a	n/a	n/a	n/a	n/a
Date of publication.	--	--	--	--	--

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: Conway Corporation NPDES #: AR0051951

Date of Audit: 9/20 - 23/16 Date entered into ICIS: 10/18/16
(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.

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PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: Conway Corporation NPDES #: AR0051951

Name, address and phone number of industry:
Tokusen USA, 1500 Amity Road (501) 327-6800 x-474
Type of industry: Steel cord manufacturer for tires

Date/Time of visit: 9/21/16 / 9:45 a.m.

Industry contacts: David Yarberry, Safety & Env. Mgr. / Pat Welsh, Base Metal Mgr. / Paul Wellington, Process Supv.

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

Additional comments: Facility has not changed processes substantially since the audit site visit 4 years ago. They bring in coiled, 5.5 mm diameter steel rod, chemically (hydrochloric acid pickling) descales it followed by a fresh water rinse. This is followed by 8 "block" stations each with about 11 to 13 actual drawing dies that control tension and reduce the wire diameter to desired thickness using a dry sodium, calcium and/or barium stearate powder for surface preparation and lubrication at each die box. About 100 tons of steel is run thru the process/day.

Visit conducted by: Gilliam/Yates/Beck/Beaty/Lieblong

Date: 9/21/16 Gilliam / Adam Yates

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Conway Corporation NPDES #: AR0051951

Industry name: Tokusen

The cleaned rod is reduced in diameter by a cold forming process which draws the rod thru progressively smaller dies to produce an intermediate material of a specified diameter. Wire is (gas fired) heat treated (patenting) to ~1900 F, quenched in a "fluidized" sand bed then city water quenched/rinsed. Non-contact cooling towers' blowdown water volumes (<1% of regulated flow) are not considered significant enough to use the CWF. Wire is sent through a sulfuric acid cleaning bath followed by several counter current flow (CCF) fresh water rinses; followed by a sodium hydroxide bath. Prior to their CCF rinses, the wire is "curtain" (horizontally) air wiped (CAW). Wire is then brass plated in a Cu plating solution with CAW and 2 CCF rinses, followed by a Zn plating solution with CAW and 3 CCF rinses. This completes the brass plating of the stranded wire. Above the liquid processes/rinses the facility has six (6) wet air vacuum scrubbing devices. This wastewater is sent to pretreatment. The wire is sent through an electrically heated diffuser prior to two final phosphoric acid baths and one fresh water rinse then through a heat and vacuum chamber. The brass wire is then sent through fine drawing and then through a stranding before it is sent out to the final customer. Final wire draw does come into contact with cooling water which overflows to pretreatment. Various rinses are batch discharged at different frequencies complicating "representative" sampling. Total plant clean-up occurs every 2 weeks. Pretreatment begins at a 35,000 gallon holding tank (and a 22,000 gallon emergency holding tank). From this tank, wastewater is pumped to 2 stage pH adjustment (~10 s.u.) tanks (with ~1.5 hr retention time) followed by metal hydroxide precip. with ionic polymers for floculation, then "split" through 2 lamella clarifiers followed by filtration and final pH adjustment. Concentrated wastewater is separately batch treated. Clarifier "bottoms" are drained to a filter press with sludge cake sent off as haz. waste. Facility implements a self-improvement philosophy for continual process and environmental improvements. City Corp. reps were familiar with their processes and the facility rep. was knowledgeable about their pretreatment regulations. They send their used hydrochloric & sulfuric acid our for beneficial re-use. Adequate sampling site. Observed main chemical storage area which appeared clean, but with no secondary containment. [Process/ treatment too detailed/complex to accurately describe on this site visit; descriptions above may not be totally complete]

Visit conducted by: Gilliam/Yates/Beck/Beaty/Lieblong

Date: 9/21/16 Gilliam / Yates

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Conway Corporation NPDES #: AR0051951
Name, address and phone number of industry:
Valley Plating Works, Hwy 65 South, 501.548.0200
Type of industry: Ni/Cr Plating of office/school furniture supports and BBQ grills
Date/Time of visit: 9/21/16 / 1:20 p.m.
Industry contacts: Dennis Fesmire - General Mgr / Mary Robinson - H.R. & Admin. / Wynn Holcomb - Plating Mgr. / Perry Small - Virco

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
5. Hazardous waste generated or stored?	✓		
6. Proper solid waste disposal?	✓		
7. Solvent management/TTO control? CC samples for TTOs			
8. Suitable sampling location?	✓		
9. Appropriate self-monitoring procedures/equipment?	✓*		
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention (P2) activity	✓		

*pH and ORP for internal QA/QC

Additional comments:
Facility has not changed its operations substantially since the last Audit site visit four (4) years ago. Facility manufactures office/school furniture such as desks, BBQ grills, oven racks, chairs and bookcases from low carbon steel. This company took over the old Virco #1 plant/plating operations and has substantially "modernized" their processes and pretreatment. Virco still supplies Valley w/most of the furniture "tube" formed pieces/frames. Facility utilizes wetting agents/surfactants in their baths for most efficient coverage. Wastewater generated was estimated at ~25,000 gal/shift (3 shifts).

Visit conducted by: Gilliam/Yates/Beck/Beaty/Lieblong
Date: 9/21/16 Gilliam / Yates

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Conway Corporation NPDES #: AR0051951
Industry name: Valley Plating

Facility falls under the metal finishing regs (CFR 433) because of its Ni/Cr plating ops. Valley's plating ops described as such: 23 tanks/baths are all placard identified (rack ops): heated, mechanical agitated caustic soda with a surfactant aided cleaning bath; Air agitated (AA) water rinse; heated sodium hydroxide electro-clean w/foam blanket; AA water rinse; heated electro (sulfuric) acid bath; AA water rinse; heated alkaline electro cleaner bath; AA water rinse; heated sulfuric acid bath; 2 stagnant AA acid fresh water rinses; heated & AA bright Ni plating; AA water rinse (the bright Ni is regenerated); 4 AA water rinses counter current flowed (CCF) back to previous tanks; AA and heated Cr^3 plate bath w/a thickness of ~10 millionths of an inch; AA water rinse; AA water rinse with CCF to tank prior to destruction; AA water rinse with CCF back to previous tank and the final AA and heated deionized water rinse.
All spills/overflows would be contained in their metal grated floor drains which are pumped overhead to pretreatment EQ tank. There are no floor drains to the City are in the process area.
Pretreatment appears to consist of best available technology where all plating tanks' wastewater is pumped to a large EQ holding tank, then to a pH adjustment tank with dosed calcium chloride; AA Cr^6 destruction and pH adjusted for typical chemical precip of metals and pumped to a "floc box", then through a lamella clarifier and then through a sand filter. Solids from the clarifier (where polymers are added) is sent to 2 separate sludge settling tanks then to their filter press. WW from the filter press is pumped back to the front of the pretreatment process to the first EQ tank to re-process. Sludge is also sent through a sludge drier prior to being sent off-site as haz waste and recycled for metals.
City Corp. reps were familiar with the facility's processes and the facility reps were familiar with their pretreatment limitations and very proactive with P2.
Adequate sampling point. [Process/ treatment too detailed/complex to accurately describe on this site visit; descriptions above may not be totally complete]

Visit conducted by: Gilliam/Yates/Beck/Beaty/Lieblong
Date: 9/21/16 _____

(signature of auditor conducting visit)

PRETREATMENT AUDIT

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

INDUSTRIAL SITE VISIT

Control Authority: Conway Corporation NPDES #: AR0051951

Name, address and phone number of industry:
Central Arkansas Dust Control 1512 Hairston 501.327.1813
Type of industry: Industrial Laundry
Date/Time of visit: 9/22/16 / 9:45 a.m.

Industry contacts: Howard Glover, Owner & President

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

Additional comments:
Facility is a fairly small industrial laundry, but has a steady stream of local companies' fast food restaurant wash/wipe-down linens, dust mops, floor mats, some shop towels, rubber "comfort mats" and a few other linens.
They launder no "inkers" whatsoever.

Visit conducted by: Gilliam/Yates/Beck/Beaty/Lieblong
Date: 9/22/16 Gilliam / Yates

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: Conway Corporation NPDES #: AR0051951

Industry name: Central AR Dust Control

Facility has 6 washers, 4 - 125 lbs ("pounders"), 1 - 100 lbs and 1 - 80 lbs. Soap is fed by hand and water is set at 100 to 125°F.
Facility rep indicated they had something close to a heat exchanger via a boiler, but the water was too hot and burned out too many pumps. No indication a true heat exchange unit was currently in service.
IU has 7 driers, all about 125 lbs (gas fired).
All washwater is collected via troughs and sumps inside and transferred to two outside settling pits.
Owner occasionally physically shovels out sludge into 5 gallon buckets and land applies it to low spots on his farm or occasionally sends the solids to the landfill.
No real chemical storage area except for the little amount of soap they buy on an as-needed basis and an emulsifier.

Adequate sampling point.

Visit conducted by: Gilliam/Yates/Beck/Beaty/Lieblong
Date: 9/22/16 Gilliam / Yates

(signature of auditor conducting visit)

Attachment A-1

TOKUSEN U.S.A., Inc.
1500 Amity Road
P.O. Box 1150
Conway, Arkansas 72033

Phone: (501) 327-6800
Fax: (501) 327-0231

September 10, 2012

Mr. Trey Leiblong
Environmental Coordinator
Conway Corporation
800 South Harkrider
Conway, AR 72032

RE: Response to IWP Certification Statement

September 4, 2012 we received a letter from you requesting a 'Certification Statement' to the permit renewal application. Please find the enclosed certification statement from Ed Lea, President of TOKUSEN U.S.A., Inc.

Sincerely,

David Yarberry

David Yarberry
Environmental Engineer
Tokusen USA Inc.
501-327-6800 x474

encl: Certification Statement

Read the previously submitted 2012 permit application and deem it complete and correct. After doing so please sign the Certification Statement below:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Title	Date
[signature]	President	9/11/12

Conway Corporation

Industrial Wastewater Application

SECTION A: GENERAL INFORMATION

1. Company Name: Tokusen USA, Inc._____

2. Address: 1500 Amity Road_____

3. Owner/CEO: Ed Lea_____ Title: President_____

4. Contact Person: David Yarberry_____ Title: Environmental Engineer____

5. Telephone #: 501-327-6800 Cell#: 501-470-8802 Email: dyarberry@tokusenusa.com

6. SIC Code: 2296_____NACIS Code: 314992_____

SECTION B: PRODUCT INFORMATION

1. Principal Raw Materials Used: Carbon Steel Wire Rod_____

2. Principal Products Produced: Brass Plated Steel Tire Cord_____

SECTION C: PLANT OPERATIONAL CHARACTERISTICS

1. Process effluent to wastewater System: Continuous ( ) Batch ( ) Both (X)
   If batch, how often is a batch of treated wastewater discharged?

Batches of acid/caustic dumps are treated as needed as well as wash down water from the plating lines. The batch treated effluent is filtered through a filter press. The effluent off the batch is then processed through the continuous treatment process.

2. Are the processes subject to seasonal variations? _No_____ If yes explain why and indicate the month or months of peak operation_____

3. Shift Operation Information

A) Number of Work Days Per Week:__7_____

B) Number of Shifts per Workday:____2 twelve hour shifts per day_____

C) Average Number of Employees per shift and the times

	Team 1 =	60	7 pm – 7 am MTW-alt Sun
1) First:	Team 2 =	70	Start Time: 7 am – 7 pm MTW-alt Sun
	Team 3 =	60	7 pm – 7 am TFS-alt Sun
2) Second:	Team 4 =	70	Start Time : 7 am – 7 pm TFS-alt Sun
3) Third	"E" shift =	40	Start Time _8 am – 5 pm M-F_

Total Number of Employees:__300

A-1c

4.Describe any Wastewater Treatment Equipment or Processes in Use in the Plant:

Industrial pretreatment system employs collection/equalization, chemical precipitation, clarification, pH adjustment and sludge dewatering.

5. Describe any Raw Water Treatment Processes Utilized in the Plant:

Water softening for boiler feedwater

6. Describe any Water Recycling Processes utilized in the Plant:

Counterflow rinses in plating process.

7. Is there any Sludge Generated From Wastewater Pretreatment Operations in the Plant, or any of the Plants processes: Yes (X) No ( )
If Yes, state briefly where sludge is generated, what it contains, and how it is disposed of:

Primarily iron hydroxide with some copper hydroxide and zinc hydroxide. No constituent exceeds TCLP limits. Sludge received an EPA exclusion to the hazardous waste regulations and is considered a delisted waste. The sludge is disposed of in an industrial waste landfill.

SECTION D: WATER CONSUMPTION

1. Plant Water Sources and Average Usage over the Previous 12 Months:

A) Water Source: 4" CW Main Usage: Gal. per Day (gpd) 86500
B) Water Source: 4" CW Main Usage: Gal. per Day (gpd) 259,500

2. List Water Consumption within the plant:

	Avg. Usage (gpd)	Avg. Effluent (gpd)	Batch or Cont.	Discharge to
A) Cooling Water	24,220	1500	C	WWT
B) Boiler Water	21,798	400	C	Sewer
C) Process Water	288,218	269,000	C	WWT
D) Sanitary Sewer	10,726	10,000	C	Sewer
E) Clean Up Water	700	575	B	WWT/Sewer
F) Other Water	350	350	B	Sewer

SECTION E: SEWER CONNECTION AND DISCHARGE INFORMATION

1. Attach an updated drawing of the plant showing the location of the building sewer lines, areas of wastewater generation, sampling points, sludge generation, etc.
2. List Plant sewer outlets, size and flow(assign reference points to each outlet):

Reference #	Size of Pipe	Location of Discharge	Avg. Flow (gpd)
A) A-1	6"	So. Side W.J. Clark Rd	9500
B) A-2	10"	W.J. Clark Rd.	270,750
C) A-3	4"	So. Side W.J. Clark Rd	1575
D)			

SECTION F: SPILL PREVENTION CONTROL

1. Is there a Spill Prevention Plan in place? Yes (X) No ( )
If yes, provide an updated copy to Conway Corporation.

Spill Prevention Plan updated in 2011. Will send updated copy.

2. State briefly the steps to be taken in case of a spill:

1) Safely secure source; 2) Notify supervisor, Mill Manager, and Environmental Engineer; 3) Identify spilled material; 4) Notify proper emergency agencies if situation warrants; 5) Use emergency materials to collect spillage for disposal.

SECTION G: WASTEWATER PRETREATMENT FACILITIES

1. Is there any pretreatment of the wastewater to bring the effluent into Compliance with the Wastewater Discharge Permit, or the Wastewater Use Ordinance, or Federal or State Regulations? Yes (X) No ( )
2. If the answer above is yes, List the Pretreatment processes used:

Industrial pretreatment system employs collection/equalization, chemical precipitation, clarification, pH adjustment and sludge dewatering.

3. Is there any planned changes to be made to the Pretreatment process? Yes ( ) No (X)

SECTION H: RCRA NOTIFICATION FOR HAZARDOUS WASTE DISPOSED TO THE SANITARY SEWER

The USEPA regulations require that local control authorities notify users that there are identification and disposal requirements for hazardous waste. 40 CFR 403.12(p)(1)-(4) States "All users shall notify the POTW of any discharges into the POTW of a Substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261". All users 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. For further instruction on hazardous waste identification and disposal contact the Arkansas Department of Environmental Quality (ADEQ) Hazardous Waste Division at 682-0833. ☐ Yes ☒ No Hazardous Waste Discharge to Sanitary Sewer

Y	N	Not		Y	N	Not		Y	N	Not	

es	o	sure		es	o	Sure		es	o	Sure	
☐	☒	☐	Acenaphthlene	☐	☒	☐	1,2 Transcichloroethylene	☐	☒	☐	4,6 Dinitro-o-cresol
☐	☒	☐	Acrolein	☐	☒	☐	2,4 Dichlorophenol	☐	☒	☐	N-Nitrosodimethylameine
☐	☒	☐	Acrylonitrile	☐	☒	☐	1,2 Dichloropropane	☐	☒	☐	N nitrosodiphenylamine
☐	☒	☐	Benzene	☐	☒	☐	1,2 Dichloropropylene	☐	☒	☐	N nitrosodinpropylamine
☐	☒	☐	Benzidine	☐	☒	☐	2,4 Dimethylphenol	☐	☒	☐	Pentachlorophenol
☐	☒	☐	Carbon Tetra chlorine	☐	☒	☐	2,4 Dinitrotoluene	☐	☒	☐	Phenol
☐	☒	☐	Chlorobenzene	☐	☒	☐	2,6 Dinitrotoluene	☐	☒	☐	Bis Phthalate
☐	☒	☐	1,2,4 Trichlorobenzene	☐	☒	☐	1,2 Diphenylhydrazine	☐	☒	☐	Butylbenzyl Phthalate
☐	☒	☐	Hexachlorobenze ne	☐	☒	☐	Ethyl benzene	☐	☒	☐	Di-n-butyl Phthalate
☐	☒	☐	1,2 Dichloroethane	☐	☒	☐	Flouroanthene	☐	☒	☐	Di-n-octyl Phthalate
☐	☒	☐	1,1,1 Trichlorethane	☐	☒	☐	4-Chlorophenyl Phenyl Ether	☐	☒	☐	Diethyl Phthalate
☐	☒	☐	Hechloroethane	☐	☒	☐	4-Bromophenyl ether	☐	☒	☐	Dimethyl Phthalate
☐	☒	☐	1, 1 dichlorethane	☐	☒	☐	Bis (2-Chloroisopropy) Ether	☐	☒	☐	1,2 Benzanthracene
☐	☒	☐	1,1,2 Trichloroethane	☐	☒	☐	Methylene Chloride	☐	☒	☐	Benzo Pyrene
☐	☒	☐	1,1,2,2, Tetrachloroethan e	☐	☒	☐	Methyl Chloride	☐	☒	☐	3,4 Benzofluoranthene
☐	☒	☐	Chloroethane	☐	☒	☐	Methyl Bromide	☐	☒	☐	11,12 benzofluoranthene
☐	☒	☐	Bis(Chloromethyl) Ether	☐	☒	☐	Bromoform	☐	☒	☐	Chrysene
☐	☒	☐	Bis(2-Chloroethyl) ether	☐	☒	☐	Dichlorobromomethan e	☐	☒	☐	Acenaphthylene
☐	☒	☐	2,Chloroethyl Vinyl Ether Mixed	☐	☒	☐	Trichlorofluoromethan e	☐	☒	☐	Anthracene
☐	☒	☐	2-Chloronaphthalen e	☐	☒	☐	Dichlorodifluorometha ne	☐	☒	☐	1,1,2 Benzoperylene
☐	☒	☐	2,4,6,-Trichlorophenol	☐	☒	☐	Chlorodibromomethan e	☐	☒	☐	Fluorene
☐	☒	☐	Parachlorometa Cresol	☐	☒	☐	Hexachlorobutadiene	☐	☒	☐	Phenanthrene
☐	☒	☐	Chloroform	☐	☒	☐	Hexachlorocyclopenta diene	☐	☒	☐	Pyrene
☐	☒	☐	2-Chlorophenol	☐	☒	☐	Isophorone	☐	☒	☐	Toluene
☐	☒	☐	1,2 Dichlorobezene	☐	☒	☐	Naphthalene	☐	☒	☐	Tetrachloroethylene
☐	☒	☐	1,3 Dichlorobezene	☐	☒	☐	Nitrobenzene	☐	☒	☐	trichloroethylene
☐	☒	☐	1,4 Dichlorobenzene	☐	☒	☐	2 Nitro phenol	☐	☒	☐	Vinyl Chloride
☐	☒	☐	3,3, Dichlorobenzidine	☐	☒	☐	4 nitro phenol	☐	☒	☐	Aldrin
☐	☒	☐	1,1 Dichloroethylene	☐	☒	☐	2,4 Dinitrophenol	☐	☒	☐	Dieldrin

Ye	No	Not sur		Ye	No	Not Sure		Ye	No	Not Sure	

s		e		s				s			
☐	☒	☐	1,2,5,6 Dibenznthracene	☐	☒	☐	Endosulfan Sulfate	☐	☒	☐	PCB-1242
☐	☒	☐	Indeno Pyrene	☐	☒	☐	Endrin	☐	☒	☐	PCB-1254
☐	☒	☐	Chlordane	☐	☒	☐	Endrin Aldehyde	☐	☒	☐	PCB-1221
☐	☒	☐	4,4 DDT	☐	☒	☐	Heptachlor	☐	☒	☐	PCB-1232
☐	☒	☐	4,4 JDE	☐	☒	☐	Heptachlor Epoxide	☐	☒	☐	PCB-1248
☐	☒	☐	4,4 DDD	☐	☒	☐	Alpha- BHC	☐	☒	☐	PCB-1260
☐	☒	☐	Alphaendosulfan	☐	☒	☐	Beta-BHC	☐	☒	☐	PCB-1012
☐	☒	☐	Beta endosulfan	☐	☒	☐	Gamma-BHC	☐	☒	☐	Toxaphene
☐	☒	☐	Beryllium	☐	☒	☐	Detta-BHC	☐	☒	☐	Antimony
☐	☒	☐	Cadmium	☒	☐	☐	Copper	☐	☒	☐	Arsenic
☐	☒	☐	Chromium	☐	☒	☐	Cyanide	☐	☒	☐	Asbestos
☒	☐	☐	Lead	☐	☒	☐	Mercury	☐	☒	☐	Nickel
☐	☒	☐	Selenium	☐	☒	☐	Silver	☐	☒	☐	Thallium
☒	☐	☐	Zinc	☐	☒	☐	2,3,7,8 Tetrachlorodibenzo-p-diozin	☐	☒	☐	Xylenes
☐	☒	☐	Alkyl Eposides	☐	☐	☐		☐	☐	☐	

Attachment A-2

CONWAY CORPORATION
INDUSTRIAL WASTE QUESTIONNAIRE

Conway Corporation is required by EPA to identify and evaluate the impacts of non-domestic discharges to the sanitary sewer system. In order to comply with this requirement, we are asking that your company fill out this questionnaire. The information provided will be used to update our Wastewater Pretreatment files and assist us in monitoring what types of wastes are being discharged into the City's sanitary sewer system. Please completely fill out the survey, and ensure it is signed before submitting to Conway Corporation. Any questions that do not pertain to your company should be answered "N/A". If you have questions, please call Trey Lieblong at 501-548-3040 for assistance.

BUSINESS INFORMATION	
Name:	
Physical Address:	
Mailing Address:	
Phone:	Fax:
Website:	
Days of Operation:	
Number of Employees:	

CONTACT INFORMATION	
Individual Responsible for Operation	Individual Providing Information
Name:	Name:
Title:	Title:
Phone:	Phone:
Email:	Email:

TYPE OF BUSINESS (please check all that apply)		
☐ Manufacturing / Assembly	☐ Storage / Warehouse	☐ Vehicle / Equipment Wash
☐ Sales / Distribution	☐ Food Preparation / Service	☐ Retail Sales only
☐ Auto Services	☐ Medical / Dental Office	☐ Other (specify)

PLEASE DESCRIBE IN DETAIL YOUR BUSINESS ACTIVITIES INCLUDING SERVICES, PROCESSES AND PRODUCTS. ATTACH ADDITIONAL SHEETS AS NECESSARY.

PLEASE LIST ALL RAW MATERIALS USED AT THIS FACILITY, IF APPLICABLE

DOES THIS FACILITY HAVE:		
Any floor drains in the work area?	☐ Yes	☐ No
Boiler Heating System?	☐ Yes	☐ No
Cooling Towers?	☐ Yes	☐ No
A septic tank for wastewater disposal?	☐ Yes	☐ No
Municipal Sewer Service?	☐ Yes	☐ No
A Grease Trap?	☐ Yes	☐ No
Oil/Water Separator	☐ Yes	☐ No
A Silver Recovery Unit?	☐ Yes	☐ No

IF WASTEWATER IS DISCHARGED TO MUNICIPAL SEWER, PLEASE INDICATE THE TYPE:

Note: "Domestic" wastewater produced from the non-commercial preparation of food, or wastewater containing only human wastes and other similar matter from the sanitary conveniences of dwellings and commercial, industrial or institutional buildings. All other wastewater should be considered "Industrial".

☐ Domestic ☐ Industrial

CHECK THE BOXES OF ALL PROCESSES / ACTIVITIES THAT OCCUR AT THIS FACILITY.	
☐ Asbestos Manufacturing	☐ Medical Procedures / Surgeries
☐ Auto Body Shop, Vehicle Repair	☐ Metal Finishing (plating, anodizing, coating etching)
☐ Auto / Truck Wash	☐ Metal Products Manufacturing
☐ Battery Manufacturing	☐ Metals Molding, Casting, Forming
☐ Cement Manufacturing	☐ Machining-Sheet Metal Shop
☐ Copper / Aluminum Forming	☐ Painting / Finishing
☐ Coil Coating / Can Making	☐ Paint / Ink Formulation
☐ Chemical Manufacturing	☐ Petroleum Refining
☐ Dairy Products	☐ Pharmaceutical Manufacturing
☐ Dentistry	☐ Photo Processing
☐ Dry Cleaning / Laundries	☐ Plastics Manufacturing / Molding
☐ Electrical / Electronic Component Manufacturing	☐ Porcelain Coating
☐ Electroplating	☐ Printed Circuit Board Manufacturing
☐ Feedlot	☐ Pulp, Paper, Paperboard Manufacturing
☐ Fertilizer Manufacturing	☐ Rubber Manufacturing / Processing
☐ Flammables / Explosive Use	☐ Radioactive Materials Use
☐ Fuel Oil Dealer	☐ Smelting
☐ Funeral Services	☐ Soap / Detergent Manufacturing
☐ Glass Manufacturing	☐ Steam / Power Generation
☐ Grain Mill	☐ Sugar Processing
☐ Iron / Steel Manufacturing	☐ Textile Manufacturing
☐ Laboratory	☐ Timber Products
☐ Leather / Tanning / Refinishing	☐ Woodworking Shop

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CHEMICAL INVENTORY – DOES THIS BUSINESS USE ANY OF THE MATERIALS LISTED BELOW?				
(place an "X" in the appropriate box)				
Category	**Yes**	**No**	**Not Sure**	**If Yes, Please Identify**
Inks/ Dyes / Paints				
Acids / Caustics				
Solvents / Incl. Cleaning				
Flammables / Explosives				
Grease / Oils				
Pesticides / Herbicides				
Metals / Inorganics				
Mercury or Silver Compounds				
Halogenated Aromatics				
Ethers				
Monocyclic Aromatics				
Phenols / Cresols				
Phthalate Esters				
Polycyclic Hydrocarbons				
Nitrosamines				
Nitrogen Containing Compounds				
Radioactive Isotopes				
If you are unsure of the category, please list any other chemicals used on a separate sheet.				

IS ANY WASTEWATER FROM THIS FACILITY TREATED BEFORE DISCHARGED? ☐Yes ☐No

If yes, what kind of treatment is performed?

- ☐ Sand / Sediment Interceptor
- ☐ Oil / Grease Interceptor
- ☐ pH Correction
- ☐ Chemical or Physical Treatment
- ☐ Silver Recovery
- ☐ Amalgam Separator
- ☐ Solvent Recovery
- ☐ Other

Specify:

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HAS ANY CHEMICAL ANALYSIS BEEN PERFORMED ON WASTEWATER DISCHARGES FROM THIS FACILITY IN THE LAST THREE (3) YEAR?

☐ Yes ☐ No

ARE THERE ANY WASTES GENERATED AT THIS FACILITY THAT ARE NOT DISCHARGED TO THE SANITARY SEWER?

☐ Yes ☐ No *NOTE: If yes, please describe the waste and disposal method for the waste.*

	Other Waste	Disposal Method
1		
2		
3		

DOES THIS FACILITY GENERATE ANY HAZARDOUS WASTE?

☐ Yes ☐ No *NOTE: If yes, please list hazardous wastes generated and disposal method. Attach additional sheets if necessary.*

	Hazardous Waste	Disposal Method
1		
2		
3		

PLEASE PROVIDE THE FOLLOWING INFORMATION OF ANY ONSITE WASTE TREATMENT VENDORS AND ANY COMPANIES THAT HAUL SOLID, LIQUID, HAZARDOUS OR NON-HAZARDOUS WASTES FROM THIS FACILITY FOR OFFSITE TREATMENT AND / OR DISPOSAL.

Company Name: _____

Address: _____

Phone: _____ Fax: _____

Website: _____ Email: _____

Company Name: _____

Address: _____

Phone: _____ Fax: _____

Website: _____ Email: _____

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PLEASE ESTIMATE THIS FACILITY'S AVERAGE MONTHLY WATER USAGE FOR THE WINTER AND SUMMER MONTHS.		
Average monthly gallons used:	Winter:_____	Summer: _____

	☐ Yes	☐ No

ATTACH A SCHEMATIC WITH THE LAYOUT OF YOUR FACILITY. PLEASE LABEL ACTIVITIES PERFORMED IN EACH AREA, ALL WATER SOURCES, ALL FLOOR DRAINS AND ALL DISCHARGES.

CERTIFICATION STATEMENT
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervisions in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment for knowing violations."

Name:_____ **Title:**_____
(Please Print)

Signature:_____ Date:_____

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Attachment A-3

CONWAY CORPORATION

WASTE HAULER DISCHARGE PERMIT
NUMBER _2____

The Conway Corporation of Conway, Arkansas (hereinafter referred to as Corporation), the operators of the City of Conway's Wastewater System, including the City's two Wastewater Treatment Plants, hereby agrees to allow Harrison Septic Service of P.O. Box 247, Mayflower, AR 72106 (hereinafter referred to as Company) to dispose of certain wastewater collected from residential or other approved septic tanks, located in the Conway area, at the City of Conway Wastewater Treatment Plant.

The wastewater quality shall be in compliance with the standards as stated in Conway City Ordinance Nos. A-566 and O-12-08, as amended or as shall be amended in the future and shall comply with other applicable City Ordinances and Corporation regulations. Wastes from industries, grease traps, oil/water separators or any hazardous or toxic wastes will not be allowed.

A Non-Hazardous Waste Manifest form provided by Corporation shall be completed for waste from each separate waste generator, not less than one Manifest per tank load. The Wastewater Plant Superintendent or his designee shall inspect each tank load of waste to be discharged at the City's Wastewater Treatment Plant to determine if it may be dumped at the Plant. If deemed necessary by the Plant Superintendent or his designee, an analysis of the tank wastes may be required.

A tank may contain no more than 3500 gallons of waste. A fee, which is currently $25.00, shall be collected from the Company for each tank load discharged at the Plant.

The Corporation reserves the right to reject any wastes it deems harmful to the City's Wastewater System or that might cause the City to be in violation of its NPDES Permits. A copy of Corporation regulations pertaining to the disposing of wastes at the City's POTWs is attached to the Permit.

The Permit will be in effect for a term of one year, beginning on June 1, 2016 and ending on June 1, 2017 unless terminated by either party upon thirty (30) days written notice to the last known address of the other party, and does not renew automatically. Any violations of the provisions of this Permit by Company will render the Permit to be immediately void.

Signed: _____ Date: May 16, 2016

Environmental Coordinator

Attachment A-4

PERMIT #17

CONWAY CORPORATION'S

INDUSTRIAL WASTEWATER DISCHARGE PERMIT NO. 17

In accordance with all terms and conditions of the City of Conway's Ordinance No. O-12-08, and amendments, and also with any applicable provisions of Federal or State law or regulation:

Permission is hereby granted to **Tokusen U.S.A. Inc.**

Classified by SIC No. **2296** NACIS No. **314992**

This Permit allows for the contribution of Industrial Wastewater into Conway Corporation's Wastewater Collection System at **1500 Amity Road, Conway, AR 72032** .

This Permit is granted in accordance with the Industrial Wastewater Discharge Application submitted to Conway Corporation and in conformity with plans, specifications and other data submitted to Conway Corporation 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: **August 1, 2012**

To expire date: **July 31, 2017**

Environmental Coordinator,
Conway Corporation

PART I: LIMITATIONS

1. The Permittee shall not exceed the effluent limitations stated below for all waters discharged to the City of Conway's Wastewater Collection System.

Parameters	Daily Max. (mg/L)	Max. Monthly Average (mg/L)	Monitoring Requirements (E, SC, S)
Biochemical Oxygen Demand (5-Day)	-----	250.0 *1	SC, *3
Total Suspended Solids	-----	250.0 *1	SC, *3
Oil & Grease	-----	100.0 *1	SC, *2
Cadmium	0.110	0.015	E, *3,4
Chromium	2.770	1.00	E, *3,4
Copper	3.38	2.07	E, *3,4
Cyanide	1.200	0.650	E, *2
Lead	0.690	0.430	E, *3,4
Nickel	3.980	1.50	E, *3,4
Silver	0.430	0.240	E, *3,4
Zinc	2.610	1.480	E, *3,4
TTO	2.130		E, *2
Temperature	140 °F		E, *2
Flow		REPORT ONLY	
pH Maximum (instantaneous)	12.0	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 Conway, Ordinance No. O-12-08, 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. This grab sample will be a onetime instantaneous grab sample

*3 Samples for this parameter shall be collected as time composite samples

*4 These "local limits" are based on pre-~~1989~~ ADPC&E guidance ~~local~~ limits

wrong

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PART II: MONITORING REQUIREMENTS

1. Conway Corporation will conduct all required monitoring for enforcement and surcharge purposes at a frequency subject to the discretion of Conway Corporation. The sampling frequency must comply with all federal and state regulations.

2. Conway Corporation will monitor the discharge from **Tokusen U.S.A. Inc.** at the **Brass Plated Steel Wire** operation at the frequency specified. All samples shall be grab samples unless otherwise indicated.

BOD_5		-1 sample once a year*
TSS		-1 sample once a year*
O&G		-1 sample once a year
Cyanide	(total)	-1 sample once a year
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*
TTO	(Pg 5, Pt III, Sec.3B)	-1 sample twice a year*

*-Denotes 24 Hour composite sample

3. All sample collection, handling, preservation and analysis shall be performed by Conway Corporation or a ADEQ approved laboratory contracted by Conway Corporation.

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, Conway Corporation's Industrial Pretreatment Coordinator must be notified immediately, by telephone, at 501-450-6080. If after regular business hours, leave a message with the Dispatch office, which will notify the proper 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 Conway, Ordinance No. O-12-08)

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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 Conway, Ordinance No. O-12-08)

C. Within five days of an accidental discharge, the Permittee shall submit to the Industrial Pretreatment Coordinator, 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 Conway, Ordinance No. O-12-08)

2. REPORTING REQUIREMENTS

A. The Permittee shall notify Conway Corporation's Industrial Pretreatment Coordinator, 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)

B. The Permittee shall notify Conway Corporation 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 Conway Corporation's approval before the changes can occur.
(City of Conway, Ordinance No. O-12-08)

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

E. The Permittee shall notify Conway Corporation of the release of a slug load. A slug load is any release of pollutants at a flow rate or concentration, which would cause the Permittee to violate any limitations contained in this permit or the General Discharge Prohibitions contained in the City of Conway, Ordinance No. O-12-08. This notification shall be made immediately by telephone 501-450-6080. 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 AND FEES

A. If the Permittee experiences a violation of any of the Pretreatment Standards specified in Part I of this Permit, then Conway Corporation is required to resample for that pollutant within 30 days, (40 CFR403.12.). If and when Conway Corporation is required to perform this resample, Conway Corporation reserves the right to charge a fee to recoup the expenses incurred during the resample. The resample charge will be based on the fees charged to Conway Corporation for the parameter resampled, by our contract laboratory. The charge will be $80 dollars above the fee incurred from our contract laboratory.

B. The User, at the option of the CEO, may be billed according to the Industrial Surcharge Formula in the Sewer Rate Ordinance No. 92-15, as amended for the excess BOD, TSS and Oil and Grease loading. All surcharges will be calculated and charged monthly based on the

last scheduled sample performed. Users have the option of having a resample performed at their cost. If the resample is still violating limits the higher of the two results will be used for calculating the surcharge.

Excessive Strength Surcharge Formula

S=(Flow)(8.34)((CB(BOD-250))+(CT(TSS-250))+(CO(OG-100)))

S=Surcharge in Dollars

8.34=Weight in pounds of one gallon of water

CB = Charge per pound of BOD

CT = Charge per pound of TSS

CO = Charge per pound of OG

BOD = Biochemical Oxygen Demand Concentration

TSS = Total Suspended Solids Concentration

OG = Oil and Grease Concentration

PART IV: STANDARD CONDITIONS

1. The Permittee shall comply with all general prohibitive discharge standards in the (City of Conway, Ordinance No. O-12-08).

2. Rights of Entry – The Permittee shall allow duly authorized representatives of Conway Corporation, 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 Conway, Ordinance No. O-12-08)

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 Conway, Ordinance No. O-12-08)

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 Conway Corporation.
(City of Conway, Ordinance No. O-12-08)

6. Permit Modification – (a) The terms and conditions of this permit are subject to modification by Conway Corporation at any time in response to changes in the City of Conway, Ordinance No. O-12-08, 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 Conway Corporation if it is determined that the Permittee has violated any provision of this permit, City of Conway, Ordinance No. O-12-08, State of Arkansas regulations, or EPA regulations. Additionally,

(1) 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.

(2) Failure to factually report wastewater constituents and characteristics of its discharge.

(3) Failure to report significant changes in operations, or wastewater constituents and characteristics.

(4) Failure to report violations of the conditions of this permit

8. Penalties – Any wastewater system user who is found to have violated or has failed to resolve any violation of this permit, City of Conway, Ordinance No. O-12-08, State of Arkansas regulation, or EPA regulation may result in the Conway Corporation seeking applicable fines and penalties as outlined in City of Conway, Ordinance No. O-12-08. Penalties can reach $1,000 for each offense, and each day on which the violation shall occur or continue shall be deemed a separate and distinct offense.

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 Conway Corporation, except for that information that is deemed confidential in accordance with the provisions of the (City of Conway, Ordinance No. O-12-08)

13. Permit Expiration – This permit comes due for review on May 1, 2017. The Permittee must reapply for re-issuance of the permit at least 60 days prior to the expiration date. Conway Corporation will notify the Permittee of this responsibility 90 days before the reapplication date. (City of Conway, Ordinance No. O-12-08)

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Attachment A-5

TOKUSEN PROCESS DESCRIPTION
(Fact Sheet) AG

Tokusen USA, Inc. owns and operates a steel tire cord manufacturing facility. These cords are used for reinforcement of vehicle tires. The operating process for the facility is described below.

Pickling
Raw wire rod material is brought to Tokusen by truck, and is staged for processing in the Rod Warehouse. As required by production schedules, the coils of rod are cleaned in a hydrochloric acid solution, and coated with a bonderite process for surface preservation and lubrication. Two wet scrubbers, designated HP-1 and HP-2, collect and clean vapors from all tanks in the pickling process, and discharge to the atmosphere as emission point source.

Coarse Drawing
The cleaned rod is reduced in diameter by a cold-forming process, which draws the rod through progressively smaller dies to produce an intermediate material of a specified diameter. To facilitate the drawing process, a dry powdered lubricant is applied to the wire as it passes through each die. A vacuum filter system provides individual vacuum connections to collect dust at each dies station. The collected material is discharged through baghouse filters.

Patenting
A heat transfer treatment process is required to restore the malleability of the cold drawn wire, and make it suitable for further drawing. Multiple lines of wire are pulled through a furnace to soften the wire prior to quenching. Each furnace burns natural gas, and recovers waste heat via a recuperator. The natural gas combustion products are discharged to the atmosphere as emission sources.

A controlled cooling process follows the furnaces called a fluidized sand bed. This unit controls the cooling temperature of the wire with a natural gas heated volume of zircon sand. The sand is "fluidized" by the injection of high volumes of air. At the same time, natural gas burners maintain the sand temperature. The combined discharge of the air injection and the natural gas combustion is filtered by a mechanical screen filter, SN-09, for particulate removal.

Brass Plating
The final process in the Base Mill operation is electroplating the wire with a layer of brass. The plating process is conventional electroplating including sulfuric acid cleaner, rinse, sodium hydroxide etch, rinse, alkaline copper plating, rinse, acid zinc plating, rinse, electric diffusion, acid finisher, rinse, and vacuum dryer.

The plating lines are divided into zones for vapor control. Six wet scrubbers remove emissions from the plating lines. The scrubbers are continuously overflowed with water. The water continuously flows to wastewater treatment.

FINE DRAWING

Brass Plated wire from the Base Mill is transported to the Finish Mill via forklift. The wire is loaded on the Fine Drawing machine where it is drawn through a series of dies that are submerged in a liquid lubricant. The lubricant is circulated from the central pit to each drawing machine and returned to the tank. The drawn wire filament is transported to the Stranding area.

STRANDING

The Brass Plated Filament Wire is transported from Fine Drawing to Stranding area. The wire is twisted and formed into a multi-filament cord or cable and wound onto a spool. This product is conveyed to packing where it is prepared for shipment to the customer.

COOLING TOWERS

The facility utilizes twelve (12) cooling towers for the purposes of cooling process water for reuse. Particulate emissions are generated from these towers as dissolved particles are emitted to the atmosphere with the evaporating water. These twelve towers are used as follows: five towers are used for wet drawing lubricant cooling, two are used for brass plating H2S04 cooling, two are used for fluidized sand bed cooling, and three are used for coarse drawing die block cooling. Total cooling water flow to all twelve towers is approximately 5,374 gallons per minute (gpm).

AREAS CONTRIBUTING WASTE WATER

There are three primary process operations which contribute rinse water to Tokusen's on-site WWTP. These are hydrochloric acid pickling, wire patenting, and brass electroplating. The individual sources of wastewater from these process operations include the following:

- Spent acid and rinse water from hydrochloric acid pickling and phosphate coating;
- Contact cooling water from course draw;
- Rinse water from preheating and cooling baths at the two wire patenting furnaces;
- Rinse water from four brass electroplating lines, including alkaline copper and acid zinc solutions, and sulfuric acid, sodium hydroxide, and phosphoric acid bath discharges;
- Water from two hydrochloric acid and six sulfuric acid scrubbers; and
- Blowdown waters from seven cooling towers.

Process operations which follow the electroplating lines (i.e., fine drawing and stranding) do not contribute wastewater to the WWTP. In addition, all boiler and sanitary wastewater from the facility is discharged directly to the municipal sanitary sewer system operated by Conway Corporation. A plant diagram showing the location of each process area is presented on Figure 2.

Equipment Descriptions and Operating Ranges HP and CD Tokusen USA, Inc., Conway, Arkansas		
Equipment	**Description**	**Operating Range of Process Equipment Contributing to WWTP**
1. HCl Pickling	Non-contact steam heated bath. Wire contacted with HCl. Some HCl carried on wire, some evaporated to scrubber.	Periodic discharge to holding tank in WWTP (approximately 9,000 gals. every 21 days). Minimal contribution to WWTP (<100 gals. per month); remaining volume shipped off-site as spent $FeC1_2$ solution.
2. Water Rinse	Used to rinse HCl from wire.	Discharge to WWTP at 12,000 gpd
3. Zinc Phosphate	Heated Zinc Phosphate solution deposits crystalline coating from wire. Some carried on wire, some evaporated to scrubber.	No discharge
4. Water Rinse	Used to rinse Zinc Phosphate from wire.	Discharge to WWTP at 12,000 gpd
5. Neutralizer	Heated Sodium Nitrite solution neutralizes acidic zinc phosphate.	No discharge
6. Scrubbers (2)	Used to scrub vapors evaporated from HCl and $ZnPO_4$ baths.	Scrubber HP-1: 15,000gpd Scrubber HP-2: 5,000gpd
7. Coarse Draw Cooling Water	Used to cool the drawing dies in the coarse (first) drawing process.	CD-1 thru CD-7: ~ 7,000 gpd each machine Total = ~ 50,000 gpd

Equipment Descriptions and Operating Ranges Plating Lines BP-1, BP-2, BP-3 ,and BP-4 Tokusen USA, Inc., Conway, Arkansas		
Equipment	**Description**	**Operating Range of Process Equipment Contributing to WWTP**
1. Pre-Furnace Rinse (2) units	Steam-heated water bath to remove CD drawing lubricant from wire.	BP-1/2 rinse: ~ 5,000 gpd BP-3/4 rinse: ~ 5,000 gpd
2. Post Furnace Rinse (2) units	City water bath to reduce heated wire to >150 deg F.	BP-1/2 rinse: ~ 7,500 gpd BP-3/4 rinse: ~ 7,500 gpd
3. Fluidized Bed	Wire is passed through a bed of air-floated zircon sand for quenching, to set microstructure of wire.	Cooling water discharge to WWTP at 20,000 gpd
4. H_2SO_4 Electroclean [4 units]	Non-contact steam heated bath. Wire contact with H_2SO_4. Some acid carried on wire, some evaporated to scrubber.	As-needed pumped discharge to local collection pit, and hence to holding tank at WWTP.
5. Water Rinse [4 units]	Used to rinse H_2SO_4 from wire.	Discharge to WWTP at 20,000 gpd
6. NaOH Electroclean	Ambient temperature bath. Wire contact with NaOH. Some caustic carried on wire, some evaporated to scrubber.	As-needed pumped discharge to local collection pit, and hence to holding tank at WWTP.

Equipment Descriptions and Operating Ranges Plating Lines BP-1, BP-2, BP-3 ,and BP-4 Tokusen USA, Inc., Conway, Arkansas		
7. Water Rinse [4 units]	Used to rinse NaOH from wire.	Discharge to WWTP at 20,000 gpd
8. Scrubbers [2 units]	Used to scrub acid and caustic vapors and mists from baths.	Discharge to WWTP at 15,000 gpd
9. Copper Electroplating [4 units]	Alkaline Copper plating solution deposits metallic copper on wire.	No discharge.
10. Scrubbers [2 units]	Used to scrub copper solution, vapors and mists from baths.	Discharge to WWTP at 20,000 gpd
11. Water Rinse [4 units]	Used to rinse copper solution from wire.	Discharge to WWTP at 20,000 gpd
12. Zinc Electroplating [4 units]	Acid Zinc plating solution deposits metallic zinc on wire.	No discharge
13. Scrubbers [2 units]	Used to scrub zinc and acid vapors and mists from baths.	Discharge to WWTP at 20,000 gpd
14. Water Rinse [4 units]	Used to rinse zinc solution from wire.	Discharge to WWTP at 20,000 gpd
15. Phosphoric Acid Rinse [4 units]	Used to remove diffusion scale from wire.	Discharge to WWTP at 20,000 gpd

WASTE WATER TREATMENT OPERATION

Rinse water from all process sources accumulates in a main accumulation sump, and is pumped through a series of two (2) neutralization tanks for pH adjustment. The rinse water entering the WWTP is acidic in nature and is neutralized by hydrated lime and periodic, automated additions of a 50% sodium hydroxide (NaOH) (a.k.a., caustic soda) solution to maintain pH of approximately 9.5 to 10.0 standard units. The pH rise from the main sump to the neutralization tanks stimulates the precipitation of dissolved metals from the wastewater. A coagulant is added as needed to assist in the precipitation. Wastewater flows by gravity from the neutralization units to two (2) clarifiers aligned in parallel. Polymer is added to the wastewater in flocculation vessels prior to the clarifiers to aid in chaining and settling of the metal precipitant. Accumulated sludge is periodically transferred through automated valves from the bottom of the clarifier units to a sludge thickening tank. The aqueous sludge is pumped from the sludge tank through either of two (2) filter presses for dewatering to form the F006 filter cake. A diagram showing the WWTP location and operations is presented in Figures 3 and 4.

Waste acid and sodium hydroxide (i.e., caustic) from the electroplating lines are periodically batch mixed in an elementary neutralization tank located inside the WWTP. Waste plating acid is neutralized with either waste sodium hydroxide or 50% sodium hydroxide to a pH of seven. This stimulates the precipitation of dissolved metals. The resultant neutralized sludge is then pumped through either of the two filter presses, and

the aqueous filtrate is returned into the main accumulation sump. On average, two to three filter press cycles are completed in a 24-hour period. After dewatering, the F006 filter cake is transferred into a 25 cubic yard roll-off container to await transportation to Chemical Waste Management in Sulphur, Louisiana, for proper treatment and disposal. The roll-off container is filled and changed on an as needed basis, usually every four to five days.

WASTE WATER EQUIPMENT

WWTP Equipment Descriptions and Operating Ranges Tokusen USA, Inc., Conway, Arkansas		
Collection Tanks	**Process Description**	**Operation Range**
1. T-1B Main Rinse water Collection Tank	Equalization tank receives waste rinsewaters and cooling waters from Pickling, Drawing, Patenting, and Plating processes.	42,000 gallon fiberglass tank
2. T-1A Wastewater Receiving Sump	Receiving tank for all incoming rinse water and cooling water flow.	3,500 gallon fiberglass tank
3. T-2 Emergency Receiving Storage Tank	Offline storage tank to hold excess and abnormal flows for delayed treatment.	24,000 gallon fiberglass tank
Holding Tanks	**Process Description**	**Operation Range**
4. T-3 Hydrated Lime Storage Tank	Storage tank for dry Hydrated Lime.	1,300 cubic foot vertical cylinder steel tank.
5. T-201 Waste Pickling Acid Holding Tank	Holding tank for spent hydrochloric acid from pickling process.	13,500 gallon fiberglass tank
6. T-202 Spent Caustic Cleaner Holding Tank	Holding tank for spent caustic cleaner solution from plating.	2,000 gallon HDPE tank
7. T-203 Spent Sulfuric and Phosphoric Acid Holding Tank	Holding tank for spent sulfuric acid cleaner and spent phosphoric acid surface finisher solutions.	11,000 gallon fiberglass tank
8. T-301 Fresh Caustic Holding Tank	Holding tank for Caustic Soda reagent.	6,200 gallon HDPE tank
Mix/Feed Tanks	**Process Description**	**Operation Range**
9. Polymer	Flocculant Solution	Drums
10. T-305 Hydrated Lime Mix/Feed Tank	Mixing and Holding tank for Hydrated Lime reagent solution.	500 gallon coated steel tank
pH Adjustment Tanks	**Process Description**	**Operation Range**
11. T-101 Stage One pH Adjustment Tank	Mixing tank for first stage chemical treatment.	10,000 gallon fiberglass tank
12. T-102 Stage Two pH Adjustment Tank	Mixing tank for second stage chemical treatment.	10,000 gallon fiberglass tank

WWTP Equipment Descriptions and Operating Ranges Tokusen USA, Inc., Conway, Arkansas		
Solids Removal Tanks	**Process Description**	**Operation Range**
13. T-103 A & B Flocculation and Coagulation Mixing Tanks	Two (2) baffled mixing tanks for polymer addition.	Two (2) 400 gallon steel tanks
14. T-104 No. 1 Clarifier	Clarifier tank for solids removal.	10,500 gallon steel tank
15. T-108 No. 2 Clarifier	Clarifier tank for solids removal.	10,500 gallon steel tank
16. T-107 Sludge Holding Tank	Collection tank for solids blowdown from clarifiers.	7,000 gallon fiberglass tank
17. T-109 Batch Treatment Tank	Mixing tank for neutralization of concentrated spent acids and caustic.	5,500 gallon steel tank
Final Pre-Treatment Tanks	**Process Description**	**Operation Range**
18. T-106 Final pH Adjustment Tank	Mixing tank for second stage chemical treatment.	8,000 gallon fiberglass tank
Dewatering Equipment	**Process Description**	**Operating Range**
19. No. 1 Filter Press	Dewatering process sludge.	50 Cubic Foot capacity
20. No. 2 Filter Press	Dewatering batch & process sludge.	30 Cubic Foot capacity

Fact Sheet for			
Part I. Industry Specific Information			
A1	**Company Name, Facility Address, Telephone**	A2	**Company Name, Mailing Address**
	Tokusen USA, Inc. 1500 Amity Road Conway, AR 72032		Tokusen USA, Inc. 1500 Amity Road Conway, AR 72032
B1	**Primary Contact Name, Title, Telephone, Fax, Email**		
	David Yarberry Environmental engineer 501-329-6800 office 501-470-8802 Cell 501-327-0231 dyarberry@tokusenusa.com		
B2	**Secondary Contact Name, Title, Telephone, Fax, Email**		
	Jim McNeal Engineer 501-329-6800 Office		
C1	**Company Owner**	C2	**Company Operator**
	Tokusen USA, Inc.		Tokusen USA, Inc.
D1	**SIC Codes and Description**	D2	**Categorical Determination**
	2296-Tire cords and fabrics		**CIU: 40 CFR 433** **SIU: CIU and metals potential** **New source determination date:**
D3	**Description of Operations**	D4	**Production Data**
	Brass Plating of Tire Cord- Drawing of tire cord, acid washing, then brass plating		
D5	**Description of Pretreatment Facilities**	D6	Description of other BMP's
	Collection/equalization, chemical precipitation, clarification, pH adjustment, and sludge dewatering		Storm Water Pollution Prevention Plan and Spill Prevention Control and Countermeasures Plan

E	**Effluent Limitations**						
E1	**Categorical Limitations**			E2	**Local Limits**		
	Mg/L						
	Parameter	**Daily Max**	**Monthly Avg**		**Parameter**	**Instantaneous Max**	
	Cd	.11	.015		Hg	.500	
	Cr	2.770	1.00		Temperature	140 F	
	Cu	3.38	2.07		BOD	250*	
	CN	1.2	.65		TSS	250*	
	Pb	.69	.43		O&G	100*	
	Ni	3.980	2.38		pH	5-12	
	Ag	.43	.24				
	Zn	2.610	1.480				
	TTO	2.13					
	Sampling Frequency					Other Limitations	
	Parameter	**Daily Max**	**Monthly Avg**	Freq	**Sample Type**	**Daily Max**	**Monthly Avg**
	Cd	.11	.015	1/M	24 hr comp		
	Cr	2.770	1.00	1/M	24 hr comp		
	Cu	3.38	2.07	1/M	24 hr comp		
	CN	1.2	.65	1/Y	Grab		
	Pb	.69	.43	1/M	24 hr comp		
	Ni	3.980	2.38	1/M	24 hr comp		
	Ag	.43	.24	1/M	24 hr comp		
	Zn	2.610	1.480	1/M	24 hr comp		
	TTO	2.13		2/Y	Grab		
	BOD		250*	1/Y	24 hr comp		
	TSS		250*	1/Y	24 hr comp		
	O & G		100*	1/Y	Grab		
	pH	5-12		1/M	Grab		
	* Surcharge limits only						
E5	Rate & Frequency of Discharge, avg. & max daily flow						
	Discharge from pretreatment: Avg. Daily Discharge: 286000 gallons/day Max Daily Discharge: 341000 gallons/day						

E6	**Discharge Locations- location designation, description of discharge, specific location, and sample location**
	Pretreatment is located at the northeast corner of the complex. It receives all process water and discharges it to collection system after treatment
E7	Permit Limitations
E8	Monitoring Requirements
E9	Reporting Requirements
E10	Standard Conditions
E11	Special Requirements
E12	Attachments
E13	Permit
	Permit #17
Publicly Owned Treatment Works (POTW) Specific Information	
A1	Name, Address of POTW, Receiving Stream
	Stone Dam POTW, Sturgis Road, Stone Dam Creek
B1	Industrial Pretreatment Contact
	Trey Lieblong

Attachment A-6

Pretreatment Industrial Inspection Facility Information			
Facility Name: Tolkien		Site Address: SAME	
Signatory Authority (Name & Title): Ed ICA			
Phone		Mailing Address (if different):	
Fax:			
Address: same as above		Corporate Owner Name and address (if applicable):	
		n/a	
Contact Person (Name & Title): David Vanderry Environmental Engineer		Phone:	
Phone: 501-470-8802		Fax:	
Fax:		Corporate CEO:	
e-mail:		e-mail:	
Facility Tracking #		**Last Inspection Date:**	
POTW (City) IU discharges to: Tupelo Bayou WWTP			POTW's NPDES #AR0051951
Industrial Classification:	☐ Categorical		☐ Significant
If Categorical, list which CFR #(s) the facility is subject to:			
Inspector's Name (Print): Trey Lieblong, Kenny Beaty			Signature:
IU Rep's Name (Print) David Vanderry, PE			Signature:
Date and Time Inspection Ended: 12/10/15 9:10 pm			

Pretreatment Industrial Inspection Facility Information		
Facility Name: Tokusen	Site Address: 1500 Amity Road	
Signatory Authority (Name & Title): Ed Lee		
Phone: 501-327-6800	Mailing Address (if different):	
Fax:		
Address: same as above	Corporate Owner Name and address (if applicable):	
	n/a	
Contact Person (Name & Title): David Yarberry		
Environmental Engineer	Phone:	
Phone: 501-470-8802	Fax:	
Fax:	Corporate CEO:	
e-mail:	e-mail:	
Facility Tracking # 17	**Last Inspection Date: 12/17/2014**	
POTW (City) IU discharges to:Stone Dam WWTP		POTW's NPDES #AR0033359
Industrial Classification: ☒ Categorical		☐ Significant
If Categorical, list which CFR #(s) the facility is subject to:		
Inspector's Name (Print): Trey Lieblong, Kenny Beaty		Signature:
IU Rep's Name (Print) David Yarberry, Paul		Signature:
Date and Time Inspection Ended: 12/10/2015 2:10pm		

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

☐ Permit Renewal	☒ Annual	☐ Spill/Slug	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

Inspection Objective(s)

Checklist of items to be reviewed and/or visually inspected:

☒ Pre-inspection Meeting	☒ Permit Conditions	☐ Safety Concerns
☒ Process Inspection	☒ Pretreatment Process	☐ TOMP
☒ Chemical Storage	☒ Discharge point(s)	☒ Spills/Slug Control Plan
☐ Records Review	☐ RCRA information	☒ Process/Flow/Pretreatment Schematics
☐ IU sampling procedures	☐ Flow/pH Meter(s)	☐ Calibration Records
☐ MSDS Inventory List	☐ New MSDS	☒ P2

Comments:

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? ☐ Yes ☒ No

Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

Records Review

Process Area(s)

Pretreatment System

Self Monitoring Procedures

Diversion/Sewer Meters

Spill/Slug Control Plan

Sampling Point

Chemical Storage

Abe

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 12/10/2015	SIC code(s): 2296
IU Reps/Titles	Control Authority Reps/Titles
Trey Lieblong Environmental Coordinator	David Yarberry
Kenny Beaty Lab Supervisor	Paul
End product(s):	Approx. # of units produced:
Days of Operation:7	Days of Production (if different):
Hours of Operation: 24 hrs a day	Hours of Production (if different):

Shift 1, hrs.:	Shift 2, hrs.:	Shift 3, hrs.: to
# of Employees: 330	Peak Mos.:	"Off" Mos.:

Are there any scheduled plant shutdowns? Yes ☒ No ☐ N/A ☐ If yes, when?Christmas Shutdown Dec 23-31

Are there designated plant clean-up days? Yes ☒ No ☐ N/A ☐ If yes, when? Regular Clean out

Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒ No ☐

If **No**, explain:

Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☐ No ☒

If Yes, explain:

Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: ☐ Yes. ☒ No

If Yes, explain:

Has there been any changes since the last inspection regarding the following items:

Plant/flow/process layout? Yes ☐ No ☒ If yes, obtain copy of updated schematic for facility file.

Processes? Yes ☐ No ☒ If yes, explain:

Production Levels? Yes ☐ No ☒ If yes, explain

Raw materials? Yes ☐ No ☒ If yes, explain:

Flow rates? Yes ☐ No ☒ If yes, explain

Are regulated and non-regulated wastestreams combined?	yes ☐	no ☒	
Prior to Pretreatment System?	yes ☐	no ☒	N/A ☐
If Yes, was the CWF used to calculate limits?	yes ☐	no ☐	
Prior to connection to the POTW sanitary sewer?	yes ☐	no ☐	N/A ☐
At connection to sanitary sewer?	yes ☐	no ☐	N/A ☐
Production and flows verified for Production-Based Standards?	yes ☐	no ☐	N/A ☒

What is the current avg. production rate and process flow?

Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes ☐ no ☐

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B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air n/a	No longer Title V permit, now a minor	
RCRA	Haz waste sludge delisted	
NPDES n/a		
Other Storm Water	Has storm water permit	

C. Additional Comments
(Note which section or attachment comments are regarding)

Attachment A: Industrial Process(es)			
List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not			
1. Pickling & rinses	Yes ☒ No ☐	4.Cooling Tower Blowdown	Yes ☐ No ☐
2. Patenting & rinses	Yes ☒ No ☐	5. Wet Scrubbers	Yes ☐ No ☐
3. Plating & Rinses	Yes ☒ No ☐	6.	Yes ☐ No ☐
Were processes visually inspected? Yes ☒ No ☐ N/A ☐			
Brief description of process(es):See File for complete description			
General observations of facility's indoor housekeeping: good			
General observations of area outside facility's building: good			
Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured estimated. If batch discharged, list frequency and volume (1000 gal/month, e.g.).			
☒ Process Rinse Overflows	☒ Equip. Cleanup	☐ Floor Cleanup	☒ Spent Bath Solutions
☒ Product Cleaning	☐ Forklifts Maint./Wash	☒ Tank Dragout	☒ Air Pollution Devices
☒ Boiler Blowdown	☒ Spent Rinse Tanks	☐ Equipment Coolants	☐ Non-Contact Cooling Water
☐ Stormwater	☐	☐	☐
List Major Raw Materials and Chemicals used:			
Check Waste Stream Pollutants of Concern from Process(es)			
☒ BOD	☐ CN^-	☒ Metals (List)	☐ Solvents (List)
☒ TSS	☐ Cl_2	A-6e	

☒ O&G	☐ S^-		
☒ pH	☐		
Are there floor drains in the Process area? ☐ Yes ☒ No If yes list number and the location of all floor drains:			

Attachment B: Pollution Prevention (P2) / Recycling Activities			
Does the facility have a written P2 Plan?	Yes ☒	No ☐	It is titled HESEN with targeted objectives
Does this facility practice P2?	Yes ☒	No ☐	
Environmental Management System in place?	Yes ☐	No ☐	
ISO Certified?	Yes ☒	No ☐	ISO 14000 and ISO 9002
Written Standard Operating Procedures?	Yes ☒	No ☐	
Explain:			
Preventative Maintenance Program	Yes ☒	No ☐	(hydraulic systems, valves, pumps, etc)
Explain:			
Water Reuse:	Yes ☒	No ☐	
Explain: Looking into further, Acid Recovery system			
Cost Accounting to Track Savings:	Yes ☐	No ☐	
Explain: Working on this			
Inventory Control / "Green Purchasing":	Yes ☒	No ☐	(lean manufacturing/"green purchasing", etc)
Explain: Switched solvent cleaners to Green friendly			
Employee Training:	Yes ☐	No ☐	
Explain:			
Spent Solvent Reclamation?	Yes ☐	No ☐	
Explain:			
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes ☒	No ☐	
Explain:			
Recycle Waste Oil, Solvents, and Lubricants?	Yes ☒	No ☐	
Explain:			
Other Activities:			

P2 Equipment/Practices in use:	
☐ Overflow Alarms	☐ Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☐ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☐ Air Jets to Blow Parts Dry	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Water Soluble Cutting Fluids	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☐ Conductivity Meters
☐ Dead Rinse Tanks	☐ Bath / Rinse Filtration

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Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment?	☒ Yes	☐ No	☐ N/A
Are they pretreated prior to discharge to the sanitary sewer?	☒ Yes	☐ No	☐ N/A settling pit
Was the pretreatment system visually inspected during this visit?	☒ Yes	☐ No	☐ N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☒ Flow Equalization	☐ Ozonation	☐ Chlorinating
☒ Chemical Precipitation	☐ Oil/Water Separation	☐ Reverse Osmosis	☐ Grit Removal
☒ Sludge Filter Press	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☒ pH Adjustment	☐ Sand Trap	☒ Sedimentation	☐ Silver Recovery
☐ Belt/Disk Oil Skimmer	☐ settling pit	☐	☐

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):

Batch Treatment with Chemical Precipitation

Does the description match the schematic currently on file?	☒ Yes	☐ No	☐ N/A
System Operator(s) Name:			
Does discharge permit require licensed operator?	☐ Yes	☒ No	☐ N/A
Is the System Operator(s) licensed by the State of Arkansas?	☐ Yes	☐ No	☒ N/A
List Name(s) and License classification: 4 trained operators			
Is training provided to the Pretreatment System Operator(s)?	☒ Yes	☐ No	☐ N/A

If Yes, list type and frequency:

Is the discharge from the Pretreatment System? ☐ Batch ☒ Continuous ☐ Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: gallons per

Describe process from which batch originated (spent bath, e.g.):

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
Waste Flow meter		

Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area(s)?	☒ Yes	☐ No
Was this area(s) visually inspected?	☒ Yes	☐ No ☐ N/A

Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
Through out plant	☐ Yes ☒ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer

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Does the Chemical Storage Area(s) contain any of the following?	
☒ Dikes, Berms for Containment	☐ Plugs for Floor Drains
☒ Secondary Tanks for Holding	☐ Premix (low) Concentrations
☒ Alarms	☐ Chain restraints, limited access
☒ Spills Control Kits for Cleanup	☐ Notification Procedures
☐ Chemical desegregation within Storage Area	☐ Other
Chemical Inventory List (MSDS) on file?	☐ Yes ☐ No ☐ N/A
Were any new MSDS reviewed during the Inspection?	☐ Yes ☒ No ☐ N/A
If yes, list below:	
Chemical storage comments:	
Hazardous waste storage comments:	
Chemical handling procedures (totes, dolly, buckets, hardline, etc):	
Hazardous waste handling procedures:	

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Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	☒ yes ☐ no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☒ yes ☐ no ☐ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☐ N/A
(B) Describes storage and handling of chemicals	☒ yes ☐ no ☐ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☒ yes ☐ no ☐ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☒ yes ☐ no ☐ N/A
2. Describes procedures and equipment for emergency response	☐ yes ☐ no ☐ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☐ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no ☐ N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no
Is it posted in areas where chemicals are used and stored?	☐ yes ☐ no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☒ no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? ☐ yes ☐ no ☐ N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point Isco sampler at discharge location in Pretreatment	
Total Flow Monitoring Point	
Upstream Manhole	
Point of Connection:	

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Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements				
Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.				
Where is the sample point located?				
☐ End of Process	☐ Pretreatment Effluent	☐ Total Flow		
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator		
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required		
☐ Safety Hazards Identified	☐	☐		
Is the Sample Collection Site Adequate?		☐ Yes ☐ No ☐ N/A		
Does the facility rep. request a split sample on this sampling/inspection?		☐ Yes ☐ No		
Does the facility perform self-monitoring tests in-house?		☐ Yes ☐ No ☐ N/A		
If no, record the name and address of Contract Lab:				
Automatic Sampler ☐ or Manual ☐				
IU Self-Monitoring Results reviewed:		☐ Yes ☐ No ☐ N/A		
Is the Contract Lab certified by ADEQ for test parameters?		☐ Yes ☐ No ☐ N/A		
Dates and Times of Sample Analysis Recorded?		☐ Yes ☐ No ☐ N/A		
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)		☐ Yes ☐ No ☐ N/A		
EPA recommended holding times being met (Refer to 40CFR Part 136)		☐ Yes ☐ No ☐ N/A		
Chain of Custody Records for Self-Monitoring Samples Reviewed		☐ Yes ☐ No ☐ N/A		
Were correct Sample Types Collected		☐ Yes ☐ No ☐ N/A		
Dates and times of Sample Collection Recorded?		☐ Yes ☐ No ☐ N/A		
Were Samples preserved correctly (refer to 40CFR Part 136)		☐ Yes ☐ No ☐ N/A		
Were Self Monitoring records on file for past 3 years?		☐ Yes ☐ No ☐ N/A		
List the parameters the facility monitors and the frequency:				
☐ Cd(t)	☐ Cu(t)	☐ Cr(t)	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☐ Zn(t)	☐ pH	☐ CN^-(t)	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☐	☐	☐	☐	☐
Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433				
How does the IU report TTO? ☐ Analysis ☐ Certification Statement				
Does the facility have a Toxic Organic Management Plan? ☐ Yes ☐ No ☐ N/A				
If yes, Does the plan show how toxic organics are used, stored, and disposed? ☐ Yes ☐ No ☐ N/A				
List the date of the last revision to the TOMP:				
Is the TOMP being followed as written? ☐ Yes ☐ No ☐ N/A (If no, provide explanation in comments.)				
If no, is there evidence that a TOMP is needed? ☐ Yes ☐ No ☐ N/A (If yes, provide description of evidence in comments.)				
Comments:				

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Attachment A-7

Conway Corporation

Conway Corporation Industrial Pretreatment
Slug/Spill Containment Evaluation

SIU Name: Tokusen
SIU Permit Number: 17

SIU Contact Information: David Yarberry
See inspection

1. Spill Plan
   a. Type of Spill Plan on File (SPCC, TOMP,Contingency,etc.) SPCC
   b. Number of spills in past 3 years 0
2. Chemical Storage Information
   a. Attach chemical list, including location of chemicals and quantity stored
   b. Chemical Containment
      1. Does the facility have containment for the chemical storage? Yes
      2. Describe the Containment: Concrete burms with extra capacity over storage
      3. Condition of Containment: Good
   c. Floor Drains/Trenches
      1. Does the facility have floor drains/trenches in or around Chemical Storage area? No
      2. Distance of nearest floor drain/trench from chemicals? N/A
   d. Potential of Chemical Spill reaching POTW? low (High,Med,Low)
3. Manufacturing Processes
   a. Process typed used in Manufacturing? Brass Plating, Metal Finishing

   Chemicals Stored for Processes:

Chemical Name	Location	Storage Amount
See attached		

   b. Do process solution tanks overflow? no
      If yes, then is the overflow contained?
      Describe Containment:
      Containment Condition:
   c. Spill Potential of Processes: low (High,Med,Low)
4. Pretreatment Systems

a. Evaluate potential for system upsets: Low (High,Med,Low)
b. Does the facility have capacity of holding excess wastewater in event of an upset? 2-4 Hours of extra capacity
c. Is their any type of alarm system to alert operators of overflows or bypasses? planned upgrades include alarm system -
d. By-pass Potential: low (High,Med,Low)

5. Non-Discharged Wastes
   a. Are their any wastes generated that are not discharge into the POTW? Yes
   b. List these wastes below:

Type of Waste	Quantity generated annually	Storage Location	Disposal Method
F006 Sludge		Roll off in Waste Services	Chemical Waste services

   c. Describe methods to prevent discharge to POTW: Stored away from all floor drains

6. Recommendations
   a. Does the facility need a Slug/Spill Control Plan? ~~Yes~~ NO TL 09-20-16
   b. If so, Does the facility have an existing Slug/Spill Control Plan? Yes
   c. Is the existing Slug/Spill Control Plan Adequate? Yes
   d. Are there any deficiencies to the Slug/Spill Control Plan that need corrected?

Tracy Fiellon
Signature of Conway Corporation Representative

11/10/06
Date

A-7b